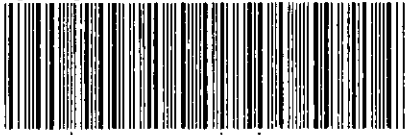


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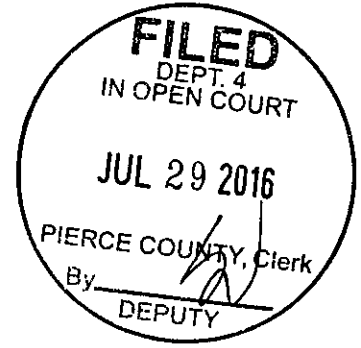
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13-2-15638-1 47330473 OR 08-01-16

EXHIBIT C



IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON FOR PIERCE COUNTY

KLAUS SNYDER, individually and as the representative of all persons similarly situated,

Plaintiffs,

v.

FARMERS INSURANCE COMPANY OF WASHINGTON and MID-CENTURY INSURANCE COMPANY,

Defendants.

No. 13-2-15638-1

ORDER OF PRELIMINARY APPROVAL OF SETTLEMENT AND APPROVAL OF NOTICE OF PENDENCY OF SETTLEMENT OF CLASS ACTION TO CLASS MEMBERS

WHEREAS Plaintiffs have made a motion for preliminary approval of a Stipulation of Settlement between the Class and Farmers Insurance Company of Washington ("Farmers") and Mid-Century Insurance Company ("Mid-Century") and (collectively "Defendants", as defined in the Stipulation of Settlement).

NOW, THEREFORE, based upon the preliminary settlement hearing held on July 29, 2016 at 9:00 a.m. and all the files, records and proceedings herein, and it appearing to the Court that a hearing should be held (on notice to the Class Members) to determine finally if the terms of the Proposed Settlement are fair, reasonable and adequate;

IT IS HEREBY ORDERED THAT:

EXHIBIT C - 1

1 For purposes of determining whether the terms of the Proposed Settlement should be
2 finally approved as fair, reasonable and adequate, and contingent upon the Settlement being
3 finally approved, substitute Plaintiffs Klaus Snyder is appointed as representatives of the Class
4 and the following counsel are designated as counsel for the Class ("Class Counsel"):

5 Scott Nealey
6 Nealey Law
7 71 Stevenson St., Suite 400
8 San Francisco, CA 94105

9 Stephen M. Hansen
10 Law Offices of Stephen M. Hansen, P.S.
11 1821 Dock Street, Suite 103
12 Tacoma, WA 98402

13 If final approval of the Proposed Settlement is not obtained, or if Final Judgment as
14 contemplated herein is not granted, this order, shall be vacated ab initio and the parties shall be
15 restored without prejudice to their respective litigation positions prior to the date of this Order of
16 Preliminary Approval.

17 Pending final determination of whether the Proposed Settlement should be approved, all
18 proceedings in the Action shall be stayed until further order of the Court, except such
19 proceedings as may be necessary either to implement the Proposed Settlement or to comply with
20 or effectuate the terms of this Stipulation.

21 Defendants shall, as soon as practical, but to be completed no later than sixty (60) days
22 after the date of this order, send to each person on the Class List (excluding Opt Outs) a notice
23 in a form and content substantially similar to the Individual Notice attached as Exhibit B hereto.
24 The Notice shall be mailed to the last known address, as determined from information previously
25 made available to the Claims Administrator with respect to the mailing of the Class Notice, and
26 as updated by the Claims Administrator by utilizing the National Change of Address Database.

The Court preliminarily finds that the dissemination of the Individual Notice under the
terms and in the format provided for in this Order constitutes the best notice practicable under

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1 the circumstances, and is due and sufficient notice for all purposes to all persons entitled to such
2 notice, and fully satisfies the requirements of due process, the Federal Rules of Civil Procedure,
3 Washington Rules of Civil Procedure and all other applicable laws.

4 A hearing (the "Settlement Hearing") shall be held on ~~October 27~~^{DECEMBER 2}, 2016 at 9:00 a.m. in
5 Courtroom 2C of the Superior Court of the State of Washington in and for the County
6 of Pierce, as set forth in the Individual Notice, to determine whether the Proposed Settlement of
7 this Action (including the payment of attorneys' fees and costs to Class Counsel) should be
8 approved as fair, reasonable, and adequate, and to determine whether final judgment approving
9 the Proposed Settlement and dismissing all claims asserted in this Action on the merits, with
10 prejudice and without leave to amend, should be entered. The Settlement Hearing may be
11 postponed, adjourned or rescheduled by order of the Court without further notice to the members
12 of the Class.

13 Objections to the Proposed Settlement shall be heard, and any papers or briefs submitted
14 in support of said objections shall be considered, by the Court (unless the Court in its discretion
15 shall otherwise direct) only if they comply with the objection procedures set forth in the
16 Stipulation and Individual Notice. Specifically, members of the Class who have not previously
17 opted out of the Class must file a notice of intent to object to the Proposed Settlement. The
18 written notice of intent to object must be: (a) filed with the Clerk of the Court not later than sixty
19 (60) days after the Notice Date; and (b) sent by first-class mail, postmarked no later than sixty
20 (60) days after the Notice Date; in the manner set forth in the Individual Notice. Any Class
21 Member who does not so request to object waives the right to do so in the future, and shall be
22 forever barred from making any objection to the Proposed Settlement. Any notice of intent to
23 object must contain: (a) a heading which refers to the Action; (b) a statement whether the
24 objector intends to appear at the Final Settlement Hearing, either in person or through counsel,
25 and, if through counsel, identifying counsel by name, address and phone number; and (c) a
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1 detailed statement of the specific legal and factual bases for each and every objection, and if
2 through counsel, a legal memorandum in support of the objection.

3 All Class Members who have not previously opted out of the Class shall be bound by any
4 final judgment and order of dismissal entered pursuant to the Stipulation of Settlement, shall be
5 barred and enjoined, now and in the future, from asserting any and all of the Released Claims, as
6 defined in the Stipulation of Settlement, against the Released Persons, as defined in the
7 Stipulation of Settlement, and any such Class Member shall be conclusively deemed to have
8 released any and all such Released Claims.

9 Class Counsel agree that any representation, encouragement, solicitation or other
10 assistance, including but not limited to referral to other counsel, of or to any Opt Outs or any
11 other person seeking to litigate with Defendants over any of the claims covered under the release
12 in this matter could place Class Counsel in an untenable conflict of interest with the Class.
13 Accordingly, Class Counsel and their respective firms agree (only to the extent that it is
14 otherwise not violative of any applicable rules governing the practice of law) not to represent,
15 encourage, solicit or otherwise assist, in any way whatsoever (including, but not limited to
16 referrals to other counsel) any Opt Out except that referring such person to the Individual Notice
17 or suggesting to any such person the option of obtaining separate counsel, without specifically
18 identifying options for such counsel, shall be permitted under the terms of this provision.
19 Additionally, Class Counsel and their respective firms agree (only to the extent that it is
20 otherwise not violative of any applicable professional rules) not to represent, encourage, solicit
21 or otherwise assist, in any way whatsoever, any Opt Out or any other person who seeks to
22 represent any form of opt-out class, or any other person, in any subsequent litigation that person
23 may enter into with Released Persons regarding the Released Claims or any related claims,
24 except that suggesting to any such person the option of obtaining separate counsel, without
25 specifically identifying options for such counsel, shall be permitted under the terms of this
26 provision.

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1 The Proposed Settlement falls within the range of possible final approval and is hereby
2 preliminarily approved, but is not to be deemed an admission of liability or fault by Defendants
3 or by any other person, or a finding of the validity of any claims asserted in the Action or of any
4 wrongdoing or of any violation of law by Defendants. The Proposed Settlement is not a
5 concession and shall not be used as an admission of any fault or omission by Defendants or any
6 other person or entity. Neither the terms or provisions of the Stipulation of Settlement, nor any
7 related document, nor any of the negotiations or proceedings connected with it, shall be offered
8 as evidence or received in evidence in any pending or future civil, criminal, or administrative
9 action or proceeding, to establish any liability or admission by Defendants except in any
10 proceedings brought to enforce the Stipulation or Proposed Settlement and except that Released
11 Parties may file this Order in any action that may be brought against them in order to support a
12 defense or counterclaim based on principles of res judicata, collateral estoppel, release, good
13 faith settlement, judgment bar or reduction, or any other theory of claim preclusion or issue
14 preclusion or similar defense or counterclaim.

15 Upon motion of any party, the Court may, for good cause, extend any of the deadlines set
16 forth in this Order without further notice to the Class.

17 It is hereby ordered that this Action shall be stayed pending further proceedings in
18 connection with the effectuation of the Proposed Settlement.

19 Capitalized terms not defined herein shall have the meaning set forth in the Stipulation of
20 Settlement.

21 IT IS SO ORDERED.

22 Dated this 29 day of July, 2016.

23 **FILED**
DEPT. 4
IN OPEN COURT

JUL 29 2016

PIERCE COUNTY, Clerk
By [Signature]
DEPUTY

[Signature]
The Honorable Bryan Chuschoff
Superior Court Judge

26 EXHIBIT C - 5

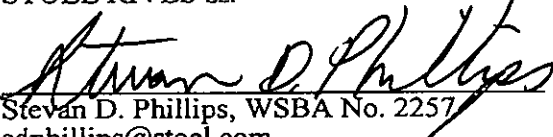
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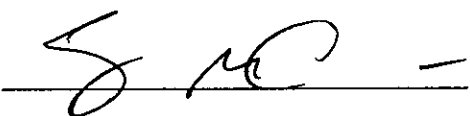
1 Presented by:

2 STOEL RIVES LLP

3 

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6 *Attorneys for Defendants Farmers Insurance Company*
7 *Of Washington and Mid-Century Insurance Company*

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9 

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EXHIBIT C - 6