

If you own or owned a UL or VUL life insurance policy issued or insured by ReliaStar Life Insurance Company or its predecessors, you may be eligible for a payment in a class action settlement

A court authorized this notice. This is not a solicitation from a lawyer.

- A proposed settlement has been reached in a class action lawsuit called *PHT Holding I LLC, et al. v. ReliaStar Life Insurance Company*, Case No. 0:18-cv-2863-DWF-TNL (D. Minn.) (the “Settlement”).
- PHT Holding I LLC and Alice Curtis (“Plaintiffs”) allege that ReliaStar Life Insurance Company (“Defendant”) violated its contractual commitment to policyholders by imposing unlawful cost of insurance (“COI”) and waiver rider (“Rider”) charges on certain universal life (“UL”) and variable universal life (“VUL”) policy owners. Defendant denies Plaintiffs’ claims and any and all liability or wrongdoing. The Court has not decided who is right or wrong. Instead, both parties have agreed to the Settlement.
- If the Court approves the Settlement, Class Members will be eligible to receive payment from a cash Settlement Fund of \$39 million, as further detailed in Section 10 of this Notice.
- In addition, Defendant agrees that for a period of seven years after the Court finally approves the Settlement or January 1, 2024, whichever is earlier, current COI rate scales for the Class Members’ policies will not be increased. Defendant further agrees that it will never take any legal action that seeks to void, rescind, cancel, have declared void, or seeks to deny coverage under or deny a death claim for any Class Policy based on: (1) an alleged lack of valid insurable interest under any applicable law or equitable principles; or (2) any misrepresentation allegedly made on the application for, or otherwise made in applying for the policy, as outlined in the Settlement Agreement available at www.ReliaStarCOILitigation.com.
- You are a Class Member if you are:
 1. A current or former owner of universal life policies issued on the following Policy Forms issued or insured by Defendant, or its predecessors, during the Class Period: 82-358, 82-500, 82-501, 82-502, 82-503, 82-508, 82-509, 83-187, 83-300, 83-301, 83-302, 83-303, 83-304, 83-305, 83-306, 83-307, 83-308, 83-309, 10820, 10820PA, 10830, 10830 PA, 10840, 10890, 10910, 10980, 10980MN, 11021F, 11021FMN, 11060, 11060MN, 11060-U, 11060-P, 11065, 11260, 11260MN, 11265, 73853-0, and 614680. Excluded are owners of policies issued in Alaska, Arkansas, New Mexico, New York, Virginia, Washington, and Wyoming, policies listed on the Court’s docket 149-2 (filed May 28, 2021) and attached in Exhibit A, and policies owned by ReliaStar, its officers and directors, members of their immediate families, and their heirs, successors or assigns.
 2. A current or former owner of universal life policies issued on the following Policy Forms issued or insured by Defendant, or its predecessors, during the Class Period who were assessed Rider charges during the Class Period: 10830 and 10910, excluding policies issued in Alaska, Arkansas, New Mexico, New York, Virginia, Washington, and Wyoming, and policies owned by ReliaStar, its officers and directors, members of their immediate families, and their heirs, successors or assigns.

The Class Period is defined in Section 7 of this Notice.

- Your legal rights are affected whether or not you act. ***Please read this Notice carefully.***

YOUR LEGAL RIGHTS AND OPTIONS

Do Nothing	<ul style="list-style-type: none"> • Get certain benefits from the Settlement. You will automatically receive a payment in the mail if you are entitled to one. 	
Object	<ul style="list-style-type: none"> • Tell the Court what you do not like about the Settlement. If you are in the Class and the Settlement becomes final, you will still receive a payment. <p>The purpose of an objection to the Settlement is to persuade the Court not to approve the proposed Settlement. A successful objection to the Settlement may mean that the objector and other members of the Class are not bound by the Settlement.</p>	Filed and served by October 5, 2023

- You may not exclude yourself from ("opt-out" of) the case at this time. The deadline for opting out has passed.
- Your rights and options are explained in this Notice. Court dates and deadlines may be moved, cancelled, or otherwise modified, so please check www.ReliaStarCOILitigation.com regularly for updates and further details.
- The Court in charge of this case still has to decide whether to approve the Settlement. Payments will be made if the Court approves the Settlement and after any appeals are resolved. Please be patient.

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BASIC INFORMATION

1. Why was this Notice issued?

You have a right to know about a proposed Settlement and your rights and options before the Court decides whether to approve the Settlement.

Judge Donovan W. Frank of the United States District Court for the District of Minnesota (the “Court”) is in charge of this case. The case is called *PHT Holding I LLC, et al. v. ReliaStar Life Insurance Company*, Case No. 0:18-cv-2863-DWF-TNL (D. Minn.). The Plaintiffs are PHT Holding I LLC and Alice Curtis. The company they sued, ReliaStar Life Insurance Company, is called the Defendant.

2. What is this lawsuit about?

The class action lawsuit alleges that Defendant breached its contracts with certain policy owners. Plaintiffs allege that Defendant breached the COI Class Policies because Defendant imposed COI charges that were not based on Defendant’s expectations as to future mortality experience, and that Plaintiffs and members of the COI Class have been damaged as a result. Plaintiffs further allege that Defendant breached the Rider Class Policies by deducting Rider charges using rates that exceed the Rider rates expressly set forth in the Rider Class Policies. Defendant denies Plaintiffs’ claims and asserts multiple defenses; however, both sides have agreed to the Settlement to avoid the risks, costs, and delays of further litigation, including an appeal, so that people affected will get a chance to receive compensation.

3. Which life insurance policies are affected by the lawsuit?

UL (including VUL) policies insured by ReliaStar written on the following policy forms which were assessed COI charges during the Class Period: 82-358, 82-500, 82-501, 82-502, 82-503, 82-508, 82-509, 83-187, 83-300, 83-301, 83-302, 83-303, 83-304, 83-305, 83-306, 83-307, 83-308, 83309, 10820, 10820PA, 10830, 10830 PA, 10840, 10890, 10910, 10980, 10980MN, 11021F, 11021FMN, 11060, 11060MN, 11060-U, 11060-P, 11065, 11260, 11260MN, 11265, 73853-0, and 614680 are affected, as well as UL policies insured by ReliaStar written on policy forms 10830 and 10910 which were assessed Waiver Rider charges during the Class Period. Excluded are owners of policies issued in Alaska, Arkansas, New Mexico, New York, Virginia, Washington, and Wyoming, policies listed on the Court’s docket 149-2 (filed May 28, 2021), and policies owned by ReliaStar, its officers and directors, members of their immediate families, and their heirs, successors or assigns. The Class Period is defined in Section 7 of this Notice.

4. What is a class action and who is involved?

In a class action, a person(s) or entity(ies) called a “class representative(s)” sues on behalf of all individuals who have a similar claim. All these people together are a class or class members. The individuals or companies the plaintiffs sue are called the defendants. One court resolves the issues for all class members, except those who have excluded themselves from (“opted out” of) the class.

5. Why is this lawsuit a class action?

The Court decided that the breach of contract claim against Defendant in this lawsuit can proceed as a class action because it met the requirements of Rule 23 of the Federal Rules of Civil Procedure, which governs class actions in federal court. The Court found that:

- There are numerous Class Members whose interests will be affected by this lawsuit;
- There are legal questions and facts that are common to each of them;
- The Class Representatives’ claims are typical of the claims of the rest of the Class;

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- The Class Representatives and the lawyers representing the Class will fairly and adequately represent the interests of the Class;
- A class action would be a fair, efficient and superior way to resolve this lawsuit;
- The common legal questions and facts predominate over questions that affect only individual Class Members; and

In certifying the Class, the Court appointed Susman Godfrey L.L.P. as Class Counsel. For more information, visit the Important Documents page at www.ReliaStarCOILitigation.com.

6. Why is there a Settlement?

Defendant denies any and all liability or wrongdoing of any sort with regard to its COI rates and rider charges. Instead, the parties have agreed to the Settlement. The parties want to avoid the risks, costs, and delays of further litigation. The Court has not decided in favor of the Plaintiffs or the Defendant. Plaintiffs and Class Counsel think the Settlement is in the best interests of the Class and is fair, reasonable, and adequate.

THE CLASS

7. Am I part of the Class?

The Settlement resolves the claims of:

1. **The COI Class**, which consists of, subject to the exceptions provided for in the answer to Question 8 below, all current and former owners of universal life policies issued on the following Policy Forms issued or insured by ReliaStar Life Insurance Company, or its predecessors, who were assessed COI charges during the Class Period: 82-358, 82-500, 82-501, 82-502, 82-503, 82-508, 82509, 83-187, 83-300, 83-301, 83-302, 83-303, 83-304, 83-305, 83-306, 83-307, 83-308, 83-309, 10820, 10820PA, 10830, 10830 PA, 10840, 10890, 10910, 10980, 10980MN, 11021F, 11021FMN, 11060, 11060MN, 11060-U, 11060-P, 11065, 11260, 11260MN, 11265, 73853-0, and 614680.
2. **The Rider Class**, which consists of, subject to the exception provided for in the answer to Question 8 below, all current and former owners of universal life policies issued on the following Policy Forms issued or insured by ReliaStar Life Insurance Company, or its predecessors, during the Class Period who were assessed Rider charges during the Class Period: 10830 and 10910.

The "Class Period" starts on the following dates through the date of final judgment in this action:

Start Date of Class Period	Policy Issue State
October 5, 2003	Kentucky
October 5, 2008	Illinois, Indiana, Iowa, Louisiana, Rhode Island, West Virginia
October 5, 2010	Montana, Ohio
October 5, 2012	Alabama, Arizona, Connecticut, Georgia, Hawaii, Maine, Massachusetts, Michigan, Minnesota, Mississippi, Nevada, New Jersey, North Dakota, Oregon, South Dakota, Tennessee, Utah, Vermont, Wisconsin
October 5, 2013	Florida, Idaho, Kansas, Missouri, Nebraska, Oklahoma
October 5, 2014	California, Pennsylvania, Texas

8. Are there exceptions to being included?

Yes. Excluded from the Class are current or former owners of the Policies issued in Alaska, Arkansas, New Mexico, New York, Virginia, Washington, and Wyoming; Defendant ReliaStar Life Insurance Company, its officers and directors, members of their immediate families, and their heirs, successors, or assigns; and any person/entity who timely and properly opted out of the Class previously. Also excluded from the COI Class are current or former owners of the policies listed in Exhibit A.

9. What if I am still not sure if I am included?

If you are still not sure whether you are a Class Member, please visit www.ReliaStarCOILitigation.com, call the Settlement Administrator toll-free at 1-888-681-2090, or write to: ReliaStar COI Settlement Administrator, c/o JND Legal Administration, P.O. Box 91307, Seattle, WA 98111.

THE SETTLEMENT

10. What does the Settlement provide?

A Settlement Fund of \$39 million will be established for Class Members. Defendant has also agreed to the following relief that has been quantified by a life insurance expert to be worth \$8,757,089: Defendant will not:

- Increase current COI rate scales for the Class Members' policies for a period of seven years after the Court finally approves the Settlement or January 1, 2024, whichever is earlier.
- Take any legal action (including asserting as an affirmative defense or counter-claim), or cause to take any legal action, that seeks to void, rescind, cancel, have declared void, or seeks to deny coverage under or deny a death claim for any Class Policy based on: (1) an alleged lack of valid insurable interest under any applicable law or equitable principles; or (2) any misrepresentation allegedly made on the application for, or otherwise made in applying for the policy.

After payment of Class Counsel's fees (not to exceed \$15,919,029.67 or 33 1/3% of the gross benefits provided to the Class), settlement administration expenses, Class Counsel's expenses, and any Service Awards (up to \$50,000 for each of the two Plaintiffs), the Settlement Administrator will distribute the remaining amounts to Class Members in proportion to their share of the overall overcharges collected from the Class through the Class Period, with each Class Member receiving a minimum distribution of \$100. No portion of the Settlement Fund will be returned to Defendant.

More details are in a document called the Settlement Agreement, which is available at www.ReliaStarCOILitigation.com.

11. How can I get a payment?

You will automatically receive a payment in the mail if you are entitled to one. No claims need to be filed.

12. When will I get my payment?

Payments will be mailed to Class Members after the Court grants "final approval" of the Settlement and after all appeals are resolved. If the Court approves the Settlement, there may be appeals. It is always uncertain whether these appeals can be resolved and resolving them can take time. Please be patient.

THE LAWYERS REPRESENTING YOU

13. Do I have a lawyer in this case?

Yes. The Court has appointed the following lawyers as “Class Counsel.”

Steven G. Sklaver
Rohit D. Nath
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Houston, TX 77002
rweiss@susmangodfrey.com
kzuniga@susmangodfrey.com
Telephone: 713-651-9366

14. How will the lawyers be paid?

The Court will determine how much Class Counsel will be paid for fees and expenses. Class Counsel will file a motion seeking an award for attorneys’ fees not to exceed 33 1/3% of the gross benefits provided to the Class (that is, will not exceed 33 1/3% of \$47,757,089 million, which is \$15,919,029.67). In addition to seeking an award for attorneys’ fees, Class Counsel will seek reimbursement for expenses incurred or to be incurred in connection with the Settlement, as well as a Service Award up to \$50,000 for each of the two Plaintiffs for their service as the representative on behalf of the Class, to be paid from the Final Settlement Fund. You will not be responsible for direct payment of any of these fees, expenses, or awards.

15. Should I get my own lawyer?

You do not need to hire your own lawyer to pursue the claims against Defendant because Class Counsel is working on behalf of the Class. However, if you want to be represented by your own lawyer, you may hire one at your own expense and cost.

YOUR RIGHTS AND OPTIONS

16. What happens if I do nothing at all?

Those who are eligible to receive a payment from the Settlement do not need to do anything to receive payment; you will automatically receive a payment from the Settlement.

17. How can I tell the Court if I do not like the Settlement?

If you are a Class Member, you may object to the fairness, reasonableness, or adequacy of the proposed Settlement. Class Members who wish to object to any term of the Settlement must do so, in writing, by filing a written objection with the Court, Class Counsel, and Counsel for the Defendant. The Court can only approve or deny the Settlement. The Court cannot alter the terms of the Settlement. The written objection must include:

- The case name and number (*PHT Holding I LLC, et al. v. ReliaStar Life Insurance Company*, Case No. 0:18-cv-2863-DWF-TNL);
- Your full name, address, telephone number, and email address (if any);
- The policy number(s);
- A written statement of all grounds for the objection accompanied by any legal support for the objection (if any);
- Copies of any papers, briefs, or other documents upon which the objection is based;
- A list of all persons who will be called to testify in support of the objection (if any);
- A statement of whether you intend to appear at the Fairness Hearing; and
- Your or your counsel's signature.

If you intend to appear at the Fairness Hearing through counsel, the written objection must also state the identity of all attorneys representing you who will appear at the Fairness Hearing. Your objection, along with any supporting material you wish to submit, must be filed with the Office of the Court, Class Counsel, and Counsel for the Defendant at the addresses below by **October 5, 2023**.

Clerk of Court	Class Counsel	Counsel for Defendant
Clerk's Office Diana E. Murphy United States Courthouse 300 South Fourth Street Suite 202 Minneapolis, MN 55415	Steven G. Sklaver SUSMAN GODFREY LLP 1900 Avenue of the Stars, Suite 1400 Los Angeles, CA 90067-6029	Clark Johnson Kaplan Johnson Abate & Bird LLP 710 West Main Street 4th Floor Louisville, KY 40202

18. Can I still exclude myself ("opt-out") from the Settlement?

No, you may not exclude yourself at this time. The instructions and deadline for excluding yourself were provided in a prior notice, and the deadline has now passed.

If you previously excluded yourself by the August 8, 2022 deadline, you are not part of the Class and you will not receive any payment from the Settlement. If you did not previously exclude yourself by the August 8, 2022 deadline, you will be bound by any judgments in this case.

THE COURT'S FAIRNESS HEARING

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

The Court will hold a Fairness Hearing on November 16, 2023 at 12:00 p.m. CT at the Warren E. Burger Federal Building and United States Courthouse, 316 North Robert Street, St. Paul, Minnesota. At the Fairness Hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. The Court will also consider how much to pay and reimburse Class Counsel and any Service Award payment to Plaintiffs. If there are objections, the Court will consider them at this time. After the hearing, the Court will decide whether to approve the Settlement. We do not know how long these decisions will take. The date of the Fairness Hearing may change without further notice, so please check www.ReliaStarCOILitigation.com.

20. Do I have to come to the hearing?

No. But you or your own lawyer may attend at your expense. If you submit an objection, you do not have to come to Court to talk about it. As long as you filed and served your written objection on time to the proper addresses, the Court will consider it.

21. May I speak at the hearing?

Yes. You may ask the Court for permission to speak at the Fairness Hearing. To do so, you must send a letter saying that it is your "Notice of Intent to Appear." Your request must state your name, address, and telephone number, as well as the name, address, and telephone number of the person that will appear on your behalf. Your request must be filed with the Clerk of the Court and served on Class Counsel and Counsel for the Defendant listed in Section 17 no later than October 5, 2023.

GETTING MORE INFORMATION

22. How can I get more information?

This Notice summarizes the proposed Settlement. More details are in the Settlement Agreement available at www.ReliaStarCOILitigation.com. You can also call the Settlement Administrator toll-free at 1-888-681-2090, or write to:

ReliaStar COI Settlement Administrator
c/o JND Legal Administration
P.O. Box 91307
Seattle, WA 98111

PLEASE DO NOT CONTACT THE COURT

Exhibit A

1785320	005009219H	00W0001060	CBS0114895	SC1073227R
1798081	005009243H	00W0001108	CBS0114896	SC1073913R
1798861	005009279E	00W0001164	CBS0116584	SC1074002H
1804847	005009305R	00W0001194	CBS0117545	SC1074784B
1806377	005009362D	00W0001195	CBS0122127	SC1075356E
1813308	005009374H	00W0001379	CBS0127499	SC1076825H
1813756	005009440J	00W0001380	CBS0127613	SC1077009R
1816050	005009623E	00W0001388	CBS0127662	SC1078252G
1819096	005009715J	00W0001456	CBS0127710	SC1081566G
1819401	005009791G	00W0001485	CBS0128106	SC1086528D
1819678	005009803J	00W0001548	CBS0128129	SC1088074R
1820540	005009828W	00W0001551	CBS0129830	SC1088867R
1824198	005009838J	00W0001570	CBS0130607	SC1092812G
1826018	005009854J	00W0001597	CBS0131241	SC1093766B
1829179	005009865X	00W0001733	CBS0131270	SC1096002M
1829237	005010021D	00W0001767	CBS0134866	SC1096087W
1829318	005010064D	00W0001870	CBS0136345	SC1098676D
1833769	005010196X	00W0001871	CBS0136844	SC1100232E
1845164	005010220W	00W0001974	CBS0137033	SC1105556G
1851738	005010365R	00W0002078	CBS0137515	SC1107829R
1851987	005010370G	00W0002082	CBS0138291	SC1107963M
1853197	005010373R	00W0002087	CBS0138445	SC1114110G
1853209	005010393B	00W0002088	CBS0138526	SC1114153G
1853841	005010394W	00W0002105	CBS0138623	SC1114627B
1854295	005010400D	00W0002259	CBS0139721	SC1115975X
1854306	005010418G	00W0002291	CBS0139772	SC1118494M
1854716	005010456E	00W0002312	CBS0139950	SC1121201E
1855527	005010693W	00W0002401	CBS0140390	SC1121556G
1857124	005010835E	00W0002450	CBS0141919	SC1122725M
1858281	005010849D	00W0002491	CBS0143958	SC1123765R
1858750	005010910D	00W0002615	CBS0145418	SC1127939W
1860281	005010912R	00W0002681	SC0397399B	SC1129613X
1860285	005010985M	00W0002760	SC0504453R	SC1131537X
1860398	005010993M	00W0002780	SC0529878D	SC1133240D
1860518	005011019K	00W0002795	SC0534754M	SC1133962X
1860532	005011033X	00W0002838	SC0543476G	SC1134549W
1860790	005011121X	00W0002901	SC0556445G	SC1135234W
1861166	005011137J	00W0002918	SC0568452M	SC1135237G
1861247	005011138G	00W0002983	SC0573011K	SC1139445B
1861250	005011200D	00W0003016	SC0575509X	SC1145496X
1861766	005011210R	00W0003038	SC0586154K	SC1149669E
1862222	005011343H	00W0003043	SC0591531G	SC1152871D
1862454	005011421R	00W0003077	SC0595346M	SC1153269X
1862483	005011434W	00W0003082	SC0596500G	SC1154132K
1863605	005011494M	00W0003178	SC0599595R	SC1156093B
1863630	005011495J	00W0003239	SC0600336M	SC1157339J
1863648	005011501R	00W0003240	SC0601328E	SC1157592D
1864184	005011516J	00W0003430	SC0603042W	SC1158915D
1864460	005011517G	00W0003457	SC0604708M	SC1159532H
1864818	005011581W	00W0003504	SC0606449G	SC1163695R
1864830	005011638M	00W0003549	SC0614409R	SC1167824E

1865284	005011661W	00W0003550	SC0615154K	SC1168116W
1865450	005011678E	00W0003554	SC0616875D	SC1169260X
1865490	005011679B	00W0003624	SC0618125D	SC1169367X
1866846	005011716B	00W0003647	SC0618382B	SC1170291W
1867037	005011783B	00W0003756	SC0625656M	SC1172654X
1867404	005011913D	00W0003764	SC0627128D	SC1180038G
1867487	005011935B	00W0003765	SC0629079X	SC1180106B
1868067	005011943B	00W0003793	SC0634149M	SC1180702H
1868108	005011956D	00W0003796	SC0639158E	SC1180976M
1868271	005012054K	00W0003801	SC0639559D	SC1181124E
1868494	005012055H	00W0003806	SC0640583G	SC1182202D
1868861	005012072E	00W0003824	SC0641636H	SC1182216B
1869241	005012165G	00W0003825	SC0646207X	SC1182614J
1869496	005012189W	00W0003834	SC0649399E	SC1184085E
1869502	005012244J	00W0003837	SC0649925D	SC2258815B
1869510	005012265K	00W0003838	SC0654683W	SC2270165D
1869514	005012460B	00W0003889	SC0655178J	SC2271674W
1870287	005012544G	00W0003890	SC0655877K	SC2283217K
1870559	005012622M	00W0003919	SC0656407K	SC2290102B
1871218	005012679K	00W0003949	SC0660107K	SC2474438B
1871420	005012888X	00W0004027	SC0661323M	
1871436	005013072R	00W0004084	SC0666392B	
1871444	005013920H	00W0004099	SC0666637D	
1871537	005013967M	00W0004144	SC0670893B	
1871717	005013972E	00W0004256	SC0673616J	
1871742	005014006D	00W0004440	SC0673723X	
1871838	005014044B	00W0004513	SC0675424B	
1872371	005014274J	00W0004560	SC0675480K	
1873083	005014291G	00W0004585	SC0675710X	
1874209	005014392H	00W0004610	SC0675977B	
1874306	005014400G	00W0004616	SC0676073W	
1874341	005014467W	00W0004662	SC0676738G	
1874720	005014480H	00W0004765	SC0678216D	
1875292	005014490B	00W0004779	SC0682070G	
1875437	005014546B	00W0004857	SC0685057H	
1875731	005014715W	00W0004874	SC0686064D	
1875733	005014751D	00W0004968	SC0688345K	
1875816	005014801E	00W0004979	SC0688347E	
1875998	005014823D	00W0005020	SC0688355E	
1876282	005014892R	00W0005076	SC0689123M	
1877396	005014999R	00W0005092	SC0689778K	
1877526	005015224W	00W0005220	SC0691896E	
1877696	005015238R	00W0005221	SC0692403J	
1877722	005015271K	00W0005268	SC0694171K	
1878036	005015375D	00W0005284	SC0694897M	
1878305	005015727M	00W0005317	SC0695146G	
1878674	005015820E	00W0005390	SC0696846R	
1879569	005016252M	00W0005436	SC0698984B	
1879746	005016262G	00W0005536	SC0700650B	
1880405	005016291H	00W0005571	SC0701336H	
1881103	005016536J	00W0005590	SC0702905W	

1881310	005016680B	00W0005711	SC0704640K	
1881339	005016717K	00W0005724	SC0705923D	
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