

## **SETTLEMENT EXHIBIT I**

### **Plan of Administration and Distribution**

The settlement consideration consists of a twenty million dollar (\$20,000,000) cash settlement fund, plus additional consideration in the form of credits to the unpaid balances of certain Charged-Off Class Members as stated in Section IX.D of the Settlement Agreement. All payments to Settlement Class Members will be made by check, except that certain Charged-Off Class Members will receive a credit instead of a check.

Settlement Class Members must submit a valid claim form either online or on paper by the deadline specified by the Court in order to receive a payment or credit under the Settlement.

Class members who submit a valid claim form will be divided into three categories. They are:

Category 1: Settlement Class Members who have made a claim for payment protection benefits and have had their claim denied. It is estimated that each class member who falls within this Category and files a valid claim form will receive \$60 before deduction for administration costs, attorney fees and legal expenses.

Category 2: Settlement Class Members (a) who claim that they have been billed for or enrolled in a Chase Payment Protection Product without their knowledge or consent and/or (b) who fall under one of the following Cardmember Agreement exclusions:

- Self-employment
- Retirement
- Seasonal employment
- Employment less than 30 hours per week (or less than 15 hours per week for students)
- Voluntary forfeiture of a job (i.e., resignation).

It is estimated that each class member who falls within this Category and files a valid claim form will receive \$30 before deduction for administration costs, attorney fees and legal expenses.

Category 3: Settlement Class Members who submit a valid claim form but who do not fall into categories 1 or 2 above and who are not completely satisfied with the Chase Payment Protection Product(s) in which they were enrolled at some point between September 1, 2004 and November 11, 2010. It is estimated that each class member who falls within this Category will receive \$15 before deduction for administration costs, attorney fees and expenses.

These estimated payments will be adjusted upward or downward as necessary dependent upon the number and nature of claims filed. The actual distribution for each Settlement Class Member filing a valid claim form will be as follows:

Settlement Class Members who fall into Category 1 above will receive four times \$X.

Settlement Class Members who fall into Category 2 above will receive two times \$X.

Settlement Class Members who fall into Category 3 above will receive \$X.

Settlement Class Members who fall into more than one category will receive only one payment at the highest applicable amount. For example, a claimant who falls into both Categories 1 and 2 will receive one payment of four times \$X.

To this end, the Claims Administrator will distribute all funds pursuant to the following formula:

$(\text{Group 1 valid claims}) * 4\$X + (\text{Group 2 valid claims}) * 2\$X + (\text{Group 3 valid claims}) * \$X = \$20,000,000$  less attorney fees, legal expenses, and administration costs.

Settlement Class Members who submit a valid claim form will receive a payment for each of their Chase Credit Card Accounts that was enrolled in a Payment Protection Product at some time between September 1, 2004 and November 11, 2010 as shown by the Chase records furnished to the Settlement Administrator. For Settlement Class Members who have multiple accounts that give rise to a claim under this Settlement, each such account will be treated the same as the other accounts with respect to their classification as bankrupt or among Categories 1, 2 or 3 above, and such accounts will be treated according to the more valuable classification. For example, if a Settlement Class Member falls into Category 1 and had three Chase Credit Card Accounts that were enrolled in a Payment Protection Product at some time between September 1, 2004 and November 11, 2010, that class member will receive four times \$X for each of the three accounts, or, in other words, that class member will receive an amount equal to twelve times \$X.

The Settlement Administrator will determine the validity of claims. For purposes of determining the validity of claims, all account records or data furnished to the Settlement Administrator by Chase shall be deemed to be correct.