

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

Supreme Court of the State of New York, County of Suffolk
McGrath v. Suffolk County, et. al., Index No. 608155/2016

If you paid an administrative fee for a red-light camera violation at any time from April 1, 2013 to the present, you may be eligible for a cash payment from a class action settlement.

A court authorized this Notice. You are not being sued. This is not a solicitation from a lawyer.

- A Settlement has been reached with Suffolk County and the Suffolk County Traffic and Parking Violation Agency (the “County Defendants”) in a class action lawsuit that alleges that, from April 1, 2013, to the present, the County Defendants imposed an unlawful \$30 administrative fee (the “Administrative Fee”) on top of the fine for each red-light camera violation. The Defendants deny the merit of this allegation and deny any wrongdoing.
- The Settlement Class includes all Persons or Entities who between April 1, 2013 and the present paid a \$30 Administrative Fee to the County Defendants for red-light camera program violations.
- If approved by the Court, the Defendants will pay up to \$45,000,000 for cash payments to Settlement Class Members who file Valid Claims. The County Defendants have also agreed to separately pay Settlement Administration Expenses as well as the court-approved attorneys’ fees and costs and an award to the Class Representative.
- Your rights are affected whether you do or do not act. Please read this Notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS		DEADLINE
SUBMIT A CLAIM FORM	The only way to receive Benefits from this Settlement is to submit a valid and timely Claim Form.	December 8, 2026
EXCLUDE YOURSELF FROM THE SETTLEMENT	If you exclude yourself (or “opt out”), you will not be bound by the terms of the Settlement and you keep the right to sue the Defendants about the claims resolved by this Settlement. You will not receive Benefits from the Settlement.	November 9, 2026
OBJECT TO THE SETTLEMENT AND/OR ATTEND A HEARING	If you do not opt out of the Settlement, you may object to it and tell the Court what you do not like about it. You may also ask the Court for permission to speak about your objection at the Fairness Hearing. If you object, you can still submit a Claim Form for Benefits.	November 9, 2026
DO NOTHING	If you do nothing, you will not get Benefits and you give up the right to sue the Defendants about the claims resolved by this Settlement.	No deadline

- 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.

Questions? Call (833) 447-6790 or visit www.SuffolkRedLightSettlement.com.

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BASIC INFORMATION

1. Why was this Notice issued?

A Court authorized this Notice because you have a right to know about the proposed Settlement of this class action and about all of your options before the Court decides whether to grant final approval of the Settlement. This Notice explains the Action, your legal rights, what benefits are available, and who can receive them.

The Action is called *McGrath v. Suffolk County*, Index No. 608155/2016 pending in the Supreme Court of the State of New York, County of Suffolk. The person who filed this Action is called the “Plaintiff” and the entities he sued are the “Defendants.” In this case, the Defendants are Suffolk County and the Suffolk County Traffic and Parking Violation Agency (the “County Defendants”).

2. What is this Action about?

The Plaintiff alleges that, as early as April 1, 2013 and continuing through January 25, 2023, the County Defendants imposed excess liability for red-light camera violations. In particular, the Action claims that New York State Vehicle and Traffic Law section 1111-b limits liability to \$50 per violation and the County Defendants charged an unlawful \$30 administrative fee on top of the fine for each red-light camera violation (the “Administrative Fee”). The Court declared these Administrative Fees to be illegal and enjoined the County Defendants from imposing them. The County Defendants are pursuing appellate review as to certain rulings by the Court. In addition to seeking this injunctive relief, the Action seeks to recover the Administrative Fees paid by Settlement Class members. The County Defendants deny the merit of these allegations and deny any wrongdoing.

3. What is a class action?

In a class action, one or more individuals sue on behalf of other people with similar claims. These individuals who sue are known as “Class Representatives” or Plaintiffs. Together, the people included in the class action are called a “Settlement Class” or “Settlement Class Members.” One court resolves the lawsuit for all Settlement Class Members, except for those who exclude themselves (sometimes called, “opting out”) from a settlement. In this Settlement, the Class Representative is Robert McGrath, Jr.

4. Why is there a Settlement?

The Court has not decided in favor of the Plaintiff or the County Defendants. The County Defendants deny all claims and contend that they have not violated any laws. The Plaintiff and County Defendants agreed to a Settlement to avoid the costs and risks of a trial, and through the Settlement, Settlement Class Members are eligible to claim a cash payment. The Plaintiff and his attorneys, who also represent Settlement Class Members as “Class Counsel,” believe the Settlement is in the best interests of all Settlement Class Members.

WHO IS IN THE SETTLEMENT?

5. Who is included in the Settlement?

The Settlement Class consists of all Persons or Entities who between April 1, 2013 and the present paid a \$30 Administrative Fee to the County Defendants for red-light camera program violations.

6. Are there exceptions to being included?

Yes, excluded from the Settlement Class are 1) Suffolk County Supreme Court Justice David T. Reilly or any trial court or appellate judge to whom this action is assigned and any member of their immediate families and 2) any Settlement Class Member who timely opts out of the Settlement Class.

THE SETTLEMENT BENEFITS

7. What does the Settlement provide?

If approved by the Court, the County Defendants will pay up to \$45,000,000 for cash payments to Settlement Class Members who file Valid Claims. The County Defendants have also agreed to separately pay Settlement Administration Expenses as well as the court-approved attorneys' fees and costs and an award to the Class Representative.

8. How much will my cash payment be?

If you are a Settlement Class Member, you may submit a Claim Form to receive up to \$36 for each red-light violation Administrative Fee you paid between April 1, 2013, and the present (the "Claim Period"). This payment amount may be subject to a *pro rata* (proportional) reduction based on the total amount of Valid Claims submitted if the total amount of Claims exceeds the maximum Benefit amount of \$45,000,000.

9. What claims am I releasing if I stay in the Settlement?

Unless you exclude yourself from the Settlement, you cannot sue, continue to sue, or be part of any other lawsuit against the County Defendants about any of the legal claims this Settlement resolves. The Releases section in the Settlement Agreement describes the legal claims that you give up if you remain in the Settlement Class. The Settlement Agreement can be found at www.SuffolkRedLightSettlement.com.

HOW TO GET BENEFITS – MAKING A CLAIM

10. How do I submit a Claim Form to get a cash payment?

You must submit a Claim Form on or before **December 8, 2026** to receive a cash payment from this Settlement. Claim Forms may be submitted online at www.SuffolkRedLightSettlement.com by 11:59 p.m. Eastern Time, or mailed postmarked on or before **December 8, 2026** to the Settlement Administrator at:

McGrath v. Suffolk County, et al.
c/o Kroll Settlement Administration LLC
P.O. Box 5324
New York, NY 10150-5324

11. When will I get a cash payment?

The short answer is – after the Settlement is “finally approved” and any challenges to that approval are finally resolved. The Court is scheduled to hold Fairness Hearing on **December 8, 2026**, to decide whether to approve the Settlement, the attorneys' fees, expenses, and costs for Class Counsel for representing the Settlement Class, and an award to the Class Representative who brought this Action on behalf of the Settlement Class.

If the Court approves the Settlement, there may be appeals. It is always uncertain whether appeals will be filed and, if so, how long it will take to resolve them. Benefits will be distributed as soon as possible, if and when the Court grants final approval of the Settlement and after any appeals are resolved.

THE LAWYERS REPRESENTING YOU

12. Do I have a lawyer in this case?

Yes, the Court has appointed Kevin S. Landau and Brett Cebulash of Taus, Cebulash & Landau, LLP and David J. Raimondo of The Raimondo Law Firm to represent you and other members of the Settlement Class as Class Counsel. You will not be charged directly for these lawyers; instead, they will separately receive compensation from the County Defendants (subject to Court approval).

If you want to be represented by your own lawyer, you may hire one at your own expense.

Questions? Call (833) 447-6790 or visit www.SuffolkRedLightSettlement.com.

13. Should I get my own lawyer?

It is not necessary for you to hire your own lawyer because Class Counsel works for you. If you want to be represented by your own lawyer, you may hire one at your own expense.

14. How will the lawyers be paid?

Class Counsel will ask the Court to approve attorneys' fees up to \$12,500,000 (the "Fee Award"), as well as a \$5,000 award to the Class Representative. If approved, the County Defendants will pay these amounts in addition to, and separately from, the up to \$45,000,000 set aside to pay Settlement Class Member Claims.

EXCLUDING YOURSELF FROM THE SETTLEMENT

15. How do I opt out of the Settlement?

If you do not want to receive any benefits from the Settlement, and you want to keep your right to separately sue the County Defendants about the legal issues in this case, you must take steps to exclude yourself from the Settlement Class. This is called "opting out" of the Settlement Class. The Opt-Out Deadline to submit a request for exclusion from the Settlement is **November 9, 2026**.

To exclude yourself from the Settlement, you must submit a written request for exclusion that includes the following information:

- Your full name, address, and phone number(s);
- An unequivocal statement of your intention to exclude yourself from the Settlement, "I/We request to opt out of the Settlement in *McGrath v. Suffolk County, et al.*, Index No. 608155/2016."; and
- Your signature.

Your request for exclusion must be mailed to the Settlement Administrator, Class Counsel, and counsel for the County Defendants at the addresses below, postmarked no later than **November 9, 2026**.

Settlement Administrator	Class Counsel	Counsel for the County Defendants
<i>McGrath v. Suffolk County, et al.</i> c/o Kroll Settlement Administration LLC ATTN: Request for Exclusion P.O. Box 5324 New York, NY 10150- 5324	Kevin S. Landau Taus, Cebulash & Landau, LLP, 123 William Street Suite 1900A New York, NY 10038	Elliot A. Hallak Harris Beach Murtha Cullina PLLC 677 Broadway, Suite 1101 Albany, NY 12207

OBJECTING TO THE SETTLEMENT

16. How do I tell the Court if I do not like the Settlement?

If you are a Settlement Class Member, you can choose (but are not required) to object to the Settlement if you do not like it or a portion of it, whether that be to the Benefits, the request for attorneys' fees, costs, and expenses, the award payment to the Class Representative, the Releases provided to the County Defendants, or some other aspect of the Settlement. Through an objection, you give reasons why you think the Court should not approve the Settlement.

To be considered by the Court, your objection must include:

- The case name and number, *McGrath v. Suffolk County, et al.*, Index No. 608155/2016;
- Your Class Member ID number, full name, address, email address, and phone number(s);
- Documents or information sufficient to allow the Parties to confirm that you are a Class Member;
- A statement of your specific objection and the grounds for that objection;
- Any documents you want the Court to consider;
- A list of all other objections submitted by you or your attorney, to any class action settlements submitted in any Court in the United States in the previous five (5) years;
- If you or your attorney have not submitted an objection to any other class action settlements submitted in any Court in the United States in the previous five (5) years, an affirmative statement to that effect; and
- Your signature.

Questions? Call (833) 447-6790 or visit www.SuffolkRedLightSettlement.com.

Note: You may not raise any grounds for objecting to the Settlement that are not expressly stated in your written objection.

To be heard at the Fairness Hearing, objections must be filed with, or mailed to, the Clerk of the Court no later than **November 9, 2026** at the address below.

Clerk of the Court
Supreme Court of New York, Suffolk County
1 Court Street
Riverhead, NY 11901

A copy of your objection also must be mailed to the Settlement Administrator, Class Counsel, and counsel for the County Defendants at the addresses below, postmarked no later than **November 9, 2026**.

Settlement Administrator	Class Counsel	Counsel for the County Defendants
<i>McGrath v. Suffolk County, et al.</i> c/o Kroll Settlement Administration LLC ATTN: Request for Exclusion P.O. Box 5324 New York, NY 10150-5324	Kevin S. Landau Taus, Cebulash & Landau, LLP, 123 William Street Suite 1900A New York, NY 10038	Elliot A. Hallak Harris Beach Murtha Cullina PLLC 677 Broadway, Suite 1101 Albany, NY 12207

17. What is the difference between objecting and opting out?

Objecting is telling the Court that you do not like something about the Settlement. You can object to the Settlement only if you do not exclude yourself from it. Excluding yourself from the Settlement means telling the Court you do not want to be part of the Settlement. If you exclude yourself or opt out of the Settlement, you cannot object to it because the Settlement no longer affects you.

THE COURT'S FAIRNESS HEARING

18. When is the Court's Fairness Hearing?

The Court is scheduled to hold a Fairness Hearing on **December 8, 2026 at 10:00 a.m. Eastern Time**, at Supreme Court of New York, Suffolk County, 1 Court Street, Riverhead, NY 11901, to decide whether to approve the Settlement, how much in attorneys' fees, costs, and expenses to award to Class Counsel for representing the Settlement Class, and whether to approve the award to the Class Representative who brought this Action on behalf of the Settlement Class. The date and time of this hearing may change without further notice. Please check www.SuffolkRedLightSettlement.com for updates.

19. Do I have to come to the Fairness Hearing?

No. Class Counsel will answer any questions the Court may have. You may attend at your own expense. If you file an objection, you may, but you do not have to, come to the Fairness Hearing to talk about it. If you file your written objection on time and in accordance with the requirements above, the Court will consider it. You may also pay your own lawyer to attend, but it is not necessary.

IF YOU DO NOTHING

20. What happens if I do nothing at all?

If you are a Settlement Class Member and you do nothing, you will give up your right to start a lawsuit, continue a lawsuit, or be part of any other lawsuit against the County Defendants and the Released Parties, as defined in the Settlement Agreement, about the legal issues resolved by this Settlement. In addition, you will be bound by the Releases in the Settlement and will not be eligible to receive a cash payment.

GETTING MORE INFORMATION

21. How do I get more information?

This Notice summarizes the proposed Settlement. Complete details are provided in the Settlement Agreement. The Settlement Agreement and other related documents are available at the Settlement Website, www.SuffolkRedLightSettlement.com.

If you have additional questions or need to update your address, you may contact the Settlement Administrator by telephone at (833) 447-6790, or by mail:

McGrath v. Suffolk County, et al.
c/o Kroll Settlement Administration LLC
P.O. Box 5324
New York, NY 10150-5324