

Did you get billed for water and/or sewer services by the City of Grovetown between September 1, 2011 and September 1, 2016?

If yes, a legal Settlement Fund valued at \$1.5 million has been created and you may be eligible to redeem a portion of that fund.

**A court authorized this notice.
This is not a solicitation from a lawyer.**

- A settlement has been proposed in a class action lawsuit about illegally high water and sewer charges to customers of Grovetown’s water and sewer utility.
- The settlement will provide vouchers to current residents of Grovetown, and payments to those who have moved away.
- Your legal rights are affected whether you act, or don’t act. Read this notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS

| | |
|----------------------------|--|
| Submit a Claim Form | The only way to be compensated from the Settlement Fund. |
| Ask to be Excluded | Get no Class Benefits. This is the only option that allows you to sue the City of Grovetown over the claims resolved by the Settlement. |
| Object | Write to the Court about why you don’t like the Settlement. You still need to submit a valid Claim Form to ask for and receive Class Benefits from the Settlement Fund. |
| Go to a Hearing | Ask to speak in Court about the fairness of the Settlement. You still need to submit a valid Claim Form to ask for and receive Class Benefits from the Settlement Fund. |
| Do Nothing | Get no Class Benefits and give up your right to sue the City of Grovetown over the same claim later. |

- These rights and options—and the deadlines to exercise them—are explained in this notice.
- The Court in charge of this case still has to decide whether to approve the Settlement. Class Benefits will be distributed if the Court does so, and after any appeals are resolved. Please be patient.

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BASIC INFORMATION

1. Why was this notice issued?

A Court authorized this notice because you have a right to know about a proposed Settlement of this class action, including the right to claim Class Benefits, and about all of your options, before the Court decides whether to give “final approval” to the Settlement. If the Court approves the Settlement, and after any appeals are resolved, Utility Payment Vouchers or Non-Resident Payments will be mailed to Eligible Class Members who submitted a timely and valid Claim. This notice explains the lawsuit, the Settlement, your legal rights, what benefits are available, who may be eligible for them, and how to get them.

Judge Michael Annis, of the Superior Court of Columbia County, State of Georgia, is presiding over this class action. The case is known as *Deena Youngblood; Learning, Laughter, and Love, LLC; and Allen Transou v. City of Grovetown*, Civil Action File No. 2016-CV-0413. The people who sued are called the “Plaintiffs” and the municipal corporation they sued (Grovetown) is called the “Defendant.”

2. What is this lawsuit about?

This Action arose out of certain illegal billing practices at the City of Grovetown. Specifically, the Plaintiffs in this case allege that the water and sewer rates assessed by the city between September 1, 2011 and September 1, 2016 were illegally high, due to the failure of city officials to abide by Ordinance 9-23. These failures affected every customer of Grovetown’s utilities department.

3. Why is this a class action?

In a class action, one or more people called “Class Representatives” sue on behalf of people who have similar claims, who are the “Class” or “Class Members.” One court resolves the issues for all Class Members, except for those who exclude themselves from the Class.

4. Why is there a Settlement?

The Court did not decide in favor of the Plaintiffs or Defendant. Instead, both sides agreed to settle. That way, they avoid the costs and risks of a trial, and the people affected will get relief. The Class Representatives and their attorneys think the Settlement is best for all Class Members. The Settlement is not an admission by Grovetown that it did anything wrong.

WHO IS IN THE SETTLEMENT?

To see if you can get benefits from this Settlement, you first have to determine if you are a Class Member.

5. How do I know if I am part of the Settlement?

All persons, who are or were formerly customers of the City of Grovetown’s water, wastewater, and stormwater utility and who were billed for water, wastewater, and/or stormwater utility services by the City of Grovetown between September 1, 2011 and September 1, 2016 are members of the class. “Persons” include business entities. Even if you are unsure whether you are a Class Member, you should submit a timely Claim Form if you do not wish to be excluded from the Class.

THE SETTLEMENT BENEFITS—WHAT YOU GET

6. What does the Settlement provide?

This Settlement will provide Utility Payment Vouchers equal to 32% of the 2015 water bill at the Class Member's current residency, to all Class Members who are still residents of Grovetown and submit timely and valid Claim Forms. The Settlement will provide Non-Resident Payments of \$50.00 to Class Members who meet the class definition but have moved away, and who submit timely and valid Claim Forms. The Settlement also provides injunctive relief. A Settlement Agreement, available at www.grovetownwatersettlement.com or by calling 1-844-330-1178, describes all of the details about the proposed Settlement.

7. I am a Resident. Will I receive an actual Utility Payment Voucher?

No. If a Class Member submits a timely and valid Claim Form, the Settlement Administrator will submit a Utility Payment Voucher on that Class Member's behalf to the City of Grovetown. The City of Grovetown will then credit that Class Member's utility account for the value of the voucher.

8. I am a Non-Resident. Will I receive an actual check?

Yes.

HOW TO SUBMIT A CLAIM FORM

9. How do I Claim my Utility Payment Voucher?

To ask for Utility Payment Vouchers, you must complete and submit a Claim Form. A Claim Form is included with this Notice. You can also get a Claim Form at www.grovetownwatersettlement.com or by calling 1-844-330-1178. Please read the instructions carefully and fill out the Claim Form entirely. You can mail your claim form by U.S. Mail, or submit it online, by facsimile, or by e-mail. If you are mailing your Claim Form by U.S. Mail, it must be postmarked by October 2, 2017, to:

Youngblood v. Grovetown
c/o KCC Class Action Services
P.O. Box 43034
Providence, RI 02940-3034

Alternatively, you can fill out a Claim Form online at www.grovetownwatersettlement.com, or e-mail it to Info@grovetownwatersettlement.com, or fax it to 1-415-256-9756, each of which must be submitted by October 2, 2017 to be timely.

10. How do I claim my Non-Resident Payment?

To ask for a Non-Resident Payment, you must complete and submit a Claim Form. A Claim Form is included with this Notice. You can also get a Claim Form at www.grovetownwatersettlement.com or by calling 1-844-330-1178. Please read the instructions carefully and fill out the Claim Form entirely. You can mail your claim form by U.S. Mail, or submit it online, by facsimile, or by e-mail. If you are mailing your Claim Form by U.S. Mail, it must be postmarked by October 2, 2017, to:

Youngblood v. Grovetown
c/o KCC Class Action Services
P.O. Box 43034
Providence, RI 02940-3034

Alternatively, you can fill out a Claim Form online at www.grovetownwatersettlement.com, or e-mail it to Info@grovetownwatersettlement.com, or fax it to 1-415-256-9756, each of which must be submitted by October 2, 2017 to be timely.

11. When will my Utility Payment Voucher be applied to my account?

The Utility Payment Vouchers will be credited to your City of Grovetown Utility Account after the Court grants “final approval” of the Settlement, and any appeals are resolved. If Judge Annis approves the Settlement after an upcoming hearing (see the section “The Court’s Fairness Hearing” below), there may be appeals. If there are any appeals, resolving them can take time. Please be patient.

12. When will I receive my Non-Resident Payment?

Non-Resident Payments will be mailed directly to you after the Court grants “final approval” of the Settlement, and any appeals are resolved. If Judge Annis approves the Settlement after an upcoming hearing (see the section “The Court’s Fairness Hearing” below), there may be appeals. If there are any appeals, resolving them can take time. Please be patient.

13. What am I giving up to stay in the class?

If the Settlement becomes final, you will be releasing the City of Grovetown for all the claims identified in the Settlement Agreement. These are called “Released Claims.” The Settlement Agreement is available at www.grovetownwatersettlement.com. The Settlement Agreement describes the Released Claims with specific descriptions, in necessarily accurate legal terminology, so read it carefully. Talk to your attorneys (see the section on “The Lawyers Representing You” below) or your own lawyer if you have questions about the Released Claims or what they mean.

EXCLUDING YOURSELF FORM THE SETTLEMENT

If you don’t want Class Benefits from this Settlement, but you want to keep the right to sue Grovetown about the issues in this case, then you must take steps to get out. This is called excluding yourself from—or is sometimes referred to as “opting out” of—the Settlement.

14. How do I get out of the Settlement?

To exclude yourself from the Settlement, you must send a letter by mail saying that you want to be excluded from the Litigation. You must include the case number (No. 2016-CV-0413), your full name, address, and telephone number, and sign the request, stating your desire to be excluded from the Class. Your exclusion request will not be valid, and you will be bound by the Settlement, if you do not include this information in your exclusion request. You must mail your request for exclusion so that it is postmarked by May 12, 2017, to:

Youngblood v. Grovetown
c/o KCC Class Action Services
P.O. Box 43034
Providence, RI 02940-3034

You can’t exclude yourself on the phone or at the website.

15. If I don’t exclude myself, can I sue Grovetown for the same thing later?

No. Unless you exclude yourself, you give up any right to sue Grovetown for the claims that this Settlement resolves. You must exclude yourself from this Class to start your own lawsuit. Remember, any exclusion requests must be postmarked by May 12, 2017.

16. If I exclude myself, can I get Utility Payment Vouchers or Non-Resident Payments from this Settlement?

No. If you exclude yourself, do not submit a Claim Form to ask for Utility Payment Vouchers or Non-Resident Payments.

THE LAWYERS REPRESENTING YOU

17. Do I have a lawyer in this case?

Yes. The Court appointed certain attorneys, known as Class Counsel, to represent you and other Class Members. You do not have to pay them. They will be paid directly by Grovetown out of the Settlement Fund. If you want to be represented by your own lawyer, and have that lawyer appear in court for you in this case, you may hire one at your own expense.

OBJECTING TO THE SETTLEMENT

You can tell the Court if you don't agree with the Settlement or some part of it.

18. How do I tell the Court if I don't like the Settlement?

You can object to the Settlement if you don't like some part of it. The Court will consider your views. To do so, you must file a written objection in the case, *Deena Youngblood, et al. v. City of Grovetown*, Civil Action File No. 2016-CV-0413 titled "Objection to Class Settlement in *Deena Youngblood, et al. v. City of Grovetown*, Case No. 2016-CV-0413." You must include your full name, address, e-mail address, telephone number, the contact information for any attorney retained by you in connection with your objection, and your signature. You must also include the specific reasons why you object to the Settlement and the facts supporting your objection, any legal support or evidence to support your objection, the relief you are requesting, and whether you or your attorney, or any other witness, will be attending the hearing, along with a description of any witness's testimony, and a list of any exhibits you may offer at the hearing along with copies of those exhibits. (See "The Court's Fairness Hearing" below). You must file your objection by May 8, 2017 to the Court's address below, and mail your objection so that it is postmarked by May 8, 2017 to the addresses listed below for Class Counsel and Defendant's Counsel:

| Class Counsel | |
|--|--|
| Jeffrey F. Peil Ga. State Bar No. 967902 Charles T. Huggins, Jr., P.C. 7013 Evans Town Center Blvd. Suite 502 Evans, Georgia 30809 | Travers W. Paine, III Ga. State Bar No. 559350 Travers W. Paine III, P.C. 560 Ninth Street Augusta, Georgia 30901 |

| Defendant's Counsel |
|---|
| Christopher N. Dube Dube & Dowdy Attorneys, PC P.O. Box 367 304 Estelle Street Wrens, GA 30833 |

| Court Clerk |
|---|
| Cindy Mason Clerk of Superior Court of Columbia County 640 Ronald Reagan Drive Evans, Georgia 30809 |

The Court may overrule your objection. If you want Utility Payment Vouchers from the Settlement, even if you object to it, you must file a timely Claim Form.

19. What’s the difference between objecting and asking to be excluded?

Objecting is telling the Court that you oppose approval of the Settlement. You can object only if you stay in the Class. Excluding yourself is telling the Court that you don’t want to be part of the Class. If you exclude yourself, you have no basis to object because the case no longer affects you.

20. Do I need to make an appearance to talk about my objection?

No.

THE COURT’S FAIRNESS HEARING

The Court will hold a hearing to decide whether to approve the Settlement. You may attend and you may ask to speak at the hearing, but you don’t have to.

21. When and where will the Court decide whether to approve the Settlement?

The Court has scheduled a Fairness Hearing at 10:00 a.m. in Courtroom 2 on June 26, 2017, at the Superior Court of Columbia County, Evans Justice Center, 640 Ronald Reagan Drive, Evans, Georgia 30809. At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. If there are objections, the Court will consider them. Judge Annis will listen to people who have asked to speak about an objection. At or after the hearing, the Court will decide whether to approve the Settlement. We do not know how long this decision will take. The hearing may be moved to a different date without additional notice, so it is a good idea to check www.grovetownwatersettlement.com for updated information.

22. Do I have to come to the hearing?

No. You do not have to attend the Fairness Hearing. Class Counsel will answer questions that Judge Annis may have. But you are welcome to come at your own expense. If you send an objection, you don’t have to come to the Fairness Hearing to talk about it. As long as you filed and mailed your written objection on time, the Court will consider it. You may also pay your own lawyer to attend, but it’s not necessary.

23. May I speak at the hearing?

If you submitted an objection to the Settlement (see Questions 18-20), you may ask the Court for permission to speak at the Fairness Hearing. If you or your attorney intends to speak at the Fairness Hearing, you must file a “Notice of Intention to Appear” in *Deena Youngblood, et al. v. City of Grovetown* (2016-CV-0413) stating such intention. Your Notice of Intention to Appear must be received no later than May 13, 2017, and must be sent to the addresses listed in question 18 along with the following information:

- name of the case (Deena Youngblood, et al. v. City of Grovetown (2016-CV-0413));
- your full name, address, telephone number, and signature;
- detailed statement of the specific legal and factual basis for each objection;
- list of any witnesses you intend to call at the Fairness Hearing;
- list of exhibits and copies of all exhibits you intend to introduce at the Fairness Hearing.

If your attorney you have hired to represent you and your objection will speak at the Fairness Hearing, your notice of appearance must also include: (1) your attorney’s name, address, phone number, e-mail address, and state bar(s) to which the attorney is admitted; (2) any points and authorities in support of

the objection the attorney will rely upon; and (3) a list identifying all objections such attorney has filed in class action Settlements from January 1, 2008 to the present, the results of such objection, including any court opinions ruling on the objections, and any sanctions by a Court in connection with filing an objection.

IF YOU DO NOTHING

24. What if I do nothing at all?

If you do nothing, you'll get no Utility Payment Vouchers or Non-Resident Payments from this Settlement. And, unless you exclude yourself, you won't be able to sue Grovetown for the claims resolved in this case.

GETTING MORE INFORMATION

25. How do I get more information about the settlement?

This notice summarizes the proposed Settlement. More details are in a Settlement Agreement, which is available at www.grovetownwatersettlement.com.