NOTICE OF CLASS ACTION SETTLEMENT

TO: NEW YORK CITY NON-PROBATIONARY TAXI OR FOR-HIRE VEHICLE DRIVERS WHO HAD THEIR LICENSES REVOKED OR WHO SURRENDERED THEIR LICENSE BETWEEN JANUARY 23, 2005 UNTIL JANUARY 14, 2014 BECAUSE OF A DRIVING WHILE ABILITY IMPAIRED ("DWAI") CONVICTION WHERE SUCH CONVICTION WAS BASED ON AN ACT THAT DID NOT OCCUR WHILE THE DRIVER WAS ON-DUTY OPERATING A TAXICAB OR FOR-HIRE VEHICLE.

This Notice contains important information that may pertain to you. Please read it carefully. Under the Settlement Agreement in *Rothenberg et al. v. Daus et al.*, No. 08-CV-00567 (SHS), certain non-probationary taxi and for-hire vehicle drivers, licensed by the New York City Taxi and Limousine Commission ("TLC") who, during the time period from January 23, 2005 until January 14, 2014, (i) surrendered their license to TLC, or (ii) had their license revoked by TLC after attending a fitness hearing, or (iii) had their license revoked by TLC after failing to attend a fitness hearing, based solely on a conviction for driving while ability impaired ("DWAI") where such conviction was based on an act that did not occur while the driver was on-duty operating a taxicab or for-hire vehicle, may be entitled to a payment.

On January 23, 2008 and September 23, 2009, Plaintiffs Saul Rothenberg, Ebrahim Abood, Tobby Kombo, Konstantinos Katsigiannis, Boubacar Doumbia, Robert Dyce and Moustach Ali ("Named Plaintiffs") filed a putative class action complaint or amended complaint, as the case may be, in which they challenged the constitutionality of certain procedures employed by the TLC to adjudicate the fitness of TLC licensees in response to either a criminal conviction or a positive result on a drug test.

After lengthy settlement negotiations, on July 14, 2017, the Named Plaintiffs and Defendants entered into a Stipulation of Settlement (the "Settlement Agreement" or "Settlement"). This Settlement may provide for payments of $34,840 to individuals whose licenses were revoked after a hearing and for payments of $26,130 to individuals whose licenses were revoked after failing to appear at a hearing or whose licenses were surrendered prior to the hearing. Such amounts may be reduced under certain circumstances set forth in the Stipulation of Settlement. The Settlement Agreement also provides that the TLC will use its best efforts to achieve certain changes in the TLC revocation rules. The Settlement also provides for a release of all claims by anyone who is a member of the Settlement Class who does not opt out of the Settlement.

To opt-out or exclude yourself from the Settlement, you must mail a written request postmarked no later than October 2, 2017, or send an email, no later than October 2, 2017, to Class Counsel.

On July 20, 2017, the Hon. Sidney H. Stein, United States District Court Judge of the Southern District of New York granted Preliminary Approval of the Settlement and scheduled a Fairness Hearing on the 16th day of November, 2017 at 10:00 AM. The Fairness Hearing will take place in Courtroom 23A at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007-1312.

A Settlement Class Member may object to the fairness, reasonableness, or adequacy of the proposed Settlement in writing or in person at the Fairness Hearing, or both. Written objections to the proposed settlement must be mailed or emailed no later than thirty (30) days before the date of the Fairness Hearing, and requests to opt-out of the settlement must be mailed or emailed no later than forty-five (45) days before the Fairness Hearing, to:

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A detailed Notice of Class Action Settlement explaining the Settlement will be mailed to Settlement Class Members' last known address. If you do not receive a mailed Notice of Settlement and want to determine if you are in the Settlement Class or wish to learn more about the Settlement, contact Class Counsel at 212-455-0300.