

EXHIBIT C

EDNA MAHAN CORRECTIONAL FACILITY FOR WOMEN CLASS ACTION LITIGATION SETTLEMENT

CONFIRMATION OF CLAIM & SUPPLEMENTAL NOTICE TO CLASS MEMBERS

WHAT IS THIS NOTICE ABOUT?

This notice confirms that your claim has been received by the Settlement Administrator. It also concerns certain deadline extensions and further explains your legal rights under the Edna Mahan Correctional Facility for Women (“EMCFW”) class settlement agreement, including the release that all Class Members are giving to the New Jersey Department of Corrections (“NJDOC”) as a condition of the settlement.

PLEASE NOTE THAT IF YOU DO NOT TAKE ANY ACTION, you will remain a Class Member under the class settlement and will receive compensation, but you will also give up the right to assert certain legal claims relating to sexual harassment, sexual abuse, hostile environment based on sexually improper conduct or gender discrimination or retaliation for reporting such conduct at EMCFW.

On November 19, 2021, the Superior Court of New Jersey approved the settlement of the class action lawsuits captioned Nobles, et al. v. Anderson, et al., Docket No. HNT-145-19 (formerly MER-L-2644-17) and Brown, et al. v. State of New Jersey Department of Corrections, Docket No. HNT-76-19 (formerly MER-503-18). As a condition of approval, the Court required a short extension of deadlines so all Class Members would receive this supplemental notice and have additional time to evaluate whether they continue to want to submit a claim for compensation or to opt out of the settlement after having the opportunity to read this notice.

HOW DOES PARTICIPATING IN THE CLASS SETTLEMENT AFFECT MY LEGAL RIGHTS?

The class settlement agreement only applies to Class Members who do not elect to opt out of the Settlement Class as further explained below. Class Members include only those women who were incarcerated at EMCFW for one day or more starting at any time since January 1, 2014 **and** who have never filed a lawsuit or tort claims notice against NJDOC or prison officials for claims relating to sexual harassment, sexual abuse, hostile environment based on sexually improper conduct or gender discrimination or retaliation for reporting such conduct at EMCFW. Class Members can decide to opt out of the class settlement, which means that they will not be treated as a Class Member. In exchange for paying compensation under the class settlement agreement, the State of New Jersey, NJDOC, and their representatives will receive a release of claims from all Class Members who do not opt out. A release like this is standard in any class action settlement, and there would not be any settlement compensation without a release.

WHAT CLAIMS AM I RELEASING IF I DO NOT OPT OUT?

The release only applies to Class Members who do not opt out and is limited to claims relating

to allegations of sexual harassment, sexual abuse, hostile environment based on sexually improper conduct or gender discrimination or retaliation for reporting such conduct at EMCFW. This includes claims for violations of civil rights based on allegations of sexual harassment, sexual abuse, hostile environment based on sexually improper conduct or gender discrimination or retaliation for reporting such conduct at EMCFW; violations of the New Jersey Law Against Discrimination based on sex or gender; or tort claims based on allegations of sexual harassment, sexual abuse, hostile environment based on sexually improper conduct or gender discrimination or retaliation for reporting such conduct at EMCFW. The release only applies to claims relating to events that happened or happen on or before January 10, 2022. Please note that this release does not prohibit separate civil rights, discrimination, personal injury, or property claims that do not relate to any sexual misconduct.

If a Class Member either files a claim under Tier 1, Tier 2, or Tier 3 or fails to file claim but does not opt out of the Settlement on or before January 10, 2022, she is forever barred from filing a lawsuit or claim against Defendants for claims relating to sexual harassment, sexual abuse, hostile environment based on sexually improper conduct or gender discrimination or retaliation for reporting such conduct at EMCFW up to January 10, 2022. If an individual claim, lawsuit, or tort claims notice is filed by a Class Member by January 10, 2022, that person will not be a Class Member eligible for compensation under this Settlement because they have elected to pursue an individual claim instead. If an individual claim or lawsuit subject to the release is filed by a Class Member after January 10, 2022, that claim or lawsuit would be subject to dismissal due to the release under the class settlement agreement.

If you do not want to be bound by the release as described above, you need to submit a form to opt out of the class settlement as set forth below. Opting out would allow you to assert individual claims, but you would not receive any compensation under the settlement agreement.

WHAT DOES IT MEAN TO OPT OUT OF THE CLASS SETTLEMENT?

Opting out of the class settlement means that you would not be a Class Member. Anyone who has opted out will not receive any compensation under the class settlement agreement, but she also would not be subject to the release and would not be barred from asserting individual claims relating to sexual harassment, sexual abuse, hostile environment based on sexually improper conduct or gender discrimination or retaliation for reporting such conduct at EMCFW.

DIRECTIONS TO OPT OUT OF THE CLASS SETTLEMENT

In the event you have changed your mind and you want to opt out of the settlement and not receive compensation under the class settlement agreement, you have until **January 10, 2022** to mail the enclosed Opt-Out Form to the Settlement Administrator in the enclosed postage-prepaid envelope. **DO NOT SUBMIT THE OPT-OUT FORM IF YOU WANT TO RECEIVE COMPENSATION UNDER THE CLASS SETTLEMENT AGREEMENT. SUBMITTING THIS OPT OUT FORM WILL RESULT IN YOUR CLAIM BEING WITHDRAWN FROM THIS SETTLEMENT.**

ADDITIONAL INFORMATION IF I WANT TO CONTINUE MY ELECTION OF FILING A CLAIM

If you selected Tier 1 on your claim form and you want to continue with that claim, you are not required to take any further action to receive your compensation under the class settlement.

If you selected Tier 2 and did not request a hearing before the Special Master and you want to continue with that claim, you now have until **January 10, 2022** to submit your sworn affidavit or certification along with any supporting documentation if you have not done so already. The Special Master will decide your claim and how much you should be compensated.

If you selected Tier 2 and did request a hearing before the Special Master and you want to continue with that claim, you may still submit your sworn affidavit or certification along with any supporting documentation up until **thirty (30) days before your hearing** with the Special Master, which has not yet been scheduled. The Special Master will decide your claim and how much you should be compensated.

If you selected Tier 3 and you want to continue with that claim, you may still submit your sworn affidavit or certification along with any supporting documentation up until **thirty (30) days before your hearing** with the Special Master, which has not yet been scheduled. The Special Master will decide your claim and how much you should be compensated.

HOW DO I GET MORE INFORMATION? Further information about the settlement, including copies of the complete Settlement Agreement and the Amendment to the Settlement Agreement, is available on the Settlement Website at www.EMCFWsettlement.com. You may also contact the Settlement Administrator:

By Phone: 1-844-810-1507

By Email: info@EMCFWsettlement.com

By Mail: EMCFW Settlement Administrator
PO Box 3595, Baton Rouge, LA 70821

(Opt-Out Form on reverse)

**EDNA MAHAN CORRECTIONAL FACILITY FOR WOMEN
CLASS ACTION LITIGATION SETTLEMENT**

OPT-OUT FORM

ONLY COMPLETE AND RETURN THIS FORM IF YOU WISH TO WITHDRAW YOUR
CLAIM AND NOT PARTICIPATE IN THE SETTLEMENT CLASS.

SUBMITTING THIS FORM MEANS **YOU WILL NOT RECEIVE
COMPENSATION** UNDER THE CLASS ACTION SETTLEMENT

Must be Postmarked by **January 10, 2022**

Name: _____

SBI No.: _____ D.O.B.: _____

Address: _____

By submitting this Opt-Out Form, I am deciding that I do not want to be a Class Member in the class action settlement involving allegations of sexual harassment, sexual abuse, hostile environment based on sexually improper conduct or gender discrimination or retaliation for reporting such conduct at Edna Mahan Correctional Facility for Women.

I acknowledge that I will not be bound by any terms of the class action settlement agreement, that I will not receive any compensation in connection with the settlement, and that I will be able to assert individual claims for sexual harassment, sexual abuse, hostile environment based on sexually improper conduct or gender discrimination or retaliation for reporting such conduct at EMCFW.

Date: _____

Signature: _____

Name: _____