

Melissa Pitkin, et al v. State Farm General Insurance Company, Case No. 3:23-CV-00924-WHO
United States District Court for the Northern District of California

If you are or were a named insured under a property insurance policy issued in California by State Farm General Insurance Company and suffered a covered loss to personal property for which you received a payment of actual cash value benefits that were reduced due to depreciation of sales tax between March 1, 2019 and July 15, 2025, a class action lawsuit may affect your rights.

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

- A class action lawsuit is pending in the United States District Court for the Northern District of California (the “Court”) against State Farm General Insurance Company (“State Farm” or “Defendant”) relating to State Farm’s calculation of Actual Cash Value (“ACV”) benefits for personal property claims where ACV benefits were reduced due to depreciation of sales tax. The lawsuit has been certified by the Court to proceed as a class action on behalf of certain State Farm insureds.
- The Class includes: all persons, who between March 1, 2019 and July 15, 2025, were or are a named insured under a property insurance policy issued in California by Defendant, who suffered a covered loss to personal property for which they received payment of ACV benefits that were reduced due to depreciation of sales tax, and who were paid or are reasonably certain to be paid benefits in an amount that is less than the applicable policy limits.
- The Court has not determined that the Defendant did anything wrong. There is no settlement or money available now, and no guarantee there will be in the future. However, if you are a class member, your legal rights are affected and you have a choice to make now.

This Notice may affect your rights. Please read it carefully.

DO NOTHING	Stay in this lawsuit. Await the outcome. Give up the right to sue separately. If you are a class member, by doing nothing, you keep the possibility of getting money or benefits that may result from a trial or a settlement. You will give up your right to sue Defendant separately about the same legal claims in this lawsuit, and you will be bound by the outcome of this lawsuit.
ASK TO BE EXCLUDED POSTMARKED BY MAY 28, 2026	Get out of this lawsuit. Get no benefits if any are available in the future. Keep your rights to sue separately. If you ask to be excluded from this lawsuit, you will not be bound by what the Court does in this lawsuit and you will keep any right you might have to sue Defendant separately about the same legal claims in this lawsuit. If money or benefits are later awarded, you will not receive any money or benefits.

- The Plaintiffs must prove their legal claims against Defendant at trial, unless a settlement is reached. If you do not ask to be excluded from the lawsuit and money or benefits are obtained from Defendant, you will be notified about how to receive your benefits.

Questions? Go to www.SFSalesTaxDepreciationLawsuit.com or call 1-877-748-5778

BASIC INFORMATION

1) Why is this Notice being provided?

You received this Notice because the Court has allowed, or “certified” a Class in this lawsuit and your rights may be affected by this lawsuit.

The Court certified a class of persons who, between March 1, 2019 and July 15, 2025 (the “Class Period”), were or are insureds under a property insurance policy issued in California by State Farm, who suffered a covered loss to personal property for which they received payment of ACV benefits that were reduced due to the depreciation of sales tax and who were paid or are reasonably certain to be paid benefits in an amount that is less than the applicable policy limits.

Judge William H. Orrick of the United States District Court for the Northern District of California is overseeing this class action. The lawsuit is called *Pitkin, et. al. v. State Farm, et al*, No. 3:23-cv-00924-WHO. The individuals who filed this lawsuit are called the “Plaintiffs” and/or “Class Representatives” and the company sued, State Farm General Insurance Company, is called the “Defendant.” More information about why the Court is allowing this lawsuit to proceed as a class action is included in the Court’s Order Certifying Class, which is available at www.SFSalesTaxDepreciationLawsuit.com.

2) Why is the lawsuit a class action?

In a class action, one or more people (called class representatives) sue on behalf of all people who have similar legal claims. Together, all these people are called a class or class members. One court resolves the issues for all class members, except for those class members who timely exclude themselves (opt out) from the class.

THE LEGAL CLAIMS IN THE LAWSUIT

3) What is this lawsuit about?

The lawsuit alleges Defendant’s calculation of ACV payments violated Section 2051(b) of the California Insurance Code which resulted in a breach of the insurance contract issued by State Farm, a breach of State Farm’s covenant of good faith and fair dealing and violations of the California Unfair Competition law, during the Class Period.

Defendant denies the Plaintiffs’ and class members’ legal claims and denies any wrongdoing or liability. Defendant further denies that Plaintiffs and class members suffered any loss as a result of Defendant’s calculation of ACV payments. Defendant also asserts that Plaintiffs’ and class members’ claims are barred or limited by legal defenses.

4) Has the Court decided who is right?

The Court has not decided whether Plaintiffs or Defendant are right. By certifying the Class and providing this Notice, the Court has not decided and is not suggesting that Plaintiffs will win or lose this lawsuit. Plaintiffs must prove their legal claims against Defendant at trial.

If a settlement of the lawsuit is reached, it will be subject to approval by the Court. You will be sent notice of any proposed settlement. Members of the Class who have not excluded themselves will have an opportunity to object to any proposed settlement, and have the ability to submit a timely and valid Claim form to request money or benefits, if applicable. You will also be sent notice following any

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judgment that may be entered after the trial of this lawsuit, or for any other reason that the Court may determine is appropriate.

Defendant's Answer to the Complaint is available at www.SFSalesTaxDepreciationLawsuit.com.

5) Is there any money available now?

No money or any other benefits are available now because the lawsuit is ongoing. There is no guarantee that money or any other benefits will be obtained in the future. You will be notified if money or benefits become available.

WHO IS INCLUDED IN THE CLASS?

6) Am I part of the Class?

The Class, as certified by the Court, consists of:

All persons who, between March 1, 2019 and July 15, 2025 (the "Class Period"), were or are insureds under a property insurance policy issued in California by Defendant, who suffered a covered loss to personal property for which they received payment of actual cash value (ACV) benefits that were reduced due to the depreciation of sales tax, and who were paid or are reasonably certain to be paid benefits in an amount that is less than the applicable policy limits.

Excluded from the Class are any Class Members who timely and validly request exclusion as explained in this Notice.

7) What if I am still not sure whether I am in the Class?

If you are still not sure whether you are included in the Class, you can obtain additional information at www.SFSalesTaxDepreciationLawsuit.com, by calling the Notice Administrator toll-free at 1-877-748-5778, or by writing to the lawyers who are representing the Parties in this lawsuit at the address below.

8) What if my address changed?

If Notice was mailed to you at an old address, or if you move, please notify the Notice Administrator of your current address by writing to:

Pitkin v. State Farm General Insurance Company.
 Notice Administrator
 PO Box 2530
 Portland, OR 97208-2530

YOUR RIGHTS AND OPTIONS

If you are a Class Member, you must decide whether to stay in the Class or ask to be excluded from the Class. If you are a member of the Class and wish to be excluded from the Class, you must follow the requirements below.

9) What happens if I do nothing at all?

If you do nothing and are a Class member, you will be legally bound by all the orders the Court issues and judgments the Court makes in this lawsuit. You do not have to do anything now if you want to

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keep the possibility of obtaining money or any other benefits from this lawsuit in the future. By doing nothing, you are staying in the Class. If you stay in the Class and Plaintiffs obtain money or any other benefit, either as a result of a court ruling or a settlement, you will be notified about how to get your share. If you do nothing now, regardless of whether Plaintiffs win or lose the lawsuit, you will not be able to sue Defendant – as part of any other lawsuit – regarding the same factual circumstances and legal claims that are the subject of this lawsuit. If you choose to remain a member of the Class, you do not need to do anything at this time other than to keep documentation related to any claims or payments from property insurance policies paid during the Class Period. If money or benefits become available in the future, members of the Class may be required to submit a Claim Form with documentation of their claims or payments from property insurance policies paid during the Class Period. For this reason, please be sure to keep all records related to any claims or payments from property insurance policies paid during the Class Period.

10) If I am a Class Member, why would I ask to be excluded?

If you want to sue Defendant on your own regarding the same legal claims in this lawsuit, do not want to be bound by what the Court does in this lawsuit, or if you simply do not want to be part of the Class pursuing legal claims against Defendant, you must ask to be excluded from the Class. If you exclude yourself from the Class – which also means to remove yourself from the Class and is sometimes called “opting out” of the Class – you will not be legally bound by the Court’s judgments in this class action, and will keep any right you may have to later sue the Defendant regarding the legal claims being made in the lawsuit. If you exclude yourself, you will not get any money or any other benefits from this lawsuit, if there are any in the future.

If you start your own lawsuit against Defendant after you exclude yourself, you will have to hire and pay your own lawyer for that lawsuit, and you will have to prove your legal claims. If you do exclude yourself so you can start or continue your own lawsuit against Defendant, you should talk to your own lawyer soon because your *legal claims may be subject to a statute of limitations*, meaning that you may face a deadline after which you cannot sue.

11) If I am a Class Member, how do I ask the Court to exclude me from the Class?

Only request exclusion if you do not wish to participate in this lawsuit, wish to keep your rights to pursue your own lawsuit or legal claims, and do not wish to share in any potential money or benefits that the Class may obtain.

Unless otherwise ordered by the Court, Class Members will not have another opportunity to exclude themselves, or otherwise opt out of this lawsuit.

If you wish to be excluded from the Class, you must send a written request clearly stating that you request exclusion from the Class in *Pitkin, et al. v. State Farm*, No. 3:23-cv-00924-WHO. Your request for exclusion must include:

- 1) Your name, address and telephone number;
- 2) The policy number of any State Farm property insurance policy issued to you during the Class Period;
- 3) The claim number(s) related to any claim made on any State Farm property insurance policy during the Class Period; and
- 4) Your personal physical signature or the signature of your authorized representative.

You must mail your exclusion request by USPS First-Class Mail, **postmarked by May 28, 2026**, to:

Pitkin v. State Farm Fire and Casualty Co.
 Notice Administrator
 PO Box 2530
 Portland, OR 97208-2530

You cannot exclude yourself from the Class by telephone or by email.

Your request for exclusion will not be valid unless it contains all of the information described above, and is **postmarked** by **May 28, 2026**, or is otherwise accepted by the Court.

“Mass” or “class” requests for exclusion filed by third parties on behalf of a “mass” or “class” of Class Members or multiple Class Members where the opt out has not been signed by each and every individual Class Member will not be allowed.

THE LAWYERS REPRESENTING YOU

12) Do I have a lawyer in this lawsuit?

As a member of the Class, you will be represented by the law firms Cotchett, Pitre & McCarthy LLP, the Murray Law Firm and Weaver & Currie, P.C. These law firms are called “Class Counsel.”

COTCHETT, PITRE & McCARTHY LLP

840 Malcolm Road, Suite 200

Burlingame, CA 94010

www.cpmlegal.com

Telephone: (650) 697-6000

tredenbarger@cpmlegal.com

WEAVER & CURRIE, P.C.

Jack W. Weaver, Esq.

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Santa Rosa, California 95403

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MURRAY LAW FIRM

Stephen B. Murray, Jr., Esq.

Thomas M. Beh, Esq.

701 Poydras Street, Suite 4250

New Orleans, Louisiana 70139

Telephone: (504) 525-8100

tbeh@murray-lawfirm.com

You may hire your own lawyer at your own cost and expense if you want someone other than Class Counsel to represent you in this lawsuit.

13) How will Class Counsel be paid?

If Class Counsel gets money or benefits for the Class, they may ask the Court for an award of attorneys’ fees and expenses. You will not have to personally pay these attorneys’ fees and expenses. If the Court grants Class Counsel’s request, the attorneys’ fees and expenses will either be deducted from any money obtained for the Class or paid separately by Defendant. If there is no money or benefits obtained for the Class, no attorneys’ fees will be requested by Class Counsel.

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14) Should I get my own lawyer?

You do not need to hire your own lawyer because Class Counsel is working on your behalf. However, if you want your own lawyer, you can hire one at your own expense. If you hire your own lawyer, your lawyer must enter an appearance on your behalf by filing a Notice of Appearance with the Court and mailing it to Class Counsel at the address above by May 28, 2026.

THE TRIAL

15) How and when will the Court decide who is right?

Class Counsel will have to prove Plaintiffs' legal claims at a trial. The trial has been scheduled for September 8, 2026. During the trial, a Jury and the Judge will hear all of the evidence to help them reach a decision about whether Plaintiffs or Defendant are right about the legal claims in the lawsuit. There is no guarantee that Plaintiffs will win, or that they will get any money for the Class.

16) Do I have to attend the trial?

No. You do not need to attend the trial. Class Counsel will present the case for the Plaintiffs and the Class, and lawyers for Defendant will present on their behalf. You or your own lawyer may attend at your own expense.

17) Will I get money after the trial?

If the Plaintiffs obtain money or benefits as a result of the lawsuit, and you remain in the Class, you will be notified about how to participate to receive money or benefits. It is unknown how long this will take.

GETTING MORE INFORMATION

18) Where can I get more information?

If you would like more detailed information regarding this action, you may contact counsel for the Parties or visit www.SFSalesTaxDepreciationLawsuit.com, by calling 1-877-748-5778 or by writing to:

Pitkin v. State Farm Fire and Casualty Co.

Notice Administrator

PO Box 2530

Portland, OR 97208-2530

You also may call the Notice Administrator's toll-free number at 1-877-748-5778.

You may also access the Court docket in this lawsuit, for a fee, through the Court's Public Access to Electronic Records (PACER) system at <https://ecf.cand.uscourts.gov>. To learn about PACER and register for a PACER account, go to <https://www.Pacer.gov/>. Once you have a PACER account, you can access and retrieve documents from the Court's docket for the Action at <https://ecf.cand.uscourts.gov/cgi-bin/login.pl>.

You can also access and retrieve documents from the Court's docket by visiting the office of the Clerk of the Court for the United States District Court for the Northern District of California, 450 Golden Gate Avenue, San Francisco, CA 94102, between 9:00 a.m. and 4:00 p.m., Monday through Friday, excluding Court holidays.

**PLEASE DO NOT TELEPHONE THE COURT OR THE COURT
CLERK'S OFFICE REGARDING THIS NOTICE.**

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