

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE: INSURANCE BROKERAGE ANTITRUST LITIGATION

APPLIES TO ALL ACTIONS

IN RE: EMPLOYEE BENEFIT INSURANCE BROKERAGE
ANTITRUST LITIGATION

APPLIES TO ALL ACTIONS

MDL No. 1663

Civil Action No. 04-cv-5184 (GEB)

Civil Action No. 05-cv-1079 (GEB)

Hon. Garrett E. Brown, Jr.

**NOTICE OF PROPOSED CLASS ACTION SETTLEMENT,
SETTLEMENT HEARING AND RIGHT TO APPEAR**

TO: All individuals or entities who, from August 26, 1994 through December 31, 2005, inclusive (the "Class Period"), engaged the services of the Arthur J. Gallagher Entities ("Gallagher") or any other Broker Defendant (both identified below) in connection with the purchase or renewal of insurance or reinsurance from any insurer

PLEASE READ THIS NOTICE CAREFULLY. IT HAS BEEN SENT TO ADVISE YOU ABOUT THE PROPOSED SETTLEMENT OF THIS CLASS ACTION AS TO GALLAGHER (THE "GALLAGHER SETTLEMENT"), AND YOUR RIGHTS WITH RESPECT TO THE GALLAGHER SETTLEMENT.

IF YOU WANT TO RECEIVE A MONETARY SETTLEMENT BENEFIT, YOU MUST COMPLETE AND SUBMIT THE ATTACHED PROOF OF CLAIM FORM (DISCUSSED MORE FULLY BELOW).

IF YOU DETERMINE YOU DO NOT WANT TO PARTICIPATE IN THE GALLAGHER SETTLEMENT, YOU MUST REQUEST EXCLUSION FROM THE GALLAGHER SETTLEMENT POSTMARKED BY NO LATER THAN JUNE 29, 2007 (AS DISCUSSED MORE FULLY BELOW).

I. BASIC INFORMATION

1. Who are the Gallagher Entities?

The Gallagher Settlement involves the following Gallagher Entities:

AJG Canada ULC	Arthur J. Gallagher Risk Management Services, Inc.	Gallagher Lambert Group
AJG Capital, Inc.	Arthur J. Gallagher Service Co. (Delaware)	Gallagher Loss Control Services, Inc.
AJG Chem Mod Holdings LLC	Arthur J. Gallagher (UK) Limited	Gallagher Re, Inc.
AJG Coal, Inc.	Arthur J. Gallagher Middle East BSC(c)	Gallagher Re Limited
AJG Coal Indiana LLC	Arthur J. Gallagher Asia Pte Ltd.	GBS Administrators, Inc.
AJG Financial Services, Inc.	Arthur J. Gallagher Asia Limited	GBS Insurance and Financial Services, Inc.
AJG Investments, Inc.	Arthur J. Gallagher (L) BHD	GBS Retirement Services, Inc.
AJG North America ULC	Arthur J. Gallagher Australasia Holdings Pty. Ltd.	Interpacific Underwriting Agencies Pty Ltd.
AJG Two Pierce, Inc. (Delaware)	Arthur J. Gallagher Reinsurance Australasia Pty Ltd.	Lamberson Koster & Co.
Artex Insurance Company Ltd	Arthur J. Gallagher (Aus) Pty Ltd.	Manning & Smith Insurance, Inc.
Artex Risk Solutions, Inc.	Australis Group (Underwriting) Pty Ltd.	MRS Holdings Limited
Artex Underwriting Managers Ltd.	Aviacargo Leasing Limited	Morgan Read & Sharman Limited
Arthur J. Gallagher	Charity First Insurance Services, Inc.	Protected Insurance Company
Arthur J. Gallagher & Co.	C.W. Excess, Inc.	Risk Management Partners Ltd.
Arthur J. Gallagher & Co. (Bermuda) Limited	Commonwealth Premium Finance Corporation	Risk Placement Services, Inc. (Illinois)
Arthur J. Gallagher & Co. (Canada) Ltd.	Connor Hale Kerslake Limited	Risk Placement Services of Arizona, Inc.
Arthur J. Gallagher & Co. (Florida)	Edwin M. Rollins Company	Risk Placement Services of Arkansas, Inc.
Arthur J. Gallagher & Co. (Illinois)	Gallagher Bassett Services, Inc. (Delaware)	Risk Placement Services of Louisiana, Inc.
Arthur J. Gallagher & Co. - Greenville	Gallagher Bassett of New York, Inc.	Risk Placement Services of Massachusetts, Inc.

**If you have any questions, please call 1-866-459-3650,
or e-mail gallagheradmin@completeclaimssolutions.com
or visit www.gallaghersettlement.com**

Arthur J. Gallagher & Co. - Little Rock
 Arthur J. Gallagher & Co. Insurance Brokers of California, Inc.
 Arthur J. Gallagher & Co. of Kentucky, Inc.
 Arthur J. Gallagher & Co. of Mississippi, Inc.
 Arthur J. Gallagher & Co. of New York, Inc.
 Arthur J. Gallagher & Co. of Tennessee, Inc.
 Arthur J. Gallagher Brokerage and Risk Management Services, LLC
 Arthur J. Gallagher Intermediaries (Bermuda) Limited
 Arthur J. Gallagher Management (Bermuda) Limited

Gallagher Bassett International Ltd. (UK)
 Gallagher Bassett Canada Inc.
 Gallagher Bassett Services Pty Ltd
 Gallagher Bassett International S.A.
 Gallagher Benefit Services, Inc.
 Gallagher Captive Services (Cayman) Limited
 Gallagher Healthcare Insurance Services, Inc.
 Gallagher Healthcare Insurance Services of Kansas City, LLC
 Gallagher Holdings Bermuda Company Limited
 Gallagher Holdings (UK) Limited

Risk Placement Services of Nevada, Inc.
 Risk Placement Services of New York, Inc.
 Risk Placement Services of Pennsylvania, Inc.
 Risk Placement Services of Texas, Inc.
 Scholastic Risk Services Limited
 Sobieski & Bradley of Nevada, Inc.
 Strand Underwriting Limited
 Western Litigation, Inc.
 Wyatt Gallagher Bassett Workers Compensation Victoria Pty Ltd.

2. Who are the Broker Defendants?

The "Broker Defendants" are insurance brokers (other than the Gallagher Entities) who are defendants in the above-caption lawsuits (the "Class Action"). The Broker Defendants are:

Acordia, Inc.
 Affinity Insurance Services, Inc.
 Aon Broker Services, Inc.
 Aon Consulting Inc.
 Aon Corporation
 Aon Group Inc.
 Aon Re, Inc.
 Aon Re Worldwide, Inc.
 Aon Risk Services Companies, Inc.
 Aon Risk Services, Inc. of Louisiana
 Aon Risk Services, Inc. of Maryland
 Aon Risk Services, Inc. of Michigan
 Aon Risk Services Inc. U.S.

Aon Risk Services of Texas, Inc.
 Aon Services Group, Inc.
 Benefits Commerce
 BB&T Corporation
 BB&T Insurance Services, Inc.
 Branch Banking and Trust Company
 Brown & Brown, Inc.
 Brown & Brown Insurance Benefits, Inc.
 Frank H. Haack & Associates
 Hilb Rogal & Hobbs Company
 Hub International Limited
 Marsh & McLennan Companies, Inc.
 Marsh Inc.

Marsh USA, Inc.
 Marsh USA Inc. (Connecticut)
 Mercer, Inc.
 Mercer Human Resource Consulting LLC
 Mercer Human Resource Consulting of Texas, Inc.
 O'Neill Finnegan & Jordan Insurance Agency, Inc.
 Seabury & Smith, Inc.
 Stewart Smith Group
 Summit Global Partners of Florida, Inc.
 Talbot Financial Corporation
 Universal Life Resources

ULR Insurance Services, Inc.
 USI Holdings Corporation
 USI Consulting Group
 USI Insurance Service Corporation
 USI Insurance Services of Florida, Inc. (d/b/a USI Florida)
 Wells Fargo & Company
 Willis Group Holdings Limited
 Willis Group Limited
 Willis North America, Inc.
 Willis of New York, Inc.
 Willis Re Inc.

owns Acordia, Inc

3. Who are the Insurer Defendants?

The "Insurer Defendants" are insurers who were defendants in the Class Action at the time the Gallagher Settlement was reached and are discussed in this Notice. The names of the Insurer Defendants are:

ACE American Insurance Co.
 ACE INA Holdings, Inc.
 ACE Limited
 ACE USA, Inc.
 AIG Life Insurance Company
 AIU Insurance Co.
 American Alternative Insurance Corp.
 American Casualty Co. of Reading, PA
 American Guarantee and Liability Insurance Co.
 American Home Assurance Co.
 American International Group, Inc.
 American International Insurance Co.
 American International Specialty Lines Insurance Co.
 American Re Corporation
 American Re-Insurance Co.
 Athena Assurance Co.
 AXIS Reinsurance Company
 AXIS Specialty Insurance Company
 AXIS Surplus Insurance Company
 Berkshire Hathaway, Inc.
 Berkshire Hathaway Insurance Group
 Birmingham Fire Insurance Co. of Pennsylvania
 Chicago Insurance Co.
 CNA Financial Corp.
 Commerce and Industry Insurance Co.
 Connecticut General Life Insurance Company
 Continental Casualty Co.
 Crum & Forster Holdings Corp.
 Empire Fire and Marine Insurance Co.
 Empire Indemnity Insurance Company

Executive Risk Indemnity Inc.
 Federal Insurance Co.
 Fidelity and Deposit Company of Maryland
 Fireman's Fund Insurance Co.
 General Re Corporation
 General Reinsurance Corp.
 Greenwich Insurance Co.
 Gulf Insurance Co.
 Hartford Financial Services Group, Inc.
 Hartford Life & Accident Insurance Company
 Hartford Life Group Insurance Company
 Hartford Life Insurance Company
 Hartford Steam Boiler Inspection and Insurance Co.
 Hartford Fire Insurance Co.
 Illinois Union Insurance Co.
 Indemnity Insurance Co. of North America
 Indian Harbor Insurance Co.
 Insurance Company of North America
 Lexington Insurance Company
 Liberty Mutual Fire Insurance Co.
 Liberty Mutual Holding Company, Inc.
 Liberty Mutual Insurance Co.
 Life Insurance Company of North America
 Metropolitan Life Inc.
 Metropolitan Life Insurance Company
 Mt. Hawley Insurance Co.
 Munich Reinsurance Co.
 Munich-American Risk Partners, Inc.
 National Surety Corp.
 National Union Fire Insurance Co. of Louisiana
 National Union Fire Insurance Co. of Pittsburgh, Pa.

New Hampshire Insurance Co.
 Nutmeg Insurance Co.
 Pacific Insurance Co., Ltd
 Paragon Life Insurance Company
 Prudential Financial, Inc.
 Prudential Insurance Company of America
 Provident Life and Accident Insurance Company
 RLI Corporation
 RLI Insurance Co.
 St. Paul Fire & Marine Insurance Co.
 St. Paul Mercury Insurance Co.
 St. Paul Travelers Companies, Inc.
 Steadfast Insurance Company
 The Chubb Corporation
 The Continental Insurance Corp.
 The Hartford Fidelity & Bonding Co.
 The Hartford Financial Services Group, Inc.
 The Insurance Company of the State of Pennsylvania
 Travelers Casualty & Surety Co. of America
 Travelers Indemnity Company
 Twin City Fire Insurance Co.
 United States Fire Insurance Co.
 Vigilant Insurance Co.
 UnumProvident Corporation
 Unum Life Insurance Company of America
 Wausau Underwriters Insurance Co.
 Westchester Surplus Lines Insurance Co.
 XL Capital Ltd.
 Zurich American Insurance Company
 Zurich Financial Services Group

4. Why did you receive this Notice?

You have received this Notice because it appears that during the Class Period you engaged the services of Gallagher and/or any other Broker Defendant in connection with the purchase or renewal of insurance or reinsurance from any insurer. Thus, you might be a member of a group of individuals and entities (the "Settlement Class") on whose behalf the Gallagher Settlement has been reached.