

## NOTICE OF CLASS ACTION SETTLEMENT AND HEARING DATE FOR FINAL COURT APPROVAL

*Reach v. LJ's Cleaning Solutions CA, LLC* (Case No. 23CV-0201731)

***The Superior Court for the State of California authorized this Class Notice. Read it carefully! It's not junk mail, spam, an advertisement, or solicitation by a lawyer. You are not being sued.***

You may be eligible to receive money from an employee class action lawsuit ("Action") against Defendant LJ's Cleaning Solutions CA, LLC ("Defendant") for alleged wage and hour violations. The Action was filed by Plaintiff Tammy Reach ("Plaintiff"), a former employee of Defendant. The Action seeks payment of unpaid wages for a class of current and former hourly, non-exempt employees of Defendant in California at any time during the period from March 10, 2019, through March 24, 2024 ("Class," "Class Members," "Class Period").

Based on Defendant's records, and the Parties' current assumptions, your Individual Class Payment is estimated to be \$<<MERGED\_ClassAward>> (less tax withholding). The actual amount you may receive likely will be different and will depend on several factors.

The above estimates are based on Defendant's records showing you worked <<MERGED\_ClassWW>> Workweeks during the Class Period. If you believe you worked more Workweeks during the Class Period, you can submit a challenge by the deadline date. See Section IV of this Class Notice.

The Court has already preliminarily approved the settlement and approved this Class Notice. The Court has not yet decided whether to grant final approval. Your legal rights are affected whether you act or not act. Read this Class Notice carefully. You will be deemed to have carefully read and understood it. At the Final Approval Hearing, on October 28, 2024, the Court will decide whether to enter a judgment that requires Defendant to make payments under the settlement and requires Class Members to give up their rights to assert certain claims against Defendant. The Court will also decide how much of the settlement will be paid to Plaintiff and Plaintiff's attorneys ("Class Counsel").

### **I. WHAT IS THE ACTION ABOUT?**

Plaintiff is a former employee of Defendant. The Action accuses Defendant of violating California labor laws by failing to: (1) pay overtime wages; (2) provide meal period premiums; (3) provide rest period premiums; (4) pay minimum wages; (5) timely pay final wages; (6) provide compliant wage statements; (7) reimburse business expenses; and (8) comply with the requirements of Business & Professions Code section 17200, *et seq.* Plaintiff is represented by attorneys Douglas Han, Shunt Tatavos-Gharajeh, and Lizette Rodriguez of Justice Law Corporation.

Defendant strongly denies violating any laws or failing to pay any wages and contends it complied with all applicable laws.

### **II. WHAT ARE THE IMPORTANT TERMS OF THE PROPOSED SETTLEMENT?**

1. Defendant Will Pay \$125,585.23 as the Gross Settlement Amount if the Court grants Final Approval of the Settlement.
2. At the Final Approval Hearing, Plaintiff and/or Class Counsel will ask the Court to approve the following deductions from the Gross Settlement Amount, the amounts of which will be decided by the Court at the Final Approval Hearing:
  - a. Up to \$43,954.83 (35% of the Gross Settlement Amount) to Class Counsel as their Class Counsel Fees Payment and up to \$20,000 as their Class Counsel Litigation Expenses Payment. To date, Class Counsel have worked and incurred expenses on the Action without payment.
  - b. Up to \$5,000 to Plaintiff as her Class Representative Service Payment for filing the Action, working with Class Counsel, and effectively representing the Class. The Class Representative Service Payment will be the only money Plaintiff will receive other than her Individual Class Payments.
  - c. Up to \$15,000 to the Administrator as the Administration Expenses Payment for services administering the Settlement.
3. Need to Promptly Cash Payment Checks. You have one hundred eighty (180) calendar days after the date of mailing to cash your Individual Class Payment before it is void. All Individual Class Payment checks that are uncashed after the void date are cancelled and the Administrator shall transmit the funds represented by such checks to the *cy pres* recipient Legal Aid At Work. Once the amount is transferred, you will have no way to get the money back.
4. The Proposed Settlement Will be Void if the Court Denies Final Approval. If the Settlement does not receive Final Approval from the Court or the Final Approval is reversed on appeal then: (a) Defendant will not pay any money; and (b) Class Members will not release any claims against Defendant.

5. **Participating Class Members' Release.** After the Judgment is final and Defendant has fully funded the Gross Settlement Amount and separately paid all employer payroll taxes, Participating Class Members will be legally barred from asserting any of the claims released under the Settlement Agreement. This means unless you opted out by validly excluding yourself from the Class Settlement, you cannot sue, continue to sue, or be part of any other lawsuit against Defendant or its related entities for wages based on the Class Period facts, as alleged in the Action and resolved by the Settlement Agreement.

### **III. HOW WILL THE ADMINISTRATOR CALCULATE MY PAYMENT?**

1. **Workweek Challenges.** The number of Workweeks you worked during the Class Period, as recorded in Defendant's records, are stated on the first page of this Class Notice. You have until October 11, 2024, to challenge the number of Workweeks credited to you. You can submit your challenge by signing and sending a letter to the Administrator via mail, email, or fax. Section VII of this Class Notice has the Administrator's contact information.
  - a. You need to support your challenge by sending copies of pay stubs or other records. You should send copies rather than originals because the documents will not be returned to you. The Administrator will resolve Workweek challenges based on your submission and on input from Class Counsel (who will advocate on behalf of Participating Class Members) and Defense Counsel. The Administrator's decision is final. You cannot appeal or otherwise challenge its final decision.

### **IV. HOW WILL I GET PAID?**

1. **Participating Class Members.** The Administrator will send, via first-class United States Postal Service ("USPS") mail, postage prepaid, a single check to every Participating Class Member.
2. **Your check will be sent to the same address as this Class Notice. If you change your address, be sure to notify the Administrator as soon as possible. Section VIII of this Class Notice has the Administrator's contact information.**

### **V. HOW DO I OPT OUT OF THE CLASS SETTLEMENT?**

Submit a written and signed letter with your full name, present address, email address or telephone number, and a simple statement that you do not want to participate in the Settlement. The Administrator will exclude you based on any writing communicating your request be excluded. Be sure to personally sign your request, identify the Action as *Reach v. LJ's Cleaning Solutions CA, LLC* (Case No. 23CV-0201731), and include your identifying information (full name, present address, and email address or telephone number). You must make the request yourself. If someone else makes the request for you, it will not be valid. The Administrator must be sent your request to be excluded by October 11, 2024, or it will be invalid. Section VIII of the Class Notice has the Administrator's contact information.

### **VI. HOW DO I OBJECT TO THE SETTLEMENT?**

A Participating Class Member who disagrees with any aspect of the Agreement, the Motion for Final Approval and/or Motion for Class Counsel Fees Payment, Class Counsel Litigation Expenses Payment, and Class Representative Service Payment may wish to object. The deadline for sending written objections to the Administrator is October 11, 2024. Be sure to tell the Administrator what you object to, why you object, and any facts that support your objection. Make sure you identify the Action as *Reach v. LJ's Cleaning Solutions CA, LLC* (Case No. 23CV-0201731) and include your full name, present address, email address or telephone number, and signature. Section VIII of this Class Notice has the Administrator's contact information.

Alternatively, a Participating Class Member can object (or personally retain a lawyer to object at your own cost) by attending the Final Approval Hearing. You (or your attorney) should be ready to tell the Court what you object to, why you object, and any facts that support your objection. See Section VII of this Class Notice for specifics regarding the Final Approval Hearing.

### **VII. CAN I ATTEND THE FINAL APPROVAL HEARING?**

You can, but don't have to, attend the Final Approval Hearing on October 28, 2024, at 8:30 a.m. in Department 63 of the Shasta County Superior Court located at 1500 Court Street, Redding, California 96001. At the Final Approval Hearing, the judge will decide whether to grant Final Approval of the Settlement and how much of the Gross Settlement Amount will be paid to Class Counsel, Plaintiff, and Administrator. The Court will invite comments from objectors, Class Counsel, and Defense Counsel before deciding.

It's possible the Court will reschedule the Final Approval Hearing. You should check the Administrator's website <https://ilymgroup.com/LJsCleaningCA> beforehand or contact Class Counsel to verify the date and time of the Final Approval Hearing.

### **VIII. HOW CAN I GET MORE INFORMATION?**

The Settlement Agreement sets forth everything the Parties have promised to do under the Settlement Agreement. The easiest way to read the Settlement Agreement, Judgment, or any other Settlement documents is to go to Administrator's website at <https://ilymgroup.com/LJsCleaningCA>. You can also telephone or send an email to Class Counsel or the Administrator using the contact information listed below or consult the Court's website by going to <https://portal.shasta.courts.ca.gov/PortalPROD> and entering the Case

No. 23CV-0201731. You can also go to the Court in person at the address listed in Section VII of this Class Notice and request copies of the court documents.

**DO NOT TELEPHONE THE COURT TO OBTAIN INFORMATION ABOUT THE SETTLEMENT.**

Class Counsel:

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**IX. WHAT IF I LOSE MY SETTLEMENT CHECK?**

If you lose or misplace your settlement check before cashing it, the Administrator will replace it if you request a replacement before the void date on the face of the original check. If your check is already void, you will have no means to retrieve the uncashed funds.

**X. WHAT IF I CHANGE MY ADDRESS?**

To receive your check, you should immediately notify the Administrator if you move or otherwise change your mailing address.