

1 **Notice of Settlement**

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3 *Anti Police-Terror Project, et al. v. City of Oakland, et al.*

4 U.S. District Court, Northern District of California

5 Case No. 3:20-cv-03866 JCS

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7 This lawsuit challenges the Oakland Police Department (OPD)'s handling of the
8 response to demonstrations in Oakland on May 29, 30, 31, and June 1, 2020, following
9 the murder of George Floyd. The Court has certified the following class of people for
10 purposes of obtaining injunctive relief against the City of Oakland:

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12 All persons injured by tear gas deployed by the Oakland Police Department or its
13 mutual aid partners during the George Floyd protests on May 29-31, and June 1,
14 2020, while protesting peacefully in the City of Oakland, with respect to their
15 claims against the City of Oakland for violations of their rights under the First
16 Amendment, Fourth Amendment (excessive force), and Fourteenth Amendment
17 to the United States Constitution and their state law claims of assault and battery,
18 negligence, and violation of the Bane Act (California Civil Code § 52.1).

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20 The parties have agreed to settlement of the claims for injunctive relief on behalf of this
21 class. The settlement includes multiple requirements regarding the use of chemical
22 agents; multiple requirements regarding OPD's management of mutual aid agencies;
23 requirements regarding the use of impact munitions, displaying of identifying
24 information, use of personal digital recording devices, and crowd dispersal methods;
25 training of officers; and a five-year period of continuing jurisdiction. The settlement is
26 for injunctive relief only and does not provide any monetary relief to class members.
27 The settlement also provides for up to \$1,200,000 in attorneys' fees and costs to the
28 attorneys representing the class.

1 The Court will decide whether to approve the settlement at a Final Approval Hearing on
2 December 16, 2022, at 9:30 a.m. Class members and members of the public may attend
3 the hearing via Zoom at

4 <https://cand->

5 [uscourts.zoomgov.com/j/1619260804?pwd=RE5qWDhGOTdWWTZUOFI0KzhNc3pjZz](https://cand-uscourts.zoomgov.com/j/1619260804?pwd=RE5qWDhGOTdWWTZUOFI0KzhNc3pjZz)

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7 Webinar ID: 161 926 0804, Password: 050855

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9 If you are a member of this class of people, you can ask the Court to deny approval by
10 filing an objection. You cannot ask the Court to order a different settlement; the Court
11 can only approve or reject the settlement. If the Court denies approval, no settlement
12 will occur, and the lawsuit will continue. If that is what you want to happen, you must
13 object.

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15 Any objection to the proposed settlement must be in writing. If you file a timely written
16 objection, you may, but are not required to, appear at the Final Approval Hearing, either
17 in person or through your own attorney. If you appear through your own attorney, you
18 are responsible for hiring and paying that attorney. All written objections and
19 supporting papers must (a) clearly identify the case name and number (*Anti Police-*
20 *Terror Project, et al. v. City of Oakland, et al.*, Case Number 3:20-cv-03866 JCS), (b) be
21 submitted to the Court either by mailing them to the Clerk, United States District Court
22 for the Northern District of California, 450 Golden Gate Avenue, Box 36060, San
23 Francisco, CA 94102-3489, or by filing them in person at any location of the United
24 States District Court for the Northern District of California, and (c) be filed or
25 postmarked on or before November 11, 2022. Your written objection should also
26 describe the facts indicating that you are a member of the class, and describe the nature
27 of your objection.

1 This notice summarizes the proposed settlement. For the precise terms and conditions
2 of the settlement, please see the settlement agreement available at www.SiegelYee.com,
3 by contacting class counsel at (510) 839-1200, by accessing the Court docket in this
4 case, for a fee, through the Court's Public Access to Court Electronic Records (PACER)
5 system at <https://ecf.cand.uscourts.gov>, or by visiting the office of the Clerk of the Court
6 for the United States District Court for the Northern District of California, 450 Golden
7 Gate Avenue, 16th floor, San Francisco, CA, between 9:00 a.m. and 1:00 p.m., Monday
8 through Friday, excluding Court holidays.

9 PLEASE DO NOT TELEPHONE THE COURT OR THE COURT CLERK'S OFFICE TO
10 INQUIRE ABOUT THIS SETTLEMENT OR THE CLAIM PROCESS.