

**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](http://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](http://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](http://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](http://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](http://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](http://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](http://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](http://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](http://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 8a.m. and 5 p.m. Central Time, or by email at [info@SyndicateSettlement.com](mailto:info@SyndicateSettlement.com). Claim Forms can be completed online at [www.SyndicateSettlement.com](http://www.SyndicateSettlement.com), emailed to the Claims Administrator at [info@SyndicateSettlement.com](mailto: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  
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& DOWD LLP  
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The Attorneys for the Settling Defendants are:

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**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](http://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.**