

A proposed settlement has been reached in a class action lawsuit claiming that Hilco Redevelopment, LLC, HRE Crawford, LLC, and HRP Exchange 55, LLC (collectively, "Hilco"), MCM Management Corp., Controlled Demolition, Inc., and Marine Technology Solutions LLC ("Defendants") acted improperly and caused damage when they demolished a smokestack on April 11, 2020, at the former Crawford Coal Plant, which was located at 3501 S. Pulaski Rd., Chicago, IL 60623. The settlement doesn't decide who is right, but rather is a compromise to end the lawsuit and avoid the uncertainties and costs associated with a trial.

**Why am I being contacted?** The settlement allows individuals who were present, or owned real or personal property within the following boundaries on April 11, 2020 to file a claim for payment from the settlement: from 33rd St. and Kedzie Avenue, west to 33rd St. and Kilbourn Avenue, north to Kilbourn Avenue and Cermak Road, east to Cermak Road and Ogden Avenue, northeast to Ogden Avenue and California Avenue, south to 26th St. and California Avenue, west to 26th St. and Sacramento Avenue, south to Sacramento Avenue and 31st St., west to 31st St. and Kedzie Avenue, south to 33rd St. & Kedzie Avenue. These boundaries are known as the Class Boundaries. Our records indicate that you may have lived in or owned real or personal property within the Class Boundaries on April 11, 2020, and therefore you may have the right to share in the settlement. More information about the class and the settlement is available at [www.LittleVillageSmokestack.com](http://www.LittleVillageSmokestack.com).

**What can I get out of the settlement?** If the Court approves the settlement, Class Members who submit valid claims will receive a cash payment from the Settlement Fund. The Settlement Fund is \$12,250,000.00. The settlement provides for two separate Classes. One is for individuals who were present in the Class Boundaries on April 11, 2020, and therefore are presumed to have suffered personal injuries. The second is for individuals who file a valid claim for damage to their real or personal property and are entitled to recover the value of the actual documented damages, subject to a pro rata reduction if the total amount of property claims exceed \$1,000,000.00. Individuals who file valid personal injury claims will be paid a pro rata share of the remaining funds available to the class, which are estimated to be at least \$7,000,000.00.

**How do I get my payment?** You just need to complete and verify a short and simple Claim Form, which is attached and available at [www.LittleVillageSmokeStack.com](http://www.LittleVillageSmokeStack.com). The Claim Form has two options. Select the first option if you want to file a claim for personal injury. The claim form does not require additional proof to recover for personal injury. Select the second option if you want to file a claim for property damage. You will need to provide some evidence to support your claim for property damage, such as receipts or a detailed description of the property damage. If your property was damaged and you also qualify for a personal injury claim, you may select both options. You may later be asked to provide additional documents or information to support your claim.

**All Claim Forms must be received by March 26, 2024.** You may also submit a claim form in person at a community outreach event. Please call 877-272-4962 or check the Class website, [www.LittleVillageSmokestack.com](http://www.LittleVillageSmokestack.com), for details about when and where these events will take place. The Class website also has more information about the timing for payment of claims.

**What are my options?** You can do nothing, submit a Claim Form, comment on or object to any of the Settlement terms, or exclude yourself from the Settlement. If you do nothing or submit a Claim Form, you won't be able to sue Defendants in a future lawsuit about the claims resolved in the Settlement. If you exclude yourself, you won't get a payment but you'll keep your right to sue Defendants on the issues the Settlement resolves. You must contact the Claims Administrator by mail to exclude yourself. You can also object to the Settlement if you disagree with any of its terms. All Requests for Exclusion and Objections must be received by February 26, 2024. Go to [www.LittleVillageSmokeStack.com](http://www.LittleVillageSmokeStack.com) for complete details about all of your rights and options and how to exercise them.

**Who represents me?** The Court has appointed lawyers from the firm Loevy & Loevy to represent you as "Class Counsel." The lawyers will request to be paid from the Settlement Fund. You can hire your own lawyer, but you'll need to pay your own legal fees. Antonio Solis, Jose Solis, and Juan Rangel – class members like you – have been appointed by the Court as the "Class Representatives."

**When will the Court approve the settlement?** The Court will hold a final approval hearing on April 22, 2024 at 9:30 a.m. before the Honorable Judge Sunil R. Harjani in Courtroom 1858 of the Dirksen United States Courthouse, 219 S. Dearborn St., Chicago, 60604. The Court will hear objections, determine if the settlement is fair, and consider Class Counsel's request for fees and expenses of up to \$4,250,000.00 and incentive awards, which if granted, will be paid out of the Settlement Fund. Class Counsels' request for fees and an incentive award will be posted on [www.LittleVillageSmokestack.com](http://www.LittleVillageSmokestack.com).

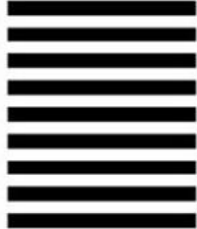
This notice summarizes the proposed Settlement. For the precise terms and conditions of the settlement, please see the Settlement Agreement available at [www.LittleVillageSmokestack.com](http://www.LittleVillageSmokestack.com), contact Class Counsel at 312-243-5900, through the Court's online electronic full case docket search at [ecf.ilnd.uscourts.gov](http://ecf.ilnd.uscourts.gov), or visit the office of the Clerk of the United States District Court for the Northern District of Illinois, Everett McKinley Dirksen United States Courthouse, 219 S. Dearborn St. Chicago, IL 60604, between 8:30 a.m. and 4:30 p.m., Monday through Friday, excluding Court holidays.



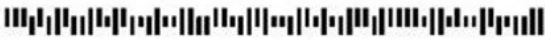
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UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS

**Solis, et al. v. Hilco Redevelopment LLC, et al., No. 20-cv-02348 (N.D. Ill.)**

If you or your property were impacted by the demolition of the smokestack at the former Crawford Coal Plant in Chicago's Little Village neighborhood in April 2020, you may be entitled to a cash payment.

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

CLASS MEMBER UNIQUE ID:

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CLASS MEMBER UNIQUE ID:

**CRAWFORD COAL PLANT SMOKESTACK CLAIM FORM**

**Instructions:** Fill out the top section of this form, choose Option One if you were present in the Class Boundaries on April 11, 2020, Option Two if your real or personal property was damaged as a result of the demolition of the smokestack demolition on April 11, 2020, or both if you qualify for both categories. Then sign where indicated. If you submit a claim for property damage, you must provide proof. Accepted proof may include a detailed description of the type and amount of damage to your property, or receipts showing the amount of damage. You may submit pictures to help document the damage to your property.

First Name \_\_\_\_\_ Last Name \_\_\_\_\_

Street Address \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ ZIP Code \_\_\_\_\_

Phone \_\_\_\_\_ Email \_\_\_\_\_

Address as of April 11, 2020 (If different than current address) \_\_\_\_\_

**YOU MUST PROVIDE ALL OF THE INFORMATION ABOVE AND SIGN THIS CLAIM FORM. YOUR CLAIM FORM MUST BE POSTMARKED OR SUBMITTED ONLINE BY MARCH 26, 2024.**

**Option One (personal injury claim):** I affirm that I was present within the Class Boundaries on April 11, 2020.

**Option Two (property damage claim):** I affirm that my real or personal property was damaged as a result of the smokestack demolition on April 11, 2020, in the amount of \$ \_\_\_\_\_. I affirm that the following description of the damaged property is true and accurate:

\_\_\_\_\_  
\_\_\_\_\_

*If available, please attach any documentation that supports your description of property damage, such as receipts and pictures.*

By submitting this Claim Form, I declare, under penalty of perjury under the laws of the United States of America, that I believe I am a member of the Settlement Class, that the information provided above is true to the best of my knowledge, and any proof attached is true and accurate.

Signature \_\_\_\_\_ Date (MM-DD-YY): \_\_\_\_ - \_\_\_\_ - \_\_\_\_