

UNITED STATES DISTRICT COURT

DISTRICT OF NEW JERSEY

LINCOLN ADVENTURES, LLC, a)	
Delaware Limited Liability Company, and)	
MICHIGAN MULTI-KING, INC., a)	No. 2:08-cv-00235-CCC-ESK
Michigan Corporation, on Behalf of)	
Themselves and All Those Similarly)	<u>CLASS ACTION</u>
Situated,)	
)	
Plaintiffs,)	DECLARATION OF
)	MARK COWEN REGARDING
vs.)	NOTICE ADMINISTRATION
)	
THOSE CERTAIN UNDERWRITERS AT)	
LLOYD’S, LONDON MEMBERS OF)	
SYNDICATES, et al.)	
)	
Defendants.)	
)	

I, Mark Cowen, hereby declare as follows:

1. I am a Project Manager at A.B. Data, Ltd.’s Class Action Administration Division (“A.B. Data”), whose Corporate Office is located in Milwaukee, Wisconsin. This declaration (“Declaration”) is based upon my personal knowledge, and that of A.B. Data staff members, and if called as a witness, I could and would testify competently thereto.

2. I submit this Declaration in connection with the class action notice administration proceedings related to the above-captioned Action (the “Action”).

DISSEMINATION OF DIRECT-MAIL NOTICE

3. Pursuant to the "Order Preliminarily Approving Proposed Partial Class Action Settlement and Preliminarily Certifying a Class for Settlement Purposes" issued by the Court on July 10, 2023 ("Preliminary Approval Order"), A.B. Data was responsible for

providing direct Notice of the Partial Settlement to all members of the Settlement Class who could be reasonably identified. In accordance with the Preliminary Approval Order, the Settling Defendants provided A.B. Data with data files containing 52,374 names of potential Settlement Class Members. A.B. Data was also instructed to send Notice to potential Settlement Class Members identified in the 2019 Settlement, *Lincoln Adventures, LLC vs. Those Certain Underwriters at Lloyd's*, No. 2:08-CV-00235 (D.N.J.).

4. A.B. Data processed the received data files; included the records already secured in a database, including coverholders¹ from the prior Settlement; and then removed duplicate names resulting in 238,593 distinct records for mailing.

5. Per the Preliminary Approval Order, A.B. Data was instructed to mail the approved Summary Notice to potential Settlement Class Members. However, A.B. Data inadvertently mailed the Long-form Notice and Claim Form package (“Notice”) to the Settlement Class, rather than the Summary Notice as required in the Preliminary Approval Order. A.B. Data paid any additional expense associated with the print and postage to ensure there was no financial impact on the Settlement Class Members.

6. On August 23, 2023, A.B. Data caused the Notice to be mailed, postage prepaid, to these 238,593 potential Settlement Class Members. A true and correct copy of the Long-form Notice that was mailed is attached as Exhibit A.

¹ Pursuant to ¶5(b) of the Preliminary Approval Order, each Settling Defendant was to write to those coverholders acting on its behalf that wrote a majority of the Settling Defendant’s business under binding authorities during the five-year period from October 1, 2017 to September 30, 2022 requesting that these coverholders provide A.B. Data, to the extent reasonably available, names and addresses of policyholders to which insurance policies were issued on behalf of the Settling Defendants under binding authorities for this period. A.B. Data has recently received a paper list from a coverholder and requested the same information be provided in electronic format.

7. A.B. Data maintained the P.O. Box originally established on May 7, 2019, and reused the same mailing address – Syndicate Settlement, c/o A.B. Data, Ltd., P.O. Box 173075, Milwaukee, WI 53217 – to receive Settlement Class Member correspondence and Notices returned by the United States Postal Service (“USPS”) as undeliverable as addressed (“UAA”).

8. As of the date of this Declaration, the USPS returned 5,233 mailed Notices to A.B. Data as UAA.

9. For UAA Notices, A.B. Data acted to locate updated addresses using the databases of TransUnion and all available Settlement Class Member information. As a result of these efforts, A.B. Data located 402 updated addresses and coordinated Notice remailing to the updated addresses.

PUBLICATION NOTICE

10. Pursuant to the Preliminary Approval Order, A.B. Data submitted the Summary Notice to various media outlets indicated in the table below for publication on the dates noted:

Print Media:

National Newspapers	Publishing Date
<i>The Wall Street Journal</i>	September 5, 2023
<i>The Wall Street Journal</i>	September 18, 2023
<i>The New York Times</i>	September 5, 2023
<i>The New York Times</i>	September 18, 2023
<i>USA Today</i>	September 5, 2023
<i>USA Today</i>	September 18, 2023
<i>Business Insurance</i>	October 1, 2023

True and correct copies of these publications are attached as Exhibit B.

11. Beginning on September 1, 2023, and running through October 31, 2023, A.B. Data coordinated the placement of Internet banner ads on the trade websites and/or within the digital publications of: *Business Insurance*, *Risk Management*, and *Risk & Insurance*. Samples of the digital publications are attached as Exhibit C.

12. Beginning on September 1, 2023, and running through October 31, 2023, A.B. Data coordinated the placement of Internet banner ads and newsfeed ads through Google Display Network, Google AdWords (Search) and LinkedIn. Over 21,464,095 banner and newsfeed ad views (or digital impressions) were delivered. A sample Internet banner is attached as Exhibit D.

13. Based on conservative calculations, the combined measurable paid print and internet effort alone delivered an estimated reach of 71% of adults involved in the purchase of insurance.

SETTLEMENT WEBSITE

14. To ensure it was easy for Settlement Class Members to access updated information, A.B. Data maintained a secure, dedicated informational website, www.SyndicateSettlement.com (the “Settlement Website”).

15. The Settlement Website was updated to include information specific to this Partial Settlement on August 23, 2023. The Settlement Website advises Settlement Class Members of the Action, the terms of the Partial Settlement, their rights and options in connection with the Partial Settlement, and the method and dates by which they may: (i) object to the Partial Settlement, Plan of Allocation, the award of attorneys’ fees and

expenses or service awards, (ii) request exclusion from the Settlement Class, and (iii) submit a Claim Form to participate in the Partial Settlement. Additionally, Settlement Class Members are advised of the date and time of the Fairness Hearing to be heard with respect to any objection.

16. It provides links to view and download copies of, among other documents, the Long-form Notice, Claim Form, Stipulation of Partial Class Action Settlement, and the Preliminary Approval Order. The Settlement Website contains contact information for the Claims Administrator (including the mailing address, toll-free number, and email address) and Co-Lead Counsel. Also, the Settlement Website includes an online claim form for Settlement Class Members to file a claim in the Settlement until December 21, 2023. A link to the Settlement Website was also posted on Co-Lead Counsel's respective law firm websites.

17. Since the start of the Notice period on August 23, 2023 and the date of this Declaration, there have been 23,276 unique visitors to the website and 46,938 webpages have been served to visitors.

TOLL-FREE TELEPHONE HELPLINE AND EMAIL

18. On August 23, 2023, A.B. Data updated the case-specific toll-free telephone number, (877) 298-4134, with an interactive voice response ("IVR") system and live operators. The automated attendant answers calls and presents callers with a series of choices in response to basic questions. If callers require further assistance, they have the option to transfer their calls to a live operator during business hours.

19. From August 23, 2023 to the date of this Declaration, the toll-free number has handled 1,382 calls. Live operators have handled more than 354 inbound and outbound calls.

20. A.B. Data also maintains a case-dedicated email address, info@SyndicateSettlement.com, to allow potential Settlement Class Members to email with questions or inquiries. As of November 7, 2023, A.B. Data has received and processed 331 email inquiries from potential Settlement Class Members.

EXCLUSION PROCESSING

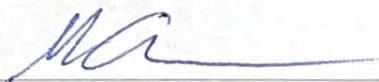
21. The deadline for Settlement Class Members to request exclusion from the Class is November 23, 2023. As of the date of this Declaration, A.B. Data has received 1 exclusion request. If A.B. Data receives any additional exclusion request(s) after the date of this Declaration, we will send such request(s) to all Counsel of Record.

CLAIMS

22. As of the date of this declaration, 1,342 claims have been filed for this matter.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 7th day of November, 2023.



Mark Cowen

EXHIBIT A

NOTICE OF PROPOSED PARTIAL CLASS ACTION SETTLEMENT, SETTLEMENT HEARING, AND RIGHT TO APPEAR IN A CLASS ACTION LAWSUIT PENDING IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY, KNOWN AS *LINCOLN ADVENTURES, LLC, ET AL. VS. THOSE CERTAIN UNDERWRITERS AT LLOYD’S, ET AL.*, CASE NO. 2:08-CV-00235-CCC-ESK (D.N.J.) (THE “LAWSUIT”)

THIS NOTICE IS AUTHORIZED BY THE U.S. DISTRICT COURT, DISTRICT OF NEW JERSEY (THE “COURT”).

IF YOU PURCHASED INSURANCE THROUGH CERTAIN SYNDICATES AT LLOYD’S, LONDON DURING THE PERIOD **JANUARY 1, 1997, THROUGH JUNE 15, 2023**, YOU COULD GET MONEY FROM A PARTIAL CLASS ACTION SETTLEMENT WHICH MAY AFFECT YOUR RIGHTS.

This Notice is not an opinion by the Court as to the merits of any of the claims or defenses in this class action lawsuit. This is not a solicitation from a lawyer.

IF YOU HAVE ANY QUESTIONS, PLEASE CALL THE CLAIMS ADMINISTRATOR TOLL-FREE AT 1-877-298-4134 OR VISIT THE WEBSITE DEDICATED TO THE SETTLEMENT AT WWW.SYNDICATESETTLEMENT.COM.

Summary of Your Legal Rights and Options in This Settlement	
Submit a Claim Form by December 21, 2023	The only way to be eligible to receive money from this Settlement is to complete, sign, and return a Claim Form as more fully described in Section I.H., below.
Request Exclusion from the Settlement by November 23, 2023	The only way to bring a separate case, at your own expense, against any of the Settling Defendants for claims arising out of the facts alleged in this Lawsuit is to request exclusion as more fully described in Section V.A., below.
Object to the Settlement by November 23, 2023	If you do not agree with any part of this Settlement, the Plan of Allocation, the application for attorneys’ fees and expenses or service awards to the class representatives, you may file an objection on or before November 23, 2023, and ask to speak to the Court at the Fairness Hearing as more fully described in Section V.C., below.
Do Nothing	Receive no payment. Lose rights.

I. BASIC INFORMATION

A. What is this Notice?

This Notice concerns a proposed partial settlement of a class action lawsuit with certain, but not all, of the Lloyd's Syndicates who are Defendants in the Lawsuit that sold insurance to policyholders in the United States (the "Settlement").

The Court has preliminarily approved the Settlement. If you are a member of the Settlement Class (defined below in Section I.B.), you have legal rights and options that you may exercise before the Court considers whether it will grant final approval to the Settlement at the Fairness Hearing (described below in Section I.E.). At the Fairness Hearing, the Court will decide whether the Settlement is fair, reasonable, and provides adequate compensation and benefits to the members of the Settlement Class.

The Honorable Claire C. Cecchi of the United States District Court for the District of New Jersey is overseeing this Lawsuit.

B. Whom does the Settlement affect?

The Settlement affects members of the Settlement Class, hereafter referred to as the "Class" or "Class Members." The Class is, with certain limited exceptions, all persons and entities in the United States (including its territories) who, during the period **January 1, 1997, through June 15, 2023**, purchased or renewed a contract of insurance with any Lloyd's Syndicates named as a defendant in the Lawsuit ("Defendants"). A contract of insurance is an insurance policy, not reinsurance.

The Defendants are those Certain Underwriters at Lloyd's, London who are members of Syndicates 510, 1084, 1096, and 1245.

C. What does the Settlement provide?

The Settling Defendants, listed below in Section II.C., have agreed to make a payment to settle the claims against them. The total amount of these payments is \$7,900,000 (the "Settlement Amount"). After deduction of fees and expenses related to providing notice to the Class, taxes and tax expenses, and the award of Court-approved attorneys' fees and litigation expenses for counsel for the Class, the remaining money will be distributed to Class Members as provided in the Plan of Allocation, attached to this Notice as Addendum A.

D. Who will receive a payment?

Only Class Members who timely submit a Claim Form, which is attached to this Notice as Addendum B and available at www.SyndicateSettlement.com, and who are entitled to payment under the Plan of Allocation, will receive a payment. Payments will be calculated and made based on the premium paid for policies (from publicly available information and information provided by you in the Claim Form). If you are not sure whether you are a Class Member, you can get help at www.SyndicateSettlement.com or by calling toll-free at 1-877-298-4134.

E. What are my legal rights?

If you do not want to be bound by the Settlement, you must exclude yourself in writing from the Class. The deadline for submitting a request for exclusion is November 23, 2023. The steps you must follow to exclude

yourself are described in Section V.A. below. If you do not exclude yourself, but instead stay in the Class, you may object or comment on the Settlement, the Plan of Allocation, the application for attorneys' fees and expenses, or service awards to the class representatives by November 23, 2023.

The Court will hold a Fairness Hearing to determine whether to approve the Settlement, the Plan of Allocation, the application for attorneys' fees and expenses, or service awards to the class representatives on December 14, 2023 11:30 a.m., in Courtroom 5B of the Martin Luther King Building & U.S. Courthouse, located at 50 Walnut Street, Newark, New Jersey 07101. If the Court approves the Settlement (1) the Settling Defendants will be dismissed from the Lawsuit, and (2) any Class Member that has not properly excluded herself, himself, or itself from the Class will be deemed to have released the Settling Defendants from all claims related to the Lawsuit and will not be able to sue the Settling Defendants for any of the conduct that was the subject of the Lawsuit.

F. What claims am I releasing?

The Release as to the Settling Defendants provides:

The Releasing Plaintiffs release and covenant not to sue on each and every Claim, including, but not limited, to any Unknown Claim, that was advanced or could have been advanced in the Action, including, but not limited to: (a) claims relating to broker compensation, so-called "contingent commissions," commissions paid on lineslips, binding authorities or open market placements, alleged overrides, alleged steering, and alleged bid-rigging arising from or related to the purchase or renewal of any insurance policy; (b) claims relating to the structure and subscription nature of the Lloyd's market and the Society of Lloyd's and its Franchise Performance Directorate and any successor, and the Lloyd's Market Association and its predecessors, including but not limited to Federal and State RICO, civil conspiracy, unjust enrichment, anti-trust, fraud, unfair business practices, and consumer protection claims; (c) claims relating to anti-competitive conduct in the Lloyd's market; and (d) the conduct and settlement of the Action (the "Released Claims"). Notwithstanding the foregoing, Plaintiffs and Settlement Class will not release by reason of this Settlement (defined below), claims for coverage under insurance policies issued to the Plaintiffs and the Settlement Class by the Syndicate Defendants or their predecessors or successors. Each of the Releasing Plaintiffs shall be deemed to have, and by operation of the Judgment shall have, fully, finally, and forever released, relinquished, and discharged each Released Defendant, including Settling Defendants' Counsel, from all Claims (including Unknown Claims) arising out of, relating to, or in connection with the Released Claims or the Action. Releasing Plaintiffs, by virtue of the Notices, have been informed of Section 1542 of the California Civil Code and expressly waive and relinquish any rights or benefits available to them under this statute and any and all similar provisions, rights, and benefits conferred by any law of any state or territory of the United States or principle of common law that is similar, comparable, or equivalent to Section 1542 of the California Civil Code.

The Release as to the Plaintiffs, the Class, and their Counsel provides:

The Releasing Defendants shall release any claims they may have against the Releasing Plaintiffs related to the initiation, prosecution, conduct, and settlement of the Action, provided, however, that (a) "Released Claims" shall not include Releasing Plaintiffs' Claims or Unknown Claims for, or Released Defendants' defenses to, coverage under Contracts of Insurance issued to a Class Member (including either Plaintiff) or Releasing Plaintiff by a Released Defendant; and (b) Releasing Plaintiffs and Releasing Defendants will retain the right to enforce the

Agreement and Exhibits, Preliminary and Final Approval Orders, Judgment, and other orders or judgments issued by the Court relating to Notice or the Settlement.

G. How will Class Counsel be paid?

Class Counsel will request to be awarded attorneys' fees in an amount not to exceed one-third of the Settlement Amount and not more than \$1.6 million in expenses. In addition, Class Counsel will seek a service award of \$5,000 for each of the two Plaintiffs for their many years of time and effort in this Lawsuit, which will be paid out of the Settlement Fund.

H. How do I make a claim?

You may use the attached Claim Form or get one online at www.SyndicateSettlement.com. Once you complete the Claim Form, mail it to the Claims Administrator at Syndicate Settlement, c/o A.B. Data, Ltd., P.O. Box 173075, Milwaukee, WI 53217 or submit it online at www.SyndicateSettlement.com or by email to info@SyndicateSettlement.com. **The deadline to submit a Claim Form is December 21, 2023.** It is your responsibility to provide truthful and accurate information, and to update any information, including contact and address information to the Claims Administrator, when appropriate.

If you send a Claim Form by mail, it is deemed submitted when posted, provided that the envelope: (a) shows that first-class postage was affixed or prepaid; and (b) bears a postmark or postage meter with a date no later than the deadline. If sent by private or commercial carrier (*e.g.*, FedEx, UPS, etc.), a Claim Form shall be deemed submitted on the shipping date reflected on the shipping label. If submitted electronically, a Claim Form shall be deemed submitted when uploaded to www.SyndicateSettlement.com or sent by email to info@SyndicateSettlement.com. The Claims Administrator or Class Counsel, in their discretion, may accept late Claim Forms.

All Claim Forms will be subject to anti-fraud procedures, and random or selective audit. The Claims Administrator may require Class Members filing claims ("Claimants") to provide supporting documentation and/or additional information as appropriate in connection with: (i) the initial submission of a Claim Form based on information provided by the Claimant; (ii) a request to aggregate claims; or (iii) an audit.

If it is ultimately determined by the Claims Administrator that the foregoing process is not administratively practicable, then, following consultation among the Plaintiffs and the Settling Defendants (the "Settling Parties") and approval by the Court, amendments to the process may be made. Any such amendments will be posted on www.SyndicateSettlement.com.

I. Privacy Notice

Certain of the Settling Defendants [defined below at Section II.C] may as insurer act as data controller of your personal data. For each Settling Defendant, further information regarding its privacy policy may be found in the relevant Settling Defendant's privacy terms on its website.

RESPONSE DUE DATE
Postmarked or Submitted
Online By December 21, 2023

Syndicate Settlement
 c/o A.B. Data, Ltd.
 P.O. Box 173075
 Milwaukee, WI 53217

FOR OFFICIAL
USE ONLY

SYNDICATE SETTLEMENT CLAIM FORM

If you are a Settlement Class Member as defined on page 2 of the Notice of Proposed Partial Class Action Settlement, Settlement Hearing, and Right to Appear (“Notice”) with respect to the purchase of insurance coverage from the Defendants described on page 5 of the Notice where the coverage incepted or renewed during the period January 1, 1997, through June 15, 2023, you must complete the following form for each such insurance that you purchased or renewed and mail it to the address listed above in order to participate in the Settlement for such policies. You may also complete the form online at www.SyndicateSettlement.com. This claim form must be postmarked or submitted online or by email to info@SyndicateSettlement.com by **December 21, 2023**.

Claimant Information

Contact Name Contact Title

Company/Organization/Insured Name

Address

City State Zip Code

Phone Number/Extension Email Address

Policy Information

Name(s) of Lloyd’s Syndicate(s)	Policy Number	Total Premium Paid (\$000,000.00)	Date of Policy (MM/DD/YYYY)
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
Broker Name <input type="text"/>			
Broker Street Address <input type="text"/>			
Broker City <input type="text"/>	Broker State <input type="text"/>	Broker Zip Code <input type="text"/>	Broker Phone Number <input type="text"/>

I certify under the penalty of perjury that the information above is true and correct and that the submission of false information may subject me to civil and/or criminal penalties.

 Signature

___ ___ / ___ ___ / ___ ___
 Date

 Print Name

 Title

Name(s) of Lloyd's Syndicate(s)		Policy Number	Total Premium Paid (\$000,000.00)	Date of Policy (MM/DD/YYYY)
Broker Name				
Broker Street Address				
Broker City	Broker State	Broker Zip Code	Broker Phone Number	

Name(s) of Lloyd's Syndicate(s)		Policy Number	Total Premium Paid (\$000,000.00)	Date of Policy (MM/DD/YYYY)
Broker Name				
Broker Street Address				
Broker City	Broker State	Broker Zip Code	Broker Phone Number	

Name(s) of Lloyd's Syndicate(s)		Policy Number	Total Premium Paid (\$000,000.00)	Date of Policy (MM/DD/YYYY)
Broker Name				
Broker Street Address				
Broker City	Broker State	Broker Zip Code	Broker Phone Number	

IF YOU NEED ADDITIONAL SPACE TO LIST YOUR TRANSACTIONS YOU MUST PHOTOCOPY THIS PAGE AND CHECK THIS BOX

II. HISTORY OF THE LAWSUIT AND THE SETTLEMENT

A. What is this Lawsuit about?

On July 13, 2007, the Lawsuit was filed in the United States District Court for the Southern District of Florida. In December 2007, the Lawsuit was transferred to the Court.

Plaintiffs assert causes of action against the Defendants for violation of the Racketeer Influenced and Corrupt Organizations Act, civil conspiracy, and unjust enrichment based on allegations that Defendants engaged in a deceptive scheme to conceal an alleged lack of competition in the Lloyd's Market. The Settling Defendants deny the allegations made against them.

B. What is the status of this Lawsuit?

The Court stayed the Lawsuit for approximately five years until 2012. Since that time, millions of pages of documents were produced and dozens of depositions were taken. Numerous motions relating to the merits of the Lawsuit and discovery disputes have been filed. On February 12, 2016, the Plaintiffs filed the current complaint. Defendants moved to dismiss the complaint, and the Court in August 2017 denied the motion. After this decision, the parties engaged in mediation, which resulted in a settlement with some, but not all, of the Defendants.

The case continued against the remaining Defendants and a settlement has been reached with certain of those remaining Defendants. Some Defendants remain and the case is continuing.

While the case is still currently pending before the Court, in order to avoid the uncertainty of continuing the litigation, the Settling Parties have agreed to settle the Lawsuit. That way, they avoid the cost of further litigation, and Class Members will get the benefits of the Settlement. Class Counsel believe the Settlement is best for all Class Members.

The Court preliminarily certified the Class in its Order dated July 10, 2023 Excluded from the Class are Released Defendants, Defendants formerly named as such in the Action, all Lloyd's syndicates, persons or entities that request exclusion from the Class (Opt-outs), and the judges presiding over the case and their immediate families. Released Defendants and the Release are described above and are further described in the Settlement Agreement, which may be found at www.SyndicateSettlement.com.

Plaintiffs' motion for certification of a plaintiff class for litigation purposes has not been decided as of the time the Settlement Agreement was signed. In connection with this Settlement, Plaintiffs have requested that the Court certify a plaintiff class for settlement purposes only.

C. Who are the Settling Defendants?

Not all of the Defendants have settled, and the case will continue against those that have not settled. The Settling Defendants consist of the following Lloyd's Syndicates: Nos. 510, 1084, 1096, and 1245. The Lloyd's Syndicates who are Defendants in the case but who have not settled are Nos. 0727, 1003, 2003, 2020, 2488, and 2791 (the "Non-Settling Defendants").

D. Will your participation in the Settlement affect your ability to obtain relief from the Non-Settling Defendants in the action?

Your participation in the Settlement will not affect your ability to obtain relief from any of the Non-Settling Defendants. Accordingly, if a judgment is entered against one or more of the Non-Settling Defendants, resulting in a damages award, you will be able to participate in that award even if you participate in the Settlement (as long as you fall within any class that the Court might certify in connection with that judgment). Similarly, if Plaintiffs reach a settlement with one or more of the Non-Settling Defendants, you will be able to participate in that settlement if you participate in this Settlement (as long as you are within any class certified in connection with that other settlement).

E. Will Class Members have to give up anything to participate in the Settlement?

Yes. If the Settlement is approved, and no longer subject to an appeal, Class Members will release all claims that have been raised or that could have been raised in the Lawsuit against all of the persons and entities as set forth in the Release and the Lawsuit will be dismissed with prejudice as to the Settling Defendants. The effect of the Release is discussed below in Section IV.

III. SETTLEMENT BENEFITS

A. Cash Benefits

1. What benefits will be provided under the Settlement Agreement?

The Settlement Amount of \$7,900,000 will be maintained in an interest-bearing account. The Settlement Amount, plus interest, is referred to as the Settlement Fund. The Settlement Fund, less certain Court-approved fees and expenses (the “Net Settlement Fund”), will be distributed to those Class Members that timely submit a valid Claim Form.

2. Will the Settlement have tax consequences for you?

If you receive a payment under the Settlement, there might be resulting tax consequences. Those tax consequences might vary, depending upon individual circumstances. Neither Plaintiffs nor the Settling Defendants can advise you about any tax consequences that might arise from your receipt of monetary settlement relief. You may wish to consult a tax advisor to determine whether any potential federal, state, local, foreign, or other tax consequences to you will arise from receipt of settlement relief in this Lawsuit.

IV. WHAT WILL BE THE LEGAL EFFECT OF THE SETTLEMENT IF IT IS APPROVED BY THE COURT?

If the Court approves the Settlement, the Settling Parties will seek the entry of a Final Order Approving Partial Class Action Settlement (“Final Approval Order”) and a Judgment. These documents, which are available at www.SyndicateSettlement.com, will, among other things:

1. Approve and adopt the terms of the Settlement Agreement.
2. Find that the Settlement is fair, reasonable, and adequate.

3. Finally certify a class for settlement purposes only.
4. Dismiss the Lawsuit with prejudice as to the Settling Defendants, meaning that no Class Members will be able to file another lawsuit or proceeding against any of the persons and entities released in accordance with the Release based upon the claims that have been raised or that could have been raised in the Lawsuit.
5. Incorporate the Release as part of the Final Approval Order and the Judgment.
6. Permanently bar Class Members from filing or participating in any lawsuit or other legal action against any of the Released Defendants arising out of or relating in any way to the claims that have been raised or that could have been raised in this Lawsuit.
7. Enter a Bar Order, the complete text of which is set forth in the Settlement Agreement, available at www.SyndicateSettlement.com, which provides that:
 - (i) any and all persons and entities are permanently barred, enjoined, and restrained from commencing, prosecuting, continuing to prosecute, or asserting any claim (including any claim for indemnification, contribution, or attorneys' fees) against any of the Released Defendants where the alleged injury to the barred person or entity is based upon that person's or entity's alleged liability to the Class or any of the Class Members;
 - (ii) any and all Released Defendants are permanently barred, enjoined, and restrained from commencing, prosecuting, continuing to prosecute, or asserting any claim (including any claim for indemnification or contribution) against a person barred by subdivision (i) above, where the Released Defendant's alleged injury is based solely upon the Released Defendant's alleged liability to the Class or any of the Class Members other than with respect to claims related to coverage under policies issued by Released Defendants to Plaintiffs or any Class Members; and
 - (iii) there shall be a judgment-reduction credit reducing any judgment that the Class or any of the Class Members might obtain against a barred person or entity in connection with any of the Released Claims by the greater of the settlement amount paid by the Settling Defendants or an amount that corresponds to the Settling Defendants' percentage of responsibility for the loss to the Class or any of the Class Members.
8. Set forth the amount of attorneys' fees and expenses to Class Counsel and service awards to the Plaintiffs, to the extent they are awarded by the Court.
9. Retain jurisdiction over all matters relating to the administration, enforcement, and interpretation of the Settlement.

B. Can a Settling Party terminate the Settlement or change its terms?

If Class Members representing 5% of the overall number of Class Members mailed the Summary Notice by the Claims Administrator, request exclusion from the Settlement, or certain other events identified in the Settlement Agreement occur, then some or all of the Settling Defendants shall have the option to terminate the Settlement Agreement as to themselves and withdraw from the Settlement.

If the Settlement Agreement is terminated, each of the Plaintiffs, Class Members, and the Settling Defendants will be in the same position as he, she, or it was in before the Settlement Agreement was executed; the Settlement

Agreement will have no legal effect; and Plaintiffs and the Settling Defendants will continue to litigate the case in the Court.

If the Settlement Agreement is terminated, you will not receive any benefits under the Settlement.

If the Settlement is approved, the Settling Parties will not be able to change the terms of the Settlement Agreement without further Court approval unless (a) the Settling Parties all agree in writing to do so, (b) the change is not materially inconsistent with the Final Approval Order and the Judgment entered by the Court, and (c) the change does not materially affect the rights of Class Members under the Settlement Agreement.

V. LEGAL RIGHTS AND OPTIONS

A. What are your options as to the Settlement?

If you are a member of the Class, you may either (a) participate in the Settlement by submitting a Claim Form (in which case you may receive benefits under the Settlement in accordance with the Plan of Allocation, if approved, and will be bound by the Release); (b) request exclusion from the Class (in which case you will receive no benefits under the Settlement and you will not be bound by the Release provided by the Settlement); or (c) do nothing, in which case you give up your ability to receive a payment from the Net Settlement Fund and will be bound by the release and other settlement terms as approved by the Court.

1. If you wish to participate in the Settlement, you need only submit a Claim Form by **December 21, 2023**.

2. If you wish to participate in the Settlement, but you object to or wish to comment on any term of the Settlement, in addition to submitting a Claim Form, you may submit an objection or comment to the Court (but note that if the Court does not approve the Settlement, you will not receive any benefits of the Settlement).

3. If you are a Class Member, but wish to be excluded from the Class, you must send by First-Class Mail to the Claims Administrator a written request for exclusion that must be delivered or postmarked no later than **November 23, 2023**, or as the Court may otherwise direct. A request to be excluded from the Class must include the following information: (i) name; (ii) address; (iii) telephone number; (iv) email address (if applicable); and (v) information about each contract of insurance relating to the Settlement, including (a) the Syndicate(s) that issued the contract(s), (b) policy numbers, (c) face amount of each policy, (d) annual premium, and (e) effective date and expiration date for each policy.

IF YOU DO NOT SUBMIT A TIMELY WRITTEN REQUEST FOR EXCLUSION AS PROVIDED ABOVE, YOU WILL BE BOUND BY ALL OF THE TERMS OF THE SETTLEMENT, INCLUDING THE RELEASE, WHICH IS AVAILABLE AT WWW.SYNDICATESETTLEMENT.COM AND BY ALL PROCEEDINGS, ORDERS, AND JUDGMENTS IN THIS LAWSUIT.

B. Fairness Hearing

In its July 10, 2023 Order, the Court scheduled the Fairness Hearing for December 14, 2023, at 11:30 a.m. Eastern Time, at which the Court will consider whether to approve the Settlement, the Plan of Allocation, an award of attorneys' fees and expenses, and service awards for the class representatives. The hearing will take place in Courtroom 5 in the United States Courthouse located at Martin Luther King Building and U.S. Courthouse, 50

Walnut Street, Newark, New Jersey 07101. **The Court may choose to change the date and/or time of the Fairness Hearing (or decide to conduct it virtually) without further notice of any kind other than on the settlement website and the Court's docket available at <http://ecf.njd.uscourts.gov>.**

At the Fairness Hearing, the Court will consider objections and comments by Class Members. If the Court finds the Settlement to be fair, reasonable, and adequate, it will enter the Final Approval Order and the Judgment.

If you plan to attend the hearing, you should confirm the date and time by checking the settlement website at www.SyndicateSettlement.com or by calling the toll-free number at 1-877-298-4134. You may attend the Fairness Hearing, either in person or through an attorney hired at your own expense, but attendance is not required. If you have made a written objection, you (or your attorney) may appear at the Fairness Hearing to present the objection, but you are not required to do so. If you choose to attend the hearing and intend to make a presentation to the Court, you (or your attorney) must file a notice of your intention to appear.

THE COURT AND THE COUNSEL IDENTIFIED BELOW MUST RECEIVE A NOTICE OF INTENTION TO APPEAR NO LATER THAN November 23, 2023.

C. What must you do if you wish to object to the Settlement?

1. If you are a Class Member and do not exclude yourself from the Class, you may object to the Settlement, any term of the Settlement Agreement, the Plan of Allocation, Class Counsel's application for attorneys' fees and expenses, or the requested service awards to the class representatives.

2. Your objection must be in writing and must provide evidence of your membership in the Class. Your written objection should also state the specific reason(s), if any, for the objection, including any legal support you wish to bring to the Court's attention and any evidence you wish to introduce in support of your objection.

3. Your written objection (and any support for it) must be received by the Court (Martin Luther King Building and U.S. Courthouse, 50 Walnut Street, Newark, N.J. 07101) and by the following counsel no later than **November 23, 2023** (or as the Court may otherwise direct):

For Plaintiffs and the Class:

Rachel L. Jensen
ROBBINS GELLER RUDMAN
& DOWD LLP
655 West Broadway, Suite 1900
San Diego, CA 92101

Robert S. Schachter
ZWERLING, SCHACHTER
& ZWERLING, LLP
41 Madison Avenue
New York, NY 10010

For the Settling Defendants:

Matthew M. Burke
ROBINSON & COLE LLP
One Boston Place, 26th Floor
Boston, MA 02108
Email: mburke@rc.com

4. If you hire an attorney in connection with making an objection, that attorney must file with the Court and serve on the counsel identified above a notice of appearance. If you hire an attorney in connection with making an objection (or for any other purpose relating to the Settlement), you will be responsible for all fees and expenses that the attorney incurs on your behalf.

THE COURT AND THE COUNSEL IDENTIFIED ABOVE MUST RECEIVE THE NOTICE OF APPEARANCE NO LATER THAN NOVEMBER 23, 2023.

5. If you make a written objection as set out above, you either may choose to speak, in person or through an attorney hired at your own expense, at the Fairness Hearing described above. You are not required to attend the Fairness Hearing. Failure to attend the hearing will not prevent the Court from considering your objection. If you (or your attorney) intend to speak at the hearing, you must file with the Court and serve on the counsel identified above a notice of intention to appear.

THE COURT AND THE COUNSEL IDENTIFIED ABOVE MUST RECEIVE THE NOTICE OF INTENTION TO APPEAR BY NO LATER THAN NOVEMBER 23, 2023.

If you fail to comply with any of the provisions of this Section V, you may waive and forfeit any and all rights that you may otherwise have to object to the Settlement, any of its terms, the Settlement Agreement, the Plan of Allocation, Class Counsel's application for attorneys' fees and expenses, or the requested service awards to the class representatives, and you shall be bound by all the terms of the Settlement Agreement and by all proceedings, orders, and judgments in this Lawsuit.

VI. COUNSEL REPRESENTING CLASS MEMBERS

A. How will Class Counsel be paid?

Class Counsel will file on or before November 9, 2023, an application with the Court for an award of attorneys' fees and expenses for their representation of Class Members in this Lawsuit, and for service awards for the class representatives. A copy of this application will be posted on the settlement website. The Court will consider this application at the Fairness Hearing, and the Court will decide the amount of fees and expenses to be awarded.

Class Counsel have agreed that they will not apply to the Court for an award of attorneys' fees of more than one-third of the Settlement Amount and will request an award of litigation expenses in an amount of not more than \$1.6 million. Class Counsel will apply for service awards for the two class representatives of \$5,000 each. If fees and expenses and/or service awards are awarded, they will be paid solely from the Settlement Fund.

VII. GETTING MORE INFORMATION

A. Where can I get more information about the Settlement?

The website at www.SyndicateSettlement.com contains a copy of the settlement-related documents including the Settlement Agreement and all of its attachments. You may also obtain information by calling the Claims Administrator at 1-877-298-4134, Monday through Friday from 8:00 a.m. to 5:00 p.m. Central Time.

You may examine the Settlement Agreement, the Court's orders, and the other papers filed in the case at the Office of the Clerk, United States District Court for the District of New Jersey, Martin Luther King Building and

U.S. Courthouse, 50 Walnut Street, Room 4015, Newark, New Jersey 07101 during the business hours of the Court.

PLEASE DO NOT CONTACT THE COURT OR THE CLERK'S OFFICE OR THE SETTLING DEFENDANTS OR THEIR COUNSEL FOR INFORMATION.

ADDENDUM A
PLAN OF ALLOCATION
INTRODUCTION

This Plan shall govern the administration and distribution of the Net Settlement Fund (“Fund”) and the procedures the Claims Administrator will use to administer and pay claims made by Class Members from the Fund.

DISTRIBUTION TO CLASS MEMBERS

The Fund shall consist of the Settlement Amount and any interest earned, less, as approved by the Court: (i) Taxes and Tax Expenses; (ii) an Attorneys’ Fee and Expense Award and Service Awards; and (iii) Notice and Administration Expenses.

Class Members entitled to receive a payment from the Fund (“Authorized Claimants”) will receive payment through a process that is fair and equitable, and which distributes the Fund in accordance with the relative economic interests as measured by the amount of premium paid to Defendants over the period January 1, 1997, through June 15, 2023 (“Class Period”). At the same time, the Plan ensures that the administration is as simple and cost-effective as possible and imposes minimal burdens on Authorized Claimants. Consistent with these goals, the Plan will allocate the Fund among Authorized Claimants in a way that is proportional to the relative economic interests of Class Members, and will rely, to the extent possible, on data available to Plaintiffs’ Counsel and the Claims Administrator, and by information provided by Authorized Claimants on the Claim Form respecting the premium paid.

The Plan proposes to determine the amount that each Authorized Claimant paid in premium to the Defendants during the Class Period based upon the best information available or a reasonable estimate of the total premium attributable to each Authorized Claimant. The premium paid will be determined or estimated by data previously obtained by Plaintiffs’ Counsel from Defendants, third-party coverholders, brokers, a settlement database from MDL 1663, publicly available information, and information provided by Authorized Claimants.

The Claims Administrator will make its best estimate of premiums paid to the Defendants over the Class Period. The actual claim value amount of any individual Authorized Claimant will be impacted by the amount of premium paid by the entire group of Authorized Claimants. Each Authorized Claimant will receive his, her, or its *pro rata* share of the Fund that is equal to its

EXHIBIT B

BERMUDA LEVY: Insurers consider implications of domicile's tax proposal - **PAGE 4**

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OCTOBER 2023

SPECIAL REPORTS

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SURVEY

PAGE 22

REINSURANCE

PAGE 26

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TRENDS II

PAGE 31



HEALTH CARE AUTOMATION

Use of artificial intelligence
for medical diagnoses, treatment
sparks debate over liability

PAGE 18

Below is a Summary Notice of a proposed partial class action settlement reached in a class action lawsuit pending in the United States District Court for the District of New Jersey known as *Lincoln Adventures, LLC, et al. vs. Those Certain Underwriters at Lloyd's, et al.* A more detailed version of this Notice is contained in a Long-form Notice posted on the Settlement website at www.SyndicateSettlement.com. You are encouraged to read the Long-form Notice for a more in-depth explanation of the proposed partial settlement and your rights as they relate to the Settlement.

**IF YOU PURCHASED INSURANCE THROUGH CERTAIN SYNDICATES AT LLOYD'S, LONDON
DURING THE PERIOD JANUARY 1, 1997, THROUGH JUNE 15, 2023,
YOU COULD GET MONEY FROM A PARTIAL CLASS ACTION SETTLEMENT
THAT MAY AFFECT YOUR RIGHTS.**

A proposed partial class action settlement has been reached with some, but not all, of the Lloyd's Syndicates who are Defendants in the case and sold insurance to policyholders in the United States (the "Settlement"). Plaintiffs assert causes of action against the Defendants for violation of the Racketeer Influenced and Corrupt Organizations Act, civil conspiracy, and unjust enrichment based on allegations that Defendants engaged in a deceptive scheme to conceal the lack of competition in the Lloyd's Market. The Settling Defendants deny the allegations made against them.

The Syndicates that have settled are Syndicate Nos. 510, 1084, 1096, and 1245 (the "Settling Defendants"). The Syndicates who remain Defendants in the case, and who have not settled, are Syndicate Nos. 0727, 1003, 2003, 2020, 2488, and 2791 (the "Non-Settling Defendants"). The case will continue to be litigated against the Non-Settling Defendants.

WHAT ARE YOUR LEGAL RIGHTS AND IMPORTANT DEADLINES

If you do not want to be legally bound by the Settlement, you must exclude yourself in writing from the Class by **November 23, 2023**. The steps you must follow to be excluded are described in the Long-form Notice, which is available at www.SyndicateSettlement.com. You can also obtain a copy of the Long-form Notice by mail or email by calling the toll-free number at 1-877-298-4134 between the hours of 8 a.m. and 5 p.m. Central Time. If you do not exclude yourself, but instead stay in the Class, you may object or comment on the Settlement, the Plan of Allocation, the application for attorneys' fees and expenses, or service awards to the class representatives by **November 23, 2023**. The procedure on how to object or comment is described in the Long-form Notice at www.SyndicateSettlement.com.

The Court scheduled a Fairness Hearing for **December 14, 2023, at 11:30 a.m. Eastern Time**, at which the Court will consider whether to approve the Settlement, the Plan of Allocation, an award of attorneys' fees and expenses, and service awards for the class representatives. The hearing will take place in Courtroom 5 in the United States Courthouse located at Martin Luther King Building and U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07101. The Court may choose to change the date and/or time of the hearing (or decide to conduct it virtually) without further notice of any kind other than on the settlement website and the Court's docket available at <http://ecf.njd.uscourts.gov>. If you plan to attend the hearing, you should confirm the date and time by checking the website at www.SyndicateSettlement.com or by calling the toll-free number at 1-877-298-4134. The Court at the hearing will consider objections that have been properly made by Class Members. If the Court finds the Settlement to be fair, reasonable, and adequate, it will approve the Settlement. You may choose to attend the hearing, either in person or through an attorney hired at your own expense, but attendance is not required. If you choose to attend the hearing and intend to make a presentation to the Court, you or your attorney must follow the procedures set forth in the Long-form Notice at www.SyndicateSettlement.com.

A NOTICE OF INTENTION TO APPEAR MUST BE RECEIVED BY THE COURT AND THE COUNSEL IDENTIFIED BELOW NO LATER THAN NOVEMBER 23, 2023.

If the Court approves the Settlement, then the Settling Defendants will be dismissed from the case. Class Members who have not properly requested exclusion from the Class will be deemed to have released the Settling Defendants from all claims related to the case and will not be able to sue the Settling Defendants for any of the conduct that was the subject of the case. The full text of the Release is set forth in the Long-form Notice at www.SyndicateSettlement.com.

WHO IS INCLUDED IN THE CLASS

The Settlement affects members of the Class, which are with certain limited exceptions, all persons and entities in the United States who, during the period **January 1, 1997, through June 15, 2023 (the "Class Period")**, purchased or renewed a contract of insurance (an insurance policy, not reinsurance) with any of the Defendants. The complete description of the Class is set forth in the Long-form Notice at www.SyndicateSettlement.com.

WHAT DOES THE SETTLEMENT PROVIDE

The Settling Defendants have agreed to make payments to settle the claims against them. The total amount of these payments is \$7,900,000. After deducting the amounts approved by the Court for settlement and claims administration costs, attorneys' fees and litigation expenses, and service awards for the class representatives, these funds will be paid to members of the Class. The Settling Defendants will be entitled to the release and other provisions of the Settlement.

WHO WILL RECEIVE A PAYMENT

Payments to Class Members will be according to the Plan of Allocation, which is included in the Long-form Notice at www.SyndicateSettlement.com. To receive a payment, Class Members **must** submit a Claim Form by **December 21, 2023**, as more fully described in the next paragraph.

HOW DO I RECEIVE A PAYMENT FROM THE SETTLEMENT

To be eligible for a payment, a Class Member must submit a Claim Form on or before December 21, 2023. Claim Forms are available at www.SyndicateSettlement.com. Claim Forms can be requested from the Claims Administrator by calling the toll-free number at 1-877-298-4134 between the hours of 8 a.m. and 5 p.m. Central Time, or by email at info@SyndicateSettlement.com. Claim Forms can be completed online at www.SyndicateSettlement.com, emailed to the Claims Administrator at info@SyndicateSettlement.com, or mailed to the Claims Administrator at Syndicate Settlement, c/o A.B. Data, Ltd., P.O. Box 173075, Milwaukee, WI 53217. Each Class Member who wishes to claim part of the Settlement **must** submit a Claim Form by **December 21, 2023**. It is the responsibility of the Class Member to provide truthful and accurate information, and to update any information, including contact and address information, to the Claims Administrator, when appropriate.

WHO ARE THE ATTORNEYS FOR THE CLASS AND THE SETTLING DEFENDANTS

The Attorneys for the Class are:

Rachel L. Jensen
ROBBINS GELLER RUDMAN & DOWD LLP
655 West Broadway, Suite 1900
San Diego, CA 92101

Robert S. Schachter
ZWERLING, SCHACHTER & ZWERLING, LLP
41 Madison Avenue
New York, NY 10010

The Attorneys for the Settling Defendants are:

Matthew M. Burke
ROBINSON & COLE LLP
One Boston Place, 26th Floor
Boston, MA 02108
Email: mburke@rc.com

HOW CAN I OBTAIN ADDITIONAL INFORMATION?

If you think that you may be a Class Member, you can obtain more information, including a copy of the Long-form Notice, the Claim Form, the Settlement Agreement, and other documents relating to the Settlement by visiting www.SyndicateSettlement.com or by contacting the Claims Administrator toll-free at 1-877-298-4134.

PLEASE DO NOT CONTACT THE COURT OR THE CLERK.

percentage share of the total premium paid by all Authorized Claimants (the “Initial Distribution”).

If an Initial Distribution for an Authorized Claimant is less than \$10.00, that Authorized Claimant shall not receive an Initial Distribution.

DISTRIBUTION OF REMAINING BALANCE OF THE FUND

The Initial Distribution and reallocation(s) shall be consistent with the Settlement Agreement. With respect to any amount remaining in the Fund after the Initial Distribution, a minimum payment threshold amount shall be determined by Class Counsel after consultation with the Claims Administrator regarding factors bearing on the economic feasibility of re-distributions (such as the costs of mailing checks, the total amount of funds to be distributed, and the number of Authorized Claimants that cashed their initial distributions). Class Counsel, with approval of the Court, may elect to delay the re-distribution of such balance in the event they believe that settlements or judgments may be reached with Non-Settling Defendants, and waiting to re-distribute would be in the best interest of the Class.

Case 2:08-cv-00235-CCC-ESK Document 298-3 Filed 11/09/23 Page 32 of 44 PageID: 17051
Syndicate Settlement
c/o A.B. Data, Ltd.
P.O. Box 173075
Milwaukee, WI 53217

COURT-APPROVED NOTICE REGARDING
Syndicate Settlement

54752_Lloyd'sII_MC_16NOT

EXHIBIT C

\$7.9 Million
Syndicate
Insurance
Settlement

If You Purchased Insurance Through Certain Syndicates at
Lloyd's of London
You Could Get Money from a Class Action Settlement.
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July 19, 2023

NAME: Ben Munro

NEW JOB TITLE: Toronto-based chief underwriting officer, Banyan Risk Ltd.

PREVIOUS POSITION: Toronto-based founder and CEO of Briza Inc.

INDUSTRY OUTLOOK: The insurance industry is at an inflection point and faces a huge challenge of bringing its systems and products into a new digitally focused era. Many millions of dollars have been spent developing new technologies over the past decade, such as blockchain, artificial intelligence and predictive analytics, both within the insurance industry and for the world in general. Technology will innovate every part of the process and distribution chain, resulting in real and meaningful change in the insurance industry over the



\$7.9 Million
Syndicate Insurance
Settlement

If You Purchased Insurance Through Certain
Syndicates at Lloyd's of London
from January 1, 1997 through June 15, 2023,
You Could Get Money from a Partial Class Action Settlement.

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Bennet Hammerberg

Cedar Rapids, Iowa-based vice president, Alliant Insurance Services Inc.



Linda Johnson

Minneapolis- and New York-based vice chair, Gallagher Re



Barb Habel

Phoenix-based vice president and head of excess casualty, Atain Insurance Cos.



Tom Leonardo

New York-based global head of accident & health, SiriusPoint Ltd.



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August 30, 2023

NAME: Bennet Hammerberg

NEW JOB TITLE: Cedar Rapids, Iowa-based vice president, Alliant Insurance Services Inc.

PREVIOUS POSITION: Cedar Rapids, Iowa-based producer, Arthur J. Gallagher & Co.

INDUSTRY OUTLOOK: The insurance industry is ever-changing. Insurance companies will continue to have to modify their forms and policies depending on cyber exposure, weather events, etc. A trusted adviser is the perfect solution to help businesses navigate these and other changes.

GOALS FOR NEW POSITION: To be a trusted insurance adviser to Alliant clients.

CHALLENGES FACING THE INDUSTRY: Weather-related losses have had a huge impact in our area the past several years. Clients have had issues with raising premiums and deductibles as well as finding a good fit for their business in the marketplace.

FIRST EXPERIENCE IN THE INDUSTRY JOB MARKET: Worked for a locally owned insurance agency that my dad owned.

ADVICE: Make as many relationships within your community as you can. Go to as many business and charitable events as possible. Find a trusted mentor or colleague to bounce ideas off. Don't be afraid to ask for help.

OUTSIDE THE INDUSTRY, A DREAM JOB: Chef

COLLEGE MAJOR: Finance, University of Iowa

LOOKING FORWARD TO: Meeting new colleagues and expending my knowledge of the insurance industry.

FAVORITE MEAL: Thanksgiving dinner

BOOK: Anything by John Grisham

HOBBIES: Spending time with family, golfing and cooking

An advertisement with a blue and white background. At the top, there is an icon of a classical building with a dollar sign. Below it, the text reads "\$7.9 Million Syndicate Insurance Settlement". Underneath, it says "If You Purchased Insurance Through Certain Syndicates at Lloyd's of London". A smaller line of text indicates the period "from January 1, 1997 through June 15, 2023". Below that, it says "You Could Get Money from a Partial Class Action Settlement." At the bottom, there is a green button that says "FILE YOUR CLAIM HERE" and the website "SyndicateSettlement.com".

\$7.9 Million
Syndicate Insurance
Settlement

**If You Purchased Insurance Through
Certain Syndicates at Lloyd's of London**
from January 1, 1997 through June 15, 2023,
You Could Get Money from a Partial Class Action Settlement.

[FILE YOUR CLAIM HERE](#)
SyndicateSettlement.com

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Employee Benefits

Legal experts discuss prospects for blocking Medicare drug pricing initiative in court

September 01, 2023

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Drug manufacturers are hopeful that their legal challenges to a Biden administration initiative which mandates them to negotiate drug prices with Medicare may find a receptive hearing at the U.S. Supreme Court, according to legal experts, Reuters reports. Before the Aug. 29 announcement of the first 10 drugs to be included in the program, pharmaceutical companies had filed eight lawsuits against the U.S. Centers for Medicare and Medicaid Services, aiming to counteract it. While experts hold mixed views on the lawsuits' merits, the Supreme Court's recent decisions show a propensity towards upholding property rights.

[Read more](#)

Most Read in Employee Benefits

1. Insurers omit coverage for new RSV vaccines, sparking out-of-pocket costs
2. 8.5% increase in employers' health care costs forecast for 2024
3. Cigna to remove prior authorization for 25% of covered services
4. Biden administration names first 10 drugs for Medicare price negotiations
5. Digital health firm Babylon files for Chapter 7 amid rising liabilities
6. Bon Secours sues Anthem BOBS over \$93M in unpaid claims

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Kathy Galia,
Chief Clinical
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Employee Benefits

SMBs adopt self-insurance as large employers scale back, says EBRI

September 01, 2023

REPRINTS

SHARE

While more large employers are backing away from self-insurance, small- and medium-sized companies are increasingly adopting this health care coverage option, reports the Employee Benefit Research Institute, according to Fierce Healthcare. Since 2018, small and medium-sized businesses have seen a rise in offering at least one self-insured plan. In contrast, large enterprises have experienced a decline in such offerings, with only 72% providing a self-insurance option in 2022, the lowest since 2010.

[Read more](#)

Most Read in Employee Benefits

1. Insurers omit coverage for new RSV vaccines, sparking out-of-pocket costs
2. 8.5% increase in employers' health care costs forecast for 2024
3. Cigna to remove prior authorization for 25% of covered services
4. Biden administration names first 10 drugs for Medicare price negotiations
5. Digital health firm Babylon files for Chapter 7 amid rising liabilities
6. Bon Secours sues Anthem BCBS over \$93M in unpaid claims

\$7.9 Million Syndicate Insurance Settlement

If You Purchased Insurance Through Certain Syndicates at Lloyd's of London
from January 1, 1997 through June 15, 2023.
You Could Get Money from a Partial Class Action Settlement.

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SyndicateSettlement.com

Paradigm

Kathy Galia,
Chief Clinical
Solutions Officer

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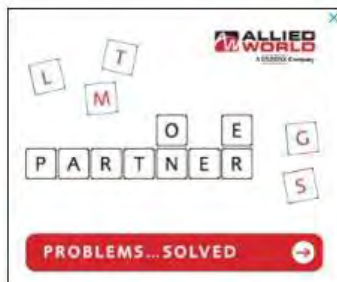
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ISSUES



September/October 2023



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May/June 2023

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Successful Succession – May/June 2023

Talent shortages and the disruption they cause are risks any aware business leader fears. Organizations that fail to take into account the impact of a wave



Risk All Stars – May/June 2023

Risk & Insurance® strives to identify emerging risks and mitigation strategies, while covering the fascinating people who drive the industry forward. Our



Health Care Apps In Focus – May/June 2023

"More and more, we are turning to our smartphones and the internet in general as a first line of defense for health care needs." — Brian Peers, vice



March/April 2023



January/February 2023



November/December 2022



SEPTEMBER/OCTOBER 2023

Mind the Gap

It's Always at the Delicate Moments

\$7.9 Million Syndicate Insurance Settlement

If You Purchased Insurance Through Certain Syndicates at Lloyd's of London from January 1, 1997 through June 15, 2023, You Could Get Money from a Partial Class Action Settlement.

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FEATURED

Successful Succession – May/June 2023

Talent shortages and the disruption they cause are risks any aware business leader fears. Organizations that fail to take into account the impact of a wave



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Health Care Apps In Focus – May/June 2023

"More and more, we are turning to our smartphones and the internet in general as a first line of defense for health care needs." — Brian Peers, vice



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P A R T N E R S

PROBLEMS ... SOLVED

SEPTEMBER/OCTOBER 2023

Mind the Gap

It's always at the ball game when our culture's dystopian income inequality strikes my soul most acutely. The occasion this time was Brighton & Hove Albion



News

Marsh McLennan Agency, a Marsh subsidiary, has acquired Philadelphia's Graham Company, a risk management consultancy and independent insurance and employee



We're Looking For The Best

WHAT IS A POWER
SHOCKER? It's an intro

\$7.9 Million
Syndicate
Insurance
Settlement

If You Purchased Insurance Through Certain Syndicates at
Lloyd's of London
You Could Get Money from a Class Action Settlement.

2024
HOWE
ROKE!



\$7.9 Million
Syndicate Insurance
Settlement

**If You Purchased Insurance Through
Certain Syndicates at Lloyd's of London**

from January 1, 1997 through June 15, 2023,
You Could Get Money from a Partial Class Action Settlement.

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Managing Data Security



**Navigating a Challenging Economic
Landscape**

August 1, 2023



Mitigating



6 Steps to

EXHIBIT D



\$7.9 Million Syndicate Insurance Settlement

**If You Purchased Insurance
Through Certain Syndicates
at Lloyd's of London**

from January 1, 1997 through June 15, 2023,
**You Could Get Money from a Partial
Class Action Settlement.**

FILE YOUR CLAIM HERE

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