IN THE COURT OF COMMON PLEAS IN FRANKLIN COUNTY, OHIO

Walter v. Meridian Security Ins. Co., Case No. 26-CV-003624

NOTICE OF CLASS ACTION SETTLEMENT

A court authorized this Class Notice. YOU ARE NOT BEING SUED.
This is not an advertisement or a solicitation.

PLEASE READ THIS CLASS NOTICE IN ITS ENTIRETY.

If your Texas home or property was insured by Meridian Security Insurance Company ("Defendant" or "Meridian") and you made a claim to Meridian for Structural Loss to your property from November 15, 2020, to November 22, 2022, this class action Settlement may affect your rights.

- A Proposed Settlement has been reached in a class action about whether Defendant properly deducted Nonmaterial Depreciation when adjusting certain Structural Loss claims in Texas.
- You may qualify for payment if you timely submit a valid Claim Form. Your legal rights are affected whether you act, or do not act. **You must submit a valid Claim Form to receive payment as part of this Settlement**. Please read this Class Notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT:	
SUBMIT A CLAIM FORM	The only way to get a payment if you qualify. The deadline to submit a claim is Wednesday, March 17, 2027.
ASK TO BE EXCLUDED	You get no payment. This is the only option that allows you to ever be part of any other lawsuit against Meridian over the legal claims in this case.
OBJECT	Write to the Court about why you do not agree with the Settlement.
GO TO A HEARING	Ask to speak in Court about the Settlement.
DO NOTHING	You get no payment. You give up rights.

- These rights and options—**and the deadlines to exercise them**—are explained in this Class Notice.
- The Court still has to decide whether to approve the Settlement. If it does, and if any appeals are resolved in favor of the Settlement, then money will be distributed to those who timely submit a valid Claim Form and qualify for payment. Please be patient.

Para una notificación en español, llamar o visitar nuestro sitio web.

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BASIC INFORMATION

1. Why was this Class Notice issued?

A court authorized this Class Notice because you have a right to know about the Proposed Settlement of this class action, including the right to claim money, and about your options regarding this Settlement, before the Court decides whether to give "Final Approval" to the Settlement. If the Court approves the Parties' Class Action Stipulation of Settlement Agreement ("Agreement"), and if any appeals are resolved in favor of the Settlement, then payments will be made to those who qualify and timely submit a valid Claim Form. This Class Notice explains this Action, the Settlement, your legal rights, what benefits are available, who may be eligible for them, and how to get them.

The Court of Common Pleas in Franklin County, Ohio is overseeing this class action. The case is known as. *Walter v. Meridian Security Ins. Co.*, Case No. 26-CV-003624. The person who sued is called the "Plaintiff," and the company she sued is called the "Defendant."

2. What is this lawsuit about?

The lawsuit claims that Defendant improperly deducted Nonmaterial Depreciation when adjusting some Texas Structural Loss claims under Texas property insurance policies.

Defendant has denied all allegations that it acted wrongfully or unlawfully.

3. Why is this a class action?

In a class action, the person called the "Representative Plaintiff" (in this case, Delilah Walter) sues on behalf of people who have similar claims. All of these people are "Class Members." One court resolves the issues for all class members, except for those who exclude themselves from the settlement class.

4. Why is there a Settlement?

The Court did not finally decide all issues in the case. By settling, the Parties avoid the cost of a trial and potentially an appeal, and the people who qualify will get compensation. The Representative Plaintiff and her attorneys think the Settlement is best for all Class Members. The Settlement does not mean that Meridian did anything wrong, no trial has occurred, and no merit determinations have been made.

WHO IS IN THE SETTLEMENT?

To see if you are eligible for benefits from this Settlement, you first have to determine if you are a Class Member.

5. How do I know if I am part of the Settlement?

If you received this Class Notice, then you have been identified as someone who is possibly a Class Member. The Settlement Class includes the following:

> All Persons who during the Class Period (1) were issued property policies in Texas by Meridian; (2) made a Structural Loss claim under Coverage A or Coverage B of the Person's policy; (3) a Symbility and/or Xactimate estimate was used in determination of the ACV Payment; and (4) from which Nonmaterial Depreciation was withheld, or that would have resulted in an ACV Payment, but for the withholding of Nonmaterial Depreciation causing the loss to drop below the applicable deductible.

"ACV Payment" is calculated by estimating the replacement cost value of the covered damage for a Structural Loss claim and subtracting the estimated Depreciation, including Nonmaterial Depreciation, and any applicable deductible.

"Nonmaterial Depreciation" means the application of the "labor," "equipment," and/or "overhead and profit" depreciation option settings in Symbility software or the application of the "depreciate removal," "depreciate non-material," and/or "depreciate O&P" option settings within Xactimate software.

"Structural Loss" means physical damage to a home, building, manufactured home, condo, rental dwelling, or other structure located in the State of Texas while covered by a commercial property, homeowners residential, manufactured home, condo, dwelling, or rental property insurance policy issued by Meridian.

6. Are there exceptions to being included?

Excluded from the Settlement Class are (a) policyholders whose claims arose under policy forms, endorsements, or riders expressly permitting the Nonmaterial Depreciation within the text of the policy form, endorsement or rider, i.e., by express use of the words "depreciation" and "labor;" (b) policyholders who received one or more ACV Payments for a claim that exhausted the applicable limits of insurance; (c) policyholders whose claims were denied or abandoned without an ACV Payment for any reason other than that the ACV Payment was not made solely because the withholding of Nonmaterial Depreciation caused the loss to drop below the applicable deductible; (d) policyholders where no Xactimate and/or Symbility estimate was generated by Meridian; (e) Meridian and its officers and directors; (f) members of the judiciary and their staff to whom this Action is assigned and their immediate families; and (g) Class Counsel and their immediate families (collectively, "Exclusions").

7. I am still not sure I am included.

If you are not sure whether you are included in the Settlement Class, you may call the toll-free number 1-877-239-8755 or visit MeridianDepreciationSettlement.com.

THE SETTLEMENT BENEFITS—WHAT YOU GET IF YOU QUALIFY

8. How much will payments be?

Under the Settlement, Defendant has agreed to pay Class Members as follows:

(a) Subject to the terms, limits, conditions, coverage limits, and deductibles of the policies, Claim Settlement Payments for members of the Settlement Class who timely file valid and completed Claim Forms by the Claims Deadline shall be equal to 51.5% of the Nonmaterial Depreciation that was withheld from ACV Payments and not subsequently paid, or that would have resulted in an ACV Payment, but for the withholding of Nonmaterial Depreciation causing the loss to drop below the applicable deductible, determined as described herein, plus simple interest of 4.875% from the first day of January of the year when the loss was reported through June 30, 2026;

(b) For Class Members identified under subsection (a) for whom all Nonmaterial Depreciation that was withheld from ACV Payments was subsequently paid, payment shall be according to the below schedule:

Amount of Nonmaterial Depreciation:	Settlement Payment:
$1 - $5,000.99	$25
$5,001 - $10,000.99	$50
$10,001 - $20,000.99	$100
$20,001 - $40,000.99	$200
$40,001 - $60,000.99	$300
$60,001 - $80,000	$400
Greater than $80,000	$500

HOW TO GET A PAYMENT—SUBMITTING A CLAIM FORM

9. How can I get a payment?

To find out whether you are eligible for payment, you must complete and return a truthful and accurate Claim Form. A copy of the Claim Form accompanies this Class Notice. If you do not submit a Claim Form, you will not receive payment and will be bound by the terms of the Settlement.

To return your Claim Form, you can either mail your Claim Form or upload your Claim Form online.

If you want to mail your completed Claim Form, your Claim Form must be postmarked no later than Wednesday, March 17, 2027, and mailed to the following address:

Barker v. Meridian Security Insurance Company
Claims Administrator
PO Box 2950
Portland, OR 97208-2950

If you want to upload your Claim Form, you can upload your Claim Form to the Settlement Website at MeridianDepreciationSettlement.com before midnight Central Time on Wednesday, March 17, 2027.

You may obtain an additional Claim Form by calling the Administrator at 1-877-239-8755 or by visiting MeridianDepreciationSettlement.com. If you sign a Claim Form as a representative of a Class Member, you must also submit written proof that you are a Legally Authorized Representative.

10. When will I get my payment?

If the Court grants "Final Approval" of the Settlement, and if any appeals are resolved in favor of the Settlement, then payment will be mailed to eligible Class Members after the claims administration process is completed. This process can take time, so please be patient.

11. What am I giving up to get a payment or stay in the Settlement Class?

Unless you exclude yourself, you are staying in the Settlement Class, and that means that you cannot sue Meridian and the Released Persons over the claims settled in this Action. It also means that all of the Court's orders will apply to you and legally bind you.

If you submit a Claim Form, or simply stay in the Settlement Class, you will agree to release all "Released Persons" of all "Released Claims." "Released Persons" and "Released Claims" are defined in the Agreement, which you can request a copy of by calling 1-877-239-8755, or you can view the Agreement at MeridianDepreciationSettlement.com.

EXCLUDING YOURSELF FROM THE SETTLEMENT

If you do not want a payment from this Settlement, and/or if you want to keep the right to individually sue Meridian about the issues in this Action, then you must take steps to get out of the Settlement. This is called excluding yourself from—or "opting out" of—the Settlement Class.

12. How do I get out of the Settlement?

To exclude yourself from the Settlement, you must mail a letter to the Administrator requesting to be excluded from the Settlement of *Walter v. Meridian Security Ins. Co.*, Case No. 26-CV-003624. Your letter must include your full name, address, and be signed.

You must mail your request for exclusion postmarked by Tuesday, November 17, 2026, to:

Barker v. Meridian Security Insurance Company
Claims Administrator
PO Box 2950
Portland, OR 97208-2950

More instructions are in Section 11 of the Agreement available at MeridianDepreciationSettlement.com. You cannot exclude yourself by phone or on the Settlement Website. The right to exclude yourself from the Proposed Settlement must be exercised individually, not as a member of a group and, except for a deceased or incapacitated Class Member, not by another Person acting or purporting to act in a representative capacity. If you request exclusion as the representative of a Class Member, you must also submit written proof that you are the Legally Authorized Representative.

13. If I do not exclude myself, can I sue Meridian for the same thing later?

No. Unless you exclude yourself, you give up any right to sue Meridian for the claims that this Settlement resolves. You must exclude yourself from the Settlement Class to sue Meridian over the claims resolved by this Settlement.

14. If I exclude myself, can I get a payment from this Settlement?

No. If you exclude yourself, you will not receive a payment from this Settlement.

THE LAWYERS REPRESENTING YOU

15. Do I have a lawyer in this case?

The Court appointed the following law firms to represent you and other Class Members as "Class Counsel": Stephen Whetstone of Whetstone Legal, LLC, Erik Peterson of Erik Peterson Law Offices, PSC, James Brandon McWherter of McWherter Scott Bobbitt PLC, and T. Joseph Snodgrass of Snodgrass Law LLC. You do not have to pay Class Counsel. If you want to be represented by your own lawyer and potentially have that lawyer appear in Court for you in this case, you may hire one at your own expense.

16. How will the lawyers be paid?

Class Counsel will ask the Court for up to $992,000 for attorneys' fees and reimbursement of their expenses and will ask the Court to award the Representative Plaintiff up to $7,500 for representing the Settlement Class as described in further detail in the Agreement. Defendant has agreed not to oppose the request for fees and expenses up to the above referenced amounts. The Court may award less than the above amounts. Defendant will separately pay the fees and expenses the Court orders. These payments will not reduce the amount distributed to Class Members. Defendant will also separately pay the costs to administer the Settlement.

OBJECTING TO THE SETTLEMENT

You can tell the Court if you do not agree with the Settlement or some part of it.

17. How do I tell the Court if I do not agree with the Settlement?

If you do not want the Court to approve the Settlement, you must file a written objection in the case with the Clerk of the Court and mail a copy to the Administrator by the deadline noted below. You must include (i) the name of the case (*Walter v. Meridian Security Ins. Co.*); (ii) case number (Case No. 26-CV-003624); (iii) your full name and address; (iv) the specific reasons why you object to the Settlement; and (v) whether you intend to appear at the Final Approval Hearing in person or through counsel. If you have a lawyer file an objection for you, he or she must follow all local rules, and you must list the attorney's name, address, bar number, and telephone number in the written objection filed with the Court and mailed to the Administrator.

If you intend to appear at the Final Approval Hearing to object to the Settlement, you must also (i) file with the Clerk of the Court a notice of intention to appear at the Final Approval Hearing by **Tuesday, November 17, 2026**; and (ii) mail copies of the notice to Class Counsel and Defendant's Counsel, postmarked by **Tuesday, November 17, 2026**. The notice must include copies of any papers, exhibits, or other evidence that you plan to present to the Court in connection with the Final Approval Hearing.

You or your lawyer may appear at the Final Approval Hearing if you have filed a written objection as provided above. The right to object to the Proposed Settlement must be exercised individually by an individual Class Member, not as a member of a group or subclass and, except in the case of a deceased or incapacitated Class Member, not by the act of another Person acting or purporting to act in a representative capacity. If you file an objection as the representative of a Class Member, you must also submit written proof that you are a Legally Authorized Representative.

File the written objection with the Clerk of the Court at the address below by **Tuesday, November 17, 2026**.	And mail a copy of the written objection to the Administrator at the following address so that it is postmarked by **Tuesday, November 17, 2026**.
Court	**Administrator**
Clerk of the Court – General (Civil) Franklin County Common Pleas Courthouse 345 S. High Street, 1st Floor Columbus, Ohio 43215	Barker v. Meridian Security Insurance Company Claims Administrator PO Box 2950 Portland, OR 97208-2950

18. What is the difference between objecting and asking to be excluded?

Objecting is simply telling the Court that you do not like something about the Settlement. You can object only if you stay in the Settlement Class. Excluding yourself is telling the Court that you do not want to be part of the Settlement Class or the Settlement. If you exclude yourself, you have no basis to object, because the case no longer affects you. If you object, and the Court approves the Settlement anyway, you will be legally bound by the result.

THE COURT'S FINAL APPROVAL HEARING

The Court will hold a hearing to decide whether to approve the Settlement. You may attend and you may ask to speak, but you do not have to.

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

The Court has scheduled a Final Approval Hearing on December 17, 2026, at 1:30 P.M. at the Court of Common Pleas in Franklin County, Ohio, Courtroom 6B, located at 345 S. High Street, Columbus, Ohio 43215. Check the Settlement Website to make sure that the location of the Final Approval Hearing has not changed, that the Final Approval Hearing has not been rescheduled, and to see whether the Court has scheduled the Final Approval Hearing to proceed via video conference or teleconference, instead of in person.

At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. If there are objections, the Court will consider them. The Court may listen to people who have asked to speak about an objection. The Court may also decide how much to award Class Counsel for fees and expenses for representing the Settlement Class and whether and how much to award the Representative Plaintiff for representing the Settlement Class. At or after the Final Approval Hearing, the Court will decide whether to approve the Settlement. It is not known how long this decision will take.

20. Do I have to come to the hearing?

You are not required to attend. If you wish to attend the Final Approval Hearing, you may come at your own expense. You may also pay your own lawyer to attend, but it is not necessary, unless you choose to have a lawyer appear on your behalf to object to the Settlement.

21. May I speak at the hearing?

If you submitted a proper and timely written objection to the Settlement, you or your lawyer acting on your behalf may speak at the Final Approval Hearing. You cannot speak at the Final Approval Hearing if you exclude yourself.

IF YOU DO NOTHING

22. What happens if I do nothing at all?

If you do nothing, you will not get any payment from this Settlement. But, unless you exclude yourself from the Settlement, you will not be able to sue Meridian for the claims resolved in this Action.

GETTING MORE INFORMATION

23. How do I get more information about the Settlement?

This Class Notice summarizes the Proposed Settlement. More details are provided in the Agreement. If you have questions or if you want to request a copy of the Agreement, call 1-877-239-8755 or visit MeridianDepreciationSettlement.com.

PLEASE DO NOT CALL OR WRITE THE COURT, THE JUDGE OR THEIR STAFF, OR MERIDIAN OR DEFENDANT'S COUNSEL FOR INFORMATION OR ADVICE ABOUT THIS SETTLEMENT.