

Member ID: <<Member ID>>

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, CHANCERY DIVISION  
No. 11 CH 15446  
Judge Cecilia A. Horan, Calendar 9  
Williams, et al. v. Retirement Plan for CTA Employees, et al.

**NOTICE OF PROPOSED CLASS ACTION SETTLEMENT**

To: All Chicago Transit Authority (“CTA”) retirees who were hired on or before September 5, 2001, retired from the CTA before January 1, 2007, and were eligible for retiree health benefits on July 1, 2009 (“Class”).

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

**THIS NOTICE MAY AFFECT YOUR LEGAL RIGHTS AND PROVIDE YOU POTENTIAL BENEFITS. PLEASE READ IT CAREFULLY.**

**WHAT IS THE PURPOSE OF THIS NOTICE?**

This Notice is being sent in connection with a class action lawsuit involving CTA retiree health benefits (the “Lawsuit”). You are receiving this Notice because records indicate you are a member of the above-defined Class (“Class Member”). The purpose of this Notice is to advise you of a proposed settlement (the “Settlement”) between the Class and Defendants, the Retirement Plan for Chicago Transit Authority Employees (“Plan”) and its Board of Trustees (together, “Plan Defendants”) and the Retiree Health Care Trust (“Trust”) and its Board of Trustees (together, “Trust Defendants”).

**Your estimated Individual Settlement Amount is: \$<<Estimated Individual Settlement Amount>>.**

If the Class Member to whom this Notice is addressed is deceased, please review carefully the information included in this Notice regarding the Proof of Kinship form required to obtain a deceased Class Member’s Individual Settlement Amount.

This Notice provides important information that (a) explains this Lawsuit and the proposed Settlement, (b) instructs you on how to object to the Settlement if you wish to do so, and (c) notifies you of a hearing the Court has scheduled (“Final Settlement Hearing”) on October 23, 2023, to consider whether to give final approval to the Settlement, including how the settlement funds will be distributed to Class Members. At the Final Settlement Hearing, the Court will also consider the request for fees and expenses (“Fee and Expense Application”) being made by the attorneys for the Class (“Class Counsel”), and the request for payment to the Class Representatives of additional funds to compensate them for their time and effort spent in prosecuting the Lawsuit (“Service Awards”). The full Class Action Settlement Agreement (“Settlement Agreement”) is available on the Settlement website, [www.ctaretireesettlement.com](http://www.ctaretireesettlement.com). Class Counsel’s Fee and Expense Application (including the request for Class Representative Service Awards) will be available on the Settlement website upon its filing with the Court no later than September 11, 2023.

**WHAT IS THIS LAWSUIT ABOUT?**

This is a class action Lawsuit in which one or more persons known as “Class Representatives” sue on behalf of themselves and others who have similar claims. Here, the Class Representatives are CTA retirees Jerry Williams and Larry Whitehead.<sup>1</sup> The Class Representatives sued Defendants, alleging they violated the Pension Protection Clause of the Illinois Constitution and breached the CTA Retirement Plan Agreement by charging the Class Members monthly premiums for health care coverage.

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<sup>1</sup> Stewart Cooke passed away during the pendency of this case and is no longer a Class Representative. His son and Estate Representative Stewart Cooke III was substituted as a Plaintiff after Mr. Cooke’s death.

ANY QUESTIONS? Contact the Claims Administrator at (833) 747-6924 or visit the Settlement website at [www.ctaretireesettlement.com](http://www.ctaretireesettlement.com)

On July 1, 2009, the Trust began charging the Class Members monthly health care premiums and the Plan began deducting those premiums from the monthly pension checks of certain Class Members. Plaintiffs contend in the Lawsuit that Class Members are entitled to lifetime, premium-free retiree health coverage. Defendants have vigorously defended against these claims for 15 years, deny the claims in this Lawsuit, and deny that they are doing anything wrong by charging the Class Members monthly premiums or otherwise.

The Class Representatives and Defendants have reached a Settlement of all claims asserted in the Lawsuit. The Settlement has been preliminarily approved by the Court and will be the subject of a Final Settlement Hearing. The Settlement is not an admission of liability or wrongdoing by Defendants. Because you are a Class Member, you will receive benefits from the Settlement if the Court gives its final approval at the Final Settlement Hearing, and after any appeals have been resolved.

### **WHO IS IN THE CLASS?**

The Class consists of approximately 6,354 CTA retirees. You are receiving this Notice because records maintained by Defendants establish that you meet the Class definition above and are therefore a Class Member, or you are the surviving spouse of a deceased Class Member. When notice of the Court's certification of the Class was mailed to you in October 2020, you did not elect to exclude yourself from the Class, but chose to remain a part of the Class.

If the Class Member to whom this Notice is addressed is deceased, a court-appointed estate representative, surviving spouse or relative of the deceased Class Member ("Estate Representative") may be entitled to receive the Class Member's Individual Settlement Amount by following the instructions set forth included with this Notice.

### **WHY IS THERE A SETTLEMENT?**

The Court has not decided this Lawsuit in favor of the Class or Defendants. While you may be aware that there have been various rulings by the Court throughout this litigation in favor of either the Class or Defendants, the Court never issued a final ruling resolving the claims or defenses of the parties in the Lawsuit. Instead of continuing the litigation and obtaining a final decision, both sides have agreed to a Settlement. By settling, they avoid the costs and delay of a trial and likely appeals, and settlement benefits go to the Class Members now. The Class Representatives and Class Counsel feel strongly that this Settlement is in the best interests of the Class Members, taking into account the benefits of the Settlement, the uncertain outcome and the risks of continuing to litigate this highly complex case, and the extensive delay in obtaining relief for the Class if the Lawsuit continues, even if Plaintiffs prevail.

### **DOES A LAWYER REPRESENT ME IN THE LAWSUIT?**

Yes. All Class Members are represented by Class Counsel Robinson Curley P.C., whose contact information is included at the end of this Notice. If you want to be represented by your own lawyer, you may hire one at your own expense but it is not necessary.

### **WHAT ARE THE PRINCIPAL TERMS OF THE SETTLEMENT?**

The principal terms of the proposed Settlement are as follows:

- A. **Settlement Fund:** If the Settlement Agreement gains final approval from the Court, the Trust will pay \$80,000,000 to fully and finally settle the entire case. This is the total amount that will be paid on behalf of all Defendants to settle the case.

ANY QUESTIONS? Contact the Claims Administrator at (833) 747-6924 or visit the Settlement website at [www.ctaretireesettlement.com](http://www.ctaretireesettlement.com)

Before the Settlement funds are divided among the Class Members and their Estate Representatives, amounts approved by the Court will be deducted for the following:

- (a) the cost to send this Notice and distribute the settlement funds (“Notice and Administration Expenses”);
- (b) any taxes owed by the Settlement Fund;
- (c) up to 33 $\frac{1}{3}$  percent of the Settlement Fund for the attorneys’ fees of Class Counsel for their work on the case for 15 years;
- (d) reimbursement of approximately \$480,000 of costs and expenses advanced by Class Counsel in the case; and
- (e) a combined total of up to \$75,000 for Service Awards to the three Class Representatives (or their heirs) to compensate them for their substantial time and effort in prosecuting the case and making this Settlement possible.

The amount of Settlement funds remaining after the above deductions is referred to as the “Net Settlement Fund.”

- B. Settlement Payments: Each Class Member will be eligible to receive a payment from the Net Settlement Fund in accordance with the Plan of Distribution set forth below in this Notice.
- C. Release: Each Class Member will release certain claims against Defendants and their Related Parties (as defined in the Settlement Agreement). This is referred to as the “Release.” If the Settlement is approved, all Class Members will be deemed to have released any and all claims that were brought or could have been brought in the Lawsuit. This includes claims arising from the charging of premiums by the Trust for retiree health coverage both in the past and the future, subject to the anti-discrimination provision described below in Section D. If final approval is given, you may not assert any of these claims in any other lawsuit or proceeding. This includes any other lawsuit or proceeding already in progress. The final judgment order entered by the Court in this case will bind all Class Members.

The Release is effective and binding as to every Class Member who did not request exclusion from the Class in accordance with the Class Notice sent in October 2020, regardless of whether the Class Member receives and cashes a settlement payment check.

- D. Future Allowed Actions By the Plan and the Trust To Charge or Deduct Premiums: Under the terms of the Settlement Agreement, for those Class Members who elect to obtain or continue coverage from the Trust in the future, the Trust may continue to charge a monthly premium and the Plan may continue to deduct those premiums from the pension checks of retirees who pay for health care coverage through a pension deduction. The Settlement Agreement has no impact on the Trust’s current (a) eligibility requirements for retiree coverage of Class Members, (b) eligibility requirements for dependents and surviving spouses of Class Members, or (c) ability to charge retirees a premium for individual retiree and/or dependent and surviving spouse health care coverage. This means the Trust may maintain or even increase the current premium levels charged to Class Members, their surviving spouses and dependents. The Settlement requires, however, that the Trust not discriminate against Class Members by imposing more stringent eligibility rules, or by charging Class Members higher premiums, deductibles, co-pays, or out-of-pocket limits for

retiree, surviving spouse or dependent coverage, than it charges non-Class retirees who are similarly situated to Class Members.

E. Dismissal of the Lawsuit: All claims in the Lawsuit will be dismissed with prejudice.

Sections A-E above provide only a general summary of the proposed Settlement. You may consult the Settlement Agreement for more information about the exact terms of the Settlement. The Settlement Agreement is available at the Settlement website, [www.ctaretireesettlement.com](http://www.ctaretireesettlement.com).

## HOW ARE INDIVIDUAL SETTLEMENT AMOUNTS CALCULATED?

### **Determination of Individual Settlement Amounts (Plan of Distribution):**

Your estimated Individual Settlement Amount is set forth on the first page of this Notice. It is only an estimate because your final Individual Settlement Amount may be higher or lower depending on the full amount of the Notice and Administration Expenses incurred, the Court's rulings with respect to the Fee and Expense Application and Service Awards, and whether certain Class Members or their Estate Representatives cannot be found or fail to cash or deposit their settlement checks. Each Class Member's final Individual Settlement Amount will be determined as follows:

1. Determining Each Class Member's "Claim": The starting point for quantifying each Class Member's Individual Settlement Amount is determining the amount of each Class Member's individual "Claim."
2. Time Period for Claim Determinations: Claim amounts will be determined for the period beginning July 1, 2009, and ending on March 31, 2023 ("Claim Period").
3. Participant and Non-Participant Claims:
  - a. To understand how the amount of each Class Member's Claim will be determined, there are a couple of important items to understand.
    - During the Claim Period, the premiums paid by retirees covered only approximately one-third of the actual cost of health coverage provided to retirees. In other words, even after imposing the premiums, the Trust subsidized (paid) approximately two-thirds of the cost of coverage for retirees.
    - The Class consists of some Class Members who paid premiums and obtained coverage from the Trust for the entire Claim Period, others who elected not to obtain coverage from the Trust and never paid premiums during the Claim Period, and others who paid premiums and obtained coverage during some but not all of the Claim Period.
    - For each month during the Claim Period that a Class Member paid a premium to the Trust and participated in the Trust's health plan, the Class Member is referred to as a "Participant."
    - For each month during the Claim Period that a Class Member did not pay the premium and therefore did not obtain coverage from the Trust, the Class Member is referred to as a "Non-Participant."
    - Class Members who paid premiums and obtained coverage for some but not all of the Claim Period are Participants during the months they paid premiums, and Non-Participants during the months they did not.

b. Calculation of Each Class Members' Participant Claim:

Participants paid the premiums and thereby obtained the full value of the Trust's health coverage (including the subsidized portion). Therefore, for each month during the Claim Period that a Class Member paid a premium to the Trust and participated in the Trust's health plan, the Class Member or Estate Representative will have a claim equivalent to the amount of premium paid to obtain such coverage. The total of such monthly amounts is the Class Member's "Participant Claim." Records maintained by Defendants have already been used to quantify these amounts and you need not provide any evidence to support them.

c. Calculation of Each Class Member's Non-Participant Claim:

Non-Participants declined to pay the premiums and therefore obtained none of the value of the coverage to which Plaintiffs contend they were entitled. However, Non-Participants could have paid the premiums and thereby obtained the full value of the coverage from the Trust (including the subsidized portion). Therefore, for each month during the Claim Period that a Class Member did not pay a premium to the Trust or obtain coverage under the Trust's health plan, the Class Member or Estate Representative will have a claim equivalent to the amount of premium that could have been paid by the Class Member to obtain coverage. The total of such monthly amounts is the Class Member's "Non-Participant Claim." This measure of Non-Participant Claims is supported by Class Counsel's analysis of the legal and evidentiary strengths and weaknesses of the Non-Participant Claims, including the fact that Defendants have asserted additional legal and factual defenses to the Non-Participant Claims, and that any measure of Non-Participant Claims must rely upon actuarial assumptions and calculations, while the Participant Claims do not. Class Counsel has consulted with Milliman, a leading, worldwide actuarial firm, to determine the appropriate measure of Non-Participant Claims for this Settlement. Records maintained by Defendants have already been used to quantify the Non-Participant Claims and you need not provide any evidence to support such claims.

d. Calculation of Total Claim

The sum of each Class Member's Participant Claim and Non-Participant Claim will equal each Class Member's total Claim against the Net Settlement Fund.

4. Determining Each Class Member's Individual Settlement Amount:

The Net Settlement Fund will be divided among the Class Members based on the ratio of each Class Member's Claim to the sum of all Class Members' Claims. The amount calculated under this formula is the Class Member's Individual Settlement Amount.

By way of example, if a Class Member paid \$20,000 of premiums and obtained health coverage from the Trust for several years during the Class Period, the Class Member would have a Participant Claim of \$20,000. If in the other years during the Class Period the same Class Member did not take coverage from the Trust but could have paid \$5,000 of premiums to obtain such coverage, the Class Member would have a Non-Participant Claim of \$5,000, making the Class Member's total Claim \$25,000. If the sum of all Class Members' Claims is \$90,000,000, and the Net Settlement Fund is \$53,000,000 after all court-approved deductions, then the Class Member would be entitled to an Individual Settlement Amount of 0.02778 percent ( $25,000 \div 90,000,000$ , stated as a percentage) of the Net Settlement Fund, or \$14,723 ( $0.0002778 \times 53,000,000$ ).

At the Final Settlement Hearing, the Court may approve this method of distributing the Net Settlement Fund or modify it without additional notice to the Class.

**WHEN WILL I RECEIVE MY INDIVIDUAL SETTLEMENT AMOUNT?**

The Court must determine that the Settlement is fair and reasonable and give final approval to the Settlement before it can go into effect. If the Settlement is approved, a final Judgment will be entered and the Claims

ANY QUESTIONS? Contact the Claims Administrator at (833) 747-6924 or visit the Settlement website at [www.ctaretireesettlement.com](http://www.ctaretireesettlement.com)

Administrator will mail checks to the Class Members or their Estate Representatives for the Individual Settlement Amounts within 30 days after the Judgment becomes final and any appeals are resolved. If there is any appeal filed, distribution of the Individual Settlement Amounts will be delayed while the appeal is being resolved, which can take significant time, sometimes a year or longer.

### **WHAT HAPPENS IF THE SETTLEMENT IS NOT APPROVED?**

If the Court does not approve the Settlement or the Settlement is terminated on any grounds provided in the Settlement Agreement, then the parties will be returned to their previous positions in the Lawsuit and the case will proceed as if no Settlement had occurred. If this occurs, no Individual Settlement Amounts will be distributed to Class Members.

### **WHAT ARE MY OPTIONS AND WHAT DO I NEED TO DO TO RECEIVE MY INDIVIDUAL SETTLEMENT AMOUNT?**

Class Members have the following options in responding to this Notice:

|   |   |
|---|---|
| <b>DO NOTHING</b>                               | You will receive a check for your final Individual Settlement Amount and be bound by the Settlement Agreement. You will give up the claims that are released by the Settlement Agreement.   |
| <b>FILE A STATEMENT IN SUPPORT OR OBJECTION</b> | You may submit a timely written statement in support of or objection to the Settlement. If the Settlement is approved despite any objection you submit, you will remain a member of the Class and still give up your rights to bring any claims that are released by the Settlement Agreement. Class Members need not submit a statement in support of the Settlement to obtain their Individual Settlement Amount. |

### **WHAT IF THE ADDRESS ON THIS NOTICE IS NO LONGER VALID?**

If the address to which this Notice has been sent is no longer valid, the Change of Address form included with this Notice must be completed, notarized and mailed to the Claims Administrator. Checks will be mailed to the same address to which this Notice was sent unless a completed Change of Address Form is sent to the Claims Administrator postmarked or received by September 25, 2023. Checks may be cashed or deposited only by the payee and not any third party. Checks not cashed or deposited within 90 days will be void and replacement checks will not be provided. If a check is lost or destroyed and a request is received by the Claims Administrator within those 90 days, a replacement check may be issued.

### **WHAT IF THE CLASS MEMBER IS DECEASED?**

Defendants' records establish that approximately 2,346 Class Members are deceased as of March 31, 2023. To obtain any deceased Class Member's Individual Settlement Amount, the Estate Representative of a deceased Class Member must complete and send the Proof of Kinship Form provided with this Notice to the Claims Administrator, postmarked or received on or before September 8, 2023. An Estate Representative can be the court-appointed representative of a deceased Class Member or, if there is no court-appointed representative, the surviving spouse, children, parents, or any other properly verified next of kin of the deceased Class Member, in that order of priority.

ANY QUESTIONS? Contact the Claims Administrator at (833) 747-6924 or visit the Settlement website at [www.ctaretireesettlement.com](http://www.ctaretireesettlement.com)

The Proof of Kinship Form must be sworn in person before a Notary Public. If a proper Proof of Kinship Form is not submitted to the Claims Administrator, or if the Notice addressed to a deceased Class Member is returned as undeliverable to the Claims Administrator, no payment will be made from the Settlement Fund on behalf of the deceased Class Member unless, after reasonable investigation, the Claims Administrator is able to identify and locate the deceased Class Member's court-appointed representative or next of kin.

### **ARE THERE TAX IMPLICATIONS FOR CLASS MEMBERS?**

You may receive an IRS form 1099 for your Individual Settlement Amount for each tax year in which any part of your Individual Settlement Amount is paid to you. You should consult with your tax professional regarding whether these payments must be reported on your federal and state income tax returns and any taxes you may owe as a result of receiving your Individual Settlement Amount.

### **HOW CAN CLASS MEMBERS OBJECT TO THE SETTLEMENT?**

You can object to the Settlement if you do not like any part of the Settlement Agreement, the Plan of Distribution, or the Fee and Expense Application, and the Court will consider your objection. Any such objection must (a) clearly indicate your name, mailing address, telephone number, and e-mail address; (b) identify what aspect(s) of the Settlement you are objecting to and the reasons for the objection, including legal support, if any; and (c) be signed by you. Any such objection must be filed with the Circuit Court of Cook County, Illinois on or before September 25, 2023 and delivered by hand, overnight delivery service, or U.S. First Class Mail to Class Counsel and Defendants' counsel at the addresses listed below by that same date. You are not required to appear at the Settlement Hearing if you object to the settlement. Nevertheless, if you wish to address the Court personally during the Settlement Hearing concerning your objection, you must so indicate in your objection letter. If the Court rejects your objection, you will still be bound by the terms of the Settlement.

### **WHEN IS THE FINAL SETTLEMENT HEARING?**

The Court will hold a hearing via the Zoom teleconferencing service on October 23, 2023, at 10:00 a.m. to decide whether to give final approval to the Settlement. The hearing date may be changed without notice to the Class, and you should check the Settlement website at [www.ctaretireesettlement.com](http://www.ctaretireesettlement.com) or the public court file for this Lawsuit for any updates. During the hearing, the Court will consider whether the Settlement, the Plan of Distribution, and the Fee and Expense Application are fair, reasonable, and adequate. If there are objections, the Court will consider them. You may attend but you are not required to do so. You can also speak in favor of or against the Settlement at the Settlement Hearing, but only if you have indicated your intention to do so in your written statement in support or objection. You may view the proceedings by Zoom using any one of the log-in methods below, but you may not speak or address the Court unless you have indicated your intention to do so in a timely submitted, written statement in support or objection.

Zoom Log-In Information for Settlement Hearing:

1. Direct link to hearing:  
<https://circuitcourtofcookcounty.zoom.us/j/95658991093?pwd=VUYvQUZxcTA2K2x4YUhhEdnpMTFBIQT09>
2. Log-in through Zoom website or app:  
Meeting ID: 956 5899 1093; Password: 129359
3. Telephone (audio only; also requires Meeting ID and Password identified above):  
312-626-6799

ANY QUESTIONS? Contact the Claims Administrator at (833) 747-6924 or visit the Settlement website at [www.ctaretireesettlement.com](http://www.ctaretireesettlement.com)

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| <b>IMPORTANT SETTLEMENT DATES AND DEADLINES</b> |
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**Deadline to Submit Proof of Kinship Form:** September 8, 2023 (postmark/receipt date)  
**Deadline to Submit Change of Address Form:** September 25, 2023 (postmark/receipt date)  
**Objection Deadline:** September 25, 2023 (filing/receipt date)  
**Final Approval Hearing:** October 23, 2023, 10:00 a.m. (by Zoom)

**CONTACT INFORMATION FOR THE CLAIMS ADMINISTRATOR, CLASS COUNSEL, AND DEFENDANTS' COUNSEL**

**Claims Administrator:**

Kroll Settlement Administration, LLC  
Williams, et al. v. Retirement Plan for CTA Employees, et al.  
c/o Kroll Settlement Administration LLC  
PO Box 225391  
New York, NY 10150-5391  
Telephone (833) 747-6924

**Class Counsel:**

C. Philip Curley  
Robinson Curley PC  
200 North LaSalle Street, Suite 1550  
Chicago, Illinois 60601  
Telephone (312) 546-5221  
CTARetireeClassAction@robinsoncurley.com

**Trust Defendants' Counsel:**

Katheleen A. Ehrhart  
Smith Gambrel & Russell LLP  
311 South Wacker Drive, Suite 3000  
Chicago, Illinois 60606

**Plan Defendants' Counsel:**

Victoria R. Collado  
Burke, Warren, MacKay & Serritella P.C.  
330 North Wabash Avenue, Suite 2100  
Chicago, Illinois 60611

This Notice provides only a summary of the Settlement Agreement. If you would like to see a full copy of the Settlement Agreement, it is available on the Settlement website, [www.ctaretireesettlement.com](http://www.ctaretireesettlement.com). If you have any questions about the Settlement or this Notice, please visit the Settlement website or contact Class Counsel or the Claims Administrator.

**PLEASE DO NOT TELEPHONE OR CONTACT THE COURT, THE COURT CLERK'S OFFICE, DEFENDANTS, OR DEFENDANTS' COUNSEL TO ASK QUESTIONS ABOUT THE SETTLEMENT**

ANY QUESTIONS? Contact the Claims Administrator at (833) 747-6924 or visit the Settlement website at [www.ctaretireesettlement.com](http://www.ctaretireesettlement.com)



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IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, CHANCERY DIVISION  
Judge Cecilia A. Horan, Calendar 9  
No. 11 CH 15446  
Williams, et al. v. Retirement Plan for CTA Employees, et al.

**CHANGE OF ADDRESS FORM**

**If the address to which the Notice of Proposed Class Action Settlement (“Notice”) was sent has changed or is inaccurate, please complete this form, have it notarized, and return it to the Claims Administrator at the address on page 2 of this form by September 25, 2023.**

Under penalty of perjury, I certify that the address to which the Notice was sent has changed or is inaccurate, and the true and accurate address of the Class Member is stated above.

Member ID (found on the first page of the Notice): \_\_\_\_\_

Name of Class Member: \_\_\_\_\_  
First Name Last Name

Address to which this Notice was sent:

\_\_\_\_\_

Address

\_\_\_\_\_

City State Zip Code - Zip 4 (optional)

New or corrected mailing address to which future notices and settlement checks should be sent:

\_\_\_\_\_

Address

\_\_\_\_\_

City State Zip Code - Zip 4 (optional)

Name of person completing this form: \_\_\_\_\_

Your relationship to Class Member: \_\_\_\_\_

Your telephone number: ( \_\_\_\_\_ ) \_\_\_\_\_ - \_\_\_\_\_

Your email address: \_\_\_\_\_ @ \_\_\_\_\_



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Under penalty of perjury, I certify that the address to which the Notice was sent has changed or is inaccurate, and the true and accurate address of the Class Member is stated above.

\_\_\_\_\_  
Your signature

Subscribed and sworn to before me this \_\_\_\_\_ day of \_\_\_\_\_, 2023

\_\_\_\_\_  
Notary Public

[Notary Seal]

**Return this Form by U.S. First Class Mail to the Claims Administrator at the following address:**

Williams, et al. v. Retirement Plan for CTA Employees, et al.  
c/o Kroll Settlement Administration LLC  
PO Box 225391  
New York, NY 10150-5391

**This form must be postmarked or received by the Claims Administrator on or before  
September 25, 2023.**

  
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IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, CHANCERY DIVISION

Judge Cecilia A. Horan, Calendar 9

No. 11 CH 15446

Williams, et al. v. Retirement Plan for CTA Employees, et al.

**PROOF OF KINSHIP FORM**

**If the Class Member to whom the Notice of Proposed Class Action Settlement (“Notice”) was sent is deceased, please complete this form, have it notarized, and return it to the Claims Administrator at the address on page 4 of this form by September 8, 2023.**

Member ID (found on the first page of the Notice): \_\_\_\_\_

Name of deceased Class Member: \_\_\_\_\_

Name of person completing this form: \_\_\_\_\_

Your relationship to deceased: \_\_\_\_\_

Your mailing address: \_\_\_\_\_

\_\_\_\_\_  
City State Zip Code Zip 4 (optional)

Your telephone number: ( \_\_\_\_\_ ) \_\_\_\_\_ - \_\_\_\_\_

Your email address: \_\_\_\_\_@\_\_\_\_\_





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**Complete the Other Relatives section below only if there is no court-appointed estate representative or surviving spouse.**

3. Other Relatives: If there is no court-appointed estate representative or surviving spouse, identify other relatives of the deceased Class Member in the table below, following these instructions carefully:

- a. List all living children of the deceased Class Member;
- b. Only if there are no living children, list all living parents of the deceased Class Member;
- c. Only if there are no living children or parents, list all living brothers and sisters of the deceased Class Member;
- d. Only if there are no living children, parents, brothers or sisters, list all living nieces or nephews of the deceased Class Member.

The deceased Class Member's Individual Settlement Amount will be divided equally between and sent to the relatives you list below.

| Name  | Address   | Phone   | Relationship           |
|---|---|---|------------------------|
| _____<br>First Name<br><br>_____<br>Last Name | _____<br>Address<br><br>_____<br>City<br><br>_____<br>State      Zip Code | _____<br>-                      -<br>_____<br>_____ | _____<br><br><br>_____ |
| _____<br>First Name<br><br>_____<br>Last Name | _____<br>Address<br><br>_____<br>City<br><br>_____<br>State      Zip Code | _____<br>-                      -<br>_____<br>_____ | _____<br><br><br>_____ |
| _____<br>First Name<br><br>_____<br>Last Name | _____<br>Address<br><br>_____<br>City<br><br>_____<br>State      Zip Code | _____<br>-                      -<br>_____<br>_____ | _____<br><br><br>_____ |
| _____<br>First Name<br><br>_____<br>Last Name | _____<br>Address<br><br>_____<br>City<br><br>_____<br>State      Zip Code | _____<br>-                      -<br>_____<br>_____ | _____<br><br><br>_____ |

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Under penalty of perjury, I certify that the Class Member to whom this Notice was sent is deceased, and above is a true and accurate identification of the deceased Class Member's court-appointed estate representative, or if there is no court-appointed estate representative, the Class Member's surviving spouse, or if there is no surviving spouse, the Class Member's other relatives as set forth above.

\_\_\_\_\_  
Your signature

Subscribed and sworn to before me this \_\_\_\_\_ day of \_\_\_\_\_, 2023

\_\_\_\_\_  
Notary Public

[Notary Seal]

**Return this Form by U.S. First Class Mail to the Claims Administrator at the following address:**

Williams, et al. v. Retirement Plan for CTA Employees, et al.  
c/o Kroll Settlement Administration LLC  
PO Box 225391  
New York, NY 10150-5391

**This form must be postmarked or received by the Claims Administrator on or before  
September 8, 2023.**

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Williams, et al. v. Retirement Plan for CTA Employees, et al.  
c/o Kroll Settlement Administration LLC  
PO Box 225391  
New York, NY 10150-5391

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<<First Name>> <<Lastname>>  
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<<Address2>>  
<<City>>, <<State>> <<Zip Code>>  
<<country>>