

The Civil Rights Education and Enforcement Center, on behalf of itself, and Ann Cupolo Freeman, Ruthee Goldkorn, and Julie Reiskin, on behalf of themselves and all others similarly situated,

v.

RLJ Lodging Trust, Inc.,

Case No. 15-cv-00224-YGR
U.S. District Court, Northern District of California

IMPORTANT NOTICE TO ALL PEOPLE WHO USE WHEELCHAIRS OR SCOOTERS FOR MOBILITY WHO HAVE VISITED, OR WERE DETERRED FROM VISITING, HOTELS OWNED BY RLJ LODGING TRUST

This notice summarizes a proposed class action settlement. For the complete terms and conditions of the settlement, you can access the settlement agreement. The agreement is available at www.creeclaw.org/RLJ, and can also be obtained by contacting class counsel at Timothy P. Fox, Civil Rights Education and Enforcement Center, 104 Broadway, Suite 400, Denver, CO 80203, tfox@creeclaw.org, by accessing the Court docket through the Court's Public Access to Court Electronic Records (PACER) system at ecf.cand.uscourts.gov, or by visiting the office of the Clerk of the Court for the U.S. District Court for the Northern District of California, Oakland Courthouse, between 9:00 a.m. and 4:00 p.m., Monday through Friday, excluding Court holidays.

PLEASE DO NOT CALL THE COURT OR THE COURT CLERK'S OFFICE TO ASK ABOUT THIS SETTLEMENT.

Notice of Class Action: A class action lawsuit is pending involving a challenge to the transportation services offered by hotels owned by RLJ Lodging Trust. Specifically, Plaintiffs, who are the Civil Rights Education and Enforcement Center and three individuals with mobility disabilities who use wheelchairs, allege that the failure at hotels owned by RLJ to provide wheelchair-accessible transportation services that are equivalent to the transportation services provided to guests without disabilities violates Title III of the Americans with Disabilities Act and California state law. The lawsuit seeks only injunctive relief, meaning, for example, an order requiring a change in policies or purchase of wheelchair-accessible vehicles. The Plaintiffs do not seek any monetary damages.

The following settlement class was certified by the Court on January 25, 2016:

All individuals who use wheelchairs or scooters for mobility who, from January 15, 2013 to January 25, 2016, have been denied the full and equal enjoyment of transportation services offered to guests at hotels owned and/or operated by RLJ because of the lack of equivalent accessible transportation services at those hotels.

The parties to the lawsuit have negotiated a settlement that resolves claims relating to accessibility of the transportation services at RLJ's hotels for people who use wheelchairs or scooters. In those negotiations, Plaintiffs and the class are represented by Timothy P. Fox, Sarah Morris, Bill Lann

Please read this Notice carefully. It affects your legal rights.

Lee, and Julie Wilensky of the Civil Rights Education and Enforcement Center, Kevin W. Williams of the Colorado Cross-Disability Coalition, and Julia Campins and Hillary Benham-Baker of Campins Benham-Baker, LLP (collectively, "Class Counsel"). The Defendant is RLJ Lodging Trust and is represented by Helen Lee Greenberg of Lewis Brisbois Bisgaard & Smith LLP.

Locations Covered by the Settlement: The proposed settlement covers hotels nationwide owned by RLJ. A list of these hotels is available at rljlodgingtrust.com/portfolio.html.

Proposed Class Action Settlement: The settlement agreement provides that the hotels owned by RLJ that provide transportation services to guests will provide equivalent accessible services to guests who use wheelchairs or scooters. These equivalent accessible services will be equivalent in timing, notice, routes or geographic scope, fares, hours, reservations, and restrictions. The settlement provides for three years of monitoring of the RLJ hotels to ensure compliance.

Your Rights as a Class Member: If you are a person who uses a wheelchair or scooter for mobility and who, from January 15, 2013 to January 25, 2016, has experienced any problems with access to hotel-provided transportation services at any RLJ-owned hotel, or has been deterred from accessing these transportation services at any RLJ-owned hotel, you are a member of the settlement class.

The Court has granted preliminary approval of the settlement. A final approval hearing will be held on **May 3, 2016 at 2:00 p.m.** in the Courtroom of U.S. District Judge Yvonne Gonzalez Rogers in Oakland, California, to evaluate the fairness of the settlement and to decide whether to grant final approval. The date of this hearing may change without further notice to the class. If Court grants final approval of the settlement, all class members will be bound by the provisions of the settlement agreement with respect to claims for injunctive or declaratory relief under the Americans with Disabilities Act, the California Unruh Act, or any public accommodation provision of any federal, local, or state statutory, regulatory, or common law concerning the provision of wheelchair-accessible transportation services at RLJ hotels. Any and all claims for injunctive or declaratory relief alleging that the transportation services provided by RLJ hotels violate these statutes with respect to access for individuals who use wheelchairs or scooters up until January 25, 2016 will be barred. **The settlement does not affect or release class members' rights to seek claims for monetary damages.** Class Counsel plan to apply to the Court for \$135,000 in attorneys' fees and costs for litigating and monitoring this class action and settlement.

You may object to the proposed settlement in writing. You may also appear at the final approval hearing. All written objections must: (a) clearly identify the case name and number listed above and (b) be submitted to the Court either by mail to the Class Action Clerk, United States District Court for the Northern District of California, Clerk, Ronald V. Dellums Federal Building & United States Courthouse, 1301 Clay Street, Oakland, CA 94612, or by filing in person at any location of the United States District Court for the Northern District of California, and (c) be filed or postmarked on or before **April 4, 2016**.

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