

**BY ORDER OF THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND in  
QUEEN V. STATE FARM MUT. AUTO LIAB. INS. CO., et al.  
Case No.: 1:18-cv-02625-PWG**

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IF YOU WERE: (1) INVOLVED IN AN ACCIDENT WITH AN UNINSURED MOTORIST BETWEEN NOVEMBER 1, 2016 AND AUGUST 12, 2020 AND; (2) WERE INSURED IN MARYLAND BY STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY OR STATE FARM FIRE AND CASUALTY COMPANY:

THE SETTLEMENT OF A CLASS ACTION LAWSUIT MAY AFFECT YOUR RIGHTS.

*A Court authorized this Notice. This is not a solicitation from a lawyer.*

**What is this lawsuit about?**

Andrae Queen (“Queen”) is a Maryland resident who sued State Farm Mutual Automobile Liability Insurance Company and State Farm Fire and Casualty Company (collectively referred to as “State Farm”), alleging that, in February 2018, he was involved in an accident with an uninsured motorist. Mr. Queen’s car was damaged in the accident and he rented a replacement car while his car was being repaired. Mr. Queen alleges that when he asked State Farm as his Uninsured Motorist Insurer to reimburse the cost of the rental, State Farm refused. Mr. Queen filed his lawsuit to allege that Maryland law and his State Farm policy required State Farm to reimburse the rental car costs. State Farm denies these allegations.

The United States District Court for the District of Maryland has allowed the lawsuit to proceed as a class action, for purposes of settlement only, on behalf of a “Class” of State Farm’s Maryland policyholders. State Farm’s records indicate that you are a member of the Class. The Class is defined as: “State Farm insureds in Maryland who submitted an uninsured motorist claim for property damage between November 1, 2016 and August 12, 2020.” The Class is made up of two subgroups:

- (1) Group 1 is defined as Class Members whose policies included Rental Car Coverage and who, as part of their uninsured motorist claim, submitted a claim for rental car reimbursement during the Class Period and received payment from State Farm for a portion of the claimed rental car expenses.
- (2) Group 2 is defined as Class Members whose policies did not include Rental Car Coverage, and who were compensated by State Farm for property damage arising out of their uninsured motorist claim.

**History of the case**

Mr. Queen originally filed suit in the Circuit Court for Baltimore City. State Farm removed the case to the United States District Court for the District of Maryland. The judge in the United States District Court referred the legal questions raised by Mr. Queen to the Maryland Court of Appeals.

In July, 2020, the Maryland Court of Appeals issued a ruling in favor of Mr. Queen on the issue of State Farm’s obligation to reimburse his rental car expenses. The case was remanded to the United States District Court for further proceedings. After remand, State Farm contended that the case could not be certified or tried as a class action on behalf of all policyholders, and argued that the issue of “damages” would require individualized proof on behalf of every potential Class Member. The Court did not resolve that issue. Instead, so as to avoid the risks, uncertainties, delays, and costs of continued litigation, and after a thorough search and examination of State Farm’s records regarding uninsured motorist claims in the State of Maryland during the relevant time period, Mr. Queen and State Farm have agreed to a settlement that provides that State Farm will pay the sum of \$3,272,944.42 to a Settlement Fund to be distributed to the Class Members, based on a formula described below, less (i) attorneys’ fees and costs that may be awarded by the Court, (ii) any individual award (not to exceed \$5,000) that the Court may approve to Mr. Queen, and (iii) any costs associated with providing notice to all Class Members and the administration of the Settlement, all of which shall also be paid from the Common Fund.

The Court will hold a hearing on November 19, 2021 at 9:00 a.m. in Courtroom 4C, United States District Court for the District of Maryland, 6500 Cherrywood Ln., Greenbelt, MD 20770, to consider whether to grant Final Approval to the Settlement. You do not have to attend the hearing.

**Who represents me?**

The Court has appointed Thomas J. Minton of Goldman & Minton, P.C. ([tminton@charmcitylegal.com](mailto:tminton@charmcitylegal.com)) and David E. Tompkins of Lewis & Tompkins, P.C. ([dtompkins@lewisandtompkins.com](mailto:dtompkins@lewisandtompkins.com)) as Class Counsel who will represent your interests. You may enter your own appearance in the case, or hire an attorney at your own expense to represent you, but it is not necessary to do so. Class Counsel will ask the Court to approve payment of their fees and costs in an amount not to exceed 25% of the Settlement Fund.

### **What are my options?**

**1. DO NOTHING:** If you do nothing, and if the Court approves the Settlement, you will receive a payment from the Settlement Fund.

If you are in Group 1, State Farm's records show that you were previously reimbursed 80% of your rental car costs (up to your coverage limit) following your accident with an uninsured motorist. You will be reimbursed the **20%** of the rental car costs up to your policy limit which you previously paid, less attorneys' fees and settlement administrative costs. **You do not have to submit any documentation. The payment will be issued automatically if the Settlement is approved.**

If you are in Group 2, State Farm's records show that you were paid for damage to your vehicle following your accident with an uninsured motorist. You will receive an additional payment of **\$200** from the Common Fund, less attorneys' fees and settlement administrative costs. **You do not have to submit any documentation. The payment will be issued automatically if the Settlement is approved.**

**2. ASK TO BE EXCLUDED:** You can ask to be excluded from the lawsuit by giving a written notice stating that you want to be excluded and delivering a copy of that notice to *Queen v. State Farm* Settlement Administrator, P.O. Box 43434, Providence, RI 02940-3434 to be postmarked no later than September 30, 2021. You will need to include your name, address, and telephone number. Your request for exclusion must contain your signature and must state "**I want to be excluded from the settlement class in *Queen v. State Farm*.**" You must send a copy of your request to Thomas J. Minton, Goldman & Minton, P.C., 3600 Clipper Mill Rd., Suite 201, Baltimore, MD 21211. Mr. Minton is one of the Court-appointed counsel for the Class.

**3. OBJECT:** You can object to the class Settlement by filing, no later than September 30, 2021 a written objection with the Clerk of the United States District Court for the District of Maryland (Case No. 1:18-cv-02625-PWG), 101 W. Lombard St., Baltimore, MD 21201. All Objections must: (a) contain a heading which shows the name of the case and the case number; (b) contain the full name, address, telephone number, and signature of the Class Member or his/her counsel; (c) state the specific reasons why the Class Member objects to the Settlement; (d) state whether the objecting Class Member intends to appear at the Final Approval Hearing either in person or through counsel; and (e) confirm that if the objecting Class Member is represented by counsel, any filing complies with all applicable laws and rules for filing pleadings and documents in the United States District Court for the District of Maryland. You must send copies of your objection to:

Thomas J. Minton, Goldman & Minton, P.C., 3600 Clipper Mill Rd., Suite 201, Baltimore, MD 21211, AND to: Daniel F. Diffley, Alston & Bird, One Atlantic Center, 1201 W. Peachtree St., Suite 4900, Atlanta, GA 30309.

ADDITIONAL INFORMATION ABOUT THE SETTLEMENT CAN BE FOUND ON THE SETTLEMENT WEBSITE: [www.statefarmrentalreimbursementsettlement.com](http://www.statefarmrentalreimbursementsettlement.com) OR BY CALLING THE SETTLEMENT ADMINISTRATOR AT 1-866-208-3310.