

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

If you were an individual in New York City Department of Correction custody between March 28, 2020, and February 29, 2024, who was strip searched upon arrival at the Manhattan Court Division after having been strip searched prior to departing Rikers Island for court during the Class Period, you may be eligible for benefits from a class action Settlement.

A federal court authorized this Notice. This is not a solicitation from a lawyer.

- A Settlement has been reached in a class action lawsuit against the City of New York, the New York City Department of Correction, and City of New York Department of Correction Commissioner Louis A. Molina (the “Defendants”), relating to the Action, alleging that Defendants violated federal and state constitutional rights under the Fourth Amendment and the New York State Constitution by requiring all New York City Department of Correction (“DOC”) persons in custody to be strip searched at the Manhattan Court Division after having been previously strip searched on Rikers Island with no legitimate penological interest for such searches and no reasonable suspicion of the harboring of weapons or contraband.
- You are included in the Settlement as a “Class Member” if you were an individual in DOC custody who was strip searched upon arrival at the Manhattan Court Division after having been strip searched prior to departing Rikers Island for court.
- Your legal rights are affected whether you act or don’t act. Read this Notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
DO NOTHING	If you do nothing, you will not receive payment. You will also give up your rights to be part of any other lawsuit against the Defendant for the legal claims made in this case and released by the Settlement Agreement.
SUBMIT A CLAIM FORM	If you want to be eligible to receive payment, you must submit a Claim Form. Claim Forms must be postmarked no later than November 26, 2026.
EXCLUDE YOURSELF FROM THE SETTLEMENT	If you exclude yourself or “Opt Out”, you will not receive payment. This is the only option that allows you to be part of any other lawsuit against the Defendants for the legal claims made in this case and released by the Settlement Agreement.
OBJECT TO THE SETTLEMENT	If you object, you must write to the Court with reasons why you do not agree with the Settlement.
GO TO THE FINAL APPROVAL HEARING	You may ask the Court for permission for you or your attorney to speak about your objection at the Final Approval Hearing.

- 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. If the Court denies final approval, the Settlement will be void and the litigation will continue against the Defendants.

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BASIC INFORMATION

1. Why is Notice being provided?

The Court directed that Notice be provided because you have a right to know about a proposed Settlement that has been reached in a class action lawsuit and about all of your options before the Court decides whether to grant final approval to the Settlement. This Notice explains the lawsuit, the Settlement, your legal rights, what benefits are available, who is eligible for them, and how to get them.

Hon. Colleen McMahon of the United States District Court for the Southern District of New York is overseeing this class action. The case is known as *Lewis, et al. v. City of New York, et al.*, No. 23 Civ 2600 (CM), and is referred to as the “Action.” The people who filed the lawsuit are called Plaintiffs and they sued, the City of New York, the City of New York Department of Correction, and the City of New York Department of Correction Commissioner Louis A. Molina, are called Defendants.

2. What is this lawsuit about?

Plaintiffs allege that Defendants violated federal and state constitutional rights under the Fourth Amendment and the New York State Constitution by requiring all New York City Department of Correction (“DOC”) persons in custody to be strip searched at the Manhattan Court Division after having been previously strip searched on Rikers Island with no legitimate penological interest for such searches and no reasonable suspicion of the harboring of weapons or contraband.

3. What is a class action?

In a class action, one or more people called “Class Representatives” (in this Action, Raymond Lewis and Frederick Ortiz) sue on behalf of people who have similar claims. Together, all these people are called 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 the Defendants. Instead, the Plaintiffs negotiated a Settlement with the Defendants that allows them to avoid the risks and costs of lengthy and uncertain litigation and the uncertainty of a trial. The Class Representatives and their attorneys think the Settlement is best for all Class Members.

WHO IS INCLUDED IN THE SETTLEMENT?

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

The Settlement includes any individual in DOC custody who was strip searched upon arrival at the Manhattan Court Division after having been strip searched prior to departing Rikers Island for court. Any individual who appears on the Class List is presumptively a Class Member.

“Class List” is the agreed-upon spreadsheet of Class Members, which shall include the dates on which, and the number of times, each such Class Member was transported from Rikers to Manhattan Criminal Court during Class Periods.

“Class Period” means the time between March 28, 2020, and February 29, 2024, for individuals classified as Enhanced Security by the NYC Department of Correction and the time between October 1, 2022, through February 29, 2024, for all other individuals.

6. Are there exceptions to being included in the Settlement?

Yes, the Settlement does not include (a) individuals who have previously settled their respective claim(s) with any entity of the City of New York stemming from a strip search conducted by DOC staff at the Manhattan Court Division after having been strip searched prior to departing Rikers Island for court during the Class Period; and (b) individual plaintiffs represented by Oddo and Babat before the Hon. Judge D. Kaplan, as set forth in the document annexed hereto as Exhibit A; and (c) individuals whose claims are otherwise barred by the terms of a valid and enforceable release with the City.

7. I am still not sure if I am included.

If you are still not sure whether you are included, call 1-888-808-6084 toll-free, email Info@NYStripSearchSettlement.com or visit www.NYStripSearchSettlement.com for more information.

THE SETTLEMENT BENEFITS—WHAT YOU GET IF YOU QUALIFY

8. What does the Settlement provide?

The City of New York has agreed to pay a total of \$28,000,000 in Settlement Class Member payments, \$37,500 to each of the Class Representatives Raymond Lewis and Frederick Ortiz, and \$500,000 in Administrative Costs to settle the Action. The “Distribution Amount” of \$28,000,000 will be used to pay for all Class Member claims. Court-approved attorneys’ fees and costs, service awards to each Class Representative, and the Administrative Costs will not be deducted from the Distribution Amount.

9. What can I get from the Settlement?

If you are a Class Member, you may file a claim to receive payment. The total distribution amount will be allocated on a pro rata basis for Class Members who submit valid and timely Claim Forms. Each claimant's share will be determined by the number of times they were strip searched upon arrival at Manhattan Court Division after having already been strip searched prior to departing Rikers, divided by the total number of such searches by all claimants combined.

HOW TO GET SETTLEMENT BENEFITS

10. How do I get Settlement benefits?

You must file a Claim Form within 90 days of the Notice Date to be eligible to receive payment. The Class Members must timely submit a Claim Form and establish his or her identity by providing the Settlement Administrator with his or her name; his or her NYSID and/or applicable book and case number, if known; his or her Social Security Number or Tax Identification Number, if known; his or her date of birth, if known; his or her Department Identification Number, Facility Name, and Facility State if currently in New York State custody. Class Members can submit claims either by returning the hard copy Claim Form in the envelope with pre-paid postage provided to them, or by submitting a claim online through the Settlement website. Claim Forms must be postmarked no later than November 26, 2026.

11. When will I get my payment?

The Court will hold a Final Approval Hearing at 10:00 a.m. on January 29, 2027, to determine whether the Settlement Agreement should receive Final Approval by the Court. If the Court approves the Settlement, there may be appeals. It is always uncertain whether any appeals can be resolved favorably, and resolving them can take time, perhaps more than a year. Settlement payments will be distributed after the Settlement is approved and becomes final.

12. What am I giving up to get Settlement benefits or stay in the Settlement?

Unless you exclude yourself from the Settlement, you will give up your right to sue, continue to sue, or be part of any other lawsuit against Defendant and certain Released Parties for any claim related to the Action or released by the Settlement Agreement. You will be legally bound by all of the Court's orders, as well as the "Released Claims," below.

"Released Parties" means Louis A. Molina and the City of New York, their predecessors, successors and assigns, together with all past and present officials, employees, representatives, and agents of the City of New York, or any agency thereof, and any person or entity represented by the Office of the New York City Corporation Counsel, and, in the case of all such entities, their respective past and present representatives, officers, directors, attorneys, agents, employees, privities, and insurers.

13. What are the Released Claims?

"Released Claims" mean any and all past or present claims or causes of action (including any suits, petitions, demands or other claims in law, equity, or arbitration), and any and all allegations of liability or damages, of whatever kind, nature, or description, direct or indirect, in law, equity, or arbitration, absolute or contingent, whether class or individual in nature, asserted or unasserted, for monetary and non-monetary relief (including without limitation attorneys' fees, costs or disbursements incurred by the Class Representatives and/or the Settlement Class and/or any Class Member in connection with or related to this action), that were or could have been asserted by the Class Representatives against the Released Parties based upon or arising out of a strip search conducted by DOC staff at the Manhattan Court Division after having been strip searched prior to departing Rikers Island for court during the Class Period. More information about the Released Claims can be found in the Settlement Agreement and Release, available at www.NYStripSearchSettlement.com.

EXCLUDING YOURSELF FROM THE SETTLEMENT

14. How do I get out of the Settlement?

To exclude yourself from the Settlement, you must mail a written request to Opt Out from the Settlement to the Settlement Administrator. The request must:

- 1) State the name, date of birth, and address of the person requesting exclusion,
- 2) Contain a clear statement communicating that such person elects to be excluded from the Settlement Class, and
- 3) Be signed by the Class Member:

All Requests for Exclusion must mail postmarked no later than November 26, 2026, to:

Lewis, et al. v. City of New York, et al.
Settlement Administrator
P.O. Box 301132
Los Angeles, CA 90030-1132

15. If I exclude myself, can I still get benefits from the Settlement?

No. If you exclude yourself from the Settlement, you will not receive payment because you will no longer be eligible for them.

16. If I do not exclude myself, can I sue the Defendant for the same thing later?

No. If you stay in the Settlement (*i.e.*, do nothing or do not exclude yourself from the Settlement), you give up any right to separately sue the Defendant or Released Parties for the claims released by the Settlement Agreement and Release.

THE LAWYERS REPRESENTING YOU

17. Do I have a lawyer in this case?

Yes. The Court appointed Steven German and Joel Rubenstein of German Rubenstein LLP to represent you and other Settlement Class Members. These lawyers are called Class Counsel. You will not be charged for these lawyers. If you want to be represented by your own lawyer, you may hire one at your own expense.

18. How will Class Counsel be paid?

If the Settlement is approved and becomes final, Class Counsel will ask the Court to award attorneys' fees not to exceed 33.33% of the settlement payout, including class payments, service awards, and attorneys' fees, as well as a \$37,500 service award for each of the Class Representatives. Defendants have reserved their right to object to Class Counsel's request for attorneys' fees. However, if approved, these amounts will not be deducted from the Class Fund.

OBJECTING TO THE SETTLEMENT

19. How do I tell the Court that I do not like the Settlement?

If you are a Class Member, you can object to the Settlement if you do not like it or a portion of it. You can give reasons why you think the Court should not approve the Settlement. The Court will consider your views before making a decision. To object, you must file a written objection with the Court, and mail copies to Class Counsel, Defense Counsel, and the Settlement Administrator. Your objection must be filed and postmarked by November 26, 2026.

Your objection must include:

- 1) the case name and number (*Lewis, et al. v. City of New York, et al.*, No. 23 Civ 2600 (CM));
- 2) your full name, mailing address, telephone number, and email address (if any);
- 3) the reasons why you object to the Settlement, including any documents supporting your objection;
- 4) the number of times you have objected to a class action settlement within the five years preceding the date of this objection, including:
 - a. the caption of each case that you have made an objection to, and
 - b. a copy of any orders related to or ruling upon those objections as issued by the trial and appellate courts in each case;
- 5) the name, address, and telephone number of your attorney (if any) representing you in your objection, including any former or current counsel who may be entitled to compensation for any reason related to your objection;
- 6) the number of times your attorney or their law firm have objected to a class action settlement within the five years preceding the date of this objection, including:
 - a. the caption of each case in which your attorney or their law firm have made an objection, and
 - b. a copy of any orders related to or ruling upon those objections as issued by the trial and appellate courts in each case;
- 7) a statement indicating whether you or your attorney intend to appear at the Final Approval Hearing;
- 8) if you have retained an attorney and your attorney will appear at the Final Approval Hearing,
 - a. the name, address, telephone number, and email address of your attorney, and
 - b. a list of all persons who will be called to testify in support of your objection; and
- 9) your signature (your attorney's signature is not sufficient).

Your objection must be filed with the Court and copies must be mailed to Class Counsel, Defense Counsel and the Settlement Administrator using the addresses below.

Court	Class Counsel	Defense Counsel	Settlement Administrator
Southern District of New York 120 Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, NY 10007-1312	Steven German and Joel Rubenstein German Rubenstein LLP 19 West 44 th Street Suite 1500 New York, NY 10036	Rachel Seligman New York City Law Department, Office of the Corporation Counsel 100 Church Street New York, NY 10007-2601	<i>Lewis, et al. v. City of New York, et al.</i> Settlement Administrator P.O. Box 301132 Los Angeles, CA 90030-1132

20. What is the difference between objecting to and excluding myself from the Settlement?

Objecting is telling the Court that you do not like something about the Settlement. Excluding yourself is telling the Court that you do not want to be part of the Class in this Settlement. If you exclude yourself from the Settlement, you have no basis to object because the Settlement no longer applies to you.

THE COURT'S FINAL APPROVAL HEARING

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

The Court will hold a Final Approval Hearing at 10:00 a.m. on January 29, 2027, to determine whether the Settlement Agreement should receive Final Approval by the Court at the United States District Court for the Southern District of New York, 500 Pearl Street, New York, NY 10007-1312. At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. The Court will take into consideration any properly-filed objections and may also listen to people who have asked to speak at the hearing (see Question 22). The Court will also decide whether to approve payments of attorneys' fees, costs, and service awards.

22. Do I have to come to the Final Approval Hearing?

No. Class Counsel will answer any questions the Court may have, but you are welcome to come at your own expense. If you file an objection, you do not have to come to Court to talk about it. You may also hire your own lawyer to attend, at your own expense, but you are not required to do so.

23. May I speak at the Final Approval Hearing?

Yes. You may ask the Court for permission to speak at the Final Approval Hearing. To do so, you must follow the instructions provided in Question 19 above. You cannot speak at the hearing if you exclude yourself from the Settlement.

IF YOU DO NOTHING

24. What happens if I do nothing?

If you do nothing, you will not receive any payment from this Settlement and you will be bound by the terms of the Settlement Agreement and Release if it is approved and becomes final. This means you will not be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against the Defendant or the Released Parties about the issues resolved by this Settlement and released by the Settlement Agreement.

GETTING MORE INFORMATION

25. How do I get more information?

More details are in the Settlement Agreement and Release, which is available at www.NYStripSearchSettlement.com. You may also call 1-888-808-6084 for information in English and Spanish, email Info@NYStripSearchSettlement.com, or write to the *Lewis, et al. v. City of New York, et al.* Settlement Administrator, P.O. Box 301132, Los Angeles, CA 90030-1132.

Please do not call the Court or the Clerk of the Court for additional information.

They cannot answer any questions regarding the Settlement or the Action.