

**NOTICE OF CLASS ACTION, PROPOSED  
SETTLEMENT AGREEMENT AND SETTLEMENT  
FAIRNESS HEARING**

**You are receiving this notice because you have been identified as a potentially non-white applicant who applied for a position with the City of Brockton's Department of Public Works on or after October 10, 2010 through December 18, 2019.**

**Your confirmation of membership in the class may entitle you to get a payment from a proposed class action settlement.**

- **If you are non-white, please read this notice, and fill out the attached form, to receive a full claim form, as you must take action or you may lose important rights. Please submit this as soon as possible as all claims forms must be submitted in full by October 27, 2020. Therefore, submit your confirmation as a non-white class member in sufficient time to receive, fill out and submit any relevant forms.**

*A state court has authorized this notice. This is not a solicitation from a lawyer.*

- The proposed Settlement will provide a fund of \$1,750,000, a portion of which will be paid pro rata to eligible Settlement Class Members, less court approved fees and costs.
- To qualify to receive a monetary award, you **must** be non-white and you must have applied for a position with the Department of Public Works in the City of Brockton at any time from October 10, 2010 through December 18, 2019.
- If you are a Settlement Class Member, your legal rights are affected whether you act or not. Read this Notice carefully. For additional information, contact Class Counsel or the Claims Administrator listed below, or go to [www.rg2claims.com/BrocktonDPW](http://www.rg2claims.com/BrocktonDPW) or [http:// BrocktonDPWSettlement.com](http://BrocktonDPWSettlement.com).
- You are on a list which the town has provided us, with the names of all applicants **from October 10, 2010 to December 18, 2019**. You did **not** identify your race on that application.
- To receive a basic award, you **must submit the claim form below identifying yourself as a nonwhite applicant** during the relevant period to be a Settlement Class Member eligible for any award. The claim form for you to identify yourself as non-white is attached. Please fill this out immediately, and we will begin the claims process with you. Once you submit this form you will receive the full claim form and other relevant

information.

- To receive an additional award: If you believe that you are eligible for an additional award from an Enumerated Damages Award Pool you will need to submit the Enumerated Claim Form also attached requesting a share of that award pool.
- In order to be eligible to receive a share of the Settlement Fund, you must fill out, sign, and submit a claim form to the Claims Administrator by October 27, 2020.

## **1. The Lawyers Representing You And The Class**

If you are a Settlement Class Member, you are represented in this litigation by Class Counsel, led by Elizabeth A. Rodgers and Philip J Gordon of the law firm Gordon Law Group, LLP:

Elizabeth A. Rodgers, Esq.  
Philip J. Gordon, Esq.  
Gordon Law Group, LLP  
585 Boylston Street  
Boston, MA 02116  
(617)536-1800  
erodgers@gordonllp.com  
pgordon@gordonllp.com

Unless you elect to engage your own attorneys at your own expense, the Settlement Class Members will continue to be represented by Class Counsel in connection with implementation of the Settlement at no cost to you.

## **2. Getting More Information**

If you have additional questions you can get free help at [www.rg2claims.com/BrocktonDPW](http://www.rg2claims.com/BrocktonDPW) or by calling the claims administrator at 1-866-742-4955 or by calling Class Counsel at the number listed above.

For further information, the complete terms of the Settlement Agreement and numerous other documents connected with the Settlement are available for review and/or downloading at either [www.rg2claims.com/BrocktonDPW](http://www.rg2claims.com/BrocktonDPW) or [http:// BrocktonDPWSettlement.com](http://BrocktonDPWSettlement.com).

Again, the important deadlines are:

**Last Day To Object To The Settlement: October 12, 2020**

**Last Day To File an Enumerated Claim Form: October 27, 2020**

**Final Approval Hearing: December 8, 2020**