

about the applicant/licensee to the Defendants. Based on current statistics provided by the Pennsylvania State Police, the Class is believed to encompass more than 17,000 individuals. Pursuant to Section 6111(i), each individual who has his/her information disclosed is entitled to a statutory damage of \$1,000.00, or three times actual damages, plus attorney fees. The Defendants dispute that they violated Section 6111(i) or the right to privacy.

As this case involves confidential information, per the Court's Order of November 4, 2015, unless the Court directs otherwise, the court filings are sealed to protect the identities of the Class Representatives and Class Members.

What are your rights and options?

You must decide whether to remain in the Class (do nothing right now) or ask to be excluded within 30 days.

You do not have to do anything right now, if you are agreeable to the Defendants providing all information relating to your application for or renewal of your license to carry firearms to Class Counsel and desire to retain the possibility of receiving money or benefits from this lawsuit. **By doing nothing, you authorize the disclosure of your information to Class Counsel and remain in the Class.** If you stay in the Class and financial or other benefits are obtained, either as a result of a trial or a settlement, you will be notified about how to apply for a share (or how to ask to be excluded from any settlement). Keep in mind that if you do nothing, regardless of whether the claims are successful, you will not be able to sue the Defendants about the same legal claims that are the subject of this lawsuit. You will also be legally bound by all Orders the Court issues and judgments the Court makes in this class action.

If do not wish for the Defendants to provide all information relating to your application for or renewal of your license to carry firearms to Class Counsel or wish to sue the Defendants on your own, you need to ask to be excluded from the Class. If you exclude yourself from the Class – which also means to remove yourself from the Class, and is sometimes called “opting-out” of the Class – you will not receive any money or benefits from this lawsuit even if the Plaintiffs/Class Representatives win damages at trial or there is a settlement. If you exclude yourself, you will not be legally bound by the Court's judgments in this class action.

If you file your own lawsuit against Defendants after you exclude yourself, you may be barred from bringing the action pursuant to the statute of limitations and you may have to hire and pay an attorney for representation in that matter. If you are considering excluding yourself, you should immediately speak with an attorney about your rights, before excluding yourself.

How do you ask the Court to exclude you from the Class?

To ask to be excluded, you must send a letter via U.S. Mail, certified return receipt, to (1) Joshua Prince, Esq., Civil Rights Defense Firm, P.C., 646 Lenape Road, Bechtelsville, PA 19505 and (2) Gerard Geiger, Esq., Newman Williams, 712 Monroe Street, Stroudsburg, PA 18360. In the letter, you must provide your name, address, date of birth, and that you wish to be excluded from the Class in *John Doe I, et al., v. Monroe County, et al.*, docket no. 6384 cv 2015.

Do you have an attorney in the case?

The Court has appointed Joshua Prince, Esq. and Adam Kraut, Esq. of Civil Rights Defense Firm, P.C., as Class Counsel to represent the Class Representatives and the interests of the Class Members. They can be contacted at Civil Rights Defense Firm, P.C., 646 Lenape Road, Bechtelsville, PA 19505, (888) 202-9297 or www.CivilRightsDefenseFirm.com. While Class Members do not need to hire their own attorney – as Class Counsel are working on the Class Members' behalfs – you may retain one, if you wish for someone other than Class Counsel to appear in Court for you.

How is Class Counsel paid?

If Class Counsel obtains money or benefits for the Class, they may ask the Court for fees and expenses. If the Court grants Class Counsel's request, the fees and expenses would either be deducted from any money obtained for the Class or paid separately by Defendants. If you hire your own attorney, you will likely have to pay that attorney to represent you; however, in the event that Class Counsel obtains money or benefits for the Class, your attorney may be able to additionally request fees and expenses from the Court.

Still want more information?

Visit the website www.MonroeLTCFClassAction.com or contact Class Counsel.