## **EXHIBIT B**

NOTICE OF CLASS ACTION SETTLEMENT: You have received this notice because your vehicle was adjusted to be a total loss by Progressive, Progressive may have undervalued your claim, and you may be entitled to a payment from a proposed Settlement in the class action lawsuit, *Brown v. Progressive Mountain Ins. Co.* and *Bost v. Progressive Premier Ins. Co. of Illinoise*, Consolidated Case No. 3:21-cv-00175-TCB, pending in the Northern District of Georgia.

A court authorized this notice. This is not a solicitation from a lawyer. You are not being sued. This notice explains important rights you may have. Please read it carefully.

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT				
Remain a Member of the Settlement Classes and Receive money from the Settlement	If you wish to remain a member of the Settlement Classes, you are not required to do anything. If you take no action, you will be part of the Settlement. You will also be bound by any judgment approving or disapproving the Settlement. After payment of certain fees and expenses, it is estimated that your payment will be \$, which will be mailed to [the Settlement Class Member's address on file with Progressive] if you do not choose to receive your payment through an electronic form, such as PayPal, Venmo, or direct deposit to your bank account. There may be benefits to choosing electronic payment. For information on how to do so, or if you would like to request a change of address, visit the Settlement Website, www.GATotalLossClaim.com, and follow the instructions for doing so.			
Ask to be Excluded from the Settlement	If you do not wish to participate in the Settlement, you <u>must</u> send a letter requesting to be excluded, postmarked no later than April 30, 2025. For details about what this letter must include, visit the Settlement Website, <u>www.GATotalLossClaim.com</u> . If you exclude yourself from this lawsuit, you will not be entitled to a Settlement payment, but you will be free to pursue any claim you may have against Defendants on your own or as part of a different lawsuit (but you should consult with a lawyer to determine whether those claims are timely).			
If you remain a Settlement Class Member, you can object if you don't like any part it	If you do not exclude yourself from the Settlement, you can object to the Settlement if you don't like any part of it. If you object, you can give reasons why you think the Court should not approve the Settlement, the request for attorney's fees and expenses, or the request for Class Representatives' service awards. Objections must be submitted in writing and postmarked no later than April 30, 2025. For details about what must be included in an objection, visit the Settlement Website, www.GATotalLossClaim.com.			

<u>What is this Class Action about?</u> The Class Action alleges that Progressive Mountain Insurance Company and Progressive Premier Insurance Company of Illinois (collectively referred to as "Progressive") systematically paid their insureds <u>less</u> than the actual cash value of their total loss vehicles.

Why did I get this notice? You received this notice because Progressive's records indicate you are a member of one of the following Settlement Classes: 1) Progressive Mountain Class: All persons who made a first-party claim on a policy of insurance issued by Progressive Mountain Insurance Company to a Georgia resident where the claim was submitted from October 11, 2015, through the date of Preliminary Approval, and Progressive determined that the vehicle was a total loss and based its claim payment on an Instant Report from Mitchell where a Projected Sold Adjustment was applied to at least one comparable vehicle. 2) Progressive Premier Class: All persons who made a first-party claim on a policy of insurance issued by Progressive Premier Insurance Company of Illinois to a Georgia resident where the claim was submitted from June 8, 2016, through the date of Preliminary Approval, and Progressive determined that the vehicle was a total loss and

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based its claim payment on an Instant Report from Mitchell where a Projected Sold Adjustment was applied to at least one comparable vehicle. This notice gives you information about the Class Action, the Settlement and your rights and options.

<u>What does the Settlement Provide?</u> Subject to court approval, the Settlement resolves all claims brought against Progressive in exchange for a cash Settlement Fund of \$43,000,000, approximately \$28,030,667 of which will be distributed to Settlement Class Members. The remainder will be used to pay attorneys' fees, litigation expenses, settlement administration expenses, and service awards.

**Do I have a lawyer representing my interests in the Settlement?** Yes. The Court appointed the following law firms to represent you and other Settlement Class Members: Carney Bates & Pulliam, PLLC; Jacobson Phillips PLLC; Normand PLLC; Edelsberg Law, P.A.; Shamis & Gentile; and Bailey Glasser LLP (collectively referred to as "Class Counsel"). The Court also appointed Plaintiffs Keddrick Brown and Michelle Bost as the Settlement Class Representatives. Class Counsel will ask the Court for attorneys' fees not to exceed one-third of the Settlement Fund, plus reimbursement of reasonable litigation expenses up to \$380,000, and service awards not to exceed \$10,000 to each of the two Plaintiffs for serving as the Settlement Class Representatives. The motion for fees, expenses and service awards will be filed by March 31, 2025, and subsequently made available on the Settlement Website, www.GATotalLossClaim.com.

<u>How can I get more information?</u> This notice only summarizes the Settlement. The Settlement Agreement, the Court's Preliminary Approval Order, and other important filings are available for review at the Settlement Website, www.GATotalLossClaim.com. You can also call the Settlement Administrator toll free at 1-888-604-7469 or contact Class Counsel at 14 NE 1st Ave., Suite 705, Miami, FL 33132 with your questions.

PLEASE DO NOT CONTACT THE COURT, THE CLERK'S OFFICE, DEFENDANTS, OR DEFENDANTS' COUNSEL TO ASK QUESTIONS ABOUT THIS CLASS ACTION OR THIS NOTICE. THEY CANNOT ANSWER ANY QUESTIONS OR DISCUSS THE CLASS ACTION.

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