

# OFFICIAL LEGAL NOTICE OF CLASS CERTIFICATION

*This Notice was authorized by the Court of Common Pleas of Philadelphia County, Pennsylvania.  
This is not a solicitation by a lawyer. You are not being sued. Please read this Notice carefully.*

## **ATTENTION: IF YOU PAID FEES TO THE TAXICAB AND LIMOUSINE DIVISION OF THE PHILADELPHIA PARKING AUTHORITY BETWEEN JULY 16, 2004 AND JULY 9, 2013, YOU MAY BE A MEMBER OF A CERTIFIED CLASS.**

A class action lawsuit against the Philadelphia Parking Authority (“PPA”) is pending in the Court of Common Pleas of Philadelphia County, Pennsylvania (the “Court”). The case is called *Z&R Cab, LLC, Zoro, Inc., Ronald Blount, and Debra Bell v. Phila. Parking Authority*, Case No. 140601394.

### **BASIC INFORMATION ABOUT THE LAWSUIT**

#### **1. What is the lawsuit about?**

In early 2013, the Commonwealth Court of Pennsylvania declared that the statute authorizing the PPA to collect fees to fund its Taxicab and Limousine Division was unconstitutional. The Plaintiffs in this class action lawsuit seek a refund, for each Class Member, of monies paid to the PPA under the unconstitutional statute.

The PPA is contesting Plaintiffs’ claims. The Court has not yet decided whether the Plaintiffs or the PPA are right. The Plaintiffs representing the Class will have to prove their claims in court.

#### **2. What is a Class action and who is involved?**

In a class action lawsuit, one or more people called “Class Representatives” (here, Z&R Cab, LLC, Zoro, Inc., Ronald Blount, and Debra Bell) sue on behalf of other people and businesses who have similar claims. The people and businesses together are called a “Class” or “Class Members.” The persons who sued – and all of the Class Members like them – are called the Plaintiffs. The entity they sued (in this case the PPA) is called the Defendant. One court (here, the Philadelphia Court of Common Pleas) resolves the issues for all Class Members, except for those who choose to opt out of the Class.

#### **3. Why is this Notice being sent?**

This Notice is to inform you that the Court decided that this lawsuit should proceed as a Class action since there is a group of individuals and entities with similar claims against the PPA.

#### **4. Who is in the Class?**

The Class consists of all individuals, partnerships, corporations, limited liability companies or other business entities which paid to (or to the use of) the Philadelphia Parking Authority fees assessed by authority under the provisions of 53 Pa.C.S.A. §5707(b), from including July 16, 2004 until July 9, 2013. Excluded from the Class are any such individuals or entities which already have received full restitution of their payments.

#### **5. Why did you get this Notice?**

You were identified as a potential Class Member according to records maintained by the PPA. You will remain a Class Member unless you submit a Request to Opt Out (explained below). If you remain in the Class, you will be bound by any future order, judgment or settlement in this matter.

### **YOUR OPTIONS**

#### **6. What are my options as a Class member?**

You must decide whether to stay in the Class or opt out of it. If you want to stay in the Class, you do not have to do anything. If you wish to opt out of the Class, you must submit a Request to Opt Out (explained below).

#### **7. What happens if I choose to stay in the Class?**

If you stay in the Class, you will be permitted to share in any potential recovery that may occur in this lawsuit. You will also reserve the right to object to any proposed settlement and participate in future proceedings, if allowed by the Court. However, by staying in the Class, you give up any rights to sue the PPA separately about the same legal claims in this lawsuit. You also will be legally bound by all of the orders and judgments entered by the Court in this lawsuit, even if there is no recovery.

**8. How do I stay in the Class?**

If you wish to stay in the Class, you do not have to do anything. You should keep any records of payments to the PPA.

**9. What happens if I opt out of the Class?**

If you opt out of the Class (by following the procedure explained below), you will give up the right to participate in any recovery or settlement that may occur. But you will keep any rights you may currently have to sue the PPA for the legal claims at issue in this lawsuit. You also will not be bound by the orders and judgments entered by the Court in this lawsuit.

**10. How do I opt out of the Class?**

If you do not want to remain a Class Member, you must submit a written “Request to Opt Out” to RG2 Claims Administration LLC by regular mail *or* email. Mail submissions must be postmarked by **May 25, 2020** and sent to PPA Taxicab and Limousine Division Fee Class Action, RG/2 Claims Administration LLC, P.O. Box 59479, Philadelphia, PA 19102-9479. Email submissions must be received by **May 25, 2020** and sent to PPA@rg2claims.com.

Your Request to Opt Out must include:

- Your name, address, email address and telephone number;
- A statement confirming that you want to opt out of the Class;
- The case name and number: “Z&R Cab, LLC, et al. v. Phila. Parking Authority, Case No. 140601394.”

**OTHER INFORMATION**

**11. Who represents you as a Class member?**

The Court has appointed the following lawyers to represent you and other Class Members as Class Counsel:

John K. Weston, Esq. & Jeremy E. Abay, Esq.  
SACKS WESTON DIAMOND, LLC  
1845 Walnut Street, Suite 1600, Philadelphia, PA 19103  
(215) 925-8200 | [www.sackswestondiamond.com/ppaclass](http://www.sackswestondiamond.com/ppaclass)

**12. Should you hire your own lawyer?**

You do not need to hire your own lawyer since Class Counsel is working for you. However, you may hire your own lawyer at your own expense. If you hire a lawyer to speak for you in Court, your lawyer must file a Notice of Appearance.

**13. Where do I get more information?**

Additional information, including select pleadings and other records from this lawsuit, are available at: [www.sackswestondiamond.com/ppaclass](http://www.sackswestondiamond.com/ppaclass). You also can examine and obtain copies of court records from this lawsuit during regular business hours at the office of the Prothonotary located at City Hall, Philadelphia, PA.

**14. Who should I contact if I have questions about this Notice or the lawsuit?**

You should call class counsel at (215) 925-8200. Do not contact the Court or PPA about this lawsuit or Notice.

**DATED: March 26, 2020**

**By Order of the Honorable Nina Wright Padilla, J.  
Court of Common Pleas of Philadelphia County, Pennsylvania**