

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

You may be entitled to payment for unpaid medical bills from a prior automobile injury claim you filed with GEICO. You may also be able to get further medical treatment for any injuries relating to that claim.

A federal court authorized this Notice. This is not a solicitation from a lawyer.

- A proposed settlement of a class action lawsuit will provide certain GEICO policyholders with an opportunity to renew their claims for reimbursement of medical expenses due to an accident and to get further treatment for any injuries relating to that accident.
- The Plaintiffs in the lawsuit claim that certain GEICO-issued automobile insurance policies should have afforded policyholders with greater coverage than may have been indicated on their policy documents or declarations.

According to GEICO's Records, You May Be Eligible To File A Claim Because:

1. You had a New Jersey Standard Automobile Liability Insurance Policy issued by a GEICO company from August 16, 2004 to October 1, 2008
2. Your policy indicated PIP* coverage limit of less than \$250,000 and GEICO did not have a signed Coverage Selection Form from you
3. You had submitted PIP claims in excess of \$10,000 from August 16, 2004 to October 1, 2008 for a covered automobile accident
4. Your policy's PIP coverage limit has not already been changed in writing by GEICO to \$250,000

* PIP means "Personal Injury Protection Medical Expense."

- The Court still has to decide whether to approve the settlement. Settlement benefits will be provided if the Court approves the settlement and after appeals, if any, are resolved.
- Your legal rights are affected whether you act or don't act. Read this Notice carefully.
- These rights and options — **and the deadlines to exercise them** — are explained in this Notice.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT:

SUBMIT A CLAIM FORM	The only way to obtain reimbursement of medical expenses or for additional medical treatment related to the accident. You must submit a claim to get reimbursement.
EXCLUDE YOURSELF	Get no reimbursement. This is the only option that allows you to ever be part of any other lawsuit against the Defendants about the legal claims being resolved in this case. <u>See Question 15</u> below.
OBJECT	Write to the Court about why you don't like the settlement.
GO TO A HEARING	Ask to speak in Court about the fairness of the settlement.
DO NOTHING	Do not attempt to qualify for reimbursement of medical benefits or additional medical treatment related to the accident. Give up certain legal rights.

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1. BASIC INFORMATION

The GEICO companies were sued. The people who sued are called “Plaintiffs,” and the companies they sued (“GEICO”) are called “Defendants.” (Throughout this notice, “GEICO” refers to the companies named Government Employees Insurance Company, GEICO Casualty Company, GEICO Indemnity Company, and GEICO General Insurance Company.)

2. WHY DID I GET THIS NOTICE PACKAGE?

The records of GEICO indicate –

- that you may have had a Standard Automobile Liability Insurance Policy issued by GEICO during the time period August 16, 2004 to October 1, 2008
- that you had submitted PIP medical claims in excess of \$10,000 during that time period
- that your policy indicated that your PIP coverage limit was less than \$250,000
- that GEICO did not have a signed Coverage Selection Form (“CSF”) from you, and
- that your policy has not already been changed by GEICO in writing to reflect the maximum \$250,000 PIP coverage provided by law.

This notice package explains the lawsuit, the settlement, your legal rights, what benefits are available, who is eligible for them, and how to get them.

The Court in charge of this case directed that this Notice be provided to you because you have a right to know about a proposed settlement of a class action lawsuit before the Court decides whether to approve the Settlement. This Notice provides details on what options you have in response to this Settlement, and how to claim benefits provided by the Settlement.

3. WHAT IS THIS LAWSUIT ABOUT?

In this case, Plaintiffs contend that GEICO may not provide less than the statutory maximum of \$250,000 per policy of PIP coverage unless its policyholder selects a lower amount of coverage and signs and returns to GEICO a particular form known as a Coverage Selection Form (“CSF”). In many instances, GEICO policyholders selected a lower coverage, but GEICO did not have on file a signed CSF. Plaintiffs further contend that, when such GEICO policyholders submitted PIP medical claims to GEICO following an accident, GEICO did not provide them with the maximum \$250,000 in coverage as required by law. GEICO denies these claims and contentions. Notwithstanding, GEICO has agreed to settle this case to avoid further and protracted litigation.

4. WHAT IS A CLASS ACTION?

In a class action, one or more people called “Class Representatives” sue on behalf of a group of people with similar claims. All of these people together are called the “Class” or “Class Members.” One court resolves the issues for all Class Members.

5. WHY IS THERE A SETTLEMENT?

A settlement is not an admission of any wrongdoing by the Defendants. The Court or a jury did not make any decision in favor of the Plaintiffs or the Defendants. Instead, the two sides agreed to settle. By settling, they both avoid the risks, delays, and costs of a trial, and the affected consumers will get some benefits. The Class Representatives and the attorneys believe this settlement is the best option for everyone in the Class.

6. WHO IS IN THE SETTLEMENT

You *will* be a member of the Settlement Class, unless you exclude yourself, if you meet all the criteria set forth in paragraph 2 above. All of the Court's orders will apply to you and legally bind you.

If you are still not sure whether you are a member of the Settlement Class, you can call GEICO at 1-800-301-1390, ext. 4759 for more information.

7. THE SETTLEMENT BENEFITS — WHAT YOU GET

As part of the proposed Settlement, GEICO has agreed to provide Settlement Class Members with: (1) the statutory maximum of \$250,000 in PIP for the Class Period; and (2) an expedited procedure for the completion, submission, adjustment, and arbitration of Settlement Class claims. Please note, however, that if you have medical bills from the accident that were paid by a governmental agency, another insurance company, or other third party, any settlement benefits, or some portion of such benefits, may be paid to them.

8. HOW YOU GET SETTLEMENT BENEFITS — SUBMITTING A CLAIM FORM

**TO PARTICIPATE IN THE SETTLEMENT, YOU MUST SUBMIT THE ENCLOSED OFFICIAL
CLAIM FORM TO GEICO AT THE ADDRESS BELOW
ON OR BEFORE JULY 10, 2009**

**GEICO
ATTENTION: WEBER CLASS ACTION
8000 LINCOLN DRIVE EAST, STE 300
MARLTON, NJ 08053.**

In order to receive any reimbursement, you must submit a completed Official Claim Form to GEICO on or before the date indicated above. An Official Claim Form is included with this Notice. If you've lost or misplaced the form, you may contact GEICO at 1-800-301-1390, ext. 4759 for an additional form. Read the instructions carefully, fill out the form, and return the completed Official Claim Form by the due date. **We strongly suggest that you send it by a manner of posting that provides you with a proof of mailing because if we do not receive your claim (for any reason), you will not get paid.** We recommend you send your claim by certified mail or by some kind of overnight express mail delivery service such as the Postal Service's Expressmail or Federal Express.

Upon receipt of the claim, GEICO will review it and determine whether the claim can be paid consistent with the terms of the insurance policy, with the changed PIP limit of \$250,000, New Jersey PIP law, and the terms of this Settlement. If GEICO grants the claim, in whole or in part, GEICO will pay the claim, or, if granted in part, that portion of the claim that is granted.

If GEICO denies a claim in whole or in part, you will be advised in writing of your right to: (1) submit the claim to an expedited binding arbitration process through a Designated Arbitrator; and (2) the assistance of an

attorney, including Class Counsel. If a claim denial is reversed, in whole or in part, by the Designated Arbitrator, GEICO will pay the amount of the claim, your reasonable attorneys' fees and costs, and double the statutory interest rate in effect for 2009. However, in no other event shall GEICO be responsible for your attorneys' fees and costs.

9. WHEN WILL I GET MY SETTLEMENT BENEFITS?

You will receive your reimbursement after the settlement is approved and becomes final. This may take several months, so please be patient. Please remember, however, that if you have medical bills from the accident that were paid by a governmental agency, another insurance company, or other third party, the settlement benefits, or some portion of such benefits, may be paid to them.

10. RELEASE OF CLAIMS

If the settlement is approved, you will give up the right to sue Defendants and other Released Parties on your own (or to be a part of any other lawsuit against Defendants and other Released Parties) concerning the claims that this Settlement resolves. The only way to keep this right is to exclude yourself from the Settlement (see below).

For full details of the matters discussed in this Notice, you may desire to review the Settlement Agreement and all exhibits appended thereto filed with the Court, which may be inspected during business hours at the office of the Clerk of the Court, United States Courthouse, Mitchell H. Cohen Building and U.S. Courthouse, 4th and Cooper Streets, Camden, NJ 08101.

11. EXCLUDING YOURSELF FROM THE SETTLEMENT

If you don't want to participate in the settlement, and you want to keep the right to sue (or continue to sue) the Defendants on your own over the legal issues in this case, then you must ask to be excluded from the Settlement. This is sometimes referred to as "opting out."

12. WHAT HAPPENS IF I EXCLUDE MYSELF FROM THE SETTLEMENT?

If you exclude yourself from the Settlement Class, you will keep your right to sue the Defendants, but you will not be able to participate in the Settlement or receive the benefits from this Settlement. You will not be legally bound by anything that happens in this lawsuit.

If you exclude yourself, do not send in an Official Claim Form to ask for any of the settlement benefits. If you elect to receive any settlement benefits, you cannot also opt out.

13. IF I DON'T EXCLUDE MYSELF, CAN I SUE THE DEFENDANTS FOR THE SAME THING LATER?

No. Unless you exclude yourself, you give up any rights to sue the Defendants and the Released Parties for the claims that this settlement resolves. If you have a pending lawsuit bringing claims that this settlement resolves, speak to your lawyer in that case immediately. You must exclude yourself from *this* Settlement Class to continue your own lawsuit. Remember, the exclusion deadline is July 31, 2009.

14. HOW DO I EXCLUDE MYSELF?

Send a letter by mail clearly indicating your name, address and telephone number, writing *Weber v. Geico*, No. 07-CV-01332 in the header of the letter, and stating that you “request to be excluded from the Settlement Class in the ‘GEICO PIP Litigation’,” and you must sign the letter. You must mail your exclusion request postmarked no later than July 31, 2009 to each of the following addresses:

COURT

Clerk of the Court
United States District Court
Mitchell H. Cohen Building
United States Courthouse
4th & Cooper Streets
Camden, NJ 08101

CLASS COUNSEL

LOCKS LAW FIRM, LLC
Michael A. Galpern, Esq.
457 Haddonfield Road
Suite 500
Cherry Hill, NJ 08002
Tel: (866) LOCKSLAW

DEFENSE COUNSEL

WHITE AND
WILLIAMS LLP
Michael N. Onufrak, Esq.
457 Haddonfield Road
Suite 500
Cherry Hill, NJ 08002

You cannot exclude yourself over the phone or by email.

15. THE LAWYERS REPRESENTING YOU

The Court ordered that the Class Counsel, Michael A. Galpern and Locks Law Firm, LLC, will represent you and the other Settlement Class Members. This lawyer and the law firm are called Class Counsel.

If you want to be represented by your own lawyer, you may hire one at your own expense.

16. HOW WILL CLASS COUNSEL BE PAID?

Class Counsel will ask the Court for an award of attorneys’ fees and reimbursement of expenses. The Court may consider the request at a Settlement Fairness Hearing on August 10, 2009. The amount of fees and expenses awarded to Plaintiffs’ Counsel by the Court are separate and apart from any money and/or benefits made available to the Class and will not affect in any way the settlement benefits to which you are entitled. The date and time for the Settlement Fairness Hearing may be postponed without prior notice.

17. OBJECTING TO THE SETTLEMENT

You can tell the Court that you don’t agree with the settlement or some part of it.

18. WHAT’S THE DIFFERENCE BETWEEN OBJECTING AND EXCLUDING MYSELF?

Objecting is simply telling the Court that you don’t like something about the settlement. You can object only if you stay in the Settlement Class. Excluding yourself is telling the Court that you don’t want to be part of the Settlement Class. If you exclude yourself, you cannot object because the case no longer affects you.

19. HOW DO I OBJECT?

If you’re a Settlement Class Member, you can object to the settlement or the motion for an award of attorneys’ fees and reimbursement of expenses, if you wish. You can give reasons why you think the Court should not approve the settlement or an award of attorneys’ fees and reimbursable expenses. The Court will consider your views.

To object, you must send a letter saying that you object to the proposed settlement in the *Weber v. Geico*, No. 1:07-CV-01332-JBS-JS litigation. You must include your name, address, *Weber v. Geico*, No. 07-CV-01332 in the header of the letter telephone number, and your signature. You must also state the reasons why you object. Mail copies of the objection to each of the following addresses, postmarked no later than July 20, 2009:

COURT

Clerk of the Court
United States District Court
Mitchell H. Cohen Building
United States Courthouse
4th & Cooper Streets
Camden, NJ 08101

CLASS COUNSEL

LOCKS LAW FIRM, LLC
Michael A. Galpern, Esq.
457 Haddonfield Road
Suite 500
Cherry Hill, NJ 08002
Tel: (866) LOCKSLAW

DEFENSE COUNSEL

WHITE AND
WILLIAMS LLP
Michael N. Onufrak, Esq.
457 Haddonfield Road
Suite 500
Cherry Hill, NJ 08002

20. THE COURT'S SETTLEMENT HEARING

United States District Court Judge Jerome B. Simandle is in charge of this case. The case was filed in the United States District Court for the District of New Jersey, Camden Division, located at 4th and Cooper Streets, Camden, New Jersey. The case number is 1:07-CV-01332.

Please do not call the Court or the Judge about this case.

The court will hold a hearing to decide whether to approve the settlement. You may attend the hearing (at your own expense) and you may ask to speak, but you don't have to. Class Counsel will answer any questions the Court may have. You may also pay your own lawyer to attend, but it's not necessary.

21. WHEN AND WHERE WILL THE COURT DECIDE WHETHER TO APPROVE THE SETTLEMENT?

The Court will hold a Settlement Fairness Hearing at 1:30 p.m. on August 10, 2009 at the United States District Court for the District of New Jersey, at 4th and Cooper Streets, Camden, New Jersey. The date and time for the Settlement Fairness Hearing may be postponed without prior notice. If you plan to attend the hearing, please check with Class Counsel whether the hearing has been postponed.

At this hearing, the Court will consider whether the settlement is fair, reasonable and adequate. If there are objections, the Court will consider them. The Court will listen to people who have asked to speak at the hearing. The Court may also decide how much to pay to Plaintiffs' counsel. After the hearing, the Court will decide whether to approve the settlement.

22. MAY I SPEAK AT THE HEARING?

You may ask the Court for permission to speak at the Fairness Hearing. To do so, you must include with your objection (described above) the statement, "I hereby give notice that I intend to appear at the Fairness Hearing in '*Weber v. Geico*.'" Be sure to include your name, address, telephone number, and your signature. If you intend to have any witnesses testify or to introduce any evidence at the Fairness Hearing, you must list the witnesses and evidence in your objection.

Your Notice of Intention to Appear must be postmarked no later than July 20, 2009, and be sent to the Clerk of the Court, Class Counsel, and Defense Counsel, at the addresses above.

You cannot speak at the hearing if you exclude yourself or opt out of the Settlement.

23. IF YOU DO NOTHING

If you do nothing and do not submit a Proof of Claim form, you will not be able to receive any settlement benefits, and you will lose your right to start or continue a lawsuit against the Defendants about the claims that this settlement resolves.

24. GETTING MORE INFORMATION

This Notice summarizes the proposed settlement. For full details of the matters discussed in this Notice, you may desire to review the Settlement Agreement and all exhibits appended thereto filed with the Court, which may be inspected during business hours at the office of the Clerk of the Court, United States Courthouse, Mitchell H. Cohen Building and U.S. Courthouse, 4th and Cooper Streets, Camden, NJ 08101.

You can also call GEICO at 1-800-301-1390, ext. 4759, toll free, with questions about submitting a Claim, the settlement, a Claim form, and other information to help you determine whether you are a Settlement Class Member and whether you are eligible for certain benefits.

Any other questions should be directed to Class Counsel, whose address is listed above.