

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

| | | |
|----------------------------------|---|-----------------------|
| STATE EMPLOYEES BARGAINING AGENT | : | |
| COALITION, et al, | : | |
| | : | |
| PLAINTIFFS, | : | |
| | : | |
| V. | : | NO. 3:03 CV 221 (AVC) |
| | : | |
| JOHN G. ROWLAND, et al | : | |
| | : | |
| DEFENDANTS. | : | SEPTEMBER 21, 2015 |

DECLARATION OF JONATHAN M. LEVINE

Jonathan M. Levine does declare, under penalty of perjury, as follows:

1. I am a member of the law firm of Silver Golub & Teitell LLP, Class Counsel in this action. I submit this Declaration to set forth the measures undertaken by Class Counsel to assist in effectuating notice to the class of the proposed Settlement in this action in accordance with the notice program previously approved by the Court.

2. The Settlement Agreement's notice program, as approved by the Court, provided for direct mail notice to Settlement Class Members who have sustained economic damages who could be identified with reasonable efforts. Since all Settlement Class Members are current or former employees of the State of Connecticut, Settlement Class Members entitled to mail notice were initially identified by the State of Connecticut through its databases of current and former State employees as well as databases of retired employees of the State of Connecticut maintained by the Department of Administrative Services ("DAS") and the Office of the State Comptroller. Throughout the period from May through July, employees of those agencies, as well from the Office of the Attorney General

provided Class Counsel with lists of class members believed to have sustained economic damages as a result of the layoffs at issue in this litigation as determined from the databases of employees and former employees maintained by the State of Connecticut. During this time period, Class Counsel met on a regular basis with employees of those agencies, *inter alia*, to refine relevant queries of the State's databases to ensure broadest possible identification of all Class Members who sustained economic damages as a result of the layoffs at issue in this litigation.¹

¹ Class Counsel also provided to the State additional names of Settlement Class Members to receive mail notice based on direct contacts – either by email or telephone – made by such members to Class Counsel's office.

In particular, in July 2014, in connection with the parties' efforts to develop a model to assess Class Members' economic damages, Class Counsel developed a questionnaire which was mailed to the last known addresses on file with the State of Connecticut of Class Members who had been identified at that time as having been laid off or demoted as a result of the layoffs at issue in this litigation. [A copy of the communication mailed to Class Members identified in the summer of 2014 is attached hereto as Exhibit A.] In addition to the direct efforts of this office, several of the State employee unions sent communications to their membership to encourage their members to complete the questionnaires.

In the period since July 2014, this office has received more than 1,370 completed questionnaires from Class Members. This office retained and compiled a list of all completed questionnaires, and regularly compared that list against the databases developed by the State of Connecticut in advance of the notice program agreed by the parties and approved by the Court.

As a result of the distribution of questionnaires, this office also had direct email contact with over 550 class members in the months prior to this filing. This office has also fielded an average of 40 phone calls per week from class members since the distribution of the questionnaire. This office maintained a list of all many of those contacts and also utilized that list to assist in supplementing the list of Settlement Class Members developed by the State from its databases.

In addition, through both discovery in this action and Freedom of Information Act requests made prior to this litigation, Class Counsel obtained thousands of pages of documents from each of the executive branch agencies of the State of Connecticut detailing the personnel actions that they undertook in response to the directive to layoff union employees. In several instances, Class Counsel was able to identify additional Settlement Class Members entitled to mail notice and provided those names to the State to supplement the list of Settlement Class Members developed from the State's databases.

3. Pursuant to the notice program outlined in the Settlement Agreement, all of the individuals on the database developed by the State were sent the mail notice approved by the Court at their last known address on file with the State of Connecticut on or about July 24, 2015 and thereafter. As a result of the combined efforts of the State and this office, approximately 3,700 Settlement Class Members who sustained economic damages were identified and received notice.

4. By agreement of the parties, this office assumed responsibility to follow up on any mail notices that were returned as undeliverable. The mail notices bore Class Counsel's return address and undeliverable envelopes were returned directly to this office. When any notice was returned as undeliverable, this office utilized the WestlawNext PeopleFinder function to locate additional addresses associated with the Settlement Class Member and to determine the most likely current address. On August 14, 18 and 21, this office sent batches of those new addresses to the State which re-sent the mail notice to those individuals.²

5. As of today, 175 notices were returned to this office as undeliverable. After re-notice to new addresses, only 20 notices (1/2 of 1% of the total number of mail notices sent to Settlement Class Members) were again returned as undeliverable.³

² In the case of 60 notices returned as undeliverable late in the notice period, to avoid any unnecessary delay in re-delivery, this office mailed the re-notice itself to the updated address rather than pass the addresses on to the State.

³ An additional 19 notices were returned because the addressee was deceased. Although any re-delivery in those cases will not provide direct mail notice in advance of the final approval hearing, Class Counsel will contact representatives of any Estates of these individuals to determine whether such Estates will seek to pursue the claims administration process available under the Settlement Agreement.

6. In further support of the Notice program in this action, this office worked with the staff of SEBAC's constituent unions to develop a notice of the Settlement to be posted on union worksite bulletin boards. The unions distributed the notice to their respective union stewards for posting on union bulletin boards throughout the State. The notice posted on the union bulletin boards specifically included a link to the SEBAC Class Action website maintained by Class Counsel. [A sample of the bulletin board notice (as posted by AFSCME Council 4) is attached as Exhibit B.]

7. Each SEBAC constituent union also either posted news and updates about the settlement on its individual union home page and/or included links on its union home page to the SEBAC Class Action website maintained by Class Counsel.

8. In further support of the Notice program approved by the Court, Class Counsel established and maintained a SEBAC Class Action Settlement website on Class Counsel's firm website. Links to that website were set forth in the Court-approved Mail Notice, the Court-approved Publication Notice, SEBAC constituent union worksite bulletin boards, SEBAC constituent union websites, and every case-related email and hard-copy notice distributed to active State of Connecticut Employees by the Department of Administrative Services and the Office of the Comptroller.

The SEBAC Class Action Settlement website was initially set up on May 22, 2015 while the Settlement Agreement was pending before the Connecticut General Assembly and before the Agreement was presented to the Court for preliminary approval. At the time, the website advised Settlement Class Members that the Settlement was pending before the General Assembly and would, if approved by the Legislature, be presented to the Court for approval, and also contained links to the Settlement Agreement itself as well as the Mail Notice agreed to by the parties (subject to the Court's

approval), and a questionnaire seeking relevant information from Class Members. The SEBAC Class Action Settlement website was subsequently revised to advise Class Members of the approval by the General Assembly.

On July 7, 2015, the SEBAC Class Action Settlement website was again revised to advise Class Members that the Settlement had received preliminary approval from the Court and to provide information concerning the date, time and logistics of the final fairness hearing. The website was also updated to include links to copies of all of the significant documents pertaining both to the lawsuit and the settlement, including the following:

- The Settlement Agreement
- Plaintiffs' Second Amended Complaint
- The Court's Order (Doc. No. 272) Preliminary Approving Settlement, Authorizing Notice to the Class and Setting Fairness Hearing
- The Court's Ruling (Doc. No. 271) on the Motion to Amend Class Certification
- The Court-Approved Class Member Mail Notice
- The Court-Approved Class Member Publication Notice
- The Court-Approved Election to Opt-Out Form

The updated website also contains a link allowing class members to contact Class Counsel and provide basic information about their employment with the State and any adverse action they suffered as a result of the conduct at issue in this lawsuit. A further link within that "Contact Us" section of the website provides a copy of the class member questionnaire which permits a more in-depth description of the class member's employment history and any economic or other damages arising from the layoffs at

issue in this lawsuit. The website also provided the email address of a legal assistant, Martha Jackson, working on this lawsuit, allowing class members to contact Ms. Jackson directly. [A Copy of the SEBAC Class Action Settlement website as of July 7, 2015 (and to date) is attached hereto as Exhibit C.]

9. The SEBAC Class Action Settlement website has received heavy traffic, indicating class member awareness of and interest in the Settlement. Between May 22 and September 15, 2015, there were almost 6,600 unique visits to the website homepage. Of these visitors, over 2,900 visited the link to the Mail Notice/Frequently Asked Questions or the Publication Notice; over 2,300 visited the link to either the Class Member Questionnaire or “Contact Us;” over 1,100 visited the link to the Settlement Agreement; and over 530 visited links to either the Second Amended Complaint or this Court’s Rulings granting preliminary approval to the Settlement or certifying the Settlement Class.

In addition, as noted previously, as a result of both the distribution of questionnaires to class members in the summer of 2014 and the development of the SEBAC Class Action Website in anticipation of the Motion for Preliminary Approval of the Settlement, this office has had extensive email contact with class members, including through the “contact us” link on the SEBAC Class Action website, directly through Silver Golub & Teitell’s firm website, or directly to Ms. Jackson. Since both the website and the questionnaire both provide Class Counsel’s telephone number and encourage telephone contact, Ms. Jackson and Class Counsel have had close to 2,000 telephone contacts with class members since last summer.

10. All of the communications with Settlement Class Members – whether on Class Counsel’s website, the union websites, the union bulletin boards, the Court-approved Notices, or

emails and mailings sent by the State of Connecticut – have been drafted to be easily understood by prospective class members and have encouraged class members to communicate directly with Class Counsel and/or their respective union representatives. All communications have been written in plain language. The Mail Notice was written in a simple question and answer format designed to address the most common types of inquiries that arise in a class action context, and fully described the litigation, summarized the terms of the Settlement Agreement, explained the scope of the release, described the provision for payment of attorneys' fees and expenses and the incentive awards for the Named Plaintiffs, explained the deadline and procedure for filing objections to the Settlement and notices of intent to appear at the Fairness Hearing, and notified Settlement Class Members of the date of the fairness hearing.

11. The response of the Settlement Class Members has been overwhelmingly positive. Of the 3,700 Settlement Class Members who received mail notice (and of the 49,000 class members in total and the 6,600 unique visits to the SEBAC Class Action Settlement website), only 1 Class Member has a pending objection to the Settlement, and only one member has elected to opt-out of the Settlement.⁴

⁴ Six Class Members – Cecile Ames, Thomas P. DeFilippo, Kristine Haswell, David Mix, Kathleen Pacholski and Sannon Beth Armstrong Gonzalez – initially indicated an intent to object to the Settlement, either by direct contact with Class Counsel (Ames) or by letter or filing with the Court. *See* Docs. 276, 281, 282, 283 (DeFilippo, Haswell, Pacholski and Mix). An additional four Class Members initially indicated an intent to opt-out, either by direct contact with this office (Barbara Hess, John McGee and Thu Phung) or by formal filing with the Court (Flutra Lena; *see* Doc. 277).

Class Members Ames, Haswell, Pacholski, Mix, DeFilippo and Gonzalez have since advised Class Counsel (and have authorized Class Counsel to represent to the Court) that they wish to withdraw their Objections to the Settlement. Class Members Hess, McGee, Lena and Phung have similarly advised Class Counsel (and have authorized Class Counsel to represent to the Court) that they

I declare pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the foregoing is true and correct.

Executed on September 21, 2015.

/s/ Jonathan M. Levine
JONATHAN M. LEVINE

wish to withdraw their elections to opt-out.

CERTIFICATION

I hereby certify that on September 25, 2015, a copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ David S. Golub

DAVID S. GOLUB ct00145
SILVER GOLUB & TEITELL LLP
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Stamford, CT 06901
Telephone: 203-325-4491
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E-mail: dgolub@sgtlaw.com

EXHIBIT A

SEBAC, et al v. ROWLAND, et al
No. 3:03 cv 0221 (AVC) (D. Conn.)
Attorney-Client Information - privileged

**TO ALL UNION MEMBERS AFFECTED BY
GOVERNOR ROWLAND'S ILLEGAL LAYOFFS IN 2003**

We are writing to all union members who may have been financially affected by Governor Rowland's illegal layoffs in 2003 to provide an update on the status of our lawsuit against Governor Rowland and the State.

As many of you already know, the United States Court of Appeals for the Second Circuit has ruled that Governor Rowland's layoff orders in 2003 violated the First Amendment and were illegal. Although the State had the right to seek review of the Court of Appeals' decision in the United States Supreme Court, we were able to convince the Attorney General at the end of last year to defer seeking Supreme Court review and to enter into settlement discussions to resolve the case. The actual process was delayed by former Governor Rowland's attempt on his own to convince the Supreme Court to review the Second Circuit's decision, which the Supreme Court ultimately rejected.

We have, since early this year, been having discussions with the State about the ways to gather information necessary to calculate damages, and we are now in the process of trying to determine the amount of damages the affected union members have sustained as a result of the illegal layoffs. We have received data from the State to help us calculate damages, and we have retained an economic expert team to assist in this process. We are scheduled to have a conference with the federal court on July 8, 2014 to discuss the settlement process.

We also need information from all union members who were affected by the layoffs orders. Affected employees fall into one of the following classifications:

1. Employees who received a layoff notice in 2002 or 2003 and were laid off and never returned to state employment;
2. Employees who received a layoff notice in 2002 or 2003 and were laid off and subsequently returned to state employment in the same or a lesser paying position;
3. Employees who received a layoff notice and elected to take early retirement;
4. Employees who received a layoff notice but were able to bump a less senior employee and obtain a lesser paying position (or position at the same grade that required travel or other additional expenses);
5. Employees who were bumped out of their positions by more senior employees who received layoff notices and who then fall into one of the four categories listed above.

The State has provided us with the names of all union employees were actually laid off (*i.e.*, after exercise of bumping rights and transfers due to early retirements). We have also been provided with the names of all union employees who received layoff notices and took early retirement in 2003.

We want to confirm this information concerning everyone who was affected by the layoff orders and attempt to establish, as best as possible, the affected employees' losses.

Please fill out the attached form and email or fax the form back to us as soon as possible. If you have questions about the form or the information we are seeking, please contact us – preferably by email at mjackson@sgtlaw.com – for clarification.

Thanks.

DAVID S. GOLUB
JONATHAN M. LEVINE
SILVER GOLUB & TEITELL LLP

SEBAC, et al v. ROWLAND, et al
No. 3:03 cv 0221 (AVC) (D. Conn.)
Attorney-Client Information - privileged

Name: _____

Union: _____

Address: _____

Email: _____

Home or cell telephone: _____

1. If you were laid off in 2003, please tell us:

a. the date you were laid off: _____

b. your position at the time you were laid off (including whatever information you know concerning your job class, pay grade and salary step): _____

c. your annual compensation at the time you were laid off (including if you know, your total annual compensation, base salary and longevity): _____

2. If you were laid off in 2003 and subsequently rehired by the State, please tell us:

a. the date you were rehired: _____

b. the position to which you were rehired (including whatever information you know concerning your job class, pay grade and salary step): _____

c. your annual compensation at the time you were rehired (including if you know, your total annual compensation, base salary and longevity): _____

3. If you were laid off in 2003 and rehired, and were subsequently promoted to another position, please tell us:

a. the date you were promoted (or dates if you were promoted more than once): _____

b. the position you were promoted to or positions if you were promoted more than once (including whatever information you know concerning your job class, pay grade and salary step):

c. your annual compensation upon receiving the promotion (including if you know, your total annual compensation, base salary and longevity): _____

4. If you were bumped or transferred to a new position in 2003, please tell us:

a. the date you changed your position: _____

b. the position from which you were bumped or transferred (including whatever information you know concerning your job class, pay grade and salary step): _____

c. the new position you were bumped or transferred to (including whatever information you know concerning your job class, pay grade and salary step): _____

d. your annual compensation before you changed position (including if you know, your total annual compensation, base salary and longevity): _____

e. your annual compensation in 2003 upon your change in position (including if you know, your total annual compensation, base salary and longevity): _____

f. any other damages or loss you sustained as a result of being bumped or transferred: _____

5. If you were bumped or transferred in 2003, and were subsequently promoted to another position, please tell us:

a. the date you were promoted (or dates if you were promoted more than once): _____

b. the position you were promoted to or positions if you were promoted more than once (including whatever information you know concerning your job class, pay grade and salary step): _____

c. your annual compensation at the time of any promotion (including if you know, your total annual compensation, base salary and longevity): _____

6. If you were laid off – permanently or temporarily – and obtained other work during the period you were laid off, please tell us:

a. each place you worked and the dates you worked there: _____

b. your actual earnings in any other employment: _____

c. do you have tax returns showing any other employment compensation you received:

7. If you took early retirement in 2003 because of a layoff notice directed to you or someone in your work area or that you knew, please tell us:

a. whether the notice was directed to you or someone in your work area: _____

b. the date you retired: _____

c. your position at the time you retired (including whatever information you know concerning your job class, pay grade and salary step): _____

d. your annual compensation at the time you retired (including if you know, your total annual compensation, base salary and longevity): _____

e. the annual retirement payments you receive: _____

f. if you worked anywhere else after taking retirement, each place you worked and the dates you worked there: _____

g. your actual earnings in any other employment: _____

h. do you have tax returns showing any other employment compensation you received:

8. If you took normal retirement in 2003 because of a layoff notice directed to you or someone in your work area or that you knew, please tell us:

a. whether the notice was directed to you or someone in your work area: _____

b. the date you retired: _____

c. your position at the time you retired (including whatever information you know concerning your job class, pay grade and salary step): _____

d. your annual compensation at the time you retired (including if you know, your total annual compensation, base salary and longevity): _____

e. the annual retirement payments you receive: _____

f. if you worked anywhere else after taking retirement, each place you worked and the dates you worked there: _____

g. your actual earnings in any other employment: _____

h. do you have tax returns showing any other employment compensation you received: _____

9. Please tell us if you have sustained any damages other than lost wages, lost seniority and lost benefits (such as, increased travel expenses because your place of work was changed):

10. If you are no longer employed by the State's work force, please tell us:

a. the date your employment with the State ended: _____

b. your position at the time your employment with the State ended (including whatever information you know concerning your job class, pay grade and salary step) : _____

c. the reason your employment with the State ended: _____

(Please sign your name)

(Please print your name)

Date: _____

PLEASE RETURN THIS TO YOUR UNION, PREFERABLY BY EMAIL.

IF YOU HAVE QUESTIONS OR ARE NOT SURE HOW TO GET THIS TO YOUR UNION,
PLEASE CONTACT MARTHA JACKSON , BY EMAIL (MJACKSON@SGTLAW.COM)
OR TELEPHONE (877 731-9050) AT SILVER GOLUB & TEITELL LLP.

EXHIBIT B

ATTENTION UNIONIZED STATE EMPLOYEES:
SEBAC V. ROWLAND CLASS ACTION LAWSUIT UPDATE

Class counsel has now reached a settlement of the SEBAC lawsuit with the Connecticut Attorney General. The settlement has been approved by the General Assembly.

The Court presiding over the case has also preliminarily approved the settlement and has scheduled a hearing to consider whether to give final approval for the settlement. That hearing will take place **on October 1, 2015** at the United States District Court at 450 Main Street, in Hartford.

Class members will receive notice before the hearing – either by mail, email or workplace posting, or through publication in several newspapers throughout Connecticut – which will advise them of the date of the hearing and their rights with respect to the settlement. It is expected that the notices will be mailed, emailed or published on or before August 1, 2015.

WHAT WE NEED FROM YOU

To be a class member, you must have been employed by the State of Connecticut and a member of a bargaining unit (or, if you were under a working test period or training program, designated for membership in a bargaining unit when you completed the test period) as of November 17, 2002.

Class members will receive different compensation from the settlement depending on whether they were laid off from their State employment, bumped to a different position in the State workforce, or suffered some other adverse job consequence as a result of the layoffs.

In addition, all members of bargaining units will be entitled to receive compensation for the chilling of their union membership rights as a result of then-Governor Rowland's targeting of union members for layoff.

We need to make sure that we have accurate information about each class member to make sure that you receive the proper award from the settlement.

If you believe you were a member of the class, have questions, or want to retrieve important documents or information about the lawsuit, please check your bargaining unit's website for a link to the special **SEBAC Class Action Home Page** or go to www.sgtlaw.com/class-action-sebac-v-john-g-rowland/.



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EXHIBIT C

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 SEBAC V. JOHN G. ROWLAND
 CLASS ACTION

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CASE STUDY

Physician responsible for brain damage of two patients

The families of two women who fell into irreversible comas during childbirth two years apart agreed to settle their medical malpractice claims for \$13.2 million and a substantial confidential settlement ... [Read more](#)

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Since our founding in 1978, we've become one of Connecticut's leading medical malpractice, serious personal injury and complex civil litigation law firms based on a simple philosophy: to provide our clients with the best legal representation possible, regardless of the effort and expense required. When our attorneys decide to take a case, we dedicate the full and substantial knowledge, experience and resources of our law firm — including an experienced physician on staff — to investigating what happened and making sure we have a solid set of facts to take to a judge or jury. Most of our cases come to us by referrals from other lawyers based on our expertise, honesty, integrity and record of success. The Connecticut Law Tribune noted that the firm "... has earned some of the largest verdicts and settlements in state history." [Read more](#)

FOR
 ATTORNEYS



Super Lawyers



MEDICAL MALPRACTICE



PHYSICIAN RESPONSIBLE FOR BRAIN DAMAGE OF TWO PATIENTS

The families of two women who fell into irreversible comas during childbirth two years apart agreed to settle their medical malpractice claims for \$13.2 million and a substantial confidential settlement. Mia House checked into Norwalk Hospital to deliver her first child, but fell into an irreversible coma when anesthesiologist Jay Angeluzzi failed to notice when... [Read more](#)

AUTO ACCIDENT



AUTO ACCIDENT VICTIM COVERED FOR LONG-TERM MEDICAL NEEDS

Silver Golub & Teittel partners Richard A. Silver and Peter M. Dwyer reached a settlement of \$11.8 million on behalf of Rene Villard, whose car was struck by a drunk driver who also tested positive for marijuana and was speeding at the time of the motor vehicle collision. Mr. Villard suffered significant brain injury and... [Read more](#)

BIRTH INJURY



BIRTH INJURY VICTIM AWARDED A LIFETIME OF MEDICAL CARE

Richard A. Silver and Angelo A. Zlotas presented expert testimony that an emergency C-section should take only five minutes and that Dr. Corinne de Cholnoky responded too slowly. Silver Golub & Teittel LLP recovered \$38.5 million for the client. On April 3, 2003, Elizabeth Oram was admitted to Stamford Hospital, pregnant with twins. The next morning... [Read more](#)

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CLASS ACTION -
SEBAC V. JOHN C.
ROWLAND

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Class counsel has now reached a settlement of the SEBAC lawsuit with the Connecticut Attorney General. The settlement has been approved by the General Assembly.

The Court presiding over the case has also preliminarily approved the settlement and has scheduled a hearing to consider whether to give final approval for the settlement. That hearing will take place at 1pm on October 1, 2015 at the federal courthouse in Hartford.

Abraham A. Ribicoff Federal Building
Courtroom #1 Annex
450 Main Street
Hartford, Connecticut 06103

Class members will receive notice before the hearing – either by mail, email or workplace posting, or through publication in several newspapers throughout Connecticut – which will advise them of the date of the hearing and their rights with respect to the settlement. It is expected that the notices will be mailed, emailed or published on or before August 1, 2015.

Copies of those notices have also been posted on this website.

To be a class member, you must have been employed by the State of Connecticut and a member of a bargaining unit (or, if you were under a working test period or training program, designated membership in a bargaining unit when you completed the test period) as of November 17, 2007.

Class members will receive different compensation from the settlement depending on whether they were laid off from their State employment; bumped to a different position in the State workforce; or suffered some other adverse job consequence as a result of the layoffs.

In addition, all class members will be entitled to receive compensation for the chilling of their union membership rights as a result of then-Governor Rowland's targeting of union members for layoff.

We need to make sure that we have accurate information about each class member to make sure that you receive the proper award from the settlement. The State will have the necessary records of each class member's earnings and benefits while employed, but it's important that each class member look for relevant documents to establish what your earnings and benefits were either during any periods in which you were laid off or, if you were never rehired, at any other jobs you held after you were laid off. These documents could include tax returns; W-2 forms; pension statements; and disability statements.

If you laid off, bumped, transferred or suffered some other adverse job consequence as a result of the layoffs, please click here to fill out the Class Member Questionnaire.

If you did not suffer any other adverse job consequence as a result of the layoffs, but are a class member because you were a member of a bargaining unit as of November 17, 2002, please click here to provide us with some basic information about you and your State employment.

This section contains links to important documents about the lawsuit that are available for you to download.

- The Settlement Agreement
- Plaintiff's Second Amended Complaint
- Order Preliminarily Approving Proposed Settlement, Authorizing Notice to the Class and Settling Fairness Hearing
- Ruling on the Motion to Amend Class Certification
- Class Member Mail Notice / Frequently Asked Questions
- Class Member Publication Notice
- Class Member Questionnaire
- Election to Opt-Out Form

If you have any other questions or otherwise want to contact us, please send an email with your question to mjackson@siglaw.com. If possible, we will try to respond by phone, so please make sure to provide a phone number where you can be reached during the daytime.

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Address

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TO WHAT UNION DID YOU BELONG IN 2002?

WHAT WAS YOUR BARGAINING UNIT?

WERE YOU LAID OFF FROM STATE EMPLOYMENT IN 2002 OR 2003?

IF YOU WERE NOT LAID OFF, WERE YOU BUMPED TO ANOTHER POSITION?

IF YOU WERE NOT LAID OFF OR BUMPED, WERE YOU OTHERWISE ADVERSELY AFFECTED IN YOUR EMPLOYMENT?

LAST FALL, QUESTIONNAIRES WERE MAILED TO CLASS MEMBERS. HAVE YOU FILLED OUT AND RETURNED THE QUESTIONNAIRE?

IF NOT, (CLICK HERE) TO DOWNLOAD THE QUESTIONNAIRE. PLEASE FILL IT OUT AND RETURN IT TO US BY EMAIL, FAX OR REGULAR MAIL.

Submit

HAVE ANY QUESTIONS?

If you have any other questions or otherwise want to contact us, please send an email with your question to mjackson@sgtlaw.com. If possible, we will try to respond by phone, so please make sure to provide a phone number where you can be reached during the daytime.

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