

LEGAL NOTICE

Were you physically disabled while housed at the Western Region Detention Facility? If so, you may be entitled to a payment from the proposed settlement of a class action lawsuit.

*Para información en español, visite la página web,
www.GEOSettlementSanDiego.com*

WHAT IS THIS? A settlement is proposed in a class action lawsuit against The GEO Group, Inc. and SDCC Middle Block, LLC, (“Defendants”) regarding alleged violations of disability antidiscrimination laws by failing to provide accessible accommodations to persons with medical conditions or disabilities requiring ambulatory aids at the Western Region Detention Facility. The Facility is located at 220 West C Street, San Diego, California 92101. All disabled persons and persons with medical conditions that required the use of ambulatory aids and who were housed at the Western Region Detention Facility on or after January 4, 2017 may be entitled to an award if they had a problem because of an architectural barrier at the Facility; or they can exclude themselves from the Settlement or object. The Court will hold a hearing to consider whether to approve the proposed settlement. You will receive benefits only if the Court approves the settlement.

AM I A CLASS MEMBER? You are a Class Member if you were a physically disabled person or person with medical conditions that required the use of ambulatory aids (a “Mobility Disability”) while housed at the Facility at any time on or after January 4, 2017.

WHAT IS THE LAWSUIT ABOUT? The lawsuit, *Stout, et al. v. The GEO Group, Inc., et al.*, alleges that The GEO Group, Inc. and SDCC Middle Block, LLC, violated disability antidiscrimination laws by failing to provide accessible accommodations to persons with medical conditions or disabilities requiring ambulatory aids. These claims have not been proven in Court, and Defendants deny they violated any laws or did anything wrong. The Settlement is not an admission of any violation of the law or wrongdoing.

DO I HAVE A LAWYER? Yes.

WHAT DOES THE SETTLEMENT PROVIDE? If you are a Class Member, you may need to submit a Claim Form to receive your proportionate share of the Net Settlement Fund, from a gross \$8 million Settlement Fund, which is based on (i) the total number of days he or she had a Mobility Disability while housed at the Facility and

encountered an architectural barrier that violated disability laws that caused the Settlement Class Member difficulty, discomfort and/or embarrassment within the meaning of Cal. Civ. Code § 55.56, (ii) divided by the total number of days all Settlement Class Members had a Mobility Disability while housed at the Facility and encountered architectural barriers that violated disability laws that caused the Settlement Class Members difficulty, discomfort and/or embarrassment within the meaning of Cal. Civ. Code § 55.56, (iii) multiplied by the Net Settlement Fund. Claims will be graded based on certain categories, including the nature and likely severity of the physical disability as it relates to encounters with the alleged architectural barriers, as well as the likelihood of experiencing difficulty, discomfort or embarrassment as a result.

The Defendants have also remediated the alleged architectural barriers at the Facility that Plaintiffs’ expert identified.

Class Counsel, Timothy G. Blood and Leslie E. Hurst of Blood Hurst & O’Reardon, will seek attorneys’ fees in the amount of \$2,640,000 (which is 33% of the Settlement Fund) and reimbursement of expenses up to \$275,000 on behalf of themselves and other Plaintiffs’ Counsel. The Court must approve the request for attorneys’ fees and expenses which, if awarded by the Court, will be paid from the Settlement Fund.

The Class Representatives will also ask the Court to award service awards for their time and effort spent representing the class members in this lawsuit. Class Representatives will seek service awards of \$10,000 each. The Court must approve the request for service awards.

WHAT ARE MY OPTIONS? To receive your proportionate share of the Settlement Fund, you may need to submit a Claim Form by **August 24, 2023**. Visit **www.GEOSettlementSanDiego.com** for the Claim Form, submission deadline, and information on whether you are required to submit the Claim Form.

If you don't want to be bound by the Settlement, you may exclude yourself from the Settlement Class by **August 30, 2023**. If you stay in the Class, you may object to the Settlement by **August 30, 2023**. By staying in the Settlement, you will release (give up) all claims against Defendants. Visit **www.GEOSettlementSanDiego.com** for important information about these options.

HEARING ON THE PROPOSED SETTLEMENT? The Court will hold a Final Approval Hearing on **September 29, 2023** at 9:30 a.m. to determine whether to approve the proposed Settlement, attorneys' fees and expenses, and Class Representative service awards. The hearing is scheduled to take place at the Superior Court, County of San Diego, 330 West Broadway, San Diego, California 92101, in Department C-66. The hearing date or time may be changed by the Court. Check **www.GEOSettlementSanDiego.com** for updates. You do not have to attend the hearing.

For more details, including the detailed notice, Claim Form, and Settlement Agreement, visit **www.GEOSettlementSanDiego.com** or call (855) 678-0651.