

# **EXHIBIT B**

## **Notice of Settlement**

DVORAK LAW OFFICES, LLC  
6262 Kingery Highway, Suite 305  
Willowbrook, IL 60527  
Telephone: (630) 568-3190  
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Date\*, 2020

«RecipientName»  
«AddressLineOne»  
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**Re: *Adair et al., v. Town of Cicero*, 18 CV 3526  
Notice of Proposed Class Action Settlement**

This is a court-authorized notice that you may be entitled to receive compensation in a class action lawsuit against the Town of Cicero. Your rights and options are explained in this notice. This is not a lawsuit against you.

**The Lawsuit**

The plaintiffs in this case claim that the Town of Cicero subjects female arrestees to unreasonable searches in violation of the Fourth Amendment by forcing them to expose their genitals to the view of lockup employees and male arrestees when using the toilet.

The court certified this case as a class action on behalf of all female arrestees who were detained at the Town of Cicero Police Department lockup facility for eight hours or more during the time period of May 18, 2016, to March 31, 2020. You were identified as a member of the class because the Town's records indicate that you were detained in the Town of Cicero's police lockup during the relevant time period.

**The Proposed Settlement**

The parties have reached a proposed agreement to settle this case, which has received the preliminary approval of the court.

The proposed settlement provides two forms of relief:

First, the Town has agreed to modify its police department General Orders to include a directive that male arrestees shall not be allowed to walk past the cells of the female arrestees during processing and/or transportation at the Cicero police Department.

Second, the Town has agreed to pay \$290,000 to settle this case. From that amount, payments will be made to each of the five named Plaintiffs for representing the class (\$4,000 per named Plaintiff, for a total of \$20,000); and to Class Counsel for attorneys' fees, costs incurred in litigating this case, and class administration costs (\$145,000).

The remainder of the settlement amount (\$125,000) will remain for distribution to class members. Each class member will be entitled to a pro-rata share of the Settlement Fund up to a maximum of \$500 per class member. The amount payable to each class member will be calculated based on the number of class members who submit a timely Proof of Claim.

If fewer than 250 class members submit timely claims, the funds remaining in the Settlement Fund shall be donated to Ascend Justice, a non-profit agency that provides legal services to women in the Chicago-land area.

## **Your Options**

### **1. Participate in the Settlement**

If you want to participate in the settlement, you can do so by submitting the enclosed Proof of Claim. Instructions for participating in the settlement and obtaining your share of the settlement fund are set forth below under the heading How to Obtain Compensation.

*Please note that claims will not be paid until 90 days after this settlement receives final approval of the Court.*

### **2. Comment on or Object to the Settlement**

You may comment on or object to the Settlement prior to final approval.

You may submit a written comment or objection by mail to Class Counsel Dvorak Law Offices LLC at the address below. Comments or objections must be postmarked no later than **\*\*\*date (60 days from date the notice is sent)**. The objection must contain (1) your name, (2) your address, (3) the grounds for the objection; and (4) the case name and number *Adair et al. v. Town of Cicero*, 18 CV 3526.

The court has set this case for a Fairness Hearing on final approval of the settlement on **date\*\* (30 days after objection deadline)** at the United States District Court for the Northern District of Illinois, 219 S. Dearborn Street, Courtroom 2188, Chicago, Illinois 60604. All timely written objections will be provided to the court no later than seven days prior to the Fairness Hearing. You may appear in person at this hearing on your own behalf or through counsel. If you intend to appear at the

hearing through counsel, you must identify the attorney(s), who will appear and include the attorney(s) name, address, phone number, e-mail address. Only individuals who submit a timely written objection will be heard at the Fairness Hearing.

If the court rejects your objection, you will still be bound by the terms of the Settlement.

### **3. Exclude Yourself from the Settlement**

If you ask to be excluded (or “opt out”) of the settlement, you will not be bound by the Settlement (including the Release of Claims) but will not receive any share of the settlement proceeds.

If you elect to be excluded from the settlement, you may file an individual action or seek to intervene in this action. The statute of limitations, which stopped running on May 18, 2018, when this case was filed, will begin running again upon your filing of a request for exclusion. You will have the same number of days to file suit as you had on May 18, 2018.

Your request to exclude yourself must be postmarked by no later than **\*date (60 days from date the notice is sent)**, and sent to Class Counsel Dvorak Law Offices LLC at the address below. Your request to exclude yourself (or “opt out”) of the settlement, must be made in writing and must include (1) your name, (2) your address, (3) a statement that you are excluding yourself from the settlement; and (4) the case name and number *Adair et al. v. Town of Cicero*, 18 CV 3526.

### **How to Obtain Compensation**

The only way to receive compensation is by submitting the enclosed Proof of Claim to Class Counsel Dvorak Law Offices, LLC at the address below. Your Proof of Claim must be postmarked no later than **\*date (90 days after final approval hearing)**.

### **Further Information**

Any questions you have concerning this notice or how to submit a claim should be directed to the Dvorak Law Offices LLC at the address and/or phone number listed below. **Do not contact the court or the judge regarding this notice.**

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