

LEGAL NOTICE

If you were an employee of the State of Connecticut as of November 17, 2002 and were a member of a bargaining unit designated as an exclusive bargaining representative pursuant to the State Employee Collective Bargaining Act

YOU COULD GET A PAYMENT FROM A PROPOSED CLASS ACTION SETTLEMENT

The United States District Court for the District of Connecticut (the “Court”) has given preliminary approval for settlement of a class action lawsuit against the then-Governor and Secretary of the Office of Policy and Management of the State of Connecticut (the “Defendants”). The lawsuit is known as *State Employees Bargaining Agent Coalition, et al v. John G. Rowland, et al.*, Civ. No. 3:03-cv 221-(AVC). The Proposed Settlement, if finally approved by the Court, will provide for payment of damages for economic and non-economic losses sustained by Settlement Class Members, as discussed below. This notice summarizes your rights and options in connection with the Proposed Settlement.

Are You Affected?

You are a Settlement Class Member if you were an employee of the State of Connecticut as of November 17, 2002 and (a) you were a member of a bargaining unit designated as an exclusive bargaining representative pursuant to the State Employee Collective Bargaining Act, or (b) you were employed by the State of Connecticut under a working test period or training program, including as a provisional employee or an employee appointed to a durational position for six months or more, and you were designated for membership in a bargaining unit upon successful completion of the requirements of such working test period, training program or provisional appointment.

What is the Case About?

The lawsuit alleges that the Defendants took improper adverse employment action against State of Connecticut union employees in retaliation for their and their unions’ exercise of their constitutionally protected freedoms of speech and association. The lawsuit claims that such improper actions included the wrongful layoff of approximately 3,000 union members in retaliation for the unions’ refusal to forego certain statutorily protected contract rights, which in turn, also resulted in bumping and demotions to other union employees. The lawsuit makes claims under the First Amendment to the United States Constitution as well as a Connecticut law protecting the free speech rights of employees in the State.

There has not been a final determination that the Defendants are liable for any damages to the Settlement Class, but the Defendants have agreed to settle the lawsuit in order to avoid the risk, delay and expense of the litigation.

What are the Terms of the Settlement?

Under the terms of the Proposed Settlement, Defendants will provide benefits to Class Members for Economic Damages and for Emotional Distress based on whether the individual Class Member sustained actual economic loss as a result of the layoffs (or layoff orders).

Each class member who sustained an actual economic loss as a result of being laid-off, demoted or transferred will be entitled to receive a sum to compensate for that economic loss equal to 70% of each Settlement Class Member's gross economic loss *minus* any replacement earnings. In addition, each Settlement Class Member will be entitled to receive prejudgment interest calculated from the date of loss to the date of payment at a rate of 5% per year. For those Settlement Class Members still employed in the State's work force, such compensation will be paid either directly by check or in the form of an award of vacation pay and, in either case, will be paid out in equal yearly installments over four years. For Class Members who are no longer employed in the State's work force (or who do not receive vacation pay as an element of their annual compensation), economic damage awards will be paid in equal yearly installments over four years.

Under the terms of the Proposed Settlement, each Class Member is also entitled to receive a benefit for emotional distress and punitive damages, based on whether the Class Member was laid-off, bumped or transferred, or not otherwise affected in his or her employment. Settlement Class Members who were laid off as a result of the layoff orders will receive an award of either \$1,500 or ten vacation days and five personal leave days (depending on whether the Class Member is still employed by the State and eligible for vacation pay). Settlement Class Members who were demoted to a lower paying job will receive an award of four vacation days and three personal leave days or \$700.00 (depending on whether the Class Member is still employed by the State and eligible for vacation pay). Any other Class Member will receive an award of \$100 or 1.25 personal leave days (depending on their continued employment eligibility for personal leave).

Under the Proposed Settlement, class members who missed salary or longevity adjustment while laid off or who were returned to the State workforce at lesser seniority levels may be entitled to further salary adjustments, damages in lieu of such an adjustment, and/or pension adjustments.

Who Represents You?

The Court has appointed the law firm of Silver Golub & Teitell, LLP as "Class Counsel." You do not have to pay any fees or expenses to Class Counsel. As part of the Proposed Settlement counsel fees and expenses will be paid directly by the State of Connecticut. You may hire your own attorney, if you wish. However, you will be responsible for that attorney's fees and expenses.

What Further Proceedings Are Scheduled?

The Court has not yet decided whether to give Final Approval to the Proposed Settlement. The Court will hold a Fairness Hearing at 1:00 p.m. on October 1, 2015 at the Abraham A. Ribicoff Federal Building, Courtroom #1, Annex, 450 Main Street in Hartford, Connecticut,. At this hearing, the Court will consider: (1) whether the Proposed Settlement is fair, reasonable and

adequate, and whether it should be approved; and (2) any payments to the Class Representatives for their Services. If there are objections, the Court will also consider them.

Settlement Class Members who have followed certain procedures may appear and be heard by the Court at the Fairness Hearing. After the hearing, the Court will decide whether to approve the Proposed Settlement.

What Are Your Legal Rights?

If the proposed Settlement is approved and you are a Settlement Class Member as defined in this Notice, you do not need to do anything in order to receive the benefits set forth above.

If the Proposed Settlement is approved, the lawsuit will be dismissed with prejudice. This means that the lawsuit cannot be re-filed. As a result, all Settlement Class Members will give up all the claims covered in this lawsuit and settlement against the Defendants (or other entities covered by the Release of Claims). All Settlement Class Members are releasing the Defendants (or other entities covered by the Release of Claims) and will be bound by that release. No Settlement Class Member will be able to sue any of the Defendants (or other entities covered by the Release of Claims) for the same claims.

If you are a member of the Settlement Class, you may object to any aspect of the Proposed Settlement, including (1) Final certification of the Settlement Class; (2) the fairness, reasonableness, or adequacy of the Proposed Settlement; (3) the adequacy of the representation by the Class Representatives or by Class Counsel; or (4) the awards to the Class Representatives. Your objection must be in writing, sent to the Clerk of the United States District Court, 450 Main Street, Hartford, CT 06103 as well as to Class Counsel, Silver Golub & Teitell, LLP, 184 Atlantic Street, Stamford, Connecticut 06901, and must be postmarked no later than September 14, 2015.

If you do not want to be bound by the judgment in this case, do not want a payment from the Proposed Settlement, and you instead want to keep the right to sue the Defendants about the legal issues in this case, then you must exclude yourself from the class. To exclude yourself from the Class, you must submit an Opt-Out Election Form to the address indicated on the form. Be sure to include your name, address, telephone number and your signature. Your Opt-Out Election Form must be postmarked on or before September 14, 2015. The Opt-Out Election Form is available on Class Counsel's website: www.sgtlaw.com/class-action-sebac-v-john-g-rowland/. You cannot exclude yourself by telephone or by email. If you ask to be excluded, you will not get any recovery from the Proposed Settlement. You will not be legally bound by anything that happens in the lawsuit, and you may be able to sue the Defendants in the future about the legal issues in this case, but you will be subject to any legal defenses that the Defendants may assert.

HOW CAN YOU GET MORE INFORMATION?

If you have questions or want a full, detailed notice or other documents about this lawsuit and your rights, write to Class Counsel, Silver Golub & Teitell, LLP, 184 Atlantic Street, Stamford, Connecticut, 06901, or call toll-free: 1-800-284-5642. You can also download copies of the Proposed Settlement and other documents related to the Proposed Settlement at Class Counsel's website: www.sgtlaw.com/class-action-sebac-v-john-g-rowland/.