

The Lewis-Abdulhaadi v. Union Security Insurance Company case is a class action lawsuit concerning dependent child life insurance policies under the Employee Retirement Income Security Act (ERISA). The lawsuit claims that Union Security Insurance Company (USIC) and Sun Life Assurance Company of Canada (Sun Life) improperly collected premiums for dependent child life insurance for children who were ineligible. A preliminary settlement has been approved by the U.S. District Court for the Eastern District of Pennsylvania, affecting class members who paid premiums for dependent child life insurance for children denied benefits based on age criteria. Class members can choose to receive payments or benefits, object to the settlement, or opt-out if they have filed a separate lawsuit on the same issues. Specifically, those with claims denied between August 25, 2015, and March 14, 2025, due to age restrictions will automatically receive benefits unless they need to update their contact or beneficiary information. Class members whose children passed away during this period without filing a claim must submit a claim to receive benefits, while those who paid premiums for children not qualifying as dependents can convert their coverage to an individual policy.

The settlement outlines various benefits based on individual circumstances. For denied claims, Sun Life will pay 100% of previously denied benefits for children over the maximum age limit and 50% for claims denied due to age and full-time student status. Benefits will also be paid for children who died without a prior claim if they were under 40 and the member had coverage for at least six months before the child's death. In exchange for these benefits, class members will release all claims against USIC and Sun Life related to premium collection and claim denials based on age limits. The full terms of the settlement, including the release of claims, are available on a designated website, and class members are encouraged to review their rights and options carefully, as the settlement will be finalized following a court hearing scheduled for March 14, 2025.

Class members with pending lawsuits regarding these claims can opt out of the settlement by submitting a written request to the Settlement Administrator, thus retaining their right to continue

their lawsuits against USIC and/or Sun Life. The settlement may be terminated if the Court does not approve it, and if terminated, claims against the defendants will proceed as if the settlement had not existed. The settlement will not be final until the Court grants final approval and resolves any appeals, with the earliest finalization expected 30 days after the Final Approval Hearing. The decision to settle was made after Class Counsel reviewed extensive documentation and considered the strengths and weaknesses of the claims and defenses, as well as the risks and costs associated with further litigation. The settlement was reached after multiple mediation sessions, with the parties agreeing that it was in their best interest to settle given the uncertainties involved. Class Counsel has worked on this case for over three years without payment, and under the settlement, USIC and Sun Life will contribute \$1 million to cover attorneys' fees and expenses, with Class Counsel applying to the Court for an award from this fund.

A Final Approval Hearing is scheduled for March 14, 2025, where the Court will evaluate the fairness of the settlement and any requests for attorneys' fees and service awards. Class members can object to the settlement or the fee requests by submitting written objections by March 3, 2025. Attendance at the hearing is not mandatory, and class members can arrange for their own counsel to attend if desired. Class members are encouraged to update their contact information with the Settlement Administrator and can opt out of the class only if they have a pending lawsuit related to the claims. For further information, class members can contact the Settlement Administrator or Class Counsel, but should not reach out to USIC or Sun Life regarding the settlement.

To obtain benefits under Group 4 of the Notice of Class Action Settlement, individuals who did not meet the definition of dependent child must complete and submit a specified form. The maximum life insurance coverage available is the lesser of \$10,000 or the amount for which the child was insured when they ceased to be eligible as a dependent under the group policy. The premium for this individual life insurance is determined by the dependent's age closest to the policy's effective date, with an addendum providing rates and examples for calculating the annual premium. The application

for conversion coverage involves a two-step process: first, the individual must complete and mail the form to the Settlement Administrator by July 12, 2025; second, upon final approval of the settlement, Sun Life will send a formal application and other necessary documents, which must be submitted within 30 days. Required documents include a completed application, a W-9 form, a premium payment check (with options for automatic withdrawals), and a government-issued ID. The form requires personal information such as name, address, email, policyholder name, policy number, and dependent children's details. An example calculation for the annual premium is provided, illustrating how to determine the premium based on the coverage amount and applicable rates. Additional rates for other ages will be included with the application. For further assistance, contact information for the Settlement Administrator is provided, including a website, email, and telephone number.