

IN THE CIRCUIT COURT FOR PRINCE GEORGE’S COUNTY, MARYLAND

AARON SNIPES, on behalf of himself and all others )  
similarly situated )  
Plaintiff, )

v. )  
SIX FLAGS AMERICA, L.P., and SIX FLAGS )  
ENTERTAINMENT CORPORATION )  
Defendants. )

CASE NO.: C-16-CV-23-004959

**ORDER GRANTING PRELIMINARY APPROVAL TO  
CLASS ACTION SETTLEMENT**

Before the Court is Plaintiff’s Motion for Preliminary Approval of a Class Action Settlement on Consent; filed by Aaron Snipes (“Plaintiff”). Six Flags America, L.P. and Six Flags Entertainment Corporation (“Defendants”) do not oppose Plaintiff’s motion. On November 24, 2025, the Court granted preliminary approval to the Parties’ proposed class action settlement and conditionally certified the following class for settlement purposes:

*All current and former employees of either of the Defendants, whether directly or jointly employed by Defendants, who were assigned to work at the Six Flags America and Hurricane Harbor amusement parks in Bowie, Maryland, and who were employed as hourly, non-exempt workers at any time from October 23, 2020, through the date on which notices informing Class Members of their right to exclude themselves from, or object to any aspect of the proposed settlement, in writing, by sending such objection to the settlement administrator prior to the end of the notice period (i.e., Notice of Proposed Class Action Settlement and Fairness Hearing), are issued to the Class Members.*

The Court designated Plaintiff as the Class Representative, and appointed Hayber, McKenna & Dinsmore, LLC as Class Counsel. The Court designated ILYM Group, Inc. as the Settlement Administrator. Upon review of the motions filed and attachment contained therein; and preliminary review of the proposed Settlement Agreement, it is, this 12/10/2025, by the Circuit Court of Prince George’s County, Maryland,

**FOUND** that the proposed settlement appears to be fair, reasonable and adequate. It is, therefore,

**ORDERED**, that Plaintiff’s Motion for Preliminary Approval of a Class Action Settlement on Consent shall be **GRANTED**; and that the Court shall grant preliminary approval of the proposed settlement set forth in the Settlement Agreement; it is further

**ORDERED**, that the Settlement Administrator shall perform settlement administration and distribution duties in accordance with the provisions of the Settlement Agreement; it is further

**ORDERED**, that within Seventy-Five (75) calendar days of this Order, the Settlement Administrator shall mail, via First Class United States mail, the Notice of Proposed Settlement of Class Action Lawsuit and Fairness Hearing (“Notice”)<sup>1</sup> to all Class Members using each individual’s last known address, as provided by Defendants in accordance with Section IV.D of the Settlement Agreement. If a Notice is returned to the Settlement Administrator with a forwarding address, the Notice shall be re-mailed by the Settlement Administrator. If a Notice is returned to the Settlement Administrator without a forwarding address, it shall undertake reasonable efforts (such as skip traces) to search for the correct address and shall promptly re-mail the Settlement Notice to any newly found address(es) in accordance with Section IV.B of the Settlement Agreement; it is further

**ORDERED**, that Members who wish to retain their individual right to pursue legal action against Defendant may opt-out of the proposed settlement in writing. To be considered, such statements must be sent to the Settlement Administrator via First Class United States mail and must be postmarked within sixty (60) days of the mailing of the Notice by the Settlement Administrator. The written statement must be signed by the Class Member and include their name, address, phone number, and state that “I opt out of the Six Flags America and Six Flags Entertainment Corporation wage and hour settlement” or include words to that effect; it is further

**ORDERED**, that Class Members who wish to present objections to the proposed settlement at the Fairness Hearing must do so first in writing. Class Members who object may not also opt out. To be considered, such statements must be sent to the Settlement Administrator via First Class United States mail and must be postmarked within sixty (60) days of the mailing of the Notice by the Settlement Administrator. Any Objection must include: (i) the objector’s full name, address, and telephone number; (ii) a written statement of all factual and legal support for such Objection; (iii) copies of any papers, briefs, or other documents upon which the Objection is based; and (iv) a statement whether the objector intends to appear at the Fairness Hearing. If the objector intends to appear at the Fairness Hearing through counsel, the Objection must also state the identity of all attorneys representing the objector who will appear at the Fairness Hearing and include a list of all persons who will be called to testify in support of the Objection. Any Class Member who does not file a timely written Objection or otherwise comply with the foregoing requirements shall be foreclosed from having their Objection considered by the Parties or the Court or seeking any adjudication or review of the Settlement by appeal or otherwise; it is further

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<sup>1</sup> The Notice was filed as an attachment (Exhibit A) to Plaintiff’s instant motion.

**ORDERED**, that all proceedings in this action, other than such proceedings as may be necessary to carry out the terms and conditions of this Order and the Settlement Agreement, are stayed and suspended until further order of the Court, without prejudice to reinstatement of the docket if, for any reason, the Court does not enter a final order approving the settlement. Pending final approval of the Agreement, the Named Plaintiff and the Class Members are barred from commencing, prosecuting, continuing or asserting in any forum, either directly or indirectly, on their own behalf or on behalf of any class or other person, any Released Claims against Defendants or any of the Released Parties; it is further

**ORDERED**, that the findings and rulings in this Order are made for the purposes of settlement ONLY. It is understood that the Settlement Agreement reflects a compromise of disputed claims. Nothing in the Settlement Agreement or this Order, or in any ancillary documents, actions, statements, or filings made in furtherance of settlement, shall be deemed as admissible or used as evidence of (or as an admission of) liability by Defendants or any of the Released Parties, or of any fault or wrongdoing whatsoever, or as evidence that (or as an admission that) this action may proceed as a class action under Md. Rule 2-231 *et. seq.* for any purpose other than settlement; is further

**ORDERED**, that this instant Order shall be deemed null and void and of no force or effect if the Settlement Agreement is not finally approved by the Court, or if the Settlement Agreement, after being finally approved by the Court, is invalidated on appeal or terminated pursuant to its own terms; and it is further

**ORDERED**, that a Fairness Hearing to consider whether to grant final approval of the Settlement Agreement in accordance with Md. Rule 2-231 *et. seq.* **shall be set by Calendar Management before Judge Robin Bright on April 24, 2026, at 1:30 pm.**

  
ROBIN D. GILT BRIGHT  
Judge of the Circuit Court  
for Prince George's County, MD