United States District Court for the Central District of California
Ronduen v. The GEO Group, et al.
Case No. 5:23-cv-00481

Class Action Notice

Authorized by the U.S. District Court

Class Action Notice

Authorized by the U.S. District Court

Were you detained at Adelanto ICE Processing Center between March 11 and September 30, 2020 and exposed to the chemical disinfectant HDQ Neutral?

If so, you may be a class member entitled to declaratory relief based on settlement of a lawsuit. This is a declaratory relief only settlement.

You are part of this settlement if it is approved by the Court. Please visit www.ronduenclassaction.com to learn more.

Important things to know:

- The class action lawsuit allowed for declaratory relief for class members only. This is not a settlement for money damages.
- The declaratory relief identifies some of the symptoms that may, but will not necessarily, manifest as a result of exposure to HDQ Neutral under certain conditions and at sufficient exposure levels.
- Any suit by a Class Member for personal injury as a result of exposure to HDQ Neutral must be brought individually.
- You can submit written objections to the settlement for the Court's consideration.
- If you have questions or need assistance, please call 213-524-5241. You can learn more about the settlement and how to submit an objection at www.ronduenclassaction.com or by scanning the QR code.

Table of Contents

Table of Contents **2**
About This Notice **3**
Why did I get this notice? 3
What do I do next? 3
What are the most important dates? 3
Learning About the Lawsuit **4**
What is this lawsuit about? 4
Why is there a settlement in this lawsuit? 4
What happens next in this lawsuit? 5
Learning About the Settlement **6**
What does the settlement provide? 6
How do I know if I am part of this settlement? 6
Can I opt out? 7
What happens if the Court approves the settlement? 7
Deciding What to Do **7**
How do I weigh my options? 7
Lawyers' Fees **8**
Do I have a lawyer in this lawsuit? 8
Do I have to pay the lawyers in this lawsuit? 8
Objecting **8**
What if I disagree with the settlement? 8
Doing Nothing **9**
What are the consequences of doing nothing? 9
Key Resources **9**
How do I get more information? 9

Why did I get this notice?

This notice is to tell you about the settlement of a class action lawsuit, *Ronduen v. The GEO Group, et al.* brought on behalf of people who were detained in Adelanto ICE Processing Center between March 11, 2020 and September 30, 2020 who were exposed to the chemical disinfectant HDQ Neutral. **You received this notice because you may be a member of the group of people affected, called the "class."** This notice gives you a summary of the terms of the proposed settlement agreement, explains what rights class members have, and helps class members make informed decisions about what action to take.

What do I do next?

Read this notice to understand the settlement and to determine if you are a class member. Then, decide if you want to:

Options	More information about each option
Do Nothing	This settlement automatically applies to all class members if approved by the Court. There are no money damages, but you may be entitled to declaratory relief.
Object	Tell the Court why you don't like the settlement.

Read on to understand the specifics of the settlement and what each choice would mean for you.

What are the most important dates?

Your deadline to object: **November 13, 2026**
Settlement approval hearing: **Monday, January 4, 2027, at 9:00 a.m. in Courtroom 1 of the United States District Court for the Central District of California, Eastern Division, located at 3470 12th Street, Riverside, California 92501**

Learning About the Lawsuit

What is this lawsuit about?

Where can I learn more?
You can get a complete copy of the proposed settlement and other key documents in this lawsuit at:
www.ronduenclassaction.com

Beginning in March 2023, six Plaintiffs detained at the Adelanto ICE Processing Center filed a putative class action lawsuit against Defendants GEO Group, Inc. ("GEO") and Spartan Chemical Company, Inc. ("Spartan"), the manufacturer of HDQ Neutral. The lawsuit was brought on behalf of all people detained at Adelanto ICE Processing Center ("Adelanto") who were exposed to the chemical disinfectant HDQ Neutral during the COVID-19 pandemic. The lawsuit alleges various personal injuries as a result of GEO's use of the disinfectant throughout Adelanto during 2020. The lawsuit also alleged personal injury liability against Spartan, the manufacturer of HDQ Neutral, related to its dispensing labeling and inspection of HDQ Neutral at Adelanto during 2020.

GEO asserts that it used the product in accordance with CDC and government guidance for the mitigation of COVID-19 within detention facilities, and denies that its use or application of the product caused any injuries.

Spartan asserts that it manufactured and labeled its product in accordance with all applicable regulations and denies any liability for the alleged injuries.

Both Defendants assert that the two-year statute of limitations has run on bringing the lawsuit, barring any Plaintiff from moving forward. Plaintiffs assert that they are entitled to the so-called Delayed Discovery Rule in so far as they did not discover the wrongful nature of Defendants' conduct until on or after March 20, 2021.

Why is there a settlement in this lawsuit?

In September 2025, the Court certified only a "general causation" class and denied class certification as to other classes. That means that the

only class-wide relief available in this lawsuit was declaratory relief stating what "whether HDQ Neutral can cause certain specific injuries at some exposure levels." The court denied class-wide money damages. You can read that order at www.ronduenclassaction.com. This means that in order to get any other form of relief, including money damages, class members need to file their own individual lawsuits. In November 2025, the Court granted, in part, the Defendants' motion for summary judgment and ordered a trial solely on the issue of whether Plaintiffs had timely filed the lawsuit.

In February 2026, the parties agreed to settle the "general causation" class, which means they reached an agreement to resolve the lawsuit.

The settlement is on behalf of all class members who were exposed to HDQ Neutral at Adelanto between March 11 and September 30, 2020. The Court has not decided this case in favor of either side.

What is a class action settlement?
A class action settlement is an agreement between the parties to resolve and end the case. Settlements can provide relief to class members.

What happens next in this lawsuit?

The Court will hold a fairness hearing to decide whether to approve the settlement. The hearing will be:

Where: Courtroom 1 of the United States District Court for the Central District of California, Eastern Division, located at 3470 12th Street, Riverside, California
92501.

When: Monday, January 4, 2027, at 9:00 a.m.

The Court has directed the parties to send you this notice about the proposed settlement. Because the settlement of a class action decides the rights of all members of the proposed class, the Court must give final approval to the settlement before it can take effect.

You don't have to attend, but you may, at your own expense. You may also ask the Court for permission to speak and express your opinion about the settlement. If the Court does not approve the settlement, it

will be void and the lawsuit will continue. The date of the hearing may change without further notice to members of the class. To learn more and confirm the hearing date, go to www.ronduenclassaction.com.

Learning About the Settlement

What does the settlement provide?

The settlement provides general causation declaratory relief to all class members. In toxic tort lawsuits, a plaintiff needs to establish both general causation and specific causation. General causation is whether the chemical *can* cause certain symptoms. Specific causation is whether the chemical *actually* caused certain symptoms for the plaintiff.

The general causation declaratory relief in the settlement declares that exposure to HDQ Neutral, under certain conditions and at sufficient exposure levels, may, but will not necessarily, cause the following symptoms:

Skin contact: pain, redness, blistering, chemical burn.

Eye contact: pain, redness, swelling of the conjunctiva, tissue damage, permanent damage.

Inhalation: nasal discomfort, coughing, irritation or damage to the mucous membranes of the respiratory tract.

Ingestion: Pain, nausea, vomiting, or diarrhea. Damage or chemical burns to the mouth, throat and stomach.

Class members may use this general causation declaratory relief in future individual lawsuits only to establish general causation and for no other purpose. You may speak with an attorney to discuss your options.

There is no money in this settlement. Class Counsel is receiving no attorneys' fees as part of the settlement.

How do I know if I am part of this settlement?

If you were detained at Adelanto ICE Processing Center at any time between March 11, 2020 and September 30, 2020 and were exposed to HDQ Neutral, you are part of this settlement.

Can I opt out?

You cannot opt out given the nature of the relief the settlement provides. The settlement does not waive any claim of any class member nor does it preclude class members from claiming they suffered symptoms other than those contained in the general causation declaratory relief.

What happens if the Court approves the settlement?

If the Court approves the settlement agreement at the final approval hearing, the class action lawsuit will be terminated. You need not wait for the settlement to be approved to determine whether to file your own individual lawsuit.

Deciding What to Do

How do I weigh my options?

You have two options: you can object to the settlement or you can do nothing. This chart shows the effects of each option:

	Object	**Do Nothing**
Can I receive settlement money if I . . .	NO	NO
Am I bound by the terms of this lawsuit if I . . .	YES	YES
Can I pursue my own case if I . . .	YES	YES

Lawyers' Fees

Do I have a lawyer in this lawsuit?

In a class action, the court appoints class representatives and lawyers to work on the case and represent the interests of all the class members. They are called "Class Counsel." For this issue class, the Court has appointed the following individuals and lawyers.

Class Counsel: The lawyers who negotiated this settlement on your behalf include Sara Haji, Amy Xu, and Marjorie Menza of Trial Impact Project, and Robert Klieger and Ashley Artmann of Hueston Hennigan LLP.

While these lawyers represented the entire class in the general causation settlement negotiations, these lawyers cannot commit to representing you as an individual in your future individual lawsuit, should you choose to file one. If you want to be represented by your own lawyer in an individual lawsuit in the future, you may hire one at your own expense.

Do I have to pay the lawyers in this lawsuit?

You do not have to pay the Class Counsel in this class action lawsuit.

To date, Class Counsel have not been paid any money for their work or the expenses that they have paid for the case. They will receive no money as part of the settlement.

If you want an attorney going forward for your individual case, you will have to hire one at your own expense or by contingency.

Objecting

What if I disagree with the settlement?

If you disagree with any part of the settlement, you may object. You must 1) give reasons why you think the Court should not approve it, 2) state any evidence that you wish to introduce in support of the objection(s) and 3) say whether your objection applies to just you, a

part of the class, or the entire class. The Court will consider your views. The Court can only approve or deny the settlement — it cannot change the terms of the settlement. You may, but don't need to, hire your own lawyer to help you. Objections must be timely or they will not be considered.

To object, you must send or deliver a letter to Class Counsel that:

(1) is postmarked by **November 13, 2026**;
(2) includes the case name and number: *Ronduen v. The GEO Group, et al.,* Case No. 5:23-cv-00481
(3) includes your full name, A-number, address and telephone number, and email address (if you have one);
(4) states the reasons for your objection, any evidence you wish to introduce, and whether your objection applies only to you or a subset of the class, as outlined above;
(5) says whether either you or your lawyer intend to appear at the final approval hearing and your lawyer's name;
(6) your signature.

Mail or hand-deliver the letter to:

Ronduen Litigation
c/o Trial Impact Project
523 6th St., Ste 450
Los Angeles, CA 90014

Doing Nothing

What are the consequences of doing nothing?

If you do nothing and you are a class member, you will be part of the settlement once it is approved.

Key Resources

How do I get more information?

This notice is a summary of the proposed settlement. The complete

settlement with all its terms can be found here. To get a copy of the

Resource	Contact Information
Case website	www.ronduenclassaction.com
Class Counsel	Trial Impact Project info@trialimpact.org 523 6th St, Ste 450 Los Angeles, CA 90014 (213) 542-5241 Hueston Hennigan LLP 523 6th St, Ste 400 Los Angeles, CA 90014

settlement agreement or get answers to your questions:

- contact Class Counsel (information below)
- visit the case website at www.ronduenclassaction.com