

United States District Court, District of Arizona

Jane V., et al. v. Motel 6 Operating LP, et al.

No: 18-02420PHX DGC

NOTICE

IF YOU STAYED AT A MOTEL 6 BETWEEN FEBRUARY 1, 2015 AND JUNE 28, 2019, YOU COULD GET BENEFITS AND YOUR RIGHTS MAY BE AFFECTED BY A CLASS ACTION SETTLEMENT

- There is a proposed Settlement of claims against Motel 6 Operating L.P, and G6 Hospitality LLC (collectively “Defendants”). The settlement would resolve a lawsuit in which the plaintiffs allege that Defendants violated federal laws—including 42 U.S.C. § 1981, 42 U.S.C. § 1985(3), and the Fourth Amendment to the United States Constitution—and Arizona laws—including A.R.S. § 44-1522, Intrusion Upon Seclusion, Intentional Infliction of Emotional Distress, Breach of Contract, and False Imprisonment—by disclosing guests’ personal information to Federal Immigration Authorities, such as agents of the United States Immigration and Customs Enforcement (“ICE”) and/or the United States Department of Homeland Security (“DHS”).
- You are included in the settlement if you are a member of the Primary Class, defined as follows:
 - All persons who were Registered Guests at a Motel 6 Location in the United States between February 1, 2015, and June 28, 2019, and whose Guest Information was provided to Federal Immigration Authorities by a Motel 6 Location in the United States, except those who file a timely request to opt-out of the monetary damages provisions
- You are included in the settlement if you are a member of the Class 2, defined as follows:
 - All Guests who were not Registered Guests at a Motel 6 Location in the United States between February 1, 2015, and June 28, 2019, and were questioned, interrogated, detained, and/or placed in immigration removal proceedings by Federal Immigration Authorities as a result of a Motel 6 Location’s disclosure of Guest Information to Federal Immigration Authorities, except those who file a timely request to opt-out of the Settlement Class.
- Definitions:
 - “Federal Immigration Authorities” means the following: United States Department of Homeland Security Immigration and Customs Enforcement, Customs and Border Patrol, Homeland Security Investigations, their officers or employees, and any other employee of the Department of Homeland Security whose primary responsibility is enforcement of federal immigration laws.
 - “Guest” means any Registered Guest or other person occupying a guestroom in any Motel 6 Location.
 - “Guest Information” means the name, address, and/or other registration information provided to a Motel 6 Location by a Registered Guest or Guest at the time of check-in.
 - “Motel 6 Location” means any Motel 6 branded lodging facility in the United States, including Operated Locations and Franchised Locations.
 - “Registered Guest” means any person who provided his or her Guest Information to a Motel 6 Location at the time of check-in and whose information was stored in Motel 6’s guest registration system.



- If you received a notice in the mail, the Parties identified you from Defendants’ records.
- If you are included in the Primary Class or Class 2 **and you submit a claim form by December 31, 2019**, you may qualify for a cash payment.
- **Your legal rights are affected whether you act or don’t act. Please read this notice carefully.**



Your Legal Rights and Options in this Settlement	
Submit a Claim Form Deadline: <u>December 31, 2019</u>	You must submit a claim form to qualify for a cash payment. For further information about how to submit a claim form, please refer to Question No. 9 below.
Exclude Yourself Deadline: <u>December 13, 2019</u>	Excluding yourself from the settlement is the only option that allows you to ever be part of another lawsuit against Defendants about the legal claims resolved by this settlement. If you exclude yourself from this settlement, then you will not be able to obtain any of the benefits that it provides. For further information about how to exclude yourself, please refer to Question Nos. 15-18 below.
Object Deadline: <u>December 13, 2019</u>	You can object to the settlement by writing to the Court about why you do not like the settlement. For further information about how to object, please refer to Question No. 19 below.
Attend the Hearing Date: February 7, 2020 (notice of intention due January 31, 2020)	You can ask to speak to the Court about the fairness of the Settlement. For further information about how to do this, please refer to Question Nos. 23-25 below.
Do Nothing	If you do nothing, you will give up your right to ever be a part of another lawsuit against Defendants about the legal claims resolved by this settlement. If you do not submit a claim form, then you will not receive any benefits from this Settlement. For further information, please refer to Question No. 26 below.

- These rights and options are explained further below.
- The Court in charge of this case still has to decide whether to approve the settlement. Benefits will be provided if the Court approves the settlement and after any appeals are resolved. Please be patient.

Questions? Call 833-261-6616