

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN DIEGO

Coordination Proceedings Special Title
(Rule 1550(b))

RED LIGHT PHOTO ENFORCEMENT CASES

This document applies to:

C.L. Trustees v. Lockheed Martin

Cook v. Lockheed Martin

Glickman v. City of San Diego

Buys v. City and County of San Francisco

Judicial Council Coordination Proceeding No. 4305

Assigned to: Judge Linda B. Quinn

Superior Court of California
County of San Diego, No. GIC773619

Superior Court of California
County of San Diego, No. GIC773950

Superior Court of California
County of San Diego, No. GIC767025

Superior Court of California
County of San Francisco, No. 400669

**IF YOU RECEIVED A TICKET BECAUSE OF A RED LIGHT PHOTO
ENFORCEMENT CAMERA SYSTEM, YOU MAY BE ENTITLED
TO A PAYMENT FROM A CLASS ACTION SETTLEMENT.**

A California Court authorized this Notice. This is not a solicitation from a lawyer.

- A settlement has been proposed in a class action lawsuit about the operation of some red light camera systems in California.
- The Settlement will provide \$400,000.00 to pay claims from drivers who paid a fine, penalty, attorneys' fees or forfeited bail as a result of a citation issued from a red light automated traffic enforcement system operated in California between January 1, 1996 and December 31, 1998.
- The Settlement resolves a portion of lawsuits alleging that red light photo enforcement systems operated in certain areas were illegal. The lawsuit is continuing against other Defendants.
- If you qualify, you may send in a Claim Form to get benefits, or you may object to the Settlement.
- Your legal rights are affected whether you act, or don't act. **READ THIS NOTICE CAREFULLY.**

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT:

SUBMIT A CLAIM FORM	The only way to get a payment.
OBJECT	Write to the Court about why you don't like the Settlement.
GO TO A HEARING	Ask to speak in Court about the fairness of the Settlement.
DO NOTHING	Get no payment. Give up your rights.

- These rights and options – **and the deadlines to exercise them** – are explained in this Notice.
- The Court in charge of these cases still has to decide whether to approve the Settlement. Payments may only be made if the Court approves the Settlement and after appeals, if any, are resolved. Please be patient.

Questions? Call Complete Claim Solutions, Inc. at (800) 930-0057 OR Visit www.redlightcases.com

BASIC INFORMATION

1. WHAT IS THIS LAWSUIT ABOUT?

The Class Representatives claim the red light photo enforcement systems in certain California cities are illegal because (a) they are operated by a private, for-profit corporation instead of government agencies in cooperation with law enforcement, and (b) the private, for-profit corporation is paid if money is collected from the red light tickets. This Settlement addresses only a portion of the time period covered by the lawsuit. The rest of the lawsuit is not part of this Settlement, and will continue.

The Defendants include Del Mar Ventures, LLC (formerly known as U.S. Public Technologies, LLC). Only Del Mar Ventures is settling this lawsuit.

Del Mar Ventures denies all allegations of wrongdoing.

The Court has made no determination of the merits of Plaintiffs' or Defendant's case.

2. WHY IS THERE A SETTLEMENT?

The Court did not decide in favor of Plaintiffs or Defendant. Instead, Plaintiffs and Defendant, Del Mar Ventures, have agreed to a Settlement. That way, they avoid the cost of a trial, and the people affected will get compensation. The Class Representatives and the attorneys think the Settlement is best for all Class Members.

3. WHO IS INCLUDED IN THE SETTLEMENT CLASS?

You may be a member of the Settlement Class if you paid fines, penalties, or attorneys' fees or forfeited bail as a result of a citation issued from a red light automated traffic enforcement system operated in California between January 1, 1996 and December 31, 1998.

Excluded from the Class are the officers, directors and employees of Defendant, the judge presiding over this matter and members of the judge's family.

4. WHO REPRESENTS MY INTERESTS IN THIS SETTLEMENT?

The Court has designated a number of the Plaintiffs who brought these actions as Class Representatives. Plaintiffs' Counsel, some of whom are listed below, are the lawyers for the Class and the Settlement Class. If you are a member of the Settlement Class, these Class Representatives and these lawyers will act as your representatives and lawyers for this Settlement against this Defendant.

If you are a Settlement Class Member, you may, but are not required to, enter an appearance through counsel of your own choosing at your own expense. If you do not do so, you will be represented by Plaintiffs' Settlement Counsel: Milberg Weiss Bershad Hynes & Lerach LLP, Timothy G. Blood, Helen I. Zeldes, 401 B Street, Suite 1700, San Diego, California 92101 and Wingert, Grebing, Brubaker & Ryan, Charles R. Grebing, Eric Deitz, 600 West Broadway, 7th Floor, San Diego, California 92101.

5. DO I HAVE TO PAY MONEY TO PARTICIPATE IN THE SETTLEMENT CLASS?

You will not be personally responsible for any costs or attorneys' fees incurred in these lawsuits. If the Court approves the proposed Settlement, the lawyers for the Class will request that the Court award a portion of the attorneys' fees and costs incurred which shall be paid from the Fund recovered on behalf of the Class.

Questions? Call Complete Claim Solutions, Inc. at (800) 930-0057 OR Visit www.redlightcases.com

6. IF I PARTICIPATE IN THE SETTLEMENT CLASS, WHAT ARE MY CHOICES?

As a Settlement Class Member, you will be bound by any judgment benefiting or adverse to the Class and you may not maintain a separate lawsuit. You will have your claim for money and other relief decided in this lawsuit and receive your portion, if any, from the Settlement. You must submit a Claim Form **postmarked no later than September 24, 2004** to receive any portion of the Settlement. A Claim Form for your use is included in this packet.

7. I WISH TO OBJECT TO THE SETTLEMENT. HOW DO I OBJECT?

If there is something about the Settlement you do not like, you may file an objection with the Court. You will still be in the Settlement Class and will still receive benefits if the Settlement is approved and you timely submit a valid Claim Form by September 24, 2004.

If you want to object, you must file your objection in writing with the Court. Your objection should include:

- (a) Your name, address, and telephone number;
- (b) The entity issuing the citation, and the citation number for the citation, that makes you a member of the Class;
- (c) The reason(s) you do not like the Settlement; and
- (d) The case names and numbers of this lawsuit.

You must file your written objection with the Court no later than February 2, 2004. Mail your objection to Clerk of the Court, San Diego Superior Court, 330 West Broadway, San Diego, California 92101.

You also **must** deliver copies of your objection to the attorneys in the case:

Karen Jensen Petrulakis
Folger Levin & Kahn LLP
Embarcadero Center West
275 Battery Street, 23rd Floor
San Francisco, California 94111

*Counsel for Defendant
Del Mar Ventures, LLC*

Timothy G. Blood
Milberg Weiss Bershad Hynes & Lerach LLP
401 B Street, Suite 1700
San Diego, California 92101

Co-Lead Counsel for the Class

The Court and the attorneys **must** receive your objection by **February 2, 2004**, or your objection may not be considered.

8. ADDITIONAL INFORMATION.

All references in this Notice to pleadings and Court orders are only summaries. Complete copies of the pleadings, orders and other documents filed in this litigation may be examined and copied at any time during regular office hours at the Office of the Clerk of the Court, San Diego Superior Court, 330 West Broadway, San Diego, California 92101. Three of the cases are *C.L. Trustees v. Lockheed Martin IMS*, Case No. GIC773619; *Jerrold Cook v. Lockheed Martin IMS*, Case No. GIC773950, *Glickman v. City of San Diego*, Case No. GIC767025, and all cases are part of Judicial Council Coordination Proceeding No. 4305.

Certain documents and other information are also available on the Internet at www.redlightcases.com.

Questions? Call Complete Claim Solutions, Inc. at (800) 930-0057 OR Visit www.redlightcases.com

If you have any questions concerning any matter raised in this Notice, or wish to provide us with your current name or address, please visit the website, send an email to info@redlightcases.com or write to any of the attorneys identified below, who are designated as Class Counsel:

MILBERG WEISS BERSHAD
HYNES & LERACH LLP
Timothy G. Blood
Helen I. Zeldes
401 B Street, Suite 1700
San Diego, California 92101

WINGERT, GREBING, BRUBAKER
& RYAN
Charles R. Grebing
Eric Deitz
600 West Broadway, 7th Floor
San Diego, California 92101

Attorneys for the Class

PLEASE DO NOT CALL OR WRITE TO THE COURT FOR INFORMATION OR ADVICE.

DATED: January 7, 2004

BY ORDER OF THE SUPERIOR COURT
OF THE STATE OF CALIFORNIA
COUNTY OF SAN DIEGO

IMPORTANT COURT DOCUMENTS

Red Light Photo Enforcement Cases
c/o Complete Claim Solutions, Inc.
P.O. Box 24690
West Palm Beach, FL 33416

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN DIEGO

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Judicial Council Coordination Proceeding No. 4305

RED LIGHT PHOTO ENFORCEMENT CASES

Assigned to: Judge Linda B. Quinn

CLAIM FORM

To Receive Reimbursement Of Money Paid For Red Light Auto Enforcement Citations

INSTRUCTIONS

If you paid a fine, penalty, attorneys' fees or forfeited bail as a result of a citation issued from a red light automated enforcement system operated in California between January 1, 1996 and December 31, 1998, you may be entitled to a return of some or all of the money you paid.

To obtain your portion of the Settlement Fund, if any, you must:

- Fill out this Claim Form,
- Sign this Claim Form,
- Attach copies of the documents this Claim Form requests,
- Mail the Claim Form and documents to:

***Red Light Photo Enforcement Cases
c/o Complete Claim Solutions, Inc.
P.O. Box 24690
West Palm Beach, FL 33416***

- If you have any questions, you may contact Complete Claim Solutions, Inc. at (800) 930-0057.

**YOU MUST MAIL YOUR COMPLETED AND SIGNED CLAIM FORM
SO THAT IT IS POSTMARKED ON OR BEFORE SEPTEMBER 24, 2004.**

PART I: CLAIMANT IDENTIFICATION

Please Type or Print

Claimant's Name (First, Middle, Last)

Street Address

City

State

Zip Code

()

Area Code

Telephone Number (work)

()

Area Code

Telephone Number (home)

PART II: TELL US ABOUT YOUR RED LIGHT CITATION:

1. Please identify the city or county that issued the citation to you through an automatic red light camera enforcement system: _____

2. Intersection citation issued at: _____

3. Citation Information: _____
Date of Citation Time of Citation Citation Number

4. Do you have a copy of your citation? _____ (Yes) _____ (No)
If yes, please attach proof of citation.

5. Did you: (mark each that applies)
_____ Pay a Fine _____ Pay a Penalty _____ Forfeit Bail _____ Pay Attorneys' Fees

6. How much did you pay for each?
\$_____ Fine \$_____ Penalty \$_____ Forfeiture of Bail \$_____ Attorneys' Fees

7. Do you have proof of your payment of a fine, penalty, forfeited bail or attorneys' fees related to your red light citation? _____ (Yes) _____ (No)
If yes, please attach proof of payment.

To recover under this Settlement, you must provide proof of payment of the fine, penalty, forfeited bail or attorneys' fees. Documents that can be used to prove payments include: a receipt of payment from a governmental entity or your attorney; a copy of a cancelled check used for payment that clearly indicates the purpose of payment; a credit card statement or receipt; or an invoice from your attorney showing payment and the purpose of the payment.

8. Did you receive more than one citation? _____ (Yes) _____ (No)
If yes, please provide the information above for each additional ticket on a separate sheet of paper.

I declare under penalty of perjury under the laws of the State of California that the foregoing information supplied by the undersigned is true and correct and that this Claim Form was executed this _____ day of _____ in _____
(month) (year) (City, State)

(Sign your name here)

(Type or print your name here)

REMINDER CHECKLIST

- 1. Please sign the above declaration.
- 2. Remember to attach all supporting documentation.
- 3. Keep a copy of your Claim Form for your records.
- 4. If you desire an acknowledgement of receipt of your Claim Form, please send it Certified Mail, Return Receipt Requested.
- 5. If you move or change your name, please send us your new name, address and/or telephone number.

ACCURATE CLAIMS PROCESSING TAKES A SIGNIFICANT AMOUNT OF TIME.
THANK YOU FOR YOUR PATIENCE.