

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

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MINA RICHARDSON, and NAYM AHMED EDRAK,  
on behalf of themselves and all others similarly situated,

Index No.: 150786-2022

Plaintiffs,

-against-

**NOTICE OF CLASS ACTION  
LAWSUIT**

SHAKE SHACK ENTERPRISES LLC,

Defendant.

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**TO: All individuals who performed work on behalf of Defendant Shake Shack Enterprises LLC (“Shake Shack”) in the State of New York at any time between January 27, 2016 through today (the “Class Period”)**

***PLEASE READ THIS NOTICE CAREFULLY.*** The purpose of this Notice is to advise you that a lawsuit has been filed against Shake Shack Enterprises, LLC d/b/a Shake Shack (“Shake Shack”) alleging claims under New York law and to advise you of the legal rights you may have with respect to this lawsuit.

**DESCRIPTION OF THE LAWSUIT**

Plaintiffs Mina Richardson and Naym Ahmed Edrak (“Plaintiffs”), who worked as non-exempt employees of Shake Shack in New York State filed a lawsuit in state court under New York law alleging that Shake Shack required employees to wear a Shake Shack uniform and did not pay those employees for uniform maintenance pay for the care and maintenance of the Shake Shack uniform.

The Court has allowed this action to proceed as a class action lawsuit and has authorized publication of this Notice to advise you about the status of this lawsuit. The Court has not decided whether the claims in the lawsuit are valid or have any merit.

Shake Shack denies that Plaintiffs’ claims have any merit and has asserted various defenses against Plaintiffs’ claims. Shake Shack denies any wrongdoing or liability to Plaintiffs or any past or present employee of Shake Shack who may allege that he or she was underpaid.

**YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT**

A class has been certified for claims arising under New York law seeking wages. You may participate in this case as long as you were employed by Shake Shack in New York as a non-exempt Team Member, Trainer, Cross Trainer, or Shift Supervisor at any time between

January 27, 2016 and today. If you wish to be included in this lawsuit, or you do nothing in response to this Notice, you will be a member of the Class of persons whose rights will be determined by the lawsuit. As a Class member, you will waive your right to proceed individually and you will also waive any right you may have to liquidated damages, a penalty that the court may decide to impose if it finds that Shake Shack violated the law. As a member of the Class, you will also be legally bound by any decision of the Court in this lawsuit. Regardless of whether Plaintiffs wins or loses in this lawsuit, you will not be able to sue Shake Shack in a separate action for the claims alleged in this case.

You will be represented by the law firm of Bouklas Gaylord LLP, the attorneys designated by the Court to represent you (“Class Counsel”). If a settlement or judgment is reached at the conclusion of the case, Class Counsel will make an application to the Court for the recovery of their legal fees and costs, and the Court will have discretion in the amount to award Class Counsel. Their costs and fees will be paid out of any recovery that may be obtained in this lawsuit. You have a right to consult with an attorney about this matter. If you wish to be represented by other counsel, you may retain another attorney, but you may be responsible for paying that attorney.

If you do not wish to participate in this lawsuit, you must send a signed letter stating “I elect to exclude myself from the class in *Mina Richardson and Naym Ahmed Edrak v. Shake Shack Enterprises, LLC*, Index No. 150786-2022, pending in the Supreme Court of New York for New York County.” You must also include your name, address, telephone number, and signature. Your request to exclude yourself from the Class must be postmarked no later than [60 days from the mailing of the notice], and must be mailed by First Class U.S. mail to,

Bouklas Gaylord LLP  
357 Veterans Memorial Highway  
Commack, NY 11725

You must follow these procedures precisely to exclude yourself from this lawsuit. If you decide not to participate in this lawsuit, you may not be eligible to receive any benefits in the event that recovery is obtained, but you will retain the right to sue Shake Shack separately and on your behalf for the claims asserted in the lawsuit.

You can obtain further information about Class Counsel by visiting Bouklas Gaylord LLP’s website [www.wagetheftny.com](http://www.wagetheftny.com) or contacting Mark Gaylord, Esq., or James Bouklas, Esq. at:

Bouklas Gaylord, LLP  
357 Veterans Memorial Highway  
Commack, New York 11725  
(516) 742-4949  
[info@wagetheftny.com](mailto:info@wagetheftny.com)

**You have a right to participate in this lawsuit even if you are an undocumented immigrant or you are still working for Shake Shack.**

DATED: March 30, 2026