

**UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA**

**NOTICE OF CLASS ACTION**

**If you received notice, on or after March 28, 2008, or if this is your first notice, that you may have been entitled to a life insurance benefit under the United States Postal Service Annuity Protection Plan, a class action lawsuit may affect your rights.**

A class action in the United States District Court for the District of Columbia seeks payment of life insurance benefits and interest to beneficiaries of Postal Service employees who were covered by the Annuity Protection Plan set forth in the joint Collective Bargaining Agreements of the American Postal Workers Union, AFL-CIO, and the National Association of Letter Carriers, AFL-CIO and in effect during the periods July 21, 1981 to July 20, 1984; July 21, 1984 to July 20, 1987; July 21, 1987 to November 20, 1990; and November 21, 1990 to November 20, 1994.

In 1981, the Postal Service and the American Postal Workers Union, AFL-CIO, and the National Association of Letter Carriers, AFL-CIO entered into a collective bargaining agreement in which the parties agreed that the cost of living adjustment (COLA) that had accumulated in the previous three years would not be counted in basic salary during the term of the agreement, but rather would be deferred until the next collective bargaining agreement. They also agreed that certain benefits would not be diminished by this deferral and that no one would be hurt by it.

A dispute arose over the meaning of the agreement. Arbitration between the Postal Service and unions led to an award in 1986 that life insurance benefits had to be paid as though the COLA had been included in basic salary from 1981.

Following the arbitration, some life insurance beneficiaries were not paid the additional death benefits immediately. Some were paid many years later, and some have not been paid yet.

The same COLA deferral in the 1981 collective bargaining agreement was included in collective bargaining agreements in 1984, 1987 and 1990. Some life insurance beneficiaries covered by these collective bargaining agreements also have been paid years later or have not been paid yet.

In the lawsuit, Plaintiffs say that the Postal Service should have paid interest on life insurance benefits it paid after the arbitration. Plaintiffs are also seeking payment of benefits and interest to those beneficiaries who may be entitled to benefits but have not been paid them in full.

The Class is defined as:

All beneficiaries of deceased United States Postal Service employees (or, if deceased, the beneficiaries' estates or other legal representatives), who first received notice on or after March 28, 2008, that they may be entitled to an additional death benefit payment under provisions of the U.S. Postal Service Annuity Protection Program.

You can obtain additional details by emailing Class Counsel at [classaction@steinmitchell.com](mailto:classaction@steinmitchell.com).