

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

The parties to the *Thompson v. HUD* class action now pending in the U.S. District Court for the District of Maryland (No. MJG 95-309) have reached an agreement, subject to approval of the Court, to settle this case. If you are African-American and have lived in Baltimore City Family Public Housing at any time since January 31, 1995, or may live there at any time prior to January 1, 2027, your rights as a class member are affected by that settlement.

In this lawsuit, the Plaintiff Class alleged that the Defendants—including the U.S. Department of Housing and Urban Development (HUD), the City of Baltimore, and the Housing Authority of Baltimore City (HABC)—created and continued a racially segregated system of public housing in Baltimore City that violated the U.S. Constitution, the Fair Housing Act, and other civil rights laws. In a January 2005 Order, the Court found HUD, but not Baltimore City or HABC, liable under the Fair Housing Act. The Court later reopened the record to consider additional evidence regarding this alleged violation. All Defendants continue to deny that they violated the law, and this Notice is not an expression of any opinion by the Court about the merits of any part of the lawsuit.

This Notice briefly summarizes what the Settlement Agreement will provide if it is approved by the Court. The Settlement Agreement provides that HUD will take certain steps to increase residential housing choices for members of the Plaintiff Class, including the following:

- continue and expand the successful mobility program launched under the *Thompson* Partial Consent Decree, with Housing Choice Vouchers and high-quality housing counseling to assist up to 2600 families (spread over seven years, from 2012 through 2018) who voluntarily choose to move to communities of opportunity throughout the Baltimore Region;
- provide incentives for private housing developers who seek mortgage insurance offered by the Federal Housing Administration to produce affordable multifamily housing in communities of opportunity throughout the Baltimore Region;
- develop an online listing to provide assistance to families in locating public housing and other affordable housing opportunities throughout the Baltimore Region;
- sponsor a study assessing housing opportunity throughout the Baltimore Region;
- conduct, for a period of at least three years, civil rights reviews of particular proposals submitted to HUD for approval involving certain federally funded housing and community development programs in the Baltimore Region.

If the Court approves the proposed Settlement Agreement, the Partial Consent Decree in this case will be closed and no longer in effect, but the *Thompson* mobility program will be continued and expanded, and the remaining obligations under the Partial Consent Decree, as well as related orders, will be completed pursuant to the terms of the Settlement Agreement.

Upon approval by the Court, the Settlement Agreement will resolve and release certain specified claims of the Plaintiff Class against the Defendants relating to racial discrimination and segregation that have been or could have been asserted in *Thompson v. HUD*, prior to the date that the Settlement Agreement goes into effect.

The entire Settlement Agreement is available on the Court's website, using the following address: www.mdd.uscourts.gov/publications/forms/HUDSettlement.pdf and can also be obtained on the following websites: www.naacpldf.org/case-issue/thompson-v-hud and www.aclu-md.org/our_work/fair_housing.

In addition, the Settlement Agreement is available for review at the Office of the Clerk of the Court, United States District Court for the District of Maryland, 101 W. Lombard St., Room 4228, Baltimore, Maryland 21201.

If you have questions about the proposed settlement, or wish to receive a copy of the Settlement Agreement but do not have access to the Internet to download a copy online, you may contact the following civil rights organizations, which serve as counsel for the Plaintiff Class, by telephone or email:

- the ACLU of Maryland (Barbara Samuels, (443) 453-5755, or (877) 737-3967 (toll free), or samuels@aclu-md.org); or
- the NAACP Legal Defense & Educational Fund, Inc. (Joshua Civin, 202-682-1300 or jcivin@naacpldf.org).

You may, of course, seek the advice and guidance of your own attorney if you desire. The Court cannot respond to any questions regarding this notice, the lawsuit, or the proposed settlement.

The Court will hold a hearing to determine whether, as recommended by both the attorneys representing the Plaintiff Class and those representing the Defendants, the proposed settlement should be approved. THE HEARING WILL TAKE PLACE IN COURTROOM 5C OF THE UNITED STATES COURTHOUSE, 101 W. LOMBARD STREET, BALTIMORE, MARYLAND, ON **NOVEMBER 20, 2012**, BEGINNING AT 10:00 a.m. ANY INTERESTED PERSON MAY ATTEND THE HEARING.

You do not need to take any action in response to this notice. However, you may provide written comments about the proposed settlement for consideration by counsel and the Court and may request the opportunity to speak at the Settlement Hearing. **IF YOU HAVE ANY COMMENTS ON THIS SETTLEMENT OR WISH TO SPEAK AT THE HEARING, YOU MUST FOLLOW THE INSTRUCTIONS SET FORTH BELOW.**

If you wish to submit written comments. you must complete and deliver (by mail, private delivery service, or personal delivery) a Written Comment Submission Form together with your written comments to the Housing Case Settlement Clerk by November 2, 2012.

If you wish to submit written comments and speak at the hearing. you must complete and deliver (by mail, private delivery service, or personal delivery) a Request to Speak Form together with your written comments to the Housing Case Settlement Clerk by November 2, 2012.

Written Comment Submission Forms and Request to Speak Forms are available from the Court or from Plaintiffs' Counsel at the telephone numbers and website addresses listed above.

The address of the Housing Case Settlement Clerk is:

Housing Case Settlement Clerk
Room 4228 United States
Courthouse 101 West Lombard
Street Baltimore, MD 21201