

IN THE NINETEENTH JUDICIAL CIRCUIT COURT OF LAKE COUNTY
STATE OF ILLINOIS

Civil Action No. 23LA00000680

SHARITA WILLIAMS and ANGELA)
MATHERS, individually, and on behalf of all)
others similarly situated,)
Plaintiffs,)
v.)
GREAT AMERICA, LLC, and SIX FLAGS)
ENTERTAINMENT CORPORATION,)
Defendants.)

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT AND FAIRNESS HEARING

Preliminary Estimated Payment¹

TO: **«First_Name» «Last_Name»** Estimated Payment:
\$«Est_Individual_Class_Payment»

PLEASE READ THIS NOTICE CAREFULLY.

You are receiving this Notice because you have been identified as a member of a potential class action lawsuit involving Defendants, Great America LLC (“Great America”), and Six Flags Entertainment Corporation (“SFEC”), (collectively, “Defendants”). Parties to that lawsuit reached a Settlement, and the Nineteenth Judicial Circuit Court of Lake County, State of Illinois, granted Preliminary Approval of that Settlement. As described below, you have the right to participate in the Settlement and receive payment. You also have the right to exclude yourself or object to the Settlement. Please read this Notice carefully.

1. Why should I read this Notice?

This Notice explains your right to participate in the Settlement and to receive a payment. It also explains your right to exclude yourself or object to the Settlement, and the procedure for doing so. The Nineteenth Judicial Circuit Court of Lake County, State of Illinois, has scheduled a Fairness Hearing on **July 6, 2026, at 9:00 a.m.** At the Fairness Hearing, the Court will consider whether to grant Final Approval of the Settlement. The Fairness Hearing will take place before the Nineteenth Judicial Circuit Court of Lake County, State of Illinois, at 18 N County Street, Waukegan, Illinois, 60085. The Court’s decision will impact your rights.

¹ This amount may change based upon the fees of the Settlement Administrator, ILYM Group, Inc., to administer the Settlement and distribution to the Class Members.

2. What is the lawsuit about?

In the lawsuit, Plaintiffs Sharita Williams and Angela Mathers (“Plaintiffs”), on behalf of themselves and all others similarly situated, allege that Defendants failed to pay hourly, non-exempt employees for all hours worked, in violation of the Illinois Minimum Wage Law (“IMWL”), 820 ILCS 105/1 *et seq.*, and the Illinois Wage Payment and Collection Act (“IWPCA”), 820 ILCS 115/1 *et seq.*, as well as their implementing regulations, including the Illinois Administrative Code. Specifically, Plaintiffs allege that Defendants required employees to undergo security screenings, and walk long distances across Six Flags Great America and Hurricane Harbor amusement parks in Gurnee, Illinois, before and after their paid shifts, without compensation for this time, thereby owing them minimum wages and wages for all hours worked. In their request for relief, Plaintiffs and the putative class seek compensatory damages for unpaid minimum wages and unpaid wages for all hours worked, as well as statutory damages, treble damages, attorneys’ fees, costs, and other appropriate relief under Illinois law. Plaintiffs bring this lawsuit on behalf of all current and former employees of Defendants who were employed as hourly, non-exempt workers at the Six Flags Great America and Hurricane Harbor amusement parks in Gurnee, Illinois, at any time from October 4, 2013, through the date of final judgment in this matter (the “Class”).

Defendants denied the claims and asserted that all employees were properly compensated.

By reaching a Settlement, the Parties reached an amicable resolution of their dispute, and they avoided the costs associated with further litigation and the potential risk of loss. On **December 16, 2025**, the Court granted Preliminary Approval of the Settlement of the lawsuit on a class basis, finding that the Settlement Agreement was fair and reasonable. The Court authorized that this Notice be sent to you.

3. How will the Settlement amount be allocated?

Defendants agreed to pay a gross Settlement in the amount of Three Million, Four Hundred Eighty-Two Thousand Dollars and Zero Cents (\$3,482,000.00). From that Settlement, the amount of Two Million, Two Hundred Sixty-Four Thousand, Eight Hundred Sixty-Three Dollars and Ninety-Four Cents (\$2,264,863.94) will be allocated among the Class Members.² From the Settlement amount, Defendants agreed to pay the Named Plaintiffs a total of Ten Thousand Dollars (\$10,000.00) (subject to Court approval) as a service award, with Five Thousand Dollars (\$5,000.00) being paid to each of the Named Plaintiffs, for their efforts on behalf of the Class. In addition, Class Counsel will be reimbursed Six Thousand, One Hundred Thirty-Five Dollars and Forty-Six Cents (\$6,135.46) for out-of-pocket costs and expenses and a one-third (33.33%) contingency fee in the amount of One Million, One Hundred Sixty Thousand, Five Hundred Fifty Dollars and Sixty Cents (\$1,160,550.60) to cover all attorneys’ fees. Furthermore, the fees of Settlement Administrator, ILYM Group, Inc., not yet incurred, are estimated to be Forty Thousand, Four Hundred Fifty Dollars and Zero Cents (\$40,450.00) and will also be paid from the Settlement amount. As a

² The number of Class Members is subject to change based upon data to be provided by Defendants.

Member of the Class, your estimated individual allocation from the Settlement amount is set forth on the first page of this Notice.³

The Parties agree that your individual allocation of the Settlement reflects a fair settlement of the claims in this litigation for unpaid wages. Your Settlement payment will be allocated one-half (1/2) as wage income (subject to payroll and income taxes and withholdings) (the “Wage Portion”) and one-half (1/2) as non-wage consideration for statutory penalties, liquidated damages, interest, and other non-wage recovery (the “Non-Wage Portion”). You should consult with your tax professional concerning the proper tax payment for this payment.

4. What are my options?

Participate in the Settlement. If you wish to participate in the Settlement and receive your full payment (i.e., both the Wage and Non-Wage Portions), then you do not need to do anything. If you do nothing and the Court approves the Settlement, then you will receive your Settlement payment and you will be subject to the release described below.

If you participate in the Settlement and the Court grants Final Approval to the Settlement, you will receive your Settlement payment after the Court enters its Final Approval Order. You will have one hundred and twenty (120) days from the date of payment to cash the check. It is your responsibility to keep the current address on file with Class Counsel to ensure receipt of your payment. If it is necessary to update your address, you should call or email either the Class Counsel listed below for assistance.

If approved by the Court, the Settlement Agreement provides that you, for yourself and your Related Persons and Entities (as defined in the Settlement Agreement), will have released (i.e., you cannot sue or otherwise assert a claim against) the Defendants and the Defendants’ Related Persons and Entities (as defined in the Settlement Agreement) from any and all claims under Illinois law that could have been asserted in the lawsuit related to the payment of wages with respect to Defendants’ security screening processes, and attendant pre-shift and post-shift walking time policies, procedures, and practices, including but not limited to all claims, demands, and causes of action for unpaid wages, penalties, liquidated damages, interest, costs, expenses, and attorneys’ fees.

In addition, the Settlement Check will contain (on the back of the check near the endorsement section) a release which fully and irrevocably releases Defendants and Defendants’ Related Persons and Entities from any and all claims under the Fair Labor Standards Act that could have been asserted in the Lawsuit related to the payment of wages with respect to Defendants’ security screening processes, and attendant pre-shift and post-shift walking time policies, procedures, and practices, including but not limited to all claims, demands, and causes of action for unpaid wages, penalties, liquidated damages, interest, costs, expenses, and attorneys’ fees. By signing the Settlement Check, you will be releasing those claims under the Fair Labor Standards Act.

³ The amount available for distribution to Class Members may vary if the expenses of the Settlement Administrator are more or less than currently estimated.

Request to be Excluded. If you exclude yourself, you will not receive any money from this Settlement.

To exclude yourself from the Settlement, you must submit a written request for exclusion to the Settlement Administrator at *Sharita Williams et al. v. Great America et al.*, Settlement Administrator, via First Class United States mail so that it is received within sixty (60) calendar days after the mailing of this notice.

To be effective, the request must include: (1) your full name; (2) your address and telephone number; (3) a specific statement that you wish to exclude yourself from this Settlement, such as: “I opt out of the Great America and Six Flags Entertainment Corporation wage and hour settlement” or words to that effect; and (4) it must be signed by you. Your exclusion request must be postmarked within sixty (60) calendar days of the date of this Notice and must be mailed to the Settlement Administrator identified below.

Object to the Settlement. You may object to the Settlement if, for any reason, you believe that the Court should not approve it. The Court will consider your objection at the Fairness Hearing in deciding whether to approve the Settlement. If you wish to present objections to the proposed Settlement at the Fairness Hearing, you must do so first in writing. To be considered, such statements must be sent to the Settlement Administrator at *Sharita Williams et al. v. Great America et al.*, Settlement Administrator, via First Class United States mail within sixty (60) days of this mailing. An objector who timely submits a written objection may appear at the Fairness Hearing in person (with or without counsel hired by the objector). 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; and (iii) copies of any papers, briefs, or other documents upon which the objection is based. An objector who wishes to appear at the Fairness Hearing must state their intention to do so at the time they submit their written objections, as well as identifying all attorneys representing the objector who will appear at the Fairness Hearing and a list of all persons who will testify in support of the objection, if any. An objector may withdraw their objections at any time.

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.

5. Who are the attorneys representing the Class?

Plaintiffs are represented by the following attorneys, who have been Preliminarily Approved by the Court as Class Counsel:

Bradley Manewith, Esq.
Lichten & Liss-Riordan, P.C.
5 Revere Drive, Suite 200
Northbrook, IL 60062
Tel: (617) 994-5800
Email: claims@llrlaw.com

Raymond Dinsmore, Esq.
Hayber, McKenna & Dinsmore, LLC
One Monarch Place, Suite 1340,
Springfield, MA 01144
Tel: (413) 785-1400
Fax: (860) 218-9555
Email: rdinsmore@hayberlawfirm.com

6. How will the attorneys for the Class be paid?

Class Counsel has filed a motion with the Court requesting that a one-third (33.33%) contingency in the amount of One Million, One Hundred Sixty Thousand, Five Hundred Fifty Dollars and Sixty Cents (\$1,160,550.60) be paid as attorneys' fees and Six Thousand, One Hundred Thirty-Five Dollars and Forty-Six Cents (\$6,135.46) be paid as costs and expenses from the total Settlement fund of amount of Three Million, Four Hundred Eighty-Two Thousand Dollars and Zero Cents (\$3,482,000.00). These amounts are subject to Court approval and the Court will decide the final amount of attorneys' fees, costs, and expenses to award based on several factors.

7. When and where will the Court decide whether to approve the Settlement?

The Court will hold a Fairness Hearing to decide whether to approve the Settlement. You are permitted to attend the Fairness Hearing, **although you are NOT required or expected to attend in order to receive your individual share of the Settlement.** At the Fairness Hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. The Court will consider all written objections to the Settlement at that time, and it will hear from any Class Members who object to the Settlement provided they submit written objections in advance, in accordance with the above instructions. The Court has scheduled the Fairness Hearing to take place on **July 6, 2026, at 9:00 a.m.** in **Courtroom C-205**. If the Court changes the date, time, or location of the Fairness Hearing, it will notify the Parties through the Court's electronic case management system, but no further notice will be mailed to Class Members.

8. Where can I obtain additional information?

This Notice only provides a summary of the lawsuit and the Settlement. For more information, you may contact Class Counsel (contact information above) or visit the following website:

ILYM Group, Inc.

P.O. Box 2031 | Tustin, CA 92781

Telephone: (888) 250-6810

Fax: (888) 845-6185

Email: claims@ilymgroup.com

Website: www.ilymgroup.com/WilliamsvSixFlags

You may also inspect the Court files at the Office of the Clerk, Nineteenth Judicial Circuit Court of Lake County, State of Illinois, at 18 N County Street, Waukegan, Illinois, 60085, during regular Court hours (typically 8:00 a.m. to 5:00 p.m., Monday through Friday), or through the Illinois Court System's online service.

THIS NOTICE HAS BEEN APPROVED BY THE NINETEENTH JUDICIAL CIRCUIT COURT OF LAKE COUNTY, STATE OF ILLINOIS. PLEASE DO NOT CONTACT THE COURT DIRECTLY.

Sharita Williams et al. v. Great America et al
c/o ILYM Group, Inc.
P.O. Box 2031
Tustin, CA 92781

«ILYM_ID
QR Code»

ILYM ID: «ilym_id» «PC»
«first_name» «last_name»
«Address_1»
«City», «state» «Zip_Code»