

Legal Notice of Class Action Settlement Involving Liberty Policies.

A proposed settlement has been reached in a lawsuit called *Froeber v. Liberty Mutual Fire Insurance Co.*, No. 00C15234 in the Circuit Court of Marion County, Oregon, concerning payments to medical providers and claimants for medical treatment under certain auto policies issued by Liberty Mutual Fire Insurance Company and several affiliates (“Liberty”). If you received this notice in the mail, Liberty’s records indicate that you might be a member of a “Settlement Class.” If so, the settlement could affect your legal rights. To learn more, read this notice. For more details, call 1-866-308-7616 or visit www.froeberclaims.com.

WHAT’S THIS ABOUT?

The lawsuit alleges that Liberty improperly adjusted claims for payment of medical expenses under Medical Payments (“MedPay”) and Personal Injury Protection (“PIP”) coverages provided by personal auto policies issued in the following “Settlement States”: AL, AZ, AR, CA, CO, CT, DE, DC, GA, IL, IN, IA, KS, LA, MD, MN, MS, MO, NE, NV, NC, ND, OH, OK, OR, SC, SD, TN, TX, VA, WA, WV, and WI. Liberty denies these allegations.

WHO’S INCLUDED?

The settlement is between Liberty and a Settlement Class that includes three groups or “subclasses” of people: “Policyholders,” “Claimants,” and “Providers.” Policyholders are people who were named insureds under personal auto policies that provided PIP and/or MedPay coverage and were issued by Liberty in Settlement States between January 1, 1996, and June 9, 2005. Claimants are people who filed claims for PIP or MedPay benefits under such policies, and Providers are doctors and others who treated Claimants. “Liberty” means Liberty Mutual Fire Insurance Co., Liberty Mutual Insurance Co., The First Liberty Insurance Corp., Liberty Personal Insurance Co., Liberty Insurance Corp., Liberty Lloyds of Texas Insurance Co., LM General Insurance Co., and LM Personal Insurance Co.

WHAT THE SETTLEMENT PROVIDES.

Liberty will pay a total of up to \$6,109,585 to eligible Claimants and Providers. Also, Liberty will use agreed methods to adjust PIP and MedPay claims in the future and publicize those methods on

its website, www.libertymutual.com, and in materials provided to Policyholders, Claimants, and Providers. **Policyholders who are not Claimants or Providers will not receive cash under the settlement.** If you think that you might be a Claimant or a Provider but did not get a claim form by mail, call 1-866-308-7616 or go to www.froeberclaims.com. Claim forms for Claimants and Providers must be postmarked by **April 22, 2006**.

The settlement does not mean that Liberty acted properly or improperly, and the Court has made no such finding.

ABOUT YOUR RIGHTS.

The Court will hold a hearing on **March 8, 2006**, to consider approval of the settlement and a request by the lawyers representing Class members (including Terrell W. Oxford of Susman Godfrey, L.L.P. in Dallas, TX, and Paul M. Weiss of Freed & Weiss, LLC in Chicago, IL) for attorneys’ fees, costs and expenses of \$2,036,528, including \$15,000 in incentive fees for three Class members appointed to represent the Class: Robert Froeber, Brenda Getz, and Douglas Uhl, Psy.D. All such fees, costs, and expenses will be paid by Liberty. You or your own lawyer may ask to appear and speak at the hearing, at your own cost, but you don’t have to. If the settlement is approved, however, it will release Liberty from liability for the claims alleged in the case. The settlement agreement available at www.froeberclaims.com explains this fully.

If you don’t want to be legally bound by this settlement, you must exclude yourself by **February 22, 2006**. If you don’t exclude yourself, you won’t be able to sue Liberty about the claims in this case ever again. If you do not exclude yourself, you may object to the settlement by **February 22, 2006**. The detailed notice explains how to exclude yourself or object.

To learn more, call, go to the website, or write Liberty Froeber Claims, P.O. Box 2003, Chanhasen, MN 55317-2003.

1-866-308-7616
www.froeberclaims.com