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2
3 **IN THE UNITED STATES DISTRICT COURT FOR**
4 **THE EASTERN DISTRICT OF TENNESSEE**
5 **GREENEVILLE DIVISION**

6 **S.H., individually, and on behalf of all**
7 **others similarly situated,**

8 **Plaintiffs,**

9 **v.**

No: 2:23-cv-00071-TRM-JEM

10
11 **CITY OF JOHNSON CITY, TENNESSEE,**

12 **Defendant.**
13 _____/

14
15
16
17 **DECLARATION OF SUSAN WASKIEWICZ**

18
19 1. I am a Project Manager at JND Legal Administration (“JND”). This Declaration is
20 based on my personal knowledge and information provided to me by experienced JND
21 employees and, if called on to do so, I could and would testify competently thereto.

22 2. JND is serving as the Settlement Administrator¹ in the above-captioned litigation
23 (“Action”) for the purposes of administering Settlement Agreement and Release (the
24 “Settlement Agreement”) preliminarily approved by the Court in its Order, dated May 29, 2025.

25 3. I submit this Declaration at the request of Counsel to confirm the implementation of
26 the notice program.
27 _____

28 ¹ Capitalized terms used and not otherwise defined herein shall have the meanings given such terms in the Settlement Agreement.

CLASS MEMBER DATA

4. On May 2, 2025, JND received spreadsheets from Class Counsel which were created by policing expert, Eric Daigle of Daigle Law Group (“DLG”), during a previous audit which analyzed Johnson City Police Department (“JCPD”) and their handling of sex crimes. JND also received pdf copies of police reports created between January 1, 2018 and July 22, 2022 by JCPD, which were included in the audit. These files contained, among other information, the names, mailing addresses, incident numbers, and reporting dates of individuals who had their sexual assault reported to JCPD between January 1, 2018 and July 22, 2022. From these documents, JND was able to find identifying and contact information for 337 individuals, of which 300 qualify as unique Class Members in this Action.

5. On July 6, 2025, JND received a spreadsheet provided by JCPD containing, the names, mailing addresses, incident numbers, and reporting dates of individuals who had their sexual assault reported to Johnson City Police Department between July 1, 2022 and December 31, 2022. The spreadsheet contained contact and identifying information for 49 individuals. Of the 49 individuals, 2 were previously included in the DLG audit and 47 were new unique Class Members.

6. In total, 384 individuals were identified from the information provided in the spreadsheets and police reports. Of these, 347 met the class definition and qualified as Class Members in this Action.

7. Of the 347 identified Class Members, 73 records are believed to belong to individuals that are potentially of minority age (17 years old or less) based on their age and report date. For these individuals, additional care was taken to collect any available parent or guardian contact information. Parent or guardian information was found for 24 of the 73 potentially minor records.

8. JND updated the Class Member and parent/guardian contact information using advanced address searches and data from the National Change of Address (“NCOA”) database. For two of the 347 Class Member records, no permanent addresses could be found. The updated

1 Class Member and parent/guardian data was promptly loaded into a database established for this
2 Action.

3 **DIRECT NOTICE MAILING**

4 9. On July 23, 2025, JND sent the Court-approved Notice of Proposed Class Action
5 Settlement (“Notice”) via U.S. Postal Service first-class mail. In total, 369 Notices were sent to
6 the 345 Class Members with known, permanent addresses and the 24 parent/guardian addresses.
7 A representative sample of the Notice is attached hereto as **Exhibit A**.

8 10. As of November 7, 2025, of the total 369 Settlement Notices mailed, JND tracked
9 99 Notices (representing 91 Class Members) that were returned to JND as undeliverable.
10 Advanced address searches were completed and JND received updated address information for
11 58 Notices. JND re-mailed these 58 Notices (representing 56 Class Members), and 3 re-mailed
12 Notices have been returned as undeliverable to date.

13 11. Of the 24 Class Members who were mailed an additional Notice to a parent/guardian
14 address, 13 of the 48 Notices mailed were returned undeliverable, representing 10 Class Member
15 records. Of these 10 Class Member records, 3 are confirmed to have received at least one
16 mailing, as they have since filed online or reached out to JND.

17 12. One additional Class Member filed online after contacting JND after her notice
18 mailing was returned undeliverable.

19 **SETTLEMENT WEBSITE**

20 13. On July 23, 2025, JND established a dedicated website for the Action
21 (www.JCPDClassActionSettlement.com), which hosts downloadable copies of important case
22 documents (including, but not limited to, the Notice, Settlement Agreement, Class Action
23 Complaint, and Preliminary Approval Order), provides answers to frequently asked questions,
24 and includes contact information for the Settlement Administrator. Class Members also can
25 verify their contact information, elect a payment option, and submit their tax information
26 electronically on the website before the filing deadline on November 20, 2025.

27 14. As of November 7, 2025, the website has tracked 517 unique users who registered
28 2,629 page views.

1 **TOLL-FREE TELEPHONE LINE**

2 15. On July 23, 2025, JND activated a case-specific toll-free number, 1-855-779-3496,
3 for Class Members to call to obtain information about the Settlement. The telephone line is
4 available 24 hours a day, seven (7) days a week. The telephone line also allows callers to leave
5 voicemails and receive a call back from the Settlement Administrator.

6 16. As of November 7, 2025, the toll-free number has received 49 calls.

7 **CLASS MEMBER ATTESTATIONS**

8 17. Since the Notice mailing on July 23, 2025, individuals have reached out as they
9 believe they are Class Members.

10 18. As of November 7, 2025, a total of 6 individuals or their guardians have come
11 forward and attested that they are Class Members in this Action.

12 **REQUESTS FOR EXCLUSION**

13 19. The Notice informed Class Members who wanted to exclude themselves from the
14 Settlement (“opt-out”) that they must do so by submitting an exclusion request letter to the
15 Settlement Administrator, received or postmarked on or before September 22, 2025.

16 20. As of November 7, 2025, one Class Member has requested exclusion. A copy of this
17 exclusion request is attached hereto as **Exhibit B**.

18 **OBJECTIONS**

19 21. The Notice informed recipients that Class Members who would like to object to the
20 Settlement must do so by submitting their objection letter to the Court, received or postmarked
21 on or before September 22, 2025.

22 22. As of November 7, 2025, JND has not received any objections.

23 **SUBMITTED FORMS RECEIVED**

24 23. Pursuant to the terms of the Settlement Agreement, Settlement Class Members may
25 verify their contact information, elect a payment option, and/or submit their tax information
26 through November 20, 2025.

27 24. As of November 7, 2025, JND has received 69 timely submissions. Of these, 66 Class
28 Members completed a W-9 form to provide their tax information.

25. JND is continuing to receive and process submissions. JND will also coordinate deficiency letters for any incomplete submissions as needed.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 10th day of November 2025, in Waukesha, Wisconsin.

Susan Waskiewicz
SUSAN WASKIEWICZ

EXHIBIT A

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT
UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TENNESSEE

A federal court authorized this Notice. This is not a solicitation from a lawyer.

Women who reported sexual assault to the Johnson City Police Department in Johnson City, Tennessee may be eligible for benefits from a class action settlement.

- A Settlement has been reached with the City of Johnson City, Tennessee (“the City” or “Defendant”) in a class action lawsuit. Plaintiffs allege in the lawsuit that the City violated their constitutional right to equal protection under the law in connection with discriminatory practices by the Johnson City Police Department (“JCPD”) in response to their reports of sexual assault.
- The Settlement provides a \$4,200,000 fund for the benefit of all women (including minors) who reported sexual assault by any person to the JCPD **from January 1, 2018 through December 31, 2022**. Additionally, as part of the Settlement, JCPD will continue to use improved policies and procedures with regard to reports of sexual assault, and Class Counsel will monitor the implementation of these changes.
- The City denies all allegations of wrongdoing and liability.
- Your legal rights are affected whether or not you act. This Notice contains information about the Settlement and the lawsuit. Please read this entire Notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS		
		<u>DUE DATE</u>
VERIFY YOUR INFORMATION AND COLLECT A PAYMENT	If you are a Class Member and you verify your information via the settlement website as described below, you will be paid an estimated \$7,000. You will give up the right to sue the Defendant about the claims in this case.	November 20, 2025
EXCLUDE YOURSELF	You will not be included in the Settlement. You will receive no benefits and you will keep any rights you currently have to sue the Defendant about the claims in the case.	September 22, 2025
OBJECT	If you do not exclude yourself and you disagree with the Settlement, you can write to the Court and object.	September 22, 2025
GO TO A HEARING	Ask to speak in court about the fairness of the Settlement.	January 6, 2026 at 1:00 p.m.

- These rights and options—and the deadlines to exercise them—are explained in this Notice.
- The Court in charge of this case still must decide whether to approve the Settlement. Payments will be made if the Court approves the Settlement and after any appeals are resolved.
- For updates visit www.JCPDClassActionSettlement.com.

Questions? Call 1-855-779-3496 toll free or visit www.JCPDClassActionSettlement.com

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Questions? Call 1-855-779-3496 toll free or visit www.JCPDClassActionSettlement.com

BASIC INFORMATION

1. WHY DID I GET THIS NOTICE?

If you are a woman who reported sexual assault by any person to the JCPD between January 1, 2018 through December 31, 2022, you have the right to know about a proposed Settlement of a class action lawsuit, and your options, before the Court decides whether to approve the Settlement.

This Notice is to inform you of the lawsuit, the proposed Settlement and your legal rights. The women who sued are called “plaintiffs.” The City they sued is called “defendant.”

2. WHAT IS THIS LAWSUIT ABOUT?

Plaintiffs allege that JCPD engaged in a pattern and practice of discriminatory conduct against women reporters of sex crimes that included declining to take certain investigative steps, intimidating and discouraging women in a manner that made them less likely to participate in the investigation and prosecution of the crimes against them, and closing cases prematurely and improperly. Plaintiffs allege that these practices amounted to a violation of Class Members’ civil rights.

Defendant denies Plaintiffs’ allegations. The Court has not decided who is right.

3. WHY IS THIS A CLASS ACTION?

In a class action, one or more plaintiffs called “class representatives” sue on behalf of themselves and other people with similar claims. This group of people is called the “class” and the people in the class are called “class members.” One court resolves the issues for all class members, except for those who exclude themselves from the class.

This lawsuit is *S.H. v. City of Johnson City, Tennessee*, No.2:23-cv-00071-TRM-JEM (E.D. Tenn.). The judge is the Honorable Travis R. McDonough of the United States District Court for the Eastern District of Tennessee.

S.H. is the Class Representative for this lawsuit, and she has been participating in the case since its inception. Class representatives are eligible for what is called a “service award” to acknowledge their efforts and the benefits they achieved for the class. Class Counsel will ask the Court to approve up to \$20,000 as a service award for S.H. Any amount the Court approves will be paid from the Settlement Fund.

4. WHY IS THERE A SETTLEMENT?

The Court has not decided in favor of Plaintiffs or Defendant. Instead, both sides have agreed to a Settlement to avoid the costs and risks of trial and appeals. The Class Representative and her attorneys think the Settlement is best for the class.

WHO IS IN THE SETTLEMENT?

5. HOW DO I KNOW IF I AM PART OF THE SETTLEMENT?

You are a Class Member, and are included in the Settlement, if you are a woman who reported sexual assault by any person to the JCPD from January 1, 2018 to December 31, 2022. This includes those who were minors at the time of their report.

Questions? Call 1-855-779-3496 toll free or visit www.JCPDClassActionSettlement.com

6. WHAT SHOULD I DO IF AM NOT SURE IF I AM INCLUDED IN THE SETTLEMENT?

If you are not sure whether you are in the class, you can ask for free help and more information by calling the Settlement Administrator at 1-855-779-3496 or sending an email to info@JCPDClassActionSettlement.com. More details about the class, the lawsuit, and the Settlement can be found in the Settlement Agreement and other documents available on the settlement website, www.JCPDClassActionSettlement.com.

BENEFITS OF THE SETTLEMENT — WHAT YOU GET

7. WHAT DOES THE SETTLEMENT PROVIDE?

Monetary Benefits

Defendant will pay \$4,200,000 to settle the lawsuit. This amount will be used to pay Class Member claims. (See the answers to questions 8-10 below.) It will also be used to pay the costs of notifying Class Members and administering the Settlement, any Class Representative service award approved by the Court, and Court-approved attorney's fees and expenses of Class Counsel.

Non-monetary Relief

In addition to monetary benefits, the Settlement requires JCPD to utilize improved policies and procedures with regard to reports of sexual assault made to JCPD to ensure unbiased and non-discriminatory policing. For two years, at least fifteen (15) reports of sex crimes by women will be audited by JCPD's Office of Professional Standards, and those audits will be reviewed and evaluated by Class Counsel.

8. HOW MUCH WILL MY PAYMENT FROM THE SETTLEMENT BE?

Every Settlement Class Member is eligible for an equal pro rata payment from the Settlement Fund. Settlement Fund means the Settlement Amount of \$4,200,000.00 reduced by payments or deductions as provided in the Settlement Agreement or by Court order, including attorney's fees and costs, a service award to the Class Representative, and the cost of settlement administration.

The payment amount to each Settlement Class Member will not be calculated until after the Court grants final approval and the Settlement becomes effective. Class Counsel estimate that the payment to each Settlement Class Member who verifies her information to the Settlement Administrator will be approximately \$7,000.

HOW YOU GET A PAYMENT

9. HOW CAN I GET A SETTLEMENT PAYMENT?

Each Class Member has been identified through JCPD's records and assigned a unique ID number by the Settlement Administrator. **The Settlement Administrator is required to keep your information confidential and will use it only for purposes of administering the Settlement.**

If you received this Notice and see a unique ID number and confirmation number in the top left corner of the first page of the Notice, you are an identified Class Member.

IMPORTANT: Please confirm your contact information and select a form of payment on the settlement website at: www.JCPDClassActionSettlement.com.

Questions? Call 1-855-779-3496 toll free or visit www.JCPDClassActionSettlement.com

Additionally, a valid Social Security Number (“SSN”) may be provided on the settlement website. **Payments from this Settlement are reportable to the IRS on a Form 1099-MISC.** Backup withholding is required for payments issued without a valid SSN on file. **Payments without a valid SSN on file will have 24% of the total amount withheld for tax payments to the IRS resulting in a reduction of the payment amount.** Providing your SSN is optional.

10. WHEN WOULD I GET MY PAYMENT(S) FROM THE SETTLEMENT?

Payments will not be made until the Court grants final approval of the Settlement and any objections or appeals are resolved in favor of the Settlement. Updates will be provided on the settlement website, www.JCPDClassActionSettlement.com, and can also be obtained by contacting the Settlement Administrator by email at info@JCPDClassActionSettlement.com or by phone toll-free at 1-855-779-3496. Please be patient. Please do not contact the Court directly.

11. WHAT AM I GIVING UP TO GET PAYMENT(S) AND STAY IN THE SETTLEMENT?

In exchange for receiving payment and benefits from the Settlement, you will give up your right to sue the Defendant on your own for the claims described in the Settlement Agreement. You will also be bound by any decisions of the Court relating to the Settlement. If you do not wish to give up your right to sue the Defendant, you must exclude yourself from (opt out of) the Settlement.

In return for paying the Settlement Amount and providing non-monetary benefits, the Defendant will be released from any and all claims or causes of action that were or could have been asserted based on the facts alleged in the Third Amended Complaint. The Settlement Agreement describes the released claims in further detail in section 6.2. Please read that agreement carefully since those releases will be binding on you as a Class Member if the Court grants final approval of the Settlement. If you have any questions, you can talk with Class Counsel free of charge or you may talk with your own lawyer (at your own expense). The Settlement Agreement is available at www.JCPDClassActionSettlement.com.

EXCLUDING YOURSELF FROM THE SETTLEMENT

If you don’t want a payment from the Settlement, but you want to keep the right to sue the Defendant, then you must take steps to get out of the Settlement Class. This is called asking to be excluded from or “opting out” of the Settlement Class.

12. HOW DO I GET OUT OF THE SETTLEMENT?

To exclude yourself from the Settlement, you must send a letter to the Settlement Administrator stating that you wish to be excluded. Your exclusion request must include:

- Your full name, address, and telephone number;
- The following statement:

I want to be excluded from *S.H. v. City of Johnson City, Tennessee*, No. 2:23-cv-00071-TRM-JEM (E.D. Tenn.), and understand that by excluding myself, I will not be able to get any money or benefits from the Settlement.

- Your signature.

Questions? Call 1-855-779-3496 toll free or visit www.JCPDClassActionSettlement.com

You must mail your written exclusion request, **postmarked no later than September 22, 2025**, to:

JCPD Settlement
c/o JND Legal Administration
P.O. Box 91238
Seattle, WA 98111

13. IF I DON'T EXCLUDE MYSELF, CAN I SUE THE DEFENDANT FOR THE SAME THING LATER?

No. Unless you exclude yourself from the Settlement, you give up any right to sue the Defendant for the claims being released in *S.H. v. City of Johnson City, Tennessee*, No. 2:23-cv-00071-TRM-JEM (E.D. Tenn.). If you have a pending lawsuit involving the City of Johnson City, or plan to file one, speak to your lawyer as soon as possible; you may need to exclude yourself from this Settlement to continue your own lawsuit.

14. IF I EXCLUDE MYSELF, CAN I GET MONEY FROM THE SETTLEMENT?

No. If you exclude yourself from the Settlement, you will not receive payment(s) from the Settlement, but you will keep your legal rights to sue the Defendant.

THE LAWYERS REPRESENTING YOU

15. I HAVE A LAWYER IN THIS CASE?

The Court has appointed the following lawyers, known as Class Counsel, to represent the Class Members in connection with the Settlement:

Vanessa Baehr-Jones
ADVOCATES FOR SURVIVORS
OF ABUSE PC
4200 Park Boulevard No. 413
Oakland, CA 94602
Phone: 510-500-9634
Email:
vanessa@advocatesforsurvivors.com

Elizabeth A. Kramer
ERICKSON KRAMER
OSBORNE LLP
959 Natoma St.
San Francisco, CA
94103
Phone: 415-635-0631
Email:
elizabeth@eko.law

Heather Moore Collins
Ashley Shoemaker Walter
HMC Civil Rights Law,
PLLC
7000 Executive Center Dr.,
Suite 320
Brentwood, TN 37027
Phone: 615-724-1996
Email:
heather@hmccivilrights.com
ashley@hmccivilrights.com

You will not be charged for contacting these lawyers. If you want to be represented by your own lawyer, you may hire one at your own expense.

16. HOW WILL THE LAWYERS BE PAID?

Class Counsel will ask the Court for payment of attorneys' fees and expenses up to \$1,450,000 to compensate them for their legal services and for actual costs. Any payment to the attorneys will be subject to Court approval, and the Court may award less than the amount requested. Any attorneys' fees and expenses that the Court approves will be paid out of the Settlement Amount.

Questions? Call 1-855-779-3496 toll free or visit www.JCPDClassActionSettlement.com

Class Counsel will file a motion for attorney's fees and expenses at the same time they file the motion for final approval of the Settlement. When Class Counsel's motion for attorneys' fees and expenses is filed, it will be posted at www.JCPDClassActionSettlement.com. You have the right to comment in support of or in opposition (object) to the fee request, in the time and manner set forth on the settlement website.

OBJECTING TO THE SETTLEMENT

17. HOW DO I TELL THE COURT THAT I DON'T LIKE THE SETTLEMENT?

If you are a Settlement Class Member and you have objections to any aspect of the Settlement, you may express your views to the Court. You can object to the Settlement only if you do not exclude yourself from the Settlement Class.

You can ask the Court to deny approval by filing an objection. You cannot ask the Court to order a larger settlement—the Court can only approve or deny approval of the Settlement the parties have reached. If the Court denies approval of the Settlement, no payments from the Settlement Fund will be made and the litigation will continue.

If you wish to object to the Settlement, you must do so in writing. You may also appear at the final approval hearing, either in person or through your own attorney. If you appear through your own attorney, you are responsible for paying that attorney. All written objections and supporting papers must: (a) list your name, address, and telephone number; (b) clearly identify the case name and number (*S.H. v. City of Johnson City, Tennessee*, No. 2:23-cv-00071-TRM-JEM (E.D. Tenn.)); (c) state with specificity the grounds for the objection; (d) state whether the objecting Class Member intends to personally appear at the final approval hearing; (e) include the name and contact information of any attorneys representing, advising, or assisting the objecting Class Member; (f) state whether any attorney will appear on the objecting Class Member's behalf at the final approval hearing, and if so, the identity of that attorney; (g) be submitted to the Court by mail to the Clerk, United States District Court for the Eastern District of Tennessee, 220 West Depot Street, Suite 200, Greeneville, Tennessee 37743, or by filing in person at any location of the United States District Court for the Eastern District of Tennessee; and (h) be **postmarked on or before September 22, 2025**.

You can also submit a statement in support of the Settlement by writing to the Court at the address above.

18. WHAT'S THE DIFFERENCE BETWEEN OBJECTING AND EXCLUDING?

By excluding yourself from the Settlement, you are telling the Court that you do not want to participate in the Settlement. For that reason, you will not be eligible to receive any benefits from the Settlement and you will not be able to object to it, as it will no longer apply to you or bind you. You will not release any potential claims.

By objecting to the Settlement, you are telling the Court that you want to participate in the Settlement, but that there is something about it you do not like. If you object, you are still eligible to receive payment(s) from the Settlement.

THE COURT'S FAIRNESS HEARING

The Court will hold a fairness hearing to decide whether to approve the Settlement. You may attend the hearing, and you may ask to speak, but you are not required to do so.

Questions? Call 1-855-779-3496 toll free or visit www.JCPDClassActionSettlement.com

19. WHEN AND WHERE WILL THE COURT DECIDE WHETHER TO APPROVE THE SETTLEMENT?

The Court will hold its final approval hearing on January 06, 2026 at 1:00 p.m. at the United States District Court, Eastern District of Tennessee, Courtroom 400, James H. Quillen United States Courthouse, 220 West Depot Street, Suite 200, Greeneville, Tennessee 37743.

The hearing may be moved to a different date or time without additional direct notice to you. You can check the Court's PACER site, <https://ecf.tned.uscourts.gov/cgi-bin/ShowIndex.pl>, check the settlement website, www.JCPDClassActionSettlement.com, or call (1-855-779-3496) or email the Settlement Administrator (info@JCPDClassActionSettlement.com) to confirm the date of the hearing.

At the fairness hearing, the Court will consider whether the proposed Settlement is fair, reasonable, and adequate. If there are objections or comments, the Court will consider them at that time and may listen to people who have asked to speak at the hearing. The Court will decide whether to approve the Settlement at or after the hearing.

20. DO I HAVE TO COME TO THE FAIRNESS HEARING?

No. Class Counsel will answer any questions the Court may have at the fairness hearing, but you may attend at your own expense. If you send an objection or comment in support of the Settlement you do not have to come to the hearing to talk about it. As long as you filed or mailed your written objection on time, the Court will consider it. You may also hire your own lawyer at your own expense to attend the hearing on your behalf, but you are not required to do so.

21. MAY I SPEAK AT THE FAIRNESS HEARING?

If you send an objection or comment on the Settlement, you may be able to speak at the fairness hearing, subject to the Court's discretion. You cannot speak at the fairness hearing if you exclude yourself from the Settlement.

IF YOU DO NOTHING

22. WHAT HAPPENS IF I DO NOTHING AT ALL?

If you do nothing and the Settlement is finally approved, you will receive a payment in the form of a check mailed to the address at which you received this Notice and you will be bound by the Court's final judgment and the release of claims detailed in the Settlement Agreement. If you wish to receive payment in a different form, need to update your contact information, or wish to provide your SSN, you must do so by November 20, 2025, by visiting the settlement website: www.JCPDClassActionSettlement.com.

GETTING MORE INFORMATION

23. HOW DO I GET MORE INFORMATION?

This Notice summarizes the Settlement and your rights and options. More details are contained in the Settlement Agreement. You can get copies of the Settlement Agreement and more information on the settlement website, www.JCPDClassActionSettlement.com. You also may also contact the Settlement Administrator by email at info@JCPDClassActionSettlement.com, by phone toll-free

Questions? Call 1-855-779-3496 toll free or visit www.JCPDClassActionSettlement.com

at 1-855-779-3496, or by mail at JCPD Settlement, c/o JND Legal Administration, P.O. Box 91238, Seattle, WA 98111.

For a more detailed statement of the matters involved in the litigation and the Settlement, you may review the various documents on the settlement website, www.JCPDClassActionSettlement.com, and/or by visiting (during business hours) the clerk's office at the United States District Court for the Eastern District of Tennessee, 220 West Depot Street, Suite 200, Greeneville, Tennessee 37743, File: *S.H. v. City of Johnson City, Tennessee*, No. 2:23-cv-00071-TRM-JEM, or by accessing the docket in this case through the Court's Public Access to Court Electronic Records (PACER) system at <https://ecf.tned.uscourts.gov/cgi-bin/ShowIndex.pl>.

**PLEASE DO NOT TELEPHONE THE COURT OR THE COURT CLERK'S OFFICE
TO INQUIRE ABOUT THE SETTLEMENT OR THE CLAIM PROCESS.**

Dated: July 23, 2025

By Order of the Court
United States District Court
Eastern District of Tennessee

EXHIBIT B

FILED UNDER SEAL