

Plan of Allocation¹

1. Each Final Settlement Class Member who is the most recent owner of a policy according to Defendant's records ("Recipient") shall be issued a check for that Recipient's pro-rata share of the Net Settlement Fund.
2. Each Recipient's pro-rata share of the Net Settlement Fund shall be computed as follows:
 - a. First, identify the incremental COI charges resulting from the 2017 Adjustment ("COI Overcharges") for that Recipient;
 - b. Second, divide that amount by the total COI Overcharges for the Final Settlement Class; and
 - c. Third, multiply the resultant percentage for each Recipient by the Net Settlement Fund.
3. If a Recipient would receive multiple checks pursuant to paragraphs 1-3 above, such checks may be consolidated into a single check.
4. Within one year plus 30 days after the date the Settlement Administrator mails the first checks, any funds remaining in the Net Settlement Fund shall be redistributed on a pro rata basis to Recipients who previously cashed the checks they received, to the extent feasible and practical in light of the costs of administering such subsequent payments, unless the amounts involved are too small to make individual distributions economically viable or other specific reasons exist that would make such further distributions impossible or unfair. All costs associated with the disposition of residual funds – whether through additional distributions to Final Settlement Class Members and/or through an alternative plan approved by the Court – shall be borne solely by the Final Settlement Fund.
5. The plan of allocation may be modified upon further order of the Court. Any updates to the plan of allocation will be published on the Class Website.

¹ All capitalized terms herein are used as defined in the Joint Stipulation and Settlement Agreement.