

**If you are a JUVENILE who appeared before former
Judge Mark A. Ciavarella Jr. at any time
from January 1, 2003 through May 28, 2008**

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**If you are the PARENT/GUARDIAN OF A JUVENILE who appeared before former
Judge Ciavarella during this time,**

**YOU COULD RECEIVE BENEFITS FROM A SETTLEMENT
with Robert K. Mericle and Mericle Construction, Inc.**

A partial settlement has been entered into on behalf of juvenile and parent/guardian Settlement Class Members with Mericle Construction, Inc. and its president, Robert K. Mericle (referred to in this notice as the "Mericle Defendants"). The Mericle Defendants will pay \$17.75 million into a Cash Settlement Fund with the potential of up to an additional \$1.75 million. This Notice is a description of important terms of the Master Settlement Agreement ("MSA" or "Agreement"), but it does not set forth every term of that Agreement or modify that Agreement. You may obtain a copy of the entire MSA at www.kidswinsettlement.com.

If you believe you qualify to receive a payment as part of this settlement, you may submit a Proof of Claim form to get benefits, exclude yourself from this partial settlement, or object to it.

The United States District Court for the Middle District of Pennsylvania authorized this notice. The Court will have a hearing to consider whether to approve this settlement, so that the benefits may be paid.

WHO'S INCLUDED?

You are a Juvenile Settlement Class Member or Parent/Guardian Settlement Class Member, as defined in the MSA, if you fall into either of the following groups:

- **Juvenile Settlement Class Members:** all juveniles who appeared before former Judge Ciavarella at any time between January 1, 2003 and May 28, 2008 and who were adjudicated delinquent and/or placed in a detention center by former Judge Ciavarella.
- **Parent Settlement Class Members:** all parents and/or legal guardians of Juvenile Settlement Class Members who made payments as a result of his or her child's adjudication or placement.

WHAT'S THIS ABOUT?

Various class action lawsuits and individual lawsuits were filed against the Mericle Defendants and other defendants. The lawsuits allege that the Mericle Defendants and other defendants violated the Juveniles' constitutional rights, the Racketeer Influenced and Corrupt Organizations Act ("RICO"), and Pennsylvania law.

This settlement resolves all claims against the Released Parties, which includes the Mericle Parties and Luzerne County Parties. The Mericle Defendants have not admitted to doing anything wrong, and the Court has not found that the Mericle Defendants have done anything wrong. However, the Mericle Defendants wish to enter into this MSA to release the Released Parties, as defined in the MSA, from any potential liability and to end all further litigation by the Juveniles and the Parents against these parties.

The class action and individual lawsuits will continue against certain Non-Released Parties, as defined in the MSA, including the former Judges Ciavarella and Conahan, Robert Powell, PA Child Care ("PACC") and Western PA Child Care ("WPACC").

HOW DO I RECEIVE A PAYMENT?

You must submit a Proof of Claim form to the Claims Committee in order to receive a payment. You will also have to sign an authorization to release records to the Claims Committee so it can verify your information and calculate your payment.

The Proof of Claim Form must be submitted to the Claims Committee post-marked no later than May 13, 2012. You will not be permitted to participate in the Settlement if you miss this deadline.

HOW MUCH WILL I RECEIVE?

Settlement Class Category	Base Award
1. Probation Only.....	\$500
2. Non-PACC/WPACC.....	\$1000 *** [if you were adjudicated and placed in a facility other than PACC and/or WPACC, you fall in this category]
3. PACC/WPACC.....	\$5000 *** [if you were adjudicated and placed in PACC and/or WPACC for any period of time, you fall in this category]
***May be entitled to the Enhanced Benefit Fund . See www.kidswinsettlement.com for complete information.	
4. Parents/Guardians.....	actual amount paid

WHAT ARE MY OTHER OPTIONS?

If you do not want to be legally bound by this settlement, you must exclude yourself – or opt-out – by May 13, 2012. If you opt-out, you cannot get money from this settlement and may continue individually to proceed against the Mericle Defendants. If you want to be included in the settlement but do not agree to all the terms, you can object. The complete notice describes how to opt-out or object.

FOR COMPLETE INFORMATION

For more information, visit www.kidswinsettlement.com, call toll-free 1-866-510-3030, or write to:

Claims Committee
Anapol Schwartz
1710 Spruce Street
Philadelphia, PA 19103