

**You may be eligible for a payment from a
class action settlement relating to
Assurance IQ, LLC’s employment policies.**

A state court authorized this Notice. This is not junk mail, an advertisement, or a solicitation from a lawyer.

- A settlement has been proposed in the class action lawsuit *Schneider v. Assurance IQ, LLC*, Case No. 22-2-15633-3 SEA.
- Your rights and options—and the deadlines to exercise them—are explained in this Notice. For complete details, view the Settlement Agreement, available at www.AssuranceIQSettlement.com, or contact the Settlement Administrator, CAC Services Group, LLC, at (866) 602-2260 or info@cacsg.com.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
SUBMIT A CLAIM FORM	You will receive a payment for your share of the settlement and will release certain claims against Assurance.
OBJECT TO THE SETTLEMENT	Write to the Court with reasons why you do not agree with the settlement.
ATTEND THE FINAL APPROVAL HEARING	You may ask the Court for permission for you or your attorney to speak about your objection at the Final Approval Hearing.
DO NOTHING	You will not receive any payment from the settlement. If you do nothing you will still release your possible claim against Assurance or related parties. If you do nothing you will not be allowed to be part of any other lawsuit against Assurance or related parties for the legal claims resolved by this settlement.
OPT-OUT OF SETTLEMENT	You will not be a participant in the settlement. If you opt-out you will not receive payment and will not release your potential claim against Assurance.

- The Court still has to decide whether to grant final approval the settlement. Payments will only be made after the Court grants final approval of the settlement and after any appeals are resolved.

BASIC INFORMATION

1. Why is this Notice being provided?

The Court directed that this Notice be provided because you have a right to know about a proposed settlement that has been reached in this class action lawsuit and about all of your options before the Court decides whether to grant final approval of the settlement. If the Court approves the settlement, and after objections or appeals, if any, are resolved, the Settlement Administrator appointed by the Court will distribute the payments that the settlement allows. This Notice explains the lawsuit, the settlement, your legal rights, what payments are available, who is eligible for them, and how to receive them.

The Court in charge of this case is the Superior Court of the State of Washington, County of King. The case is *Schneider v. Assurance IQ, LLC* (the “Lawsuit”).

2. What is this lawsuit about?

The person who filed the Lawsuit – Lucas Schneider – is called the Plaintiff. The company the Plaintiff sued – Assurance IQ, LLC (“Assurance”) – is called the Defendant.

Plaintiff claims that Assurance violated Washington law by entering into noncompetition covenants with employees whose annual earnings were less than \$100,000 in 2020, \$101,390 in 2021, and/or \$107,301.04 in 2022.

Assurance has denied and continues to deny all of the claims made in the Lawsuit, as well as all charges of wrongdoing or liability against it.

3. What is a class action settlement?

In a class action, the Plaintiff (also called Class Representative) sues on behalf of people who have similar claims. Together, all these people are called a Class or the Class members. One court and one judge resolves the issues for all Class members who do not exclude themselves.

The Plaintiff negotiated a settlement that allows the Plaintiff, the Class members, and Assurance to avoid the risks and costs of lengthy and uncertain litigation and the uncertainty of a trial and appeals. It also allows Class members to obtain payment without further delay. The Plaintiff and his attorneys believe the settlement is in the best interest of all Class members. The Court did not decide in favor of the Plaintiff or Assurance, and this settlement does not mean that Assurance did anything wrong.

4. How much is the settlement?

Subject to Court approval, Assurance agreed to pay a total of \$195,000 to settle the Lawsuit (“Fund”). The Fund will cover settlement payments to the Class members; Class Representative’s service award; Class Counsel’s attorneys’ fees, costs, and expenses; and the Settlement Administrator’s fees.

WHO IS INCLUDED IN THE SETTLEMENT?

5. How do I know if I am eligible to be part of the settlement?

You are eligible to be part of this settlement if you are a current or former employees of Assurance IQ, LLC who: (1) signed a noncompetition covenant between January 1, 2020 and May 4, 2023, (2) your annual earnings were less than \$100,000 in 2020, \$101,390 in 2021, and/or \$107,301.04 in 2022, and (3) you have not already released claims relating to such covenants.

You have been identified from Assurance’s records as a Class member and are therefore eligible to be part of the settlement.

HOW TO GET SETTLEMENT BENEFITS—SUBMITTING A CLAIM FORM

6. How do I get benefits from the settlement?

To receive a settlement payment, you must complete and submit the attached Claim Form. Read the instructions carefully, fill out the Claim Form, and submit it by mail postmarked no later than **July 15, 2023**, to:

CAC Services Group, LLC
6420 Flying Cloud Dr Ste 101
Eden Prairie, MN 55344
Phone: (866) 602-2260
Email: info@cacs.com

7. How much will my settlement payment be?

Each Class member is eligible to receive **\$2,753.00**.

This payment will be treated as non-taxable damages and interest, which means there will be no payroll or tax withholdings.

8. When will I get my payment?

The Court will hold a Final Approval Hearing on October 5, 2023, at 8:30 a.m. to decide whether to approve the settlement. If the Court approves the settlement, there may be appeals. It is always uncertain whether any appeals can be resolved favorably, and resolving them can take time, perhaps more than a year. Please be patient.

Checks may be cashed or negotiated within 180 days of being issued. After 180 days, the check will be void.

9. What am I giving up as part of the settlement?

If the Court approves the settlement, you will give up your right to sue Assurance IQ, LLC and its past and present parents, subsidiaries, and affiliates and all of their officers, directors, employees, and plan administrators, and all successors and assigns of each (“Releasees”), from any and all claims for violations of RCW 49.62 (Noncompetition Covenants) that accrue during or arise out of or relate to your employment with Assurance IQ, LLC or alleged employment with or by any other Releasees, known or unknown, relating back to the full extent of the federal and state statutes of limitations and continuing through May 4, 2023, including, without limitation, all state claims for restrictive covenant and/or noncompetition covenant violations and related claims for penalties, interest, liquidated damages, exemplary damages, attorneys’ fees, costs, and expenses.

The specific claims you are giving up against Assurance IQ, LLC are described in Paragraphs 18 and 20 of the Settlement Agreement. The Settlement Agreement is available at www.AssuranceIQSettlement.com.

The Settlement Agreement describes the released claims with specific descriptions, so read it carefully. If you have any questions about what this means you can talk to the law firms listed in Question 14 for free or you can, of course, talk to your own lawyer at your own expense.

EXCLUDING YOURSELF FROM THE SETTLEMENT

If you want to keep the right to sue Assurance and other related entities about issues in the Litigation, and do not want a payment from this settlement, you must affirmatively opt-out of the settlement.

10. If I do not submit a Claim Form, can I still get payment from the settlement?

No. If you do not submit a Claim Form, you will not be entitled to any benefits of the settlement, but you will still be bound by any judgment and/or release in this case.

11. If I do not submit a Claim Form, can I sue Assurance for the same thing later?

No. If you do not submit a Claim Form, you are still subject to the release and give up any right to sue Assurance for the claims that this settlement resolves. You will be enjoined from starting your own lawsuit or to be part of any different lawsuit relating to the claims in this case.

THE LAWYERS REPRESENTING YOU

12. Do I have a lawyer in this case?

Yes. The Court appointed Timothy W. Emery of Emery Reddy, PLLC, 600 Stewart Street, Suite 1100, Seattle, WA 98101 to represent you and other Settlement Class members. These lawyers are called Class Counsel. You will not be charged for these lawyers. If you want to be represented by your own lawyer, you may hire one at your own expense.

13. How will Class Counsel and the Class Representative be paid?

If the settlement is approved and becomes final, Class Counsel will ask the Court to award attorneys' fees, costs, and expenses in the amount of \$63,375. Class Counsel will also request approval of a service award for the Class Representative in the amount of \$20,000. If approved, these amounts, as well as the costs of settlement administration, will be paid out of the Fund.

OBJECTING TO THE SETTLEMENT

You can tell the Court that you do not agree with the settlement or some part of it.

14. How do I tell the Court that I do not like the settlement?

If you are a Settlement Class member, you can object to the settlement if you do not like it or a portion of it. You can give reasons why you think the Court should not approve the settlement. The Court will consider your views before making a decision. To object, you must file with the Court and mail copies to Class Counsel and Assurance's Counsel a written notice stating that you object to the settlement in *Schneider v. Assurance IQ, LLC*, Case No. 22-2-15633-3 SEA.

Your objection must include:

- 1) Your full name, address, telephone number, and e-mail address;
- 2) Information or proof showing you are a Settlement Class member;
- 3) The reasons why you object to the settlement, including any documents supporting your objection;
- 4) The name and address of your attorney, if you have retained one;
- 5) The name and address of any attorneys representing you that may appear at the Final Approval Hearing;

- 6) A statement confirming whether you and/or your counsel intend to personally appear and/or testify at the Final Approval Hearing;
- 7) A list, by case name, court, and docket number, of all other cases in which you (directly or through a lawyer) have filed an objection to any proposed class action settlement within the last three years;
- 8) A list, by case name, court, and docket number, of all other cases in which your lawyer (on behalf of any person or entity) has filed an objection to any proposed class action settlement within the last three years;
- 9) Your signature or the signature of your attorney or other duly authorized representative (along with documentation illustrating representation).

Your objection must be filed with the Clerk of the Superior Court of the State of Washington, County of King, 516 Third Avenue, Room 3F, Seattle, WA 98104 no later than **July 15, 2023**. You must also mail copies of your objection to Class Counsel and Assurance’s Counsel postmarked no later than **July 15, 2023**, at all of the addresses below.

CLASS COUNSEL	ASSURANCE’S COUNSEL
Timothy W. Emery Patrick B. Reddy Paul Cipriani EMERY REDDY, PLLC 600 Stewart Street, Suite 1100 Seattle, WA 98101 Phone: (206) 442-9106	Molly A. Terwilliger Claire M. Lesikar MORGAN, LEWIS & BOCKIUS LLP 1301 Second Avenue, Suite 2800 Seattle, WA 98101 Phone: (206) 274-6400

OPTING OUT OF THE SETTLEMENT

If you are a Settlement Class member, you can opt-out of the settlement if you do not like it or a portion of it and want to preserve a potential claim against defendants. To opt-out, you must send the Settlement Administrator, Class Counsel, and Assurance’s Counsel a written notice stating that you opt-out of the settlement in *Schneider v. Assurance IQ, LLC*, Case No. 22-2-15633-3 SEA.

Your Opt-Out Notice must include:

- 1) Your full name, address, telephone number, and e-mail address;
- 2) Information or proof showing you are a Settlement Class member;
- 3) The reasons why you are opting-out of the settlement,
- 4) Your signature or the signature of your attorney or other duly authorized representative (along with documentation illustrating representation).

THE COURT’S FINAL APPROVAL HEARING

The Court will hold a hearing to decide whether to approve the settlement. You may attend and you may ask to speak, but you do not have to.

15. When and where will the Court decide whether to approve the Settlement?

The Court will hold a Final Approval Hearing at 8:30 a.m. on **October 5, 2023**, in the Superior Court of the State of Washington, County of King, 516 Third Avenue, Room 3F, Seattle, WA 98104. At this hearing, the Court will consider whether the settlement is fair, reasonable, and adequate. The Court will take into consideration any properly-filed written objections and may also listen to people who have asked to speak

at the hearing (*see* Question 14). The Court will also decide whether to approve attorneys' fees and costs to Class Counsel and the service award to the Class Representative.

16. Do I have to come to the Final Approval Hearing?

No. Class Counsel will answer any questions the Court may have. However, you are welcome to attend at your own expense. If you file an objection, you do not have to come to Court to talk about it. You may also hire your own lawyer to attend, at your own expense, but you are not required to do so.

17. May I speak at the Final Approval Hearing?

Yes, you may ask the Court for permission to speak at the Final Approval Hearing. To do so, you must follow the instructions provided in Question 14 above.

IF YOU DO NOTHING

18. What happens if I do nothing?

If you do nothing, you will not receive any compensation from this settlement, but you will be bound by the judgment and release. This means you will not be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against Assurance or related parties about the issues involved in the Lawsuit that were resolved by this settlement.

GETTING MORE INFORMATION

19. How do I get more information about the settlement?

This Notice summarizes the proposed settlement. More details are in the Settlement Agreement, which is available at www.AssuranceIQSettlement.com. You can also get more information by calling, emailing, or writing the Settlement Administrator:

CAC Services Group, LLC
6420 Flying Cloud Dr Ste 101
Eden Prairie, MN 55344
Phone: (866) 602-2260
Email: info@cacs.com

***Please do not call the Court or the Clerk of the Court for additional information.
They cannot answer any questions regarding the settlement or the Lawsuit.***