

NOTICE OF SETTLEMENT OF CLASS ACTION

TO: ALL WOMEN PRISONERS UNDER THE JURISDICTION OF THE MICHIGAN DEPARTMENT OF CORRECTIONS (MDOC) PAST AND PRESENT, WHO DURING THEIR INCARCERATION WERE SUBJECTED TO SEXUAL MISCONDUCT, SEXUAL HARASSMENT AND VIOLATION OF THEIR PRIVACY RIGHTS BY MALE EMPLOYEES OF THE MDOC OR WHO HAVE BEEN RETALIATED AGAINST FOR REPORTING OR RESISTING SUCH ACTIONS.

1. Class action law suits were filed in 1996 and 2003, on behalf of all women prisoners who were subjected to sexual abuse, sexual harassment, privacy violations by male staff of the MDOC and/or retaliation for reporting such abuse while incarcerated in a Michigan Department of Corrections' facility. The law suits are entitled *Neal, et al v MDOC, et al*, File No. 96-6986-CZ, pending in the Washtenaw County Circuit Court before the Honorable Timothy P. Connors, and *Anderson, et al v MDOC, et al*, File No. 03-162-MZ, pending in the Michigan Court of Claims before the Honorable Timothy P. Connors.
2. On July 15, 2009, the Court preliminarily approved a settlement of the monetary and equitable relief claims in these class actions; preliminarily approved distribution of the settlement in accordance with a Plan of Allocation of the settlement proceeds; and approved this notice of the proposed settlement, distribution and method for all Plaintiffs to object, a mechanism for Plaintiffs injured after September 1, 2004, to opt-out, and the mechanism for filing a claim to participate in the settlement proceeds.
3. You should review the terms of the settlement agreement and Plan of Allocation of settlement proceeds because your participation rights are explained in these documents. You may obtain them by calling, writing, faxing or e-mailing Plaintiff class counsel for assistance at the addresses and numbers listed below or at www.nealclassaction.com.

Counsel for Plaintiff Class
Deborah LaBelle (P31595)
221 N. Main St., Ste. 300
Ann Arbor, MI 48104
734.996.5620
734.769.2196 Facsimile
info@nealclassaction.com

PLEASE NOTE THAT OPT-OUTS, OBJECTIONS AND CLAIMS MUST BE RECEIVED NO LATER THAN AUGUST 14, 2009.

DATED: July 15, 2009

A TRUE COPY
LAWRENCE KESTENBAUM
CLERK OF CIRCUIT COURT

BY Elizabeth M. Lynn
DEPUTY CLERK


TIMOTHY P. CONNORS
Circuit Court Judge