

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF LOUISIANA

P.B., by and through his next friend,  
Cassandra Berry, et al.

Plaintiffs,

vs.

JOHN WHITE, et al.,

Defendants.

Civil Case No. 2:10-cv-04049  
Section A  
Judge Jay C. Zainey  
Magistrate Judge Karen Wells Roby

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

To: All parents of present or future students with disabilities, regardless of whether a student has been identified as a student with a disability, who reside in New Orleans

The Louisiana State Superintendent of Education, the Louisiana Department of Education, and the Louisiana Board of Elementary and Secondary Education

1. The Settlement Class:The parties have agreed to a settlement class made up collectively of seven settlement subclasses:
  - a. Subclass 1: Present and future New Orleans students who have requested a special education evaluation at a New Orleans LEA, and whose ~~request~~ ~~has~~ not or will not be

a separate lawsuit for money damages or for compensatory educational services against the State Defendants or the OPSB

terms of the Proposed Settlement is found in the actual Proposed Consent Decree. A

9. Questions about the Proposed Settlement If you have questions about the Proposed Settlement or wish to review any of the documents in the case, you may contact:

Melissa Breedlove  
Southern Poverty Law Center  
1055 St. Charles Avenue, Suite 505  
New Orleans, LA 70130

10. If the Court does not approve the Proposed Settlement, after the fairness hearing, the Court decides not to approve the Proposed Settlement, the Proposed Settlement is not approved.