

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES  
CENTRAL CIVIL WEST**

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**IN RE: TV WRITERS CASES**

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**THIS DOCUMENT RELATES TO:**

*Edwards, et al. v. International Creative Management, Inc.*, BC 268846

*Mintz, et al. v. Broder Kurland Webb Agency, Inc.*, BC 268850

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**NOTICE OF PROPOSED SETTLEMENT OF  
CLASS ACTION AND SETTLEMENT HEARING**

**If, at any time since October 22, 1996, you were a member of the WGA age 40 or older, and you were not a talent agent or television executive with significant writer hiring duties, your rights may be affected by these settlements.**

What is the lawsuit about?

The class complaints allege that International Creative Management, Inc. ("ICM") and Broder Kurland Webb Agency, Inc. ("BKW") discriminated against older television writers in their talent representation and referral practices. In addition, plaintiffs have sued several other talent agencies, television studios, and networks, in parallel lawsuits (the "TV Writers Cases"). This settlement resolves only the claims against ICM and BKW. ICM and BKW maintain that they have engaged in no unlawful conduct and that they have worked with considerable dedication to accomplish employment for writers of all ages.

Who is involved?

The class encompasses all current and former members of the WGA who at any time since October 22, 1996 were 40 and older, respectively, except for persons who at any time during the liability period were either: (1) employed by any defendant in the TV Writer Cases as an executive, manager, or talent agent, with authority or significant input into decisions to hire, retain, purchase material from, place, and/or package writers for television writing opportunities; or (2) executives and/or principals of entities signatory to the WGA Minimum Basic Agreement ("MBA"). Class members must also have worked for a defendant in one of the TV Writers Cases in a television writing position covered by an MBA before or during the liability period.

Who represents the plaintiffs and settlement class?

The plaintiffs and settlement class are represented by Lead Counsel Paul Sprenger, and Class Counsel Steven Sprenger - Sprenger & Lang; Class Counsel Maia Caplan - Kator, Parks & Weiser; National Counsel Thomas Osborne - AARP Legal Foundation, all of Washington, DC; Local Counsel Dolly Gee - Schwartz, Steinsapir, Dohrmann & Sommers of Los Angeles, and attorneys associated with them and their firms. As your attorneys, you may communicate with them about your potential to claim against the settlement fund and your rights. The designated contact email and mailing addresses are shown below.

The proposed settlement

In a consent decree dated July 24, 2008, ICM has made commitments to participate in the creation of a Task Force to evaluate and make policy recommendations intended to ensure age neutral representation and

hiring, and in a facilitation program designed to enhance script reviews from and placement of qualified older writers. Additionally, ICM and BKW have agreed to pay a total of \$4.5 million and will fund a settlement enabling class members to make claims for an award of damages according to a merits based formula approved by the Court. To qualify for monetary relief, class members need to document that they have either been rejected from ICM or BKW representation and/or deterred from seeking it owing to a reasonable perception of futility.

Your rights

- If you want to participate in the proposed settlement fund, your completed, signed claim form must be mailed to the settlement administrator with a postmark **NO LATER THAN DECEMBER 22, 2008**. The claim form, the address to which it must be sent, and other details can be obtained at [www.writerscase.com/icm](http://www.writerscase.com/icm). If you submit a claim form, or do not do anything, you will be bound by the court's orders concerning the Consent Decree settlement. You will only be eligible for a settlement payment if you timely file the completed claim form with the administrator. If the settlement is approved, any legal claims you may have against ICM and BKW for age discrimination, as well as other claims, will be resolved and forever released.
- If you want to be excluded from the proposed settlement, you must submit a written request to opt out of the class and settlement, including each of the following items: your name; address; telephone number; description of your rejection by ICM or BKW; explanation of whether after opting out you intend to seek an individual claim for monetary relief against ICM and/or BKW; and signature, to:

Settlement Administrator  
TV Writers Age Discrimination Settlement Fund  
Washington, DC 20043

The complete opt out request must be mailed to the Settlement Administrator with a postmark **NO LATER THAN OCTOBER 20, 2008**. Details are available in the full Notice of Settlement, available at [www.writerscase.com/icm](http://www.writerscase.com/icm).

- The Court will hold a final approval hearing on the settlement at 10:00 a.m. local time, on November 3, 2008 at the Los Angeles Superior Court, 600 South Commonwealth Avenue, Los Angeles, California 90005. The hearing is open but only those who have filed necessary papers may speak.

**For complete information and a copy of the full Notice of Settlement:**

Visit [www.writerscase.com/icm](http://www.writerscase.com/icm).

Call 1-800-792-0863.

Or write to:

Steven Sprenger  
Sprenger & Lang  
Suite 500  
1400 Eye Street, NW  
Washington, DC 20005

Maia Caplan  
Kator Parks & Weiser  
Suite 1000  
1200 18<sup>th</sup> Street, NW  
Washington, DC 20036

Paul Sprenger may be contacted at [psprenger@sprengerlang.com](mailto:psprenger@sprengerlang.com)

**PLEASE DO NOT CONTACT THE COURT EXCEPT AS PROVIDED IN THIS NOTICE**

Questions? Visit [www.WRITERSCASE.COM/ICM](http://www.WRITERSCASE.COM/ICM); or Phone 1-800-792-0863