

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

If you were served with a gang injunction with any of the following case numbers on it, your rights may be affected and you may have a right to receive money in a federal class action lawsuit:

Los Angeles County Superior Court Case Numbers BC397522; BC332713; BC305434; BC313309; BC319166; BC326016; BC287137; BC335749; LC020525; BC267153; BC358881; SC056980; BC359945; NC030080; BC330087; BC359944; BC282629; LC048292; BC311766; BC351990; BC298646; BC349468; BC319981; SC060375; SC057282; and BC353596.

MORE INFORMATION: WWW.GANGCASE.COM

A federal court authorized this notice. This is not an advertisement from a lawyer. You are not being sued or restrained.

- A federal civil rights lawsuit is happening right now in the United States District Court for the Central District of California, against the City of Los Angeles and the Los Angeles Police Department, City Attorney Carmen Trutanich, Police Chief Charles Beck, Allan Nadir, and Angel Gomez.
- The Court has determined that this case may proceed as a class action. A class action is a lawsuit in which one or more people sue for themselves and for others who have similar claims. This Notice has been published for the purpose of informing you of your rights in the lawsuit.
- This case involves claims that the curfews in 26 of the City of Los Angeles' gang injunctions were unconstitutional. The City of Los Angeles has ordered its officers not to enforce the allegedly unconstitutional curfews.
- The Court has issued a federal preliminary injunction ordering the City of Los Angeles to serve notice that the Los Angeles Police Department will not enforce the curfews in all of the 26 injunctions. However, the Court has not made a final determination in this lawsuit. There is no determination that any money must be paid, and there is no guarantee that there will be. However, the lawyers for the plaintiffs will be seeking money for all those persons who have been served with these 26 injunctions containing allegedly unconstitutional provisions, and your rights have been and will be affected by the determinations in this lawsuit.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT:

DO NOTHING

Stay in this lawsuit. Await the outcome. Give up rights to file your own lawsuit challenging the same behavior.

By doing nothing, you keep the possibility of getting money that may come from a trial or a settlement in the case. But, you give up any rights to sue the City of Los Angeles on your own about the same legal claims in this case.

EXCLUDE YOURSELF

Get out of this lawsuit. Get no benefits from it. Keep your right to file your own lawsuit.

If you ask to be excluded and money is later awarded. You will not share in that money. But you keep any rights to sue the City of Los Angeles on your own

about the same legal claims in this case.

- The people who have brought this lawsuit must prove the claims against the City of Los Angeles in a trial. If any money is obtained from the City of Los Angeles, you will be notified about how to ask for a share.
- To ask to be excluded from this lawsuit, you must act by July 1, 2013.

BASIC INFORMATION

1. Why did I get this Notice?

The LAPD's records show that you were served with one or more of the gang injunctions in the following court cases:

Los Angeles County Superior Court Case Numbers BC397522; BC332713; BC305434; BC313309; BC319166; BC326016; BC287137; BC335749; LC020525; BC267153; BC358881; SC056980; BC359945; NC030080; BC330087; BC359944; BC282629; LC048292; BC311766; BC351990; BC298646; BC349468; BC319981; SC060375; SC057282; and BC353596. This Notice explains that the Court has allowed, or "certified" a class action lawsuit involving you.

2. What is this lawsuit about?

This lawsuit says that the City of Los Angeles has served 26 gang injunctions with unconstitutional curfews on over 3,000 people. Specifically, the language contained in the injunctions that requires that people not go "outside" at specified times of the night unless they engage in unspecified "legitimate meeting or entertainment activit[ies]" has been determined by a California Court of Appeal to violate the California Constitution. More information about the case can be found at www.XXXXXX.com.

3. What is a class action and who is involved?

In a class action, one or more people, called Class Representatives, sue for themselves and for people who have similar claims. The person who brought the case – and all the Class Members like them – are called Plaintiffs. The people or entities they have sued are called Defendants. This case is a federal case. The case name is *Rodriguez v. City of Los Angeles*, Case number CV 11-01135 DMG. The court in charge of this case is the United States District Court for the Central District of California, the Honorable Dolly M. Gee Presiding.

THE CLAIMS IN THIS LAWSUIT

4. What are the claims in this lawsuit?

The complaint in this case has claims that the 26 gang injunctions referenced above contain unconstitutional curfew provisions. Plaintiffs have stated claims under the First, Fourth, and Fourteenth Amendments of the U.S. Constitution; Article 1, §§ 1, 2, 7, and 13 of the California Constitution; Cal. Civil Code §52.1, Penal Code §236, and a Violation of Mandatory Duties.

5. What does the City of Los Angeles respond to these claims?

The City says that it did not violate anyone's rights by serving him or her with one of the 26

injunctions and that it no longer enforces the curfew provisions in these 26 injunctions.

6. Has the Court decided who is right?

The Court has granted a preliminary injunction requiring the City of Los Angeles to notify people served with one or more of the above injunctions that the curfews will no longer be enforced.

7. What are the Plaintiffs asking for?

The Plaintiffs are asking that money be paid to each of the persons served with one or more of the above injunctions. In addition, plaintiffs are asking that the curfews in the 26 injunctions be ended permanently, attorneys fees, and costs of bringing the suit.

8. Is there any money available now?

No money is available now because the Court has not made that decision yet. There is no guarantee that money will ever be obtained from this lawsuit. If money is awarded, you will be notified about how to ask for a share. If you have had a recent change of address, or know that you will be moving, you should contact the attorneys in paragraph 13 to make sure that they have your accurate mailing address. You may also submit your information online at www.xxxxxx.com.

9. How do I know if I am part of the Class?

The Court has decided that all persons who have been served at any time with any of the 26 gang injunctions listed above are members of this Class. All of those people can participate in the lawsuit. Records from the Los Angeles Police Department show that you were served with one or more of those injunctions. You can participate.

Your Rights and Options

10. What happens if I do nothing at all?

You do not have to do anything now if you want to keep the possibility of getting money from this lawsuit. By doing nothing, you are staying in the Class. If you stay in the Class and the Plaintiffs obtain money, either as a result of trial or settlement, you will be notified about how to apply for a share. Keep in mind that if you do nothing now, regardless of whether the Plaintiffs win or lose the trial, you will not be able to sue, or continue to sue, the city of Los Angeles about the same legal claims that are the subject of this lawsuit. This means that if you do nothing, you will be legally bound by all the orders that the Court issues and any judgments that the Court makes in this Class Action.

11. Why would I ask to be excluded from the lawsuit?

If you already have your own lawsuit against the Los Angeles Police Department alleging a violation of your rights based on the curfew provisions and you want to continue with it, or if you want to file your own lawsuit based on such conduct, you need to ask to be excluded from the Class. If you exclude yourself from the Class, also known as “opting out” of the Class, you will not get any money or other benefits from this lawsuit. If you exclude yourself, you will not be legally bound by the Court’s judgments in this class action.

If you start your own lawsuit against the City of Los Angeles after you exclude yourself, you will have to hire and pay for your own lawyer for that lawsuit, and you will have to prove your claims. If you do exclude yourself so that you can start or continue your own lawsuit against the City of Los Angeles for claims arising out of the curfew provisions, you should talk to your own lawyer soon, because your claims may be subject to a statute of limitations.

12. How do I ask the Court to exclude me from the Class?

If you want to be excluded from the Class, you must send an “Exclusion Request” in the form of a letter sent by mail, stating that you want to be excluded from the *Rodriguez v. City of Los Angeles* lawsuit. Be sure to include your name and address, and sign the letter. You must mail your Exclusion Request postmarked by **July 1, 2013** to:

Rodriguez v. City of Los Angeles Exclusions
c/o CAC Services Group
1601 Southcross Dr W
Burnsville, MN 55306

The Lawyers Representing You

13. Do I have a lawyer in this case?

The Court has decided that the law firms of Hadsell Stormer Richardson & Renick, LLP and Orange Law Offices are qualified to represent you and all Class Members in this case. These lawyers are called Class Counsel. They are experienced in handling similar cases. If you have questions about this case, you may call (310) 997-0380 to speak with one of the lawyers handling the case. More information about Class Counsel, their practice, and their lawyers’ experience is available at www.hadsellstormer.com and www.orangelawoffices.com.

14. Should I get my own lawyer?

You do not need to hire your own lawyer because Class Counsel is working on your behalf. But if you want your own lawyer, you will have to pay that lawyer.

15. How will the lawyers be paid?

You will not have to pay any fees or expenses to Class Counsel. If Class Counsel obtain money or benefits for the Class, they will ask the Court for fees and expenses. If the Court grants Class Counsel’s request, or if the matter is settled, the fees and expenses will be paid by the City of Los Angeles.

The Trial

16. How and when will the Court decide who is right in this case and whether money should be awarded?

If this case is not resolved by a settlement or otherwise, Class Counsel will have to prove the Plaintiffs’ claims at a trial. The trial has not yet been scheduled. You do not necessarily need to attend the trial; however, you or your own lawyer are welcome to come at your own expense.