

IN THE SUPREME COURT OF VICTORIA
AT MELBOURNE
COMMERCIAL COURT
GROUP PROCEEDINGS LIST

S ECI 2021 00930

BETWEEN:

ZOEY ANDERSON-VAUGHAN

Plaintiff

- and -

AAI LIMITED (ACN 005 297 807) and others according to
the schedule

Defendants

GENERAL FORM OF ORDER

JUDGE: The Honourable Justice Matthews

DATE MADE: 4 April 2025

ORIGINATING PROCESS: Writ filed 30 March 2021

HOW OBTAINED: On return of the plaintiffs' summons filed 27 March 2025

APPEARANCES: None required

OTHER MATTERS:

- A. This Order is authenticated by the Judge pursuant to Rule 60.02(1)(b) of the *Supreme Court (General Civil Procedure) Rules 2015 (Rules)*.

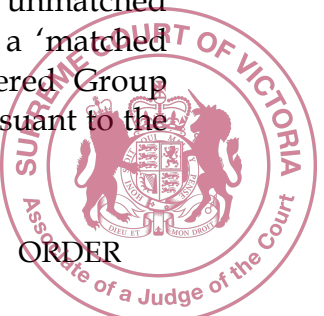
THE COURT ORDERS THAT:

Confidentiality

1. Pursuant to s 18(1)(a) of the *Open Courts Act 2013* (Vic) and/or the Court's inherent jurisdiction, pages 66-90 of Confidential Bundle **RG-3** to the affidavit of Rebecca Gilsenan affirmed 27 March 2025, being the Settlement Deed, be kept confidential and not disclosed to any persons other than the Plaintiff, her solicitors and counsel, and the Defendants, their solicitors and counsel, subject to any further order of the Court.

Deemed Registered Group Members

2. Pursuant to Order 13 made on 12 March 2024, and Orders 1 and 2 made on 2 July 2024, by the Honourable Justice Delany, any person who was an 'unmatched registrant' from Supreme Court proceeding S ECI 2020 02853 but a 'matched group member' in this proceeding, is deemed a Deemed Registered Group Member in this proceeding and is granted leave to seek a benefit pursuant to the



settlement, if the Plaintiff's application for approval of the proposed settlement of this proceeding (**Settlement Approval Application**) is approved by the Court.

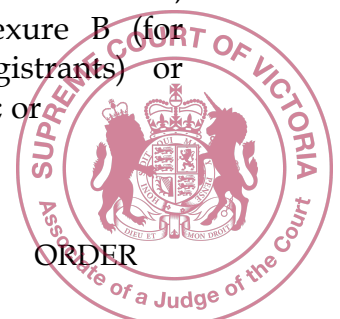
Notice to Group Members - Proposed Settlement

3. Pursuant to ss 33X(4) and 33Y(1) of the Supreme Court Act 1986 (Vic) (the **Act**), the terms of the notices and correspondence in the Annexures to these orders informing persons identified in paragraph 2 of the Further Amended Statement of Claim filed 18 October 2021, other than such persons who have opted out of the proceeding pursuant to s 33J of the Act or otherwise ceased to be a Group Member pursuant to s 33KA of the Act, (**Group Members**), of a proposed settlement of the proceeding are approved, being:
- (a) Annexure A: the Summary Notice for Registered Group Members, Deemed Registered Group Members, and Unmatched Registrants;
 - (b) Annexure B: SMS correspondence in relation to the Summary Notice;
 - (c) Annexure C: email and SMS correspondence for Deemed Registered Group Members in relation to the Summary Notice;
 - (d) Annexure D: the General Notice;
 - (e) Annexure E: email and SMS correspondence for Late Registrants;
 - (f) Annexure F: the newspaper advertisement (**Advertisement**).

Timing and Mode of Distribution of Notice

Notices intended for Registered Group Members, Deemed Registered Group Members, and Unmatched Registrants

4. Pursuant to s 33Y(2) of the Act, the Summary Notice is to be given to **Registered Group Members** (being persons identified in the 30 September 2024 letter from Maurice Blackburn to King & Wood Mallesons, which included Deemed Registered Group Members but not, for the avoidance of doubt, any Late Registrants within that list) and **Unmatched Registrants** (being persons who registered their claim in this proceeding prior to the Registration Deadlines but whose details were not matched to the **Customer Data** provided by the Defendants pursuant to Order 2(a) made by Judicial Registrar Gitsham on 6 September 2022, including any subsequent amendments to that data) according to the following procedure:
- (a) during business hours between 29 April 2025 (being the **Notice Date**) and 6 May 2025, Maurice Blackburn shall cause the Summary Notice to be sent by:
 - (i) email, where the person has provided an email as part of their registration form and, for Deemed Registered Group Members, under cover of the email correspondence in Annexure C; or
 - (ii) SMS, where the person has not provided an email address but has provided a mobile phone number as part of their registration form, under cover of the SMS correspondence in Annexure B (for Registered Group Members and Unmatched Registrants) or Annexure C (for Deemed Registered Group Members); or



- (iii) ordinary post, where the person has provided neither email nor mobile phone number as part of their registration form, but has provided their postal address; and
 - (b) the subject line of the emails in order [3.a.i] above shall be:
 - (i) for Registered Group Members and Unmatched Registrants - 'Court Notice regarding proposed settlement in the AAI & MTA Add-On Insurance Class Action'; and
 - (ii) for Deemed Registered Group Members - 'Court Notice regarding Allianz registration details and proposed settlement in the AAI & MTA Class Action'.
5. Pursuant to s 33Y(2) of the Act, the Summary Notice at Annexure A is to be published according to the following procedure:
- (a) by the Notice Date, the solicitors for the Plaintiff shall cause the Summary Notice to be posted on their website, together with:
 - (i) the Further Amended Statement of Claim dated 18 October 2021;
 - (ii) the Defence dated 17 November 2021;
 - (iii) the Reply dated 17 December 2021; and
 - (iv) these orders,

and such materials shall remain continuously displayed or available up to and including the final hearing and determination of the Settlement Approval Application.

Correspondence to Late Registrants

6. Pursuant to s 33Y(2) of the Act, the following is to be given to **Late Registrants** (being persons who registered their claim in this proceeding after the Registration Deadlines) according to the following procedure:
- (a) during business hours between the Notice Date and 6 May 2025, Maurice Blackburn shall send to each Late Registrant:
 - (i) the email correspondence to Late Registrants (Annexure E); or
 - (ii) the SMS correspondence to Late Registrants (Annexure E), where the person did not provide an email address but did provide a mobile phone number as part of their registration form; and
 - (b) the subject line of the email in order [6.a.i] above shall be 'Court Notice regarding Allianz class action – late registration'.

Notices intended for all Group Members

7. Pursuant to s 33Y(2) of the Act, by the Notice Date:
- (a) the solicitors for the Plaintiff shall cause the General Notice at Annexure D to be posted on Maurice Blackburn's publicly available website;
 - (b) the Commercial Court Registry of the Supreme Court of Victoria shall cause the General Notice to be posted on the Supreme Court of Victoria website



and available for inspection at the Commercial Court Registry of the Supreme Court of Victoria; and

- (c) The solicitors for the Plaintiff shall cause the Advertisement to be published once in each of the following newspapers:
- (i) the Adelaide Advertiser;
 - (ii) the Age;
 - (iii) the Australian;
 - (iv) the Courier-Mail;
 - (v) the Canberra Times;
 - (vi) the Mercury;
 - (vii) the Northern Territory News;
 - (viii) the Sydney Morning Herald; and
 - (ix) the West Australian.

8. The General Notice shall remain continuously displayed or available at the websites referred to in paragraphs [7(a)-(b)] up to and including the final hearing and determination of the Settlement Approval Application.

Amendments to Notices

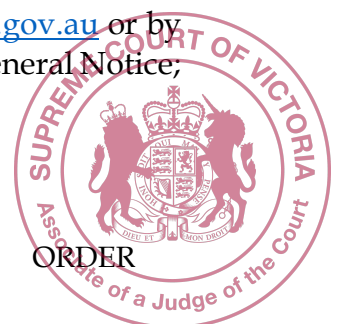
9. The materials in Annexures A to F may be amended by the solicitors for the Plaintiff before they are given or published in order to correct any typographical errors, dates, or any postal, website, email address or telephone number.
10. If the General Notice is amended by the solicitors for the Plaintiff in accordance with paragraph 9 above, a copy of the amended General Notice shall be provided to the Commercial Court Registry of the Supreme Court of Victoria as soon as possible.

Settlement Distribution Scheme

11. By 6 May 2025, the solicitors for the Plaintiff shall cause the proposed settlement distribution scheme (SDS) in redacted form to be posted on its publicly available website, with instructions provided should any Group Member want to request a copy of the SDS in unredacted form.

Objections to proposed settlement

12. Pursuant to s 33ZF of the Act, any Group Member who wishes to object to the proposed settlement:
- (a) by 4.00pm AEDT on **27 May 2025 (Objection Deadline)**, must:
- (i) complete and submit the Online Objection Notice through the Supreme Court of Victoria website; or
 - (ii) provide to the Commercial Court Registry of the Supreme Court of Victoria either by email at aaiclassaction@supcourt.vic.gov.au or by post a completed Notice of Objection as set out in the General Notice; and



(collectively, **Notices of Objection**)

- (b) must, unless the Court otherwise orders, attend (whether in person or virtually), or send a representative to attend, the Supreme Court of Victoria on **30 June 2025 at 10:00am** when the Settlement Approval Application is to be heard, and may address the Court with reasons why the proposed settlement should not be approved.
13. Each Group Member who wishes to oppose the proposed settlement in accordance with order 12 must complete the Notice of Objection or Online Notice of Objection either:
- (a) by personally signing or personally affixing their electronic signature;
 - (b) in the case of a corporation who is a Group Member, by a director of the corporation personally signing or personally affixing their electronic signature;
 - (c) by the Group Member's solicitor personally authorised to act on behalf of the Group Member personally signing or personally affixing their electronic signature as that Group Member's solicitor;
 - (d) in the case of an executor of an estate which is a Group Member, by the executor personally signing or personally affixing their electronic signature; or
 - (e) in the case of a person holding a power of attorney for a Group Member, by the attorney personally signing or personally affixing their electronic signature.
14. In the event that any Notice of Objection is received by the Defendants or the solicitors for a party prior to the Objection Deadline, the Defendants or solicitors shall within 10 business days send the Notice to the Court and the Notice shall be deemed to have been filed in the Court on the date it was received by the said Defendants or solicitors.

Inspection of Court file

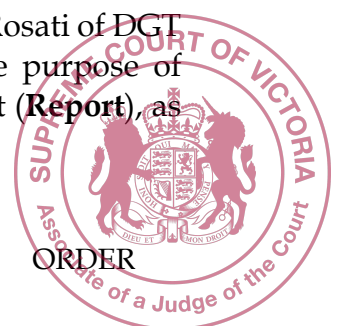
15. The parties' solicitors have leave to inspect the Court file to copy any:
- (a) Notices of Objection and submissions filed with the Court by the Objection Deadline; and/or
 - (b) Opt Out Notices and/or late opt out applications, filed with the Court by the hearing of the Settlement Approval Application.

Costs of giving notice

16. The costs of and incidental to preparation and distribution of the materials in Annexures A to F, and the costs of responding to enquiries by Group Members or potential Group Members, shall be costs in the proceeding.

Legal costs referee

17. Pursuant to s 33ZF of the Act and/or r 50.01 of the Rules, Ms Kerrie Rosati of DGT Costs Lawyers, is appointed as a special referee (**Referee**) for the purpose of conducting an inquiry (Reference), and making a report to the Court (**Report**), as



to the Referee's estimate as to the reasonable costs that are likely to be incurred during the settlement administration process.

18. The Reference will commence forthwith and:
- (a) the Referee is to consider and implement the Reference without undue formality or delay to enable a just, efficient and cost-effective resolution of the Reference;
 - (b) the Referee may give such directions and make such further or other enquiries for the purposes of the Reference as the Referee considers reasonable having regard to the terms of the Reference and the objective in order [18.a] hereof;
 - (c) any directions given by the Referee to any party for the purposes of the Reference shall be mandatory for the party (subject to other orders of the Court);
 - (d) the information provided by any party to the Referee shall, upon that party's request, be treated by the Referee as confidential and not be disclosed to any other party; and
 - (e) the Referee and parties have liberty to seek directions with respect to any matter arising in the Reference upon 24 hours' notice to each other party.
19. By 4:00 pm on 30 May 2025 the Referee shall deliver the Report to:
- (a) the Court; and
 - (b) with such redactions as may be appropriate having regard to order [18.d] above, to the solicitors for the Plaintiff,
- but shall not deliver the Report to the Defendants.
20. The costs of and incidental to the appointment of the Referee and the conduct of the Reference shall be paid as part of the administration costs (as defined in the SDS to be approved by the Court).

Adjournment

21. The hearing of the application for the further orders set out in the second return of summons below, being the hearing of the Settlement Approval Application, be adjourned to 30 June 2025 at 10:00am.

Liberty to apply

22. The parties have liberty to apply on three business days' notice to each other party.

DATE AUTHENTICATED: 4 April 2025

THE HONOURABLE JUSTICE MATTHEWS

SCHEDULE OF PARTIES

S ECI 2021 00930

BETWEEN:

ZOEY ANDERSON-VAUGHAN

Plaintiff

- v -

AAI LIMITED (ACN 005 297 807)

First Defendant

TAL LIFE LIMITED (ACN 050 109 450)

Second Defendant

MTA INSURANCE PTY LTD (ACN 070 583 701)

Third Defendant



ANNEXURE A

SUPREME COURT OF VICTORIA



SUMMARY NOTICE

PROPOSED SETTLEMENT OF AAI & MTA CLASS ACTION

1. Why did I receive this notice?

You have registered a claim in the AAI & MTA class action. The Supreme Court of Victoria has ordered that this Summary Notice be sent to you, to let you know about a proposed settlement of the case.

As someone who has registered, there is nothing that you need to do at this stage, unless you wish to object to the proposed settlement, which is explained in section 3 below.

The majority of people who registered claims in the class action have been matched to the defendants' records using information they provided during registration. Those people are '**registered group members**'.

A group of registrants have not been clearly matched to the defendants' records. These people will be contacted at a later date asking for more information and if they cannot be matched, they will not be entitled to share in the compensation.

2. The Proposed Settlement

The plaintiff and the defendants have agreed to a proposed settlement on terms that the defendants will pay **\$34 million (Settlement Sum)** without admission of liability.

The Court must approve the settlement for it to take effect. The Court will need to decide whether the proposed settlement is fair and reasonable *in the interests of the group members*.

The Court will hold a hearing to decide whether to approve the settlement on **30 June 2025**. More details about the settlement approval hearing are in the General Notice in section 4 below.



If the Court approves the settlement then:

- (a) some of the Settlement Sum will be used to pay legal costs (25% of the Settlement Sum), a reimbursement payment to the plaintiff (\$30,000), and the costs of administering payment of the Settlement Sum (estimated at \$1.5 million (incl. GST)), which also need to be approved by the Court;
- (b) the rest of the Settlement Sum will be shared proportionately between eligible registered group members, according to a 'formula' or method that the Court approves; and
- (c) all group members, whether or not they are registered group members, will be 'bound' by the settlement, meaning they will not be able to sue the defendants for issues arising from, in connection with, in respect of, or related to the claims against the defendants in the class action.

3. What are my options?

Option 1: Do nothing

If you are content with the proposed settlement, and do not want to object to it, you do not need to do anything in response to this notice.

If the proposed settlement is approved, updates will be published on Maurice Blackburn's website (see section 4 below) after the settlement approval hearing on 30 June 2025. You will be contacted at a later date with further information about anything you need to do.

We cannot provide an individual estimate of compensation amounts at this stage and you are not guaranteed to receive compensation from the Settlement Sum. Compensation amounts will depend on a range of factors including individual circumstances, such as the price of your policy, when you purchased it, and if you have already received refunds or claim payments. Claims which relate to policies purchased before 30 March 2015 will be subject to a greater reduction, due to legal issues relevant to those claims. Once again, we are not yet in a position to advise anyone of individual compensation amounts and we cannot give further information at this time. This will only be possible once the settlement distribution process is underway.

Option 2: You can object to the proposed settlement

You can object to the proposed settlement if you think it should not be approved.

If you think you might want to object then it is important that you read the General Notice in section 4 below. It explains the process and that the deadline to object is **4pm (AEST) on [DATE]**.

4. More information

You should read the General Notice: [\[link\]](#)

You can also obtain more information and other relevant documents about the AAI & MTA class action by visiting:

- (a) www.mauriceblackburn.com.au/aaiaddoninsurance



- (b) www.supremecourt.vic.gov.au/areas/group-proceedings/aai-limited

If you have any questions, you can contact Maurice Blackburn via:

- (a) aai_addonclassaction@mauriceblackburn.com.au
- (b) 1800 571 256

Please do not ask any questions to the Supreme Court of Victoria. The Court staff are not permitted to give you legal advice. If you have any questions and you do not want to speak to Maurice Blackburn, you may get independent legal advice.



ANNEXURE B

SMS correspondence for:

- **Registered Group Members (excluding Deemed Registered Group Members); and**
- **Unmatched Registrants**

Dear [Full Name]

You registered a claim in the AAI & MTA class action. The Supreme Court of Victoria has ordered the following notice about a proposed settlement of this class action to be sent to you: [\[link to Annexure A\]](#)

Please read the notice as it may affect your legal rights. There is nothing that you need to do at this stage, unless you wish to object to the proposed settlement.

Read more information, including to access copies of this notice, on Maurice Blackburn's website www.mauriceblackburn.com.au/aaiaaddoninsurance (or search online: Maurice Blackburn + AAI & MTA Class Action)



ANNEXURE C

Email and SMS correspondence for Deemed Registered Group Members

1. Email correspondence

Email subject line: Court Notice regarding Allianz registration details and proposed settlement in the AAI & MTA Class Action

Dear [Full Name]

You are receiving this email because you registered a claim in the Allianz class action conducted jointly by Maurice Blackburn and another law firm. However, it is likely that:

1. you are **not** a group member in the Allianz class action, **but**
2. you **are** a group member in this class action against AAI & MTAI, which is separate but similar to the Allianz class action and is also conducted by Maurice Blackburn.

This is because your registration details did not match Allianz's customer records, but we have identified a **preliminary match** to the defendants' customer records in the AAI & MTA class action, noting that further matching will be required at a later date. The Supreme Court of Victoria allowed Maurice Blackburn to check the registration details against the customer records in this case pursuant to a Court order.

The Court recently made an order permitting people who may have mistakenly registered in the Allianz class action to be considered as registered group members in the AAI & MTA class action. This means that **you are now a registered group member in the AAI & MTA class action**, and may be entitled to compensation.

The Supreme Court of Victoria has ordered that the following Summary Notice be sent to you, to let you know about a proposed settlement of the AAI & MTA class action: [link to Annexure A]

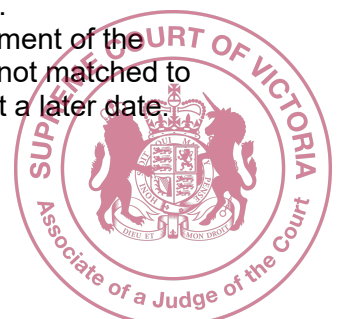
Please read the Summary Notice about the proposed settlement, including the link within the Summary Notice to the General Notice. These are important legal documents which contain information that may affect your legal rights.

As a registered group member in the AAI & MTA class action, there is nothing that you need to do at this stage, unless you wish to object to the proposed settlement. The settlement must be approved by the Court at a hearing on **30 June 2025** for it to take effect.

You can read more information, including to access copies of these notices, on Maurice Blackburn's website www.mauriceblackburn.com.au/aaiaaddoninsurance (or search online: Maurice Blackburn + AAI & MTA Class Action)

Please note:

- At this stage we cannot answer any questions about eligibility or potential compensation amounts. You will be contacted if the settlement is approved by the Court.
- You would have recently received an email regarding the proposed settlement of the Allianz class action and your registration in that case. Because you were not matched to Allianz's customer data, you will be asked to provide further information at a later date.



2. SMS correspondence

Dear [Full Name]

The Supreme Court of Victoria has made an order permitting people who may have mistakenly registered for the Allianz class action instead of the AAI & MTA class action to be considered registered group members in the AAI & MTA class action. You have been identified as one of these people, because your Allianz registration details did not match Allianz's records but we have identified a preliminary match to the defendants' records in the AAI & MTA class action. This means you are now a registered group member in the AAI & MTA class action.

The Supreme Court of Victoria has ordered the following notice about a proposed settlement of the AAI & MTA class action to be sent to you: [link]

Please read the notice as it may affect your legal rights. There is nothing that you need to do at this stage, unless you wish to object to the proposed settlement.

Read more information, including to access copies of this notice, on Maurice Blackburn's website www.mauriceblackburn.com.au/aaiaddoninsurance (or search online: Maurice Blackburn + AAI & MTA Class Action)



ANNEXURE D

SUPREME COURT OF VICTORIA



GENERAL NOTICE OF PROPOSED SETTLEMENT

AAI & MTA CLASS ACTION

ZOEY ANDERSON-VAUGHAN V AAI LIMITED & ORS

(PROCEEDING NUMBER: S ECI 2021 00930)

THIS NOTICE IS PUBLISHED BY ORDER OF THE SUPREME COURT OF VICTORIA

PLEASE READ CAREFULLY

This notice contains important information about the proposed settlement of a class action against AAI, MTA & TAL. This is an important legal document which contains information that may affect your legal rights.

1. What is this notice about?

- 1.1. The Supreme Court of Victoria has ordered that this General Notice be published for registered group members and other potential group members, to let them know about a proposed settlement of the class action.
- 1.2. Specifically, this notice provides important information about:
 - (a) the background to the AAI & MTA class action;
 - (b) the key things to know about the proposed settlement;
 - (c) whether you may be eligible to receive potential compensation; and
 - (d) what you need to do if you want to object to the proposed settlement.



2. Background information

What is a class action?

- 2.1 A class action is a legal case where one or more plaintiffs make a claim for themselves and on behalf of other people. The people make a claim together because their claims arise out of the same, similar, or related circumstances. The people represented by the plaintiff or plaintiffs are called 'group members'.

What is the AAI & MTA class action about?

- 2.2 The AAI & MTA class action is about 'add-on' insurance products that were issued by the defendants and sold at car dealerships. These insurance products are:
- (a) Loan Protection Insurance;
 - (b) Equity or Equity Plus Insurance;
 - (c) Cash Benefit Insurance;
 - (d) Extended Vehicle Warranty Insurance; and
 - (e) Tyre & Rim Insurance.
- 2.3 The class action claims that these add-on insurance products had reduced or no value and were sold to consumers in ways that breached the law.
- 2.4 The defendants deny the claims made against them in this class action.
- 2.5 The plaintiff in this class action is Zoey Anderson-Vaughan, represented by Maurice Blackburn. The defendants are AAI Limited, MTA Insurance Pty Limited (both companies in the Suncorp Group) and TAL Life Limited.
- 2.6 The trial for the AAI & MTA class action was set to commence on 24 February 2025. The parties agreed to settle the class action before the trial started. The Court must approve the settlement for it to take effect.

Am I a group member in the AAI & MTA class action?

- 2.7 Group members in the AAI & MTA class action include persons who, at any time between 1 May 2006 and 30 June 2018:
- (a) purchased or leased a vehicle from a car dealer using a loan arranged by the car dealer;
 - (b) in connection with the above, also purchased at least one of the add-on insurance products listed at paragraph 2.2 above, issued by one or more of the defendants;
 - (c) by reason of the above purchases, made payments to any of the defendants (directly or indirectly);



- (d) suffered loss or damage by reason of the alleged contravening conduct of the defendants.
- 2.8 The full group member definition is available on the websites in Part 7 below. If you meet this definition, you are a group member in this class action.
- 2.9 If you are a group member but you have previously **opted out** of the AAI & MTA class action, you may disregard this notice. By opting out you are no longer a group member.
- 2.10 Not all group members are eligible to receive potential compensation from the proposed settlement. This is explained in paragraph 3.2 below.

3. The Proposed Settlement

What are the key things to know?

- 3.1 The key things to know about the proposed settlement are:
 - (a) the defendants will pay (without admission of liability) **\$34 million (Settlement Sum)** to settle the claims in the AAI & MTA class action;
 - (b) the Court must approve the proposed settlement for it to take effect; and
 - (c) if the Court approves the settlement, the settlement will apply to **all** group members (including unregistered group members). This means that group members will not be able to sue the defendants for issues arising from, in connection with, in respect of, or related to the claims against the defendants in this class action.

Are all group members eligible to receive potential compensation?

- 3.2 No. The Court previously ordered that only group members who registered their claim by the applicable deadline (**registered group members**) would be eligible to receive compensation if the AAI & MTA class action settled before trial.
- 3.3 Group members were sent notices between March and August 2024 about the registration deadlines that applied to them. The notices made clear that group members had to register by the applicable deadlines if they wanted to receive compensation from any pre-trial settlement. The main deadline was 4pm AEST on 18 June 2024, which was extended for some persons to 4pm AEST on 21 August 2024.
- 3.4 Please note that if you wished to opt out of the proceeding, the deadline to do this was also 4pm on 18 June 2024 (or 21 August 2024 for certain persons). The opt out deadline was made clear in the notices sent to group members.

What if I did not register by the deadline?

- 3.5 If you are a group member but did not register by the deadline applicable to you, you are an **unregistered group member**. This means that, if the Court approves the proposed settlement:



- (a) you will be 'bound' by the settlement, meaning that you will not be able to bring other proceedings against the defendants in relation to any of the issues that were covered by the class action; but
- (b) you will also not be eligible to receive compensation from the settlement in this class action.

3.6 Some people submitted registrations after the applicable deadlines. The Court will be told about those late registrations. It will be a matter for the Court whether it allows those persons to be treated as registered group members.

Registrants not matched to defendants' records

3.7 The majority of people who registered claims in the class action are eligible registered group members and will be entitled to receive a share of the compensation from the Settlement Sum.

3.8 A group of registrants have not been clearly matched to the defendants' records. These people will be contacted at a later date asking for more information and if they cannot be matched they will not be entitled to share in the compensation.

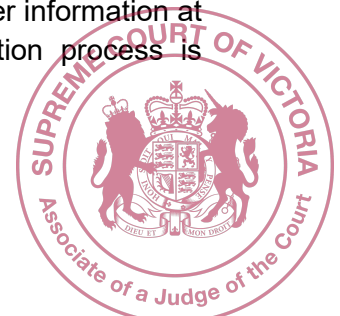
How much will registered group members receive?

3.9 For the registered group members who are entitled to share in the compensation, we are not yet able to confirm the amount that each person will be paid.

3.10 This is because:

- (a) proposed deductions from the Settlement Sum, including for legal costs, are required to be approved by the Court for them to be made (see more detail in Part 5 below); and
- (b) for the remainder of the Settlement Sum, the method to determine registered group members' eligibility and how payments are to be calculated is required to be approved by the Court for it to be applied. The plaintiff's proposed method for this process will be set out in a 'settlement distribution scheme'. Once it is finalised, a copy will be available on Maurice Blackburn's website [\[link\]](#) or by email request via aai_addonclassaction@mauriceblackburn.com.au

3.11 Registered group members are not guaranteed to receive compensation from the Settlement Sum. Compensation amounts will depend on a range of factors including individual circumstances, such as the price of your policy, when you purchased it, and if you have already received refunds or claim payments. Claims which relate to policies purchased before 30 March 2015 will be subject to a greater reduction, due to legal issues relevant to those claims. Once again, we are not yet in a position to advise anyone of individual compensation amounts and we cannot give further information at this time. This will only be possible once the settlement distribution process is underway.



4. What are my options?

Option 1: Do nothing

- 4.1 If you are content with the proposed settlement, and do not want to object to it, you do not need to do anything in response to this notice.
- 4.2 If the proposed settlement is approved, all relevant information will be published on Maurice Blackburn's website (see section 7 below) after the settlement approval hearing on **30 June 2025**. You will then be contacted at a later date with further information about anything you need to do.

Option 2: You can object to the proposed settlement

- 4.3 If you want to object to the proposed settlement, by **4pm (AEST) on 27 May 2025** you need to either:
 - (a) complete and submit the Online Objection Notice through the Supreme Court of Victoria website at: <https://www.supremecourt.vic.gov.au/areas/group-proceedings/aai-limited/online-objection> or
 - (b) complete the 'Notice of Objection' form at the end of this document, and send it to the Court by email or post at the address on the form.
- 4.4 If you object, you, or your legal representative **must** also attend the settlement approval hearing, whether in-person or virtually (unless the Court orders otherwise), which is on **30 June 2025 in the Supreme Court of Victoria**. The Court will make a Zoom link available to any objecting group members who wish to attend virtually.
- 4.5 Aside from any objecting group members, there is no requirement that any group member attend the hearing.

5. Deductions from the Settlement Sum

- 5.1 The Court will be asked to approve the following deductions from the Settlement Sum *before* the remainder is distributed to eligible registered group members.

Legal Costs

- 5.2 The Court previously made a 'group costs order', which means that unless the Court changes the order, Maurice Blackburn will be paid 25% of the Settlement Sum to cover the legal costs it incurred and the legal risks it took in running the class action.
- 5.3 Group members are not, and will not be, liable for any legal costs out of their own pocket.
- 5.4 The Court can adjust the GCO percentage at the settlement approval hearing if it considers the adjustment to be appropriate.



Plaintiff's reimbursement payment

- 5.5 The Court will also be asked to approve a 'reimbursement payment' to the plaintiff, to compensate her for her expenses, time, inconvenience and stress associated with acting as the plaintiff in the class action. The reimbursement payment is proposed to be \$30,000.

Settlement administration costs

- 5.6 The Court will be asked to appoint Maurice Blackburn as the Administrator to implement the distribution process, which will be set out in the settlement distribution scheme.
- 5.7 Regardless of who is the Administrator, there will be costs associated with the implementation of the settlement distribution scheme. The Court will be asked to authorise those costs to be paid from the Settlement Sum before the balance is shared among eligible registered group members.
- 5.8 The settlement administration costs are expected to total around \$1.5 million (incl. GST), but this is an estimate. The Court might fix a lower or higher amount if it thinks that a different figure is appropriate.
- 5.9 As part of the settlement approval process, the plaintiff will ask the Court to appoint an independent costs referee to determine whether the estimated amount of settlement administration costs is reasonable.

6. What next?

- 6.1 The Court will conduct a hearing on **30 June 2025** to decide whether to approve the proposed settlement, including how the compensation from the Settlement Sum will be distributed.
- 6.2 If it is approved, updates about next steps will be published on Maurice Blackburn's website (see section 7 below).

7. More information

- 7.1 You can obtain more information and relevant documents about the AAI & MTA class action by visiting:
- (a) www.mauriceblackburn.com.au/aaiaddoninsurance
 - (b) www.supremecourt.vic.gov.au/areas/group-proceedings/aai-limited
- 7.2 If you have any questions, you can contact Maurice Blackburn via:
- (a) aai_addonclassaction@mauriceblackburn.com.au
 - (b) 1800 571 256



- 7.3 If you have any questions, please do not contact the Supreme Court of Victoria. The Court staff are not permitted to give you legal advice.
- 7.4 If you have any questions and you do not want to speak to Maurice Blackburn, you may get independent legal advice.



NOTICE OF OBJECTION

AAI & MTA CLASS ACTION

Zoey Anderson-Vaughan v AAI Limited & Ors

(Supreme Court of Victoria S ECI 2021 00930)

ONLY COMPLETE THIS NOTICE IF YOU DO NOT WANT THE COURT TO APPROVE THE PROPOSED SETTLEMENT.

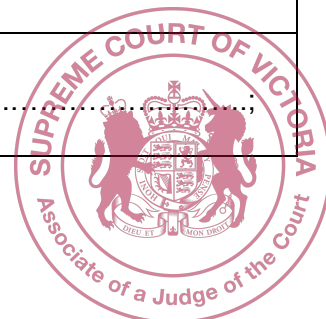
You are unable to object to the proposed settlement if you 'opted out' of the class action.

To: The Supreme Court of Victoria at:

Commercial Court Registry
Supreme Court of Victoria
210 William Street
Melbourne Victoria 3000
aaiclassaction@supcourt.vic.gov.au

A. DETAILS OF GROUP MEMBER OBJECTING

Name of Group Member OR contact name (if different from name of Group Member)	
Capacity of person completing Notice of Objection (select one)	☐ Group Member;
	☐ Director of [company name].....;
	☐ Executor for the Estate of [name].....;
	☐ Power of attorney for [name].....;
	☐ Solicitor acting for [name].....;



Postal address	
Email address	
Telephone number(s)	

B. REASONS

Explain why you object to the proposed settlement. Please include all details that you think relevant.

Please note if you are completing this form online there is a 2,000 character limit.

Continued on next page



C. SUBMISSIONS AND EVIDENCE

- ☐ I attach submissions and/or evidence in support of my objection (limited to 2 pages)
- ☐ I do not attach any submissions or evidence in support of my objection, but wish for my objection to be considered based on my reasons set out above

(please tick one of the above options)

D. ATTENDANCE AT HEARING ON 30 JUNE 2025 AT [TIME] AEST

At the hearing:

- ☐ I will appear on my own behalf
- ☐ I will be represented by a lawyer: *[insert name]*.....

(please tick one of the above options)

I or my lawyer will appear:

- ☐ virtually
- ☐ in-person

E. SIGNING OF NOTICE:

.....
Please sign notice here

Date:.....

IMPORTANT NOTE – if you want this form to be considered by the Court you must ensure that you complete this form online via the Supreme Court of Victoria website OR ensure that it reaches the Supreme Court of Victoria at the postal or email address above by **4pm (AEST) on 27 May 2025.**



ANNEXURE E

Email and SMS correspondence for late registrants

1. Email correspondence

Email subject line: Court Notice regarding AAI & MTA class action – late registration

Dear [Full name]

You registered to make a claim in the AAI & MTA class action. However, your registration was made **after** the applicable Court-ordered deadlines (which was 4pm AEST on 18 June 2024, and extended for some persons to 4pm AEST on 21 August 2024).

It was a requirement of the Court order for group members to register **before** the applicable deadlines in order to be eligible to participate in any pre-trial settlement.

The parties agreed to settle the class action before the trial was due to start on 24 February 2025.

What does this mean?

The settlement must be approved by the Court at a hearing on **30 June 2025** for it to take effect. If it is approved, then:

- all group members will be 'bound' by the settlement, meaning they will not be able to sue the defendants in relation to any of the issues that were covered by the class action; but
- only the group members who registered before the applicable deadlines will be eligible to receive potential compensation.

This means that group members who registered after the applicable deadlines are still bound, but are not eligible to receive compensation, *unless the Court makes a further order as explained in the next section.*

What next?

We will identify 'late registrants' in our evidence submitted to the Court in relation to the settlement approval.

It is a matter for the Court whether it decides to make an order to allow any late registrants to be treated as registered group members.

There is nothing you need to do at this stage. You will be told whether the Court has permitted your late registration to be accepted or not.

Please do not contact us or the Court to request late registration.

For more information on the proposed settlement and to read a copy of the General Notice to group members, please visit Maurice Blackburn's website www.mauriceblackburn.com.au/aaiaaddoninsurance (or search online: Maurice Blackburn + AAI & MTA Class Action)

Kind regards



2. SMS correspondence

Dear [Full name]

The Supreme Court of Victoria has ordered this be sent to you, because you registered in the AAI & MTA class action after the applicable deadlines (which was 4pm AEST on 18 June 2024, and extended for some persons to 4pm AEST on 21 August 2024).

The parties in the AAI & MTA class action agreed to settle this case. If the Court approves the settlement on 30 June 2025, group members who registered after the applicable deadlines are bound (meaning they will not be able to sue the defendants on the issues covered by the class action) but are not eligible to receive compensation, unless the Court makes an order allowing this.

There is nothing you need to do at this stage. You will be told whether the Court has permitted your late registration to be accepted or not. For more information and to read the General Notice to group members, visit Maurice Blackburn's website www.mauriceblackburn.com.au/aaiaddoninsurance (or search online: Maurice Blackburn + AAI & MTA Class Action)



ANNEXURE F

Newspaper advertisement

NOTICE OF PROPOSED SETTLEMENT - AAI & MTA CLASS ACTION (S ECI 2021 00930) – PUBLISHED BY ORDER OF THE SUPREME COURT OF VICTORIA

This is a notice to registered group members and other potential group members about a **proposed settlement of the AAI & MTA Class Action**.

Group members include persons who, at any time between 1 May 2006 and 30 June 2018, purchased one or more 'add-on' insurance products issued by the defendants (AAI, MTA and TAL), at or around the time they purchased or leased a vehicle from a car dealer using a loan arranged by the car dealer.

The relevant products are: **Loan Protection Insurance, Equity or Equity Plus Insurance, Cash Benefit Insurance, Extended Vehicle Warranty Insurance and Tyre & Rim Insurance**. If you are a potential group member, you should read the general notice at the links below.

The AAI & MTA Class Action alleges that these add-on insurance products had reduced or no value and were sold to consumers in ways that breached the law. The defendants deny the claims. The trial for the AAI & MTA class action was set to commence on 24 February 2025. The parties agreed to settle the class action before the trial started.

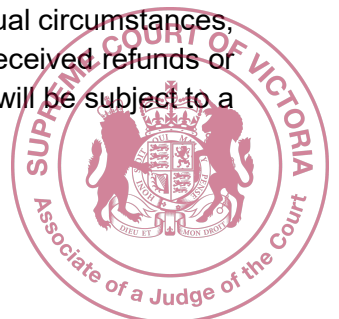
As part of the proposed settlement, the plaintiff and the defendants agreed that **the defendants will pay \$34 million (Settlement Sum)** without admission of liability.

Not all group members are eligible to receive potential compensation from the proposed settlement. The Court previously ordered that only group members who registered their claim by the applicable deadlines would be eligible to receive compensation if the AAI & MTA class action settled before the trial commenced. The main deadline was 4pm AEST on 18 June 2024, which was extended for some persons to 4pm AEST on 21 August 2024.

The Court must approve the settlement for it to take effect. The Court will hold a hearing to decide whether to approve the settlement on **30 June 2025**. If the Court approves the settlement then:

- (a) some of the Settlement Sum will be used to pay legal costs, a reimbursement payment to the plaintiff, and the costs of administering payment of the Settlement Sum, which also need to be approved by the Court;
- (b) the rest of the Settlement Sum will be shared proportionately between eligible registered group members, according to a 'formula' or method that the Court approves; and
- (c) all group members, whether or not they are registered group members, will be 'bound' by the settlement, meaning they will not be able to sue the defendants for issues arising from, in connection with, in respect of, or related to the claims against the defendants in the class action.

Registered group members are not guaranteed to receive compensation from the Settlement Sum, as compensation amounts will depend on a range of factors including individual circumstances, such as the price of your policy, when you purchased it, and if you have already received refunds or claim payments. Claims which relate to policies purchased before 30 March 2015 will be subject to a greater reduction, due to legal issues relevant to those claims.



If you are a group member but did not register by the applicable deadlines, you are an **unregistered group member**. This means that, if the Court approves the proposed settlement you will not be eligible to receive compensation from the Settlement Sum but will be 'bound' by the settlement.

If you are a group member, your options are:

1. DO NOTHING – if you are content with the proposed settlement, and do not want to object to it, you do not need to do anything in response to this notice. If the proposed settlement is approved, updates will be published on Maurice Blackburn's website. You will be contacted at a later date with further information about anything you need to do.

2. OBJECT – you can object to the proposed settlement if you think it should not be approved. If so, you should read the general notice at the links below. It explains the process and that the deadline to object is **4pm (AEST) on [DATE]**.

Please note that the deadline to opt out of the class action has passed. The main deadline was 18 June 2024 (or 21 August 2024 for a small cohort of persons).

For more information, visit:

- www.mauriceblackburn.com.au/aaiaddoninsurance
- www.supremecourt.vic.gov.au/areas/group-proceedings/aai-limited

or contact Maurice Blackburn via: aai_addonclassaction@mauriceblackburn.com.au or 1800 571 256

