

# EXHIBIT 4

**PLAN OF ALLOCATION**<sup>1</sup>

1. Each Settlement Class Member who is the current or most recent owner of a policy according to Defendant's records ("Recipient") shall be issued a check for that policy equal to the minimum settlement relief payment plus that Recipient's *pro-rata* share of the Net Settlement Fund. No claim form or claims process will be used.
2. The minimum settlement relief payment for each policy shall be one hundred dollars (\$100.00).
3. Each Recipient's *pro-rata* share of the Net Settlement Fund after deducting all minimum relief payments shall be computed as follows:
  - a. First, each Recipient's alleged damages shall be the sum of the Recipient's alleged COI Overcharge as a result of the 2019 COI Increase.
    - i. Each Recipient's alleged COI Overcharge is the sum of the difference between the estimated COI Deduction from their Policy as determined under the COI Rate Scale applied to the Policy under the 2019 COI Rate Adjustment and the estimated COI Deduction that would have existed under the COI Rate Scale that applied to the Policy before the 2019 COI Rate Adjustment, where the COI Deduction under the 2019 COI Rate Adjustment is higher than the COI Deduction that would have applied under the previous COI Rate Scale.
  - b. Second, divide each Recipient's alleged damages by the total alleged damages for all Recipients, and
  - c. Third, multiply the resultant percentage for each Recipient by the Net Settlement Fund that remains after deducting all minimum settlement relief payments.
4. If, for a particular class policy, there are two or more Settlement Class Members reflected in GLIC's records as the current or most recent owners of a policy, then the Recipient's *pro rata* share of the Net Settlement Fund shall be divided equally among each of those Settlement Class Members for that policy.
5. If a Settlement Class Member would receive multiple checks pursuant to paragraphs 1-3 above, such checks may be consolidated into a single check.
6. Within one year plus 30 days after the date the Settlement Administrator mails the first Settlement Fund Payments, any funds remaining in the Settlement Fund shall be redistributed on a *pro rata* basis to Settlement Class Members who previously cashed the checks they received, to the extent feasible and practical in light of the costs of

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<sup>1</sup> Unless otherwise noted, all Capitalized Terms mean the same as in the Settlement Agreement, which is attached as Exhibit 2 to the Declaration of Steven G. Sklaver.

administering such subsequent payments, unless the amounts involved are too small to make individual distributions economically viable or other specific reasons exist that would make such further distributions impossible or unfair. All costs associated with the disposition of residual funds — whether through additional distributions to Settlement Class Members and/or through an alternative plan approved by the Court — shall be borne solely by the Settlement Fund.

7. The plan of allocation may be modified upon further order of the Court. Any updates to the plan of allocation will be published on the settlement administration website.