

Legal Notice

**If You Are a Participant or Beneficiary of the “Legacy” Part of the  
Huntington Ingalls Industries, Inc., Newport News Operations Pension  
Plan for Employees Covered by United Steelworkers Local 8888  
Collective Bargaining Agreement (the “Covered Plan”)**

**A Proposed Class Action Settlement May Affect Your Rights**

**You have *not* been sued. A federal court authorized this notice.**

**This is not a solicitation.**

**A detailed Notice and more information is available at the Settlement website:**

**[www.HIIERISASettlement.com](http://www.HIIERISASettlement.com)**

**What is the case about?** Plaintiff Roger Herndon filed a class action lawsuit alleging that Huntington Ingalls Industries, Inc. (“HII”) provided Participants of the Covered Plan with joint and survivor annuity (“JSA”) and pre-retirement survivor annuity (“PSA”) benefits that were not “actuarially equivalent” to single-life annuities participants could have taken at the time they started receiving benefits, as required by the federal pension law known as the Employee Retirement Income Security Act, or “ERISA.” The Defendants deny Plaintiff’s claims, and the Court has not decided who is right.

**Who is affected?** The Covered Plan’s records show that you may be a member of the Class, which is defined as participants or beneficiaries of the Covered Plan who began receiving pension benefits in the form of a joint and survivor annuity during the period from May 20, 2013 through January 17, 2020.

**What are the settlement terms?** The proposed Settlement provides that the Plan will pay the \$2.8 million value of the Settlement, net of amounts awarded for Attorneys’ Fees, Expenses and Costs, in the form of a Monthly Benefit Increase to be paid during the lifetimes of the Class Member participants and their designated beneficiaries. Your share of the Net Settlement Value will be based on the value of your past and projected future benefits, compared to the value of **all** Class Members’ past and projected future benefits. Your share will then be annuitized and paid out over your lifetime (and, where applicable, over the lifetime of your designated beneficiary). Class Members will release Defendants and their Related Parties from any and all Claims arising on or before January 17, 2020 that were brought, or could have been brought, arising out of, or relating to, the allegations in the Complaint. This summary does not include all terms of the Settlement, which is available for review as described below.

**Where can I read the settlement?** The proposed settlement, a detailed Court-approved Notice about the settlement, the final approval hearing, and your right to object, and other important documents, can be found on the Settlement website at [www.HIIERISASettlement.com](http://www.HIIERISASettlement.com), or you can request copies from Plaintiff’s counsel by calling 1-860-493-6292, or sending an email to [o.faircloth@ikrlaw.com](mailto:o.faircloth@ikrlaw.com).

**Your Rights May Be Affected.** If the Settlement is approved at the final approval hearing on May 9, 2022, it will be binding on you. You cannot opt out of this Settlement. You can object to this Settlement by filing an objection by **April 11, 2022**. The detailed Notice available at the Settlement website explains how to object. The Court will hold a hearing by video conference on **May 9, 2022**, to consider

whether to approve the Settlement. You may appear at the hearing, but you are not required to attend. You may also hire your own attorney, at your own expense, to appear or speak for you at the hearing.

**PLEASE DO NOT TELEPHONE THE COURT OR THE COURT CLERK'S OFFICE TO INQUIRE ABOUT THIS SETTLEMENT, as they cannot answer your questions.**