

## IMPORTANT CLASS ACTION NOTICE

**19th Judicial District Court for the Parish of East Baton Rouge, Louisiana**  
*Anna Ardoin v. GoAuto Insurance Company*, Case No. 719102, Div. 23

**A court authorized this Notice.  
 This is not a solicitation from a lawyer.  
 You are not being sued.**

PLEASE READ THIS NOTICE CAREFULLY.

*PARA UNA NOTIFICACIÓN EN ESPAÑOL, VISITAR [www.ArdoinTotalLossSettlement.com](http://www.ArdoinTotalLossSettlement.com).*

If your automobile was determined to be a total loss (i.e., the damage was too extensive to warrant repair) and you previously received a monetary payment from your insurer, you may be entitled to compensation in connection with a class action settlement in *Anna Ardoin v. GoAuto Insurance Company*, Case No. 719102, Div. 23 (the “Action”). The case alleges that GoAuto Insurance Company (“Defendant” or “GoAuto”) breached its auto insurance policies by failing to pay state sales tax, registration and tag fees, title fees, and/or regulatory fees as part of the actual cash value of vehicles determined to be a total loss. This Notice explains, among other things, (1) the terms of the Settlement; (2) who is a Class Member; (3) how to submit a Claim Form for payment; (4) how to request exclusion from the Settlement; (5) how to object to the Settlement; and (6) how to get more information about the Settlement.

**YOU ARE RECEIVING THIS NOTICE BECAUSE IT APPEARS YOU ARE A MEMBER OF THE PROPOSED SETTLEMENT CLASS. IF YOU ARE A CLASS MEMBER, THIS LEGAL PROCEEDING MAY AFFECT YOUR RIGHTS.**

HELP IS AVAILABLE TO ASSIST YOUR UNDERSTANDING OF THIS NOTICE.

Visit [www.ArdoinTotalLossSettlement.com](http://www.ArdoinTotalLossSettlement.com) or call 1-888-867-9811 toll-free for more information.

### **BASIC INFORMATION**

#### **1. What is a class action and who is involved?**

In a class action, one or more people called “Class Representatives” file a lawsuit on behalf of other people who have similar claims. This avoids the necessity for a large number of people to file similar individual lawsuits and enables the court system to resolve similar claims in an efficient and economical way.

#### **2. What is this class action about?**

In this Action, Plaintiff claims that Defendant GoAuto failed to comply with statutory changes requiring it to pay Sales Tax and Transfer Fees to insureds who submitted Louisiana first-party total loss auto claims. GoAuto maintains that it complied with the terms of the insurance policies and applicable law, has numerous merits and class defenses, denies that it acted wrongfully or unlawfully, and continues to deny all material allegations.

#### **3. Why is this Notice being provided?**

You have been identified as someone who may be a “Class Member” from Defendants’ claims data because you were insured under an insurance policy issued by GoAuto and submitted a first-party physical damage claim with respect to a covered vehicle during the period May 16, 2012, through and including, May 13, 2024, that resulted in your vehicle being declared a total loss and the payment(s) made by GoAuto with respect to your claim did not include full amounts for sales tax, title fees, and/or regulatory fees.

The exact definition of the proposed Class, which has been preliminarily certified, is as follows:

All Louisiana citizens who were insured under a motor-vehicle policy issued by GoAuto in the State of Louisiana with comprehensive and/or collision coverage and submitted a covered first-party physical damage claim, and whose claim was adjusted as a total loss and resulted in a total-loss payment from GoAuto during the period of limitations through the date of class certification and who did not retain the salvage vehicle.

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This Notice explains that the Court has allowed, or preliminarily “certified,” the lawsuit described above as a class action for settlement purposes and describes Class Members’ legal rights and options in the lawsuit.

#### 4. What are the terms of the Settlement?

As a part of the Settlement, GoAuto has agreed that after the Court approves the Settlement and it becomes effective:

- a. GoAuto will pay for unpaid Sales Tax and Transfer Fees to eligible Settlement Class Members who submit a claim. The payment is the full amount sought in the case. Claim payments will be the full amount of Sales Tax based on the garage location and date of loss or the average tax rate for the state, and all covered Transfer Fees (i.e., title, handling, plate) reasonably necessary to be paid upon the purchase of a replacement vehicle in Louisiana, less your pro rata share of attorneys’ fees and costs.
- b. GoAuto also will not contest an application for payment of attorneys’ fees and costs of up to \$3,500,000.00.
- c. GoAuto will pay a service award of \$10,000.00 to the Class Representative.

In exchange, Plaintiff and the Class Members who do not exclude themselves from the Settlement agree to give up any claim they have arising out of or relating to the payment of taxes or fees on the settlement of total-loss claims in the Class Periods. If you are a Class Member, you can submit a Claim Form to be eligible to be paid. Alternatively, you may, if you wish, request to be excluded from the Settlement, which means you are not eligible for payment, and you maintain your right to sue Defendants individually and separately for claims arising from or relating to Defendants’ payment of taxes or fees in the handling or administering claims for coverage of total loss payments. You may also object to the terms of the Settlement, if you comply with the requirements set forth below. This settlement does not affect any claims related to any alleged undervaluation of the total loss vehicle.

#### 5. What are my options?

If you are a Class Member, you have the following options:

##### **Option 1: Submit a Claim Form for Payment**

You may submit a Claim Form to obtain a monetary payment in connection with the unpaid Sales Tax and Transfer Fees applied in your total loss claim payment. If you received a Notice in the mail, the Notice included a pre-filled Claim Form with one question. You can submit a claim by answering the question, signing the Claim Form, carefully tearing at the perforation, and mailing the Claim Form or you may submit your Claim Form online at [www.ArdoinTotalLossSettlement.com](http://www.ArdoinTotalLossSettlement.com). You may also have received an Email Notice. If so, you may follow the directions in the Email Notice to submit a claim online at [www.ArdoinTotalLossSettlement.com](http://www.ArdoinTotalLossSettlement.com). If you did not receive a Claim Form or Email Notice, you can call 1-888-867-9811 or visit [www.ArdoinTotalLossSettlement.com](http://www.ArdoinTotalLossSettlement.com) and request that the Settlement Administrator send you a Claim Form as described above (or a blank form that you will need to fill out).

You can also submit an electronic Claim Form by visiting [www.ArdoinTotalLossSettlement.com](http://www.ArdoinTotalLossSettlement.com), clicking the SUBMIT A CLAIM button, and following the steps outlined for you. You will need your full name and policy number in order to submit a claim if you did not receive a mailed Claim Form or Email Notice.

If you submit a Claim Form in the mail, it must be **postmarked** no later than **September 11, 2025**. If you submit an electronic Claim, you must do so by 11:59 p.m. on **September 11, 2025**.

##### **Option 2: Exclude yourself from the Settlement**

You can choose not to be part of the Settlement by excluding yourself or “opting out” of the Settlement Class. If you wish to exclude yourself, you must do so on or before **July 12, 2025**, as described below. You do not need to hire your own lawyer to request exclusion from the Settlement Class. If you exclude yourself from the Settlement Class, you give up your right to receive any benefits as part of this Settlement, and you will not be bound by any judgments or orders of the Court, whether favorable or unfavorable. However, you will keep your right to sue any of the Defendants separately in another lawsuit if you choose to pursue one.

To exclude yourself from this lawsuit and preserve your right to bring a separate case, you must make a request to be excluded in writing and, with sufficient postage, mail the request to the following:

Ardoin Total Loss Settlement Administrator  
P.O. Box 3748  
Portland, OR 97208-3748

**Questions? Call 1-888-867-9811 or visit [www.ArdoinTotalLossSettlement.com](http://www.ArdoinTotalLossSettlement.com).**

A request for exclusion must be postmarked on or before **July 12, 2025**.

Your request for exclusion must contain the following:

1. The name of the Action, *Anna Ardoin v. GoAuto Insurance Company, Case No. 719102, Div. 23*;
2. Your full name;
3. Your current address;
4. A clear statement that you wish to be excluded from the Settlement Class, such as, “I request exclusion from the Settlement Class;” and
5. Your signature.

The Settlement Administrator will file your request for exclusion with the Court. If you are signing on behalf of a Class Member as a legal representative (such as an estate, trust, or incompetent person), please include your full name, contact information, and the basis for your authority. A request for exclusion must be exercised individually and not on behalf of a group.

IF YOU DO NOT EXCLUDE YOURSELF FROM THE SETTLEMENT CLASS BY THE POSTMARK DEADLINE OF JULY 12, 2025, YOU WILL REMAIN PART OF THE SETTLEMENT CLASS AND WILL BE BOUND BY THE ORDERS OF THE COURT IN THIS LAWSUIT AND BY THE TERMS OF THE SETTLEMENT IF IT IS APPROVED BY THE COURT, EVEN IF YOU DO NOT SUBMIT A CLAIM FORM FOR PAYMENT. IF YOU DO NOT WISH TO BE BOUND BY THE DECISIONS OR SETTLEMENT IN THIS CASE, YOU MUST REQUEST EXCLUSION FROM THE CLASS ACTION.

### **Option 3: Object to the Terms of the Settlement**

The full terms of the Settlement can be found at [www.ArdoinTotalLossSettlement.com](http://www.ArdoinTotalLossSettlement.com). If you think the terms of the Settlement are not fair, reasonable, or adequate to the Class Members, you may file a written objection to the terms of the Settlement. If you object to the terms of the Settlement, you cannot request exclusion from the Settlement. If you object to the terms of the Settlement and your objection is overruled, you will be bound by the terms of the Settlement and all rulings and orders from the Court.

To properly object to the terms of the Settlement, you must send, with sufficient postage, a written objection to the terms of the Settlement. The written objection must include the following:

1. The name of the Action. *Anna Ardoin v. GoAuto Insurance Company, Case No. 719102, Div. 23*;
2. The objector’s full name, address and telephone number;
3. All grounds for the objection, accompanied by any legal support for the objection known to the objector or objector’s counsel;
4. The number of times the objector has objected to a class action settlement within the five years preceding the date that the objector files the objection, the caption of each case in which the objector has made such objection, and a copy of any orders related to or ruling upon the objector’s prior objections that were issued by the trial and appellate courts in each listed case;
5. The identity of all counsel who represent the objector, including any former or current counsel who may be entitled to compensation for any reason related to the objection to the Settlement or fee application;
6. The number of times in which the objector’s counsel and/or counsel’s law firm have objected to a class action settlement within the five years preceding the date of the filed objection, the caption of each case in which counsel or the firm has made such objection and a copy of any orders related to or ruling upon counsel’s or the counsel’s law firm’s prior objections that were issued by the trial and appellate courts in each listed case in which the objector’s counsel and/or counsel’s law firm have objected to a class action settlement within the preceding five years;
7. All agreements that relate to the objection or the process of objecting—whether written or oral—between objector or objector’s counsel and any other person or entity;
8. The identity of all counsel (if any) representing the objector who will appear at the Final Approval Hearing (you may have an attorney enter an appearance and present your objections for you);
9. A list of all persons who will be called to testify at the Final Approval Hearing in support of the objection;
10. A statement confirming whether the objector intends to personally appear and/or testify at the Final Approval Hearing, which is currently scheduled to take place on **August 11, 2025**, at 9:00 a.m. CDT at 19th Judicial District Court, 300 North Boulevard, Baton Rouge, LA 70801 (location and date are subject to change—please check [ArdoinTotalLossSettlement.com](http://ArdoinTotalLossSettlement.com) for any updates); and
11. The objector’s signature (an attorney’s signature is not sufficient).

You must submit your objection to all the people listed below, postmarked no later than **July 12, 2025**.

**Questions? Call 1-888-867-9811 or visit [www.ArdoinTotalLossSettlement.com](http://www.ArdoinTotalLossSettlement.com).**

<p><b>Edmund Normand</b> NORMAND, PLLC 3165 McCrory Place, Suite 175 Orlando, FL 32803</p>	<p><b>Jason Burge</b> FISHMAN HAYGOOD, LLP 201 St. Charles Avenue, Suite 4600 New Orleans, LA 70170</p>
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If you object, you may be subject to discovery requests, such as answering questions in writing, producing documents, or providing testimony consistent with the Louisiana Rules of Civil Procedure.

Any objection that is not postmarked by the deadline set forth above or which does not comport with the requirements listed above may waive the right to be heard at the Final Approval Hearing. If you file an objection, you waive the right to request exclusion from the Settlement and will be bound by any decisions and orders from the Court and by the terms of the Settlement if it is approved by the Court. If you do not want to be bound by the decisions and rulings by the Court and the terms of the Settlement, you must file a request for exclusion and not a notice of intent to object.

**Option 4: Do Nothing. Stay in the Case.**

You have the right to do nothing. If you do nothing, you will be bound by the terms of the Settlement and will release any claim against GoAuto related to Defendant's handling or administering of claims for coverage of total loss sales tax and transfer fee payments in Louisiana, even if you do not submit a Claim for payment. You will not receive a payment if you do nothing.

The Court has preliminarily appointed Plaintiff Anna Ardoin to be the Class Representative. The Court has also preliminarily appointed the following lawyers as Class Counsel for the Settlement Class:

**Edmund Normand**  
Florida Bar No. 0865590  
NORMAND PLLC  
3165 McCrory Place, Suite 175  
Orlando, FL 32803  
Telephone: (407) 603-6031  
Facsimile: (888) 974-2175  
normandpll.com

**Scott Edelsberg**  
Florida Bar No. 100537  
**Adam Schwartzbaum**  
Florida Bar No. 93014  
EDELBERG LAW, P.A.  
20900 NE 30th Ave, Suite 417  
Aventura, FL 33180  
Tel: (305) 975-3320  
edelsberglaw.com

**Andrew J. Shamis**  
Florida Bar No. 101754  
SHAMIS & GENTILE, P.A.  
14 N.E. 1st Ave., Ste. 705  
Miami, FL 33132  
Tel: (305) 479-2299  
shamisgentile.com

**Soren E. Gisleson,**  
La. Bar No. 26302  
HERMAN HERMAN & KATZ, LLC  
909 Poydras St., Suite 1860  
New Orleans, Louisiana 70112-4060  
Office: 504-581-4892  
hhklawfirm.com

These lawyers are experienced in handling class action lawsuits, including actions on behalf of insured policyholders. More information about Class Counsel is available on their websites above.

Class Counsel will file an application for attorneys' fees and costs of \$3,500,000.00, with all amounts to be approved by the Court. Defendant has agreed not to object to such application and to pay these amounts if approved by the Court and if the Settlement becomes final. Class Counsel will also seek a Service Award for the Class Representative in the amount of \$10,000.00, which Defendant has agreed not to oppose, also subject to Court approval. The Service Award is designed to reward the Class Representative for securing the recovery awarded to Class Members and to acknowledge the time spent by the Plaintiff participating in the case, mediation, and prosecuting the claims for the benefit of the Settlement Class.

You will not be personally responsible for any fees, costs, or expenses incurred by Class Counsel relating to the prosecution of this case. However, a proportionate deduction for such fees, costs, and Class Representative Service Awards will be made to Settlement Payments.

**6. What claim(s) against Defendants are Class Members releasing?**

As a part of the Settlement, Class Members agree not to sue Defendant by asserting any claim arising out of or relating to the payment of taxes or covered transfer fees in connection with the settlement of total-loss claims in the

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relevant jurisdiction during the Class Period. Unless you request exclusion from the Settlement Class, you give up the right to individually sue the Defendant and claim you were underpaid as part of your total loss payment, even if you do not submit a Claim for payment as part of this Settlement. You are not releasing any other claim against the Defendant. Full terms of the Released Claims and Released Parties can be found in the proposed Settlement Agreement and Release at [www.ArdoinTotalLossSettlement.com](http://www.ArdoinTotalLossSettlement.com).

## **7. How do I find out more about this lawsuit?**

If you have any questions about the lawsuit or any matter raised in this Notice, please go to [www.ArdoinTotalLossSettlement.com](http://www.ArdoinTotalLossSettlement.com), or call toll-free at 1-888-867-9811.

The Settlement website, [www.ArdoinTotalLossSettlement.com](http://www.ArdoinTotalLossSettlement.com), provides:

1. An electronic Claim Form submission option and directions for how to submit your Claim Form electronically;
2. The process for requesting a paper (nonelectronic) prefilled Claim Form or blank form;
3. The full terms of the Settlement;
4. Information and requirements for submitting a Claim Form, requesting exclusion, or filing an objection to the terms of the Settlement;
5. A copy of the Complaint filed by Plaintiffs and other important rulings and orders from the Court; and
6. Other general information about the Action.

You may also contact Class Counsel, whose contact information and websites are provided above.

**PLEASE DO NOT TELEPHONE OR CONTACT THE COURT OR THE CLERK OF THE COURT REGARDING THIS NOTICE.**

**Questions? Call 1-888-867-9811 or visit [www.ArdoinTotalLossSettlement.com](http://www.ArdoinTotalLossSettlement.com).**