

## NOTICE OF CLASS ACTION SETTLEMENT

*Chasen, et al. v. Alliance Building Services, LLC*

Superior Court of Washington, County of King (Case No. 24-2-02041-1 SEA)

*You are not being sued. This notice affects your rights. Please read it carefully*

To: All current and former non-exempt employees of Defendant Alliance Building Services, LLC (“Defendant”) who worked in Washington State at any time from January 21, 2021 through July 31, 2024 (“Settlement Class,” “Settlement Class Members,” and “Class Period”).

You are receiving this Notice of Class Action Settlement because you have been identified as a person who worked or currently works as a non-exempt employee of Defendant within Washington at any time during the Class Period.

On October 31, 2024, the Honorable Cindi Port of the Superior Court of Washington, County of King, granted preliminary approval of this Class Action Settlement and ordered the litigants to notify all Settlement Class Members of the settlement. You have received this notice because Defendant’s records indicate that you are a Settlement Class Member and are entitled to a payment from the settlement.

**YOU MAY BE ENTITLED TO MONEY UNDER THE PROPOSED CLASS ACTION SETTLEMENT.  
PLEASE READ THIS NOTICE AS IT INFORMS YOU ABOUT YOUR LEGAL RIGHTS.**

**The amount of your estimated payment is listed on the enclosed Claim Form.**

To participate in the settlement and to receive your payment, you must mail fax a Claim Form to the Settlement Administrator by no later than December 27, 2024. If you fail to postmark or fax a Claim Form by this time, you will not receive a payment from the settlement, but you will be bound by its terms. The Final Approval Hearing on the adequacy, reasonableness, and fairness of the Settlement will be held on January 10, 2025, in Courtroom E-863 of the Superior Court of Washington, County of King, located at 516 Third Avenue, Seattle, WA 98104. You are not required to attend the Final Approval Hearing, but you are welcome to do so.

### **Summary of the Litigation**

Counsel for Plaintiffs Sarah Chasen and Shenequay Young (“Plaintiffs”) and the attorneys appointed by the Court to represent the Settlement Class, Justice Law Corporation and Nolan Lim Law Firm, PS (“Class Counsel”), have investigated and researched the facts and circumstances underlying the issues raised in the case and the applicable law. While Class Counsel believe that the claims alleged in this lawsuit have merit, Class Counsel also recognize that the risks and expenses of continued litigation justify settlement. Based on the foregoing, Class Counsel believe the proposed settlement is fair, adequate, reasonable, and in the best interests of the Settlement Class Members.

Defendant continues to deny the factual and legal allegations in Plaintiffs’ case and believes that the claims have no merit. By agreeing to settle, Defendant is not admitting liability on any of the factual allegations or claims in the case or that the case can or should proceed as a class action. Defendant has agreed to settle the case solely for economic efficiency.

### **Summary of Settlement Terms**

Plaintiffs and Defendant have agreed to settle the underlying class claims in exchange for the Maximum Settlement Amount of up to \$1,500,000. This amount is inclusive of:

**Questions? Contact the Claims Administrator toll free at 1-888-663-4071**

- 1) Attorneys' fees of up to \$450,000 (30% of the Maximum Settlement Amount) and reimbursement of attorneys' costs that will not exceed \$15,000 to Class Counsel;
- 2) Settlement Awards of up to \$10,000 to each Plaintiff (totaling \$20,000);
- 3) Settlement administration costs to the Settlement Administrator not to exceed \$20,000.00; and
- 4) Settlement Awards to all Settlement Class Members who submit timely and valid Claim Forms for participation in the Class Action Settlement ("Claimants").

### **Calculation of Individual Settlement Payments**

The Net Settlement Amount is the portion of the Maximum Settlement Amount remaining after the deduction of the approved attorneys' fees and costs, Service Awards, and settlement administration costs. The Settlement Administrator will make settlement payments to each Claimant from the Net Settlement Amount. All Claim Forms must be signed and completed in their entirety to be considered valid. The amount of settlement payment each Settlement Class Member receives will be based on the number of hours each Settlement Class Member worked during the relevant Class Period.

If the total Settlement Awards to the Claimants would equal less than sixty percent (60%) of the Net Settlement Amount, the Claims Administrator will proportionately increase the Settlement Award for each Claimant to ensure that total Settlement Awards equal sixty percent (60%) of the Net Settlement Amount. Any unclaimed amounts above sixty percent (60%) of the Net Settlement Amount will be the exclusive property of Defendant.

The parties agree that Net Settlement Amount shall be paid out to Claimants shall be characterized as follows: (1) fifty percent (50%) as liquidated damages; and (2) fifty percent (50%) as wages. Defendant shall pay the employer's share of payroll taxes from the portion of the Net Settlement Amount characterized as wages. Defendant will withhold the employees share of payroll taxes.

### **Your Options Under the Settlement**

**Defendant will not retaliate against you for either participating or not participating in this Settlement.**

#### **Option 1 – Submit a Claim Form to Be Eligible for Payment**

If you want to receive money from the settlement, you **must** complete and sign the enclosed Claim Form (see prepaid return envelope). You need to complete the Claim Form and promptly mail or fax it to the Settlement Administrator postmarked or faxed no later than December 27, 2024.

#### **Option 2 – Opt Out of the Settlement**

If you do not wish to participate in the settlement, you may exclude yourself from participating by submitting a written request to Class Counsel expressly and clearly indicating that you have received this Notice of Class Action Settlement, decided not to participate in the settlement, and desire to be excluded from the settlement. The written Request for Exclusion must: (1) be in writing; (2) state your current address; (3) contain the following statement: "I request that I be excluded from the Settlement Class in the case of *Chasen, et al. v. Alliance Building Services, LLC*"; (4) be signed; and (5) be mailed or faxed to Class Counsel Nolan Lim Law Firm, PS and postmarked by December 27, 2024. Sign, date, and mail the Request for Exclusion by First Class U.S. Mail, or equivalent, to the address below. If you submit a Request for Exclusion that is not postmarked or faxed by this date, your Request for Exclusion will be rejected, and you will remain a

**Questions? Contact the Claims Administrator toll free at 1-888-663-4071**

member of the Settlement Class.

**Option 3 – File an Objection with the Court**

If you wish to object to the settlement, you may file with the Court an objection stating why you object to the settlement and serve copies to the Parties. For the objection to be valid, you must include (1) must not exclude yourself from the Settlement Class; and (2) must file with the Court and mail to counsel for the Parties the written Objection, along with any supporting documentation that you wish the Court to consider, by December 27, 2024. If you intend to appear at the Final Approval Hearing, either in person or through counsel, you must include notice of that fact and state the purpose for your appearance in your objection. The objection must be filed with the Court and served on the attorneys listed below:

**Class Counsel**

Douglas Han

Shunt Tatavos-Gharajeh

**JUSTICE LAW CORPORATION**

751 North Fair Oaks Avenue, Suite 101

Pasadena, California 91103

Telephone: (818) 230-7502

Nolan Lim

**NOLAN LIM LAW FIRM, PS**

1111 Third Avenue, Suite 1850

Seattle, Washington 98101

Telephone: (206) 774-8874

Facsimile: (206) 430-6222

**Defendant’s Counsel**

Darren A. Feider

Monica Ghosh

Alexandra Mullally

**SEBRIS BUSTO JAMES**

15375 SE 30<sup>th</sup> Pl., Suite 310

Bellevue, Washington 98007

Telephone: (425) 454-4233

All objections must be filed with the Court no later than December 27, 2024. Late objections will not be considered. By filing an objection, you are not excluding yourself from the settlement. To exclude yourself from the settlement, you must follow the directions described in **Option 2** above. Please note that you cannot both object to the settlement and exclude yourself. If you wish, you may also appear at the Final Approval Hearing set for January 10, 2025, at 9:00 a.m. in the Superior Court of Washington, County of King, and discuss your objection with the Court and Parties at your own expense. You may also retain an attorney to represent you at the Final Approval Hearing.

**Option 4 – Do Nothing**

You may also do nothing in response to this notice. If you choose to do nothing and if the Court grants final approval of the settlement, you will be deemed to have released all claims which were explicitly asserted in this lawsuit and which arose between January 21, 2021 through July 31, 2024 even though you will not receive money from the settlement. If you do not want to be deemed to have released the Qualified Class Member Released Claims, you must exclude yourself from the settlement by following **Option 2**.

If you choose **Option 1**, and if the Court grants final approval of the settlement, you will be mailed a check for your share of the settlement funds. If you choose **Option 4**, you will receive nothing. In addition, under both **Options 1** and **4** (or **3** if the Court approves the Settlement), you will be deemed to have released the Qualified Class Member Released Claims.

If you choose **Option 2**, you will no longer be a Settlement Class Member and will: (1) be barred from participating in the settlement, but you will not be deemed to have released the Qualified Class Member Released Claims; (2) be barred from filing an objection to the settlement; and (3) not receive a payment from the settlement.

**Questions? Contact the Claims Administrator toll free at 1-888-663-4071**

If you choose **Option 3**, you will still be entitled to your share of the settlement funds but only if you complete your Claim Form and postmark or fax it by December 27, 2024. Otherwise, if the Court overrules your objection, you will be deemed to have released the Qualified Class Member Released Claims.

**Additional Information**

If you need more information or have any questions, you may contact Class Counsel listed above, or the Settlement Administrator at the telephone number listed below, toll free.

This Notice of Class Action Settlement is only a summary of the case and the settlement. For a more detailed statement of the matters involved in the case and the settlement, you may refer to the pleadings, the Settlement Agreement, and other papers filed in the case. Copies of these documents may be obtained at the Superior Court of Washington, County of King, located at 516 Third Avenue, Seattle, WA 98104.

**DO NOT CONTACT THE CLERK OF THE COURT, JUDGE, DEFENDANT, OR DEFENDANT'S COUNSEL WITH INQUIRIES.**