



**FEDERAL COURT
OF AUSTRALIA**

**PALM ISLAND RESIDENTS
QUEENSLAND POLICE CLASS ACTION**

**CLASS ACTION
SETTLEMENT
NOTICE**

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B. WHY IS THIS NOTICE IMPORTANT?

IMPORTANT: THIS NOTICE HAS INFORMATION YOU NEED TO KNOW ABOUT A PROPOSED SETTLEMENT OF THE PALM ISLAND CLASS ACTION.

THIS NOTICE HAS BEEN APPROVED BY ORDER OF THE HONOURABLE JUSTICE MORTIMER MADE ON 24 APRIL 2018

(1) What is the class action?

A class action is a lawsuit that is brought by one or more people (who are called the “**applicants**”) on behalf of a group of people (who are called the “**group members**”) against one or more other people (who are called the “**respondents**”). It is called a class action when the applicants and the group members have similar claims against the respondents.

A class action lawsuit was brought by Lex, Agnes and Cecilia Wotton (who are the applicants) against the State of Queensland and the Commissioner of the Queensland Police Service (who are the respondents). The case was called *Wotton v State of Queensland* and it was about the police investigation into the death of Mulrunji Doomadgee in November 2004 and the police response to the protests in the community and the fire in the police station at that time.

We call this class action the “Palm Island Residents/Queensland Police Class Action” or the “**Palm Island Class Action**”.

(2) Who are the group members?

The class action was brought by the Wottons on behalf of Aboriginal and Torres Strait Island people who were “ordinarily resident” on Palm Island on 19 November 2004 (which means they usually lived there or it was their home) and were still ordinarily resident there on 25 March 2010. These people are the group members in this class action.

The applicants had a trial of their case. The applicants won the trial. The Federal Court of Australia gave judgment on 5 December 2016. Because of that judgment, some of the group members can claim compensation from the government for what happened to them in November 2004.

(3) Who are the registered group members?

In 2017, the group members were given a chance to register that they wanted to bring their own claims for compensation. The deadline for registration was 1 July 2017.

The Court has allowed a few group members who had good reasons for not registering in time to register late. You will be told if you are one of these people.

Group members who have registered on time or who were allowed to register late are called “**registered group members**”.

You **should read this notice carefully** if you are a group member and you registered your claim for compensation before 1 July 2017 or you have been allowed to register late.

IMPORTANT: Only the registered group members will be paid any compensation in the class action. If you are not a registered group member you will not be paid any compensation in the class action, whether or not the settlement is approved by the court. It is TOO LATE to register now.

(4) What is the settlement?

The applicants and the respondents have agreed to a “**settlement**” of the class action. The settlement means that the State of Queensland will pay \$30 million for compensation and legal fees. That is called the “**settlement fund**”.

One reason why the applicants and the respondents agreed to the settlement is so that no one else has to go to court for a trial. If there wasn’t a settlement, all of the registered group members would have to go to court for a trial of their claims.

Subject to the costs being approved by the Court, about \$3.8 million will be paid from the settlement fund for legal fees, which will leave about \$26.2 million for compensation.

If the settlement is approved, the State of Queensland will also apologise to all of the group members for what happened.

The court has ordered that this notice should be published so that the group members in the class action know about the settlement and how the compensation will be distributed, and to tell the group members how they can object to the settlement if they think that it is unfair.

The applicants and the respondents have also agreed on a “**settlement scheme**” for the settlement. That is a plan for deciding how the compensation will be paid. The settlement scheme is complicated. This notice summarises how the settlement scheme will work.

(5) What are the settlement deed and the settlement scheme?

The settlement is in two different documents. The first one is called the “**settlement deed**” and the second one is called the “**settlement scheme**”.

If you want to see a copy of the settlement deed or the settlement scheme, you can:

- (a) download them from www.levittrobinson.com/palmisland
- (b) email palmisland@levittrobinson.com and ask for a copy;
- (c) call Levitt Robinson on **02 9286 3133** or **0476 288 518** and ask them to send you a copy; or
- (d) ask the lawyers from Levitt Robinson for a copy when they visit Palm Island or Townsville.

The settlement deed and the settlement scheme are complicated. You may need to ask a lawyer to explain them to you.

(6) What do you do if there is something you don’t understand?

The law firm that helped the Wotton family with their case in the Federal Court is “**Levitt Robinson**”. They are still working on this class action. If there is anything in this notice that you do not understand, you can contact Levitt Robinson, by:

- calling **02 9286 3133** or **0476 288 518**;
- emailing palmisland@levittrobinson.com
- sending a letter to **PO Box 850, Darlinghurst NSW 1300**; or
- speaking to the lawyers from Levitt Robinson when they are on Palm Island or in Townsville.

You could also speak to your own lawyer.

Levitt Robinson will be holding public meetings on Palm Island and Townsville to explain the settlement to the group members. If you have any questions you can go to one of the meetings.

The meeting in Townsville will be at 10 am on Wednesday, 9 May 2018 at Queensland Country Women’s Association
134 Denham St
Townsville QLD 4810

The meeting on Palm Island will be at 10am on Thursday, 10 May 2018 at the PCYC.

C. WHAT HAS ALREADY HAPPENED IN THE CLASS ACTION?

(1) There was a trial and then a judgment

Between September 2015 and May 2016 there was a trial on Palm Island and in Townsville. The judgment was given by Justice Mortimer on 5 December 2016. The judgment can be downloaded at: www.levittrobinson.com/palmisland

Justice Mortimer's judgment said that some Queensland Police officers had committed acts of unlawful racial discrimination by:

- (a) failing to treat Senior Sergeant Christopher Hurley as a suspect in the death of Mulrunji Doomadgee and by allowing Senior Sergeant Hurley to continue to perform policing duties on Palm Island between 19 and 22 November 2004;
 - (b) their treatment of Aboriginal witnesses interviewed, and in their treatment of information supplied by those witnesses, for the purposes of the investigation by the Queensland Police Service into the death of Mulrunji Doomadgee;
 - (c) submitting inaccurate information to the coroner, and in failing to supply relevant information to the coroner, for the purposes of the coronial investigation into the death of Mulrunji Doomadgee;
 - (d) failing to suspend Senior Sergeant Hurley from active duty on Palm Island after the death of Mulrunji Doomadgee on 19 November 2004;
 - (e) failing to communicate effectively with the Palm Island community and to defuse tensions within that community relating to the death in custody of Mulrunji Doomadgee, and the subsequent police investigation;
 - (f) making a declaration of an emergency situation at 1.45 pm on 26 November 2004 and by continuing this emergency situation until 8.10 am on 28 November 2004;
 - (g) using officers of the Special Emergency Response Team to carry out the arrest of the first applicant (Lex Wotton) on 27 November 2004; and
 - (h) using officers of the Special Emergency Response Team on 27 November 2004 to carry out the entry and search of the house of the first and third applicants (Lex and Cecilia Wotton) and the house of the third applicant (Agnes Wotton).
- The applicants, the group members, and the respondents are all "bound" by the findings in the judgment. This means that all of these people have

to follow what the judgment says about who can make a claim and what they can claim for.

The Court ordered that the first respondent (the State of Queensland) should pay compensation to the applicants (Lex, Agnes and Cecilia Wotton) for the acts of unlawful racial discrimination by the police.

After the judgment, the group members were given a chance to register if they wanted to make their own claims against the State of Queensland for compensation or redress. The deadline for registration was 1 July 2017. The Court has allowed a few group members who had good reasons for not registering on time to register late. You will be told if you are one of those people.

(2) The sub-group representatives were chosen

As well as representing all of the group members in the class action, the applicants also represented a sub-group of people who were unlawfully treated by the Special Emergency Response Team (**SERT**). This sub-group is called the SERT sub-group.

Many group members were affected by the emergency declaration which shut down air and ferry transport

between Townsville and Palm Island from 1.45 pm on 26 November 2004 to 8.10 am on 28 November 2004. These people form a sub-group called the travel restriction sub-group. On 29 August 2017 the court ordered that Delphine Dawn Clay would represent the group members who are in the travel restriction sub-group.

Group members who are not in the SERT or travel restriction sub-groups are in the general damages sub-group. On 29 August 2017 the Court also ordered that Yvette Gail Wotton would represent the group members who are in the general damages sub-group.

Delphine Clay and Gail Wotton are called the “**sub-group representatives**”. The sub-groups are explained in more detail in the part of this notice called “**E What part of the Settlement Scheme applies to you?**”.

(3) There was a mediation and the settlement was agreed

On 6 and 7 December 2017 the applicants and the sub-group representatives all met with the respondents at a “**mediation**” in Townsville. A mediation is like a meeting where people try to make an agreement with each other instead of going to court.

After the mediation, the applicants and the group members agreed to the settlement so that they could end the class action without having to have more trials in the court. As part of the settlement, the applicants and the respondents agreed on the settlement scheme, to plan how the settlement would be carried out.

D. WHAT IS HAPPENING NOW IN THE CLASS ACTION?

(1) The settlement needs to be approved by the court

In a class action where there has been a settlement, the settlement can't be carried out unless the court says that it is fair to all the group members, which is called "**approving**" the settlement. There will be a hearing in Townsville where a judge will decide whether to approve the settlement in this class action. This is called the "**approval hearing**".

You can come to watch the approval hearing if you want to. The approval hearing will be at 9.30am on Friday, 15 June 2018 at this address:

Federal Circuit Court of Australia
Level 2, 143 Walker Street
Townsville QLD 4810

If the court approves the settlement at the approval hearing, then the settlement will be "**binding**" on all of the group members. This means that the settlement scheme will be the only way that any group member can be paid compensation from the class action. Group members will not be allowed to bring their own claims against the respondents except in the way the settlement scheme says that they can.

If the court approves the settlement, then the registered group members will be able to make claims for compensation from the settlement

fund. We explain how this works in the part of this notice called "**F How does the settlement scheme work?**".

If the court does not approve the settlement, all of the registered group members will have to go to court if they want to make claims for compensation, unless some other agreement can be reached. Trials of the registered group members' claims will take a long time and be very expensive, and there is no guarantee that there will be another settlement.

The court has said that the group members who are not registered are not allowed to make any claims in the class action at all, so they will not be able to do this even if the settlement is not approved.

(2) What do you have to do now?

If you support the settlement, you do not need to do anything. If you want to object to the settlement, you need to fill out the form at the end of this notice called the "**Objection to Settlement Form**" and send it to the address on the form, so that it reaches the address by no later than 1 June 2018.

Another way you can object to the settlement is by going to the approval hearing and telling the judge. You could also hire a lawyer to do this for you.

E. WHAT PART OF THE SETTLEMENT SCHEME APPLIES TO YOU?

(1) Which sub-group are you in?

The group members in the class action have been broken up into three “**sub-groups**”, based on what happened to them in November 2004. If you are a registered group member, that means you are in at least one of the sub-groups. Some people are in more than one sub-group.

If you are a registered group member, the amount of compensation that you are paid will depend on the sub-group that you are in.

The first sub-group is called the “**SERT sub-group**”. “SERT” stands for “Special Emergency Response Team”. That’s the name of the police special forces squad that was raiding peoples’ houses on Palm Island in 2004 after the fire in the police station. You are in the SERT sub-group if you were there when the SERT squad was raiding peoples’ houses or arresting people and you were in a house that was raided, you were arrested, or you saw what was happening. You are also in the SERT sub-group if the SERT squad raided your house.

The second sub-group is called the “**travel restriction sub-group**”. When everything was happening in November 2004, the police shut down the ferry and the airport, so that no one could get to Palm Island or leave Palm Island. You are in the

travel restriction sub-group if you tried to get to Palm Island or leave Palm Island, but you couldn’t do that because you couldn’t get on a ferry or a flight.

If you are in the SERT sub-group, you might also be in the travel restriction sub-group.

The third sub-group is called the “**general damages sub-group**”. If you are a registered group member and you are not in the SERT sub-group or the travel restriction sub-group, then you are in the general damages sub-group.

(2) If you are in the SERT sub-group, what kinds of claim do you have?

There are four different types of claim in the SERT sub-group. If you are in the SERT sub-group, the amount of compensation you get will depend on the type of claim you have.

The first type of claim is called a “**SERT-present**” claim. You have a SERT-present claim if the SERT squad raided your home or the place you were living or staying or visiting on Palm Island, and you were there at the time.

The second type of claim is called a “**SERT-witness**” claim. You have a SERT-witness claim if you were there when the SERT squad raided someone’s home or arrested someone, but you were not in any of the houses

at the time they were raided, you were not assaulted by them, and they didn't raid your home.

The third type of claim is called a "**SERT-property**" claim. You have a SERT-property claim if the SERT squad raided your home, but you weren't there at the time.

The fourth type of claim is called a "**SERT-assault**" claim. You have a SERT-assault claim if you were a SERT-witness who was also assaulted by the SERT squad.

Being assaulted by the SERT squad doesn't just mean that they physically hurt you. It could also mean that they pointed a gun at you or threatened you, so that you thought they were about to physically hurt you.

You can have more than one different SERT sub-group claim. For example, if your home was raided when you were not there, but you were at someone else's home when it was raided, you could have a SERT-property claim and a SERT-present claim.

(3) People who might get further damages

There are also some people in the travel restriction sub-group or the general damages sub-group who might get further damages.

These are the reasons why that might happen:

- (a) The close family members of Mulrunji Doomadgee might get further damages, because the police didn't investigate the death of their family member properly and they were traumatised by this. Family members who have already been paid compensation by the government for what happened will not get any further damages for this.
- (b) People who were threatened or assaulted by the police during the emergency situation after the fire in the police station might get further damages.
- (c) People who had their houses raided by the police around the time of the emergency situation, but where it was the normal police who did the raid and not the SERT squad, might get further damages.
- (d) People who were arrested by the police might get further damages if the police didn't have a real reason to arrest them. This will be decided based on the information the police had at the time, and not because of what people tell us now. We know what information the police had at the time because the court ordered them

to give it to us before the trial of the class action.

- (e) People in the travel restriction sub-group will get further damages if what happened to them was very humiliating or difficult. For example, people who couldn't get home and didn't have any spare clothes or any money for food might get further damages, and parents who couldn't be with their young children and were very worried about them might get further damages.

(4) People who can't be paid compensation

Some people might have registered as group members who are not able to be paid compensation. This might be because:

- (a) they registered as group members but they are not actually group members, because they are not Aboriginal or Torres Strait Islander People, or because they did not normally live on Palm Island on 19 November 2004 or 25 March 2010; or
- (b) they have already been paid compensation for the things they are claiming for.

F. HOW DOES THE SETTLEMENT SCHEME WORK?

The settlement scheme is complicated. This is only a summary of the settlement scheme. If you want to see a copy of the whole settlement scheme, you can:

- (a) download it from www.levittrobinson.com/palmisland
- (b) email palmisland@levittrobinson.com and ask for a copy;
- (c) call Levitt Robinson on **02 9286 3133** or **0476 288 518** and ask them to send you a copy; or
- (d) ask the lawyers from Levitt Robinson for a copy when they visit Palm Island or Townsville.

(1) Who is the scheme administrator?

The settlement scheme will be run by a person called the “**scheme administrator**”. His name is Stewart Alan Levitt. He is also the lawyer for the applicants in the class action.

The scheme administrator will be the person who manages the settlement fund and organises how and when group members are paid out of the settlement fund. It is his job to make sure that everything in the settlement scheme gets done the way it is supposed to. Doing what the settlement scheme says is called “**administering**” the settlement scheme.

(2) What is the settlement fund?

The State of Queensland has agreed to pay \$30 million to the registered group members. This is called the “settlement fund”. The settlement fund has been paid into a bank account and will earn interest up until the time that it is paid out of the bank account.

In return for the settlement fund being paid, the applicants have agreed that no more claims can be made by the applicants or the group members against the respondents in the class action or about the things that the police did to the group members on Palm Island in November 2004. If the settlement is approved by the court, the group

members will not be able to make any more claims like that, even if they are not registered.

(3) What legal fees are being paid?

Levitt Robinson have been doing work for the applicants and the sub-group representatives in the class action. They have also been hired by most of the group members to help with their claims. Levitt Robinson have done this on a “no win no fee” basis. Because the settlement means the applicants and the group members have “won”, they will now have to pay Levitt Robinson’s legal fees.

As a part of the settlement, Levitt Robinson’s fees will be paid out of the settlement fund. Group members will not have to pay anything extra. The court will have to approve Levitt Robinson’s fees before they are paid. There are three types of fees that will be paid:

- (a) The first type of fees are the “**outstanding costs**”, which are the fees for the work that was done before the settlement was agreed. This will be about \$2.3 million.
- (b) The second type of fees are the “**approval costs**”, which are the costs of having the settlement approved. This will be about \$200,000.

- (c) The third type of fees are the “**administration costs**”, which are the costs of administering the settlement. Because this hasn’t happened yet, we don’t know how much it will be, but the scheme administrator estimates that the administration costs will be about \$1.3 million. The scheme administrator will have to ask the court for permission if he wants to charge more than this.

After the applicants won the trial, the court ordered the State of Queensland to pay their legal fees. The State has paid a total of \$2.9 million to satisfy the Court’s order. The “outstanding costs” of about \$2.3 million are in addition to the amount Levitt Robinson has already been paid by the State.

(4) What are the sub-group representative payments and the Roy Bramwell payment?

The settlement scheme says that there will be a payment of \$2,000 made to each of the sub-group representatives. This includes the applicants, because they are the representatives of the SERT sub-group.

This payment is called the “sub-group representative payment”. It is being paid to the sub-group representatives because they had to give up a lot

of time and do a lot of work for the people in the sub-groups, like speaking to the lawyers to tell them about their claim and what to do in the case, and going to the mediation to make a deal with the government and the police about how much was going to be paid. It is also being paid to them because they took a risk when they became the sub-group representatives, which meant that they might have had to go to court, and that they would have had to pay the fees of the lawyers for the government and the police if they had lost.

One other person who will get a payment that is different from what the other group members are getting is Roy Bramwell. He has brought his own claim for compensation in the class action because of what happened to him when he was in the police station with Mulrunji Doomadgee. He is the only person who was there, and so no one else has a claim like his. He has agreed with the respondents on how much he will be paid and so his claim will be paid out of the settlement fund separately and will not be included in the settlement scheme.

(5) How will the compensation be worked out?

After the payments have been made for legal fees and to the sub-group representatives and Roy Bramwell, the scheme administrator will

work out how much compensation will be paid to the registered group members. This will be very complicated and could take up to a year after the court approves the settlement. If it takes longer than that, the scheme administrator will have to ask the court for permission to extend the time for payment.

IMPORTANT: This is only a summary of how the payments will be worked out. If you want to understand how your compensation will be worked out, you need to read the settlement scheme.

The amount of money that each group member gets will depend on the sub-group they are in. There has been a lot of work done in the last year by Levitt Robinson interviewing group members and taking statements. The scheme administrator will use that information to work out which sub-group the group members are in. Some group members will need to be interviewed again before he can do this. He will also use other information to work this out, like the records that the court said the police had to give to the applicants.

After the scheme administrator has worked out which sub-group everyone is in, he will send a letter to all of the registered group members to tell them which sub-group they are in. That letter is called a “**sub-group notice**”.

If you are sent a sub-group notice and you think that there has been a mistake, then you will be able to have a “**review**”, which means that another person will look at the decision the scheme administrator made and decide if he was right.

After it has been worked out which sub-group everyone is in, there will need to be more work done to figure out how much some of the registered group members will be paid.

People who have SERT-present claims or SERT-assault claims will have to give a sworn statement to the scheme administrator and be examined by a psychiatrist before their compensation is worked out. After this has happened, they will have an “**assessment**” to work out how much compensation they will be paid.

The people who might get further damages will also have an assessment, to see if they will get further damages. They do not need to give a sworn statement or be examined by a psychiatrist.

Everyone who has had an assessment will be sent a letter called an “**assessment notice**” to tell them what their assessment says. After they get this letter they will be given a chance to have a review of the assessment if they think that

there was a mistake in the assessment.

When all of the reviews of the assessments have finished, the scheme administrator will be able to work out how much money each of the group members should be paid out of the settlement fund. He will pay the money to the group members after this has happened.

G. WHERE CAN YOU GET COPIES OF THE DOCUMENTS?

The settlement is explained in the settlement deed and the settlement scheme. This notice only has a summary of the settlement. If you want to understand how the settlement works, you should read the settlement deed and the settlement scheme.

There are other relevant documents for the class action as well. These include the Originating Application, the Third Further Amended Statement of Claim, the Defence, the Reply, and the Judgment dated 5 December 2016. There are also Statements of Claim and Defences for the claims of the travel restriction sub-group and the general damages sub-group.

If you want to read any of these documents, you can

- (a) download them from the Levitt Robinson website at www.levittrobinson.com/palmisland or
- (b) ask Levitt Robinson for copies by calling **02 9286 3133** or **0476 288 518** or emailing palmisland@levittrobinson.com or
- (c) inspect them between 9am and 5pm at the offices of Levitt Robinson. For contact details go to www.levittrobinson.com or call **02 9286 3133** or **0476 288 518**; or
- (d) contact a District Registry of the Federal Court (contact details are available www.fedcourt.gov.au). If you do this, you may have to pay an inspection fee; or
- (e) inspect them on the Federal Court website at <http://www.fedcourt.gov.au/services/access-to-files-and-transcripts/online-files/wotton-v-qld>.

H. WHAT IF YOU HAVE ANY QUESTIONS?

Please read this notice carefully.

If there is anything you do not understand, you should ask your lawyer or speak to Levitt Robinson by

- calling **02 9286 3133** or **0476 288 518**,
- or by emailing palmisland@levittrobinson.com.

Levitt Robinson will also be holding public meetings on Palm Island and Townsville to explain the settlement to the group members. If you have any questions you can go to one of the meetings.

The meeting in Townsville will be at 10 am on Wednesday, 9 May 2018 at

**Queensland Country Women's
Association
134 Denham St
Townsville QLD 4810**

The meeting on Palm Island will be at 10am on Thursday, 10 May 2018 at the PCYC.

OBJECTION TO SETTLEMENT FORM

The next page is the Objection to Settlement form. The form is there so that you can tell the court if you object to the settlement.

If you want to object to the settlement by sending the form in, you have until 1 June 2018 to do this.

You can also object to the settlement by going to the approval hearing and telling the judge why you object. The approval hearing will be at 9.30am on Friday, 15 June 2018; at this address:

Federal Circuit Court of Australia
Level 2, 143 Walker Street
Townsville QLD 4810

Here is how to fill out the form:

- (a) Fill in your name, address, phone number, and email address. If you do not have a phone or email, you can leave this blank.
- (b) If you want to tell the court why you object to the settlement, you should write the reasons in the box that says, "I object to the settlement because:". If you run out of space, you can use your own paper and add it to the form

After you have finished filling out the form, you should post it to the court at this address, so that it reaches the court by no later than 1 June 2018:

The Registrar
Federal Court of Australia
Queensland District Registry
Level 6, Harry Gibbs Commonwealth
Law Courts Building
119 North Quay
Brisbane QLD 4000

IMPORTANT: YOU SHOULD ONLY OBJECT IF YOU DON'T LIKE THE SETTLEMENT. IF YOU SUPPORT THE SETTLEMENT YOU DO NOT NEED TO DO ANYTHING.

To: The Registrar
Federal Court of Australia
Queensland District Registry
Level 6, Harry Gibbs Commonwealth
Law Courts Building
119 North Quay
Brisbane QLD 4000

Federal Court of Australia
No. QUD 535 of 2013
District Registry: Queensland
Division: General
Lex Patrick WOTTON and others
Applicants
State of QUEENSLAND and another
Respondents

**Palm Island Residents
Queensland Police Class Action
Objection to Settlement Form**

Name of Group Member:

Your Address:

Your Phone Number:

Your Email (if any):

I object to the settlement because:

Attach more pages if you need to.

