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FRANK SICA

Attorneys for Plaintiff
FRANK SICA

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

FRANK SICA, on behalf of himself, and all
others similarly situated, and all aggrieved
employees,

Plaintiff,

v.

MADISON INDUSTRIAL SERVICES TEAM,
LIMITED PARTNERSHIP; and DOES 1
through 50, inclusive,

Defendants.

Case No. 4:20-cv-08347-KAW

Hon. Kandis A. Westmore

CLASS ACTION

**DECLARATION OF EVELIN REYES
REGARDING NOTICE AND
SETTLEMENT ADMINISTRATION**

Date: August 4, 2022

Time: 1:30 p.m.

Ctrm: TBD

Judge: Kandis A. Westmore

Complaint Filed: September 30, 2020

FAC filed: November 19, 2020

Removal Date: November 25, 2020

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DECLARATION OF EVELIN REYES

I, Evelin Reyes, hereby declare:

1. I am employed as a Case Manager by Simpluris, Inc. (“Simpluris”), the claims administrator in the above-entitled action. Our Corporate Office address is 3194-C Airport Loop Drive, Costa Mesa, CA 92626. My telephone number is (714) 640-5654. I am over twenty-one years of age and authorized to make this declaration on behalf of Simpluris and myself.

2. Simpluris is a Class Action Settlement Administration company located in Costa Mesa, California. It was founded by individuals who have each managed hundreds of settlements, along with professionals in the areas of Software Development, Third-Party Claims Administration, Mail-House Operations, and Call Center Support Management.

3. Simpluris was approved by Counsel for Plaintiff Frank Sica (“Plaintiff”) and Defendant Madison Industrial Services Team (“Defendant”) (collectively the “Parties”) to provide settlement administration services in the *Sica v. Madison Industrial Services Team* case (“Settlement”). In this capacity, Simpluris was charged with (a) establishing and maintaining a related settlement fund account; (b) establishing and maintaining a calendar of administrative deadlines and responsibilities; (c) processing and mailing payments to the Plaintiffs, Class Counsel and Class Members; (d) printing and mailing the Notice of Class Action Settlement to Class Members; (e) receiving and validating Requests for Exclusion, Objections or Disputes of Qualified Shifts submitted by Class Members; (f) calculating Employer Payroll Taxes and providing appropriate forms and calculations to Defendant; (g) mailing settlement checks, and (h) other tasks as the Parties mutually agree or the Court orders Simpluris to perform.

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TOLL FREE TELEPHONE HELPLINE

4. A toll-free telephone number was included in the Class Notice for the purpose of allowing the Class Members to call Simpluris and to make inquiries regarding the Settlement. The system is accessible 24 hours a day, 7 days a week, and will remain in operation throughout the settlement process. Callers have the option to speak with a live call center representative during normal business hours or to leave a message and receive a return call during non-business hours. The toll-free

1 telephone number, (888) 369-3780, was included in the Notice of Proposed Class Action Settlement
2 and went live on April 13, 2022.

3 5. A website link was included in the Class Notice for the purpose of allowing the Class
4 Members to view the case information, court documents, and important dates. Class Members also
5 have the ability to opt out of the settlement through the website. The website is accessible 24 hours a
6 day, 7 days a week, and will remain operational throughout the settlement process. The website link,
7 <https://www.madisonindustrialsettlement.com/>, was included in the Notice of Proposed Class Action
8 Settlement and went live on April 13, 2022.

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11 **NOTIFICATION TO THE CLASS**

12 6. On March 9, 2022, Simpluris received the Court-approved Notice of Class Action
13 Settlement (hereafter “Class Notice”). The Class Notice advised Class Members of their right to
14 request exclusion from the Settlement, object to the Settlement, do nothing, and the implications of
15 each such action. The Class Notice advised Class Members of applicable deadlines and other events,
16 including the Final Approval Hearing, and how Class Members could obtain additional information.

17 7. On March 30, 2022, Counsel for Defendant provided Simpluris with a mailing list
18 (“Class List”) containing Class Members’ names, most recent mailing address and telephone numbers,
19 social security numbers, and pertinent employment information for each Class Member during the
20 Class Period. The Class List contained data for 377 Class Members.

21 8. The mailing addresses contained in the Class List were processed and updated utilizing
22 the National Change of Address Database (“NCOA”) maintained by the U.S. Postal Service. The
23 NCOA contains requested changes of address filed with the U.S. Postal Service. In the event that any
24 individual had filed a U.S. Postal Service change of address request, the address listed with the NCOA
25 would be utilized in connection with the mailing of the Notice Packets.

26 9. On April 13, 2022, the Class Notice was mailed to the 377 Class Members to the
27 addresses contained in the Class List or updated through the NCOA process via First Class mail. An
28 example copy of the Class Notice is attached hereto as **Exhibit A**.

1 10. Twenty-four Class Notices were returned by the USPS as undeliverable. Simpluris
2 performed an advanced address search (i.e. skip trace) on all of these addresses by using Accurint, a
3 reputable research tool owned by Lexis-Nexis. Simpluris used the Class Member's name and previous
4 address to locate a current address. Through the advanced address search, Simpluris was able to locate
5 17 updated addresses and Simpluris promptly mailed the Notice Packets to those updated addresses.
6 As of this date, there are seven Class Notices that are undeliverable. That translates to a 98% success
7 rate of the Class Notice mailing program.

8 **REQUESTS FOR EXCLUSION, OBJECTIONS AND DISPUTES**

9 11. The last day to opt-out, object, or submit a dispute is May 31, 2022. As of this date,
10 Simpluris has not received any Requests for Exclusion from Class Members.

11 12. As of this date, Simpluris has not received any Objections to the Settlement from Class
12 Members.

13 13. As of this date, Simpluris has not received any Disputes of Work Weeks from Class
14 Members.

15 **SETTLEMENT AWARDS**

16 14. As of this date, there are 377 Class Members who will be paid their portion of the Net
17 Settlement Fund.

18 15. The estimated Net Settlement Fund is \$401,000.00. This amount was determined by
19 subtracting the estimated Class Counsel's Fees (\$195,000.00), Class Counsel's Costs (\$17,500.00), the
20 Named Plaintiff Service Award (\$7,500.00), the PAGA LWDA Payment (\$20,000.00) and the
21 Administration Costs (\$9,000.00) from the Maximum Settlement Amount (\$650,000.00).
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23 16. Based on an estimated Net Settlement Fund of \$401,000.00, the ***average estimated***
24 ***payment*** is \$1,063.66, and the ***highest estimated payment*** is \$5,106.32.

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27 **ADMINISTRATION COSTS**
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1 17. Simpluris' total costs for services in connection with the administration of this
2 Settlement, including fees incurred and anticipated future costs for completion of the administration, are
3 \$9,000.00, which is higher than the original estimate in the settlement agreement of \$7,000.00 because
4 the settlement website was not in the original scope of work. The settlement website added an
5 additional \$2,000.00 to the cost of the administration. Simpluris' work in connection with this matter
6 will continue with the calculation of the settlement checks, issuance and mailing of those settlement
7 checks, etc., and to do the necessary tax reporting on such payments.

8 18. Simpluris will provide an updated declaration as part of the final approval motion. At that
9 time, Simpluris will provide the final details of the Class Notice program and a final invoice for
10 services performed.

11 I declare under penalty of perjury under the laws of the State of California that the foregoing is
12 true and correct. Executed this 16th day of May, 2022, in Costa Mesa, California.

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16 EVELIN REYES
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EXHIBIT A

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA

Sica v. Madison Industrial Services Team

Case No. 4:20-cv-08347-KAW

NOTICE OF CLASS ACTION SETTLEMENT

*A court authorized this notice. This is not a solicitation.
This is not a lawsuit against you and you are not being sued.
However, your legal rights are affected whether you act or don't act.*

This class action settlement will affect your rights if you worked as an hourly on-site employee for Madison Industrial Services Team in California at any time during the period from and including September 30, 2016 through September 30, 2021.

«IMbFullBarcodeEncoded»

«FirstName» «LastName» «BusinessName»

«Address1» «Address2»

«City», «State» «Zip»-«ZipDPC3»

SIMID «SIMID»
«Notice_Encoded»

- Former employee and proposed class representative Frank Sica (“Class Representative” or “Plaintiff”) sued Madison Industrial Services Team, Limited Partnership (“Madison” or “Defendant”) on behalf of himself and certain current and former Madison employees in California and has alleged that Defendant violated the California Labor Code and the California Unfair Competition Law (collectively, the “Class claims”). Madison denies all of Plaintiff’s allegations, denies that it violated any law, and contends that at all times it complied with federal, state and local laws.
- The complaint also alleges that Plaintiff is entitled to recover civil penalties for himself and other aggrieved employees under the California Private Attorneys General Act of 2004 (“PAGA”).
- Plaintiff and Defendant have entered a settlement agreement (“Settlement”) that settles the claims of the Class Representative, the Class claims, and the PAGA claim. The Court has preliminarily approved the Settlement.
- If you worked for Madison at any time during the period from September 30, 2016 through September 30, 2021 as an hourly on-site employee, you may be considered a putative class member (“Class Member”). Because you qualify as a Class Member, you could receive money from the Settlement.
- If you worked for Madison at any time during the period from September 14, 2019 through September 30, 2021 as an hourly on-site employee, you may be considered an “Aggrieved Employee” under PAGA. If you qualify as an Aggrieved Employee, you will receive money from the Settlement of the PAGA claim. (In this Settlement, all Settlement Class Members are also Aggrieved Employees.)
- Your legal rights are affected whether you act or don’t act. Read this Notice carefully.

WHAT ARE YOUR OPTIONS?

DO NOTHING	If you do nothing, you will receive a Class Settlement payment if the Court approves the Settlement. In exchange for this payment, you will give up any rights to sue for the same claims that are released as of this Settlement.
EXCLUDE YOURSELF	Give up all benefits, including money, from the Class Settlement. Retain all rights you may have against Madison, as explained below. <u>NOTE:</u> Aggrieved Employees may not opt out of the PAGA portion of the Settlement.
OBJECT	Write to the Court about why you don’t agree with the Settlement. The Court may or may not agree with your objection. If the Court approves the settlement, you will receive a Settlement payment.
HOW MUCH CAN I GET FROM THE CLASS ACTION SETTLEMENT?	Based on Madison’s records, your Individual Settlement Payment is estimated to be \$«MERGED_EstSettAmnt_CALC». This is based on your total Qualified Shifts during the Class Period: «MERGED_Shifts_CALC».
HOW MUCH CAN I GET FROM THE PAGA SETTLEMENT?	Based on Madison’s records, your Individual PAGA Payment is estimated to be \$«MERGED_EstSettAmnt_CALC». This is based on your total Qualified Pay Periods during the PAGA Period: «MERGED_PayPeriods».

- Your rights and options – and the deadlines to exercise them – are explained in this Notice.
- The Court in charge of this case still has to decide whether to grant final approval of the Settlement. If the Court approves the Settlement and after any appeals are resolved, payments will be made to (a) Settlement Class Members who do not opt out of the Class Settlement; and (b) all Aggrieved Employees.

WHY AM I RECEIVING THIS NOTICE?

Defendant's records show that you worked for Madison as an hourly on-site employee in California during the period from and including September 30, 2016 through September 30, 2021 (the "Class Period"). You received this Notice because you have a right to know about a proposed settlement of a class action lawsuit ("Action") and about your options before the Court decides whether to grant final approval of the Settlement. If the Court approves the Settlement, and after any objections and appeals are resolved, a Settlement Administrator appointed by the Court will make the payments that the Settlement allows.

This Notice explains the lawsuit, the Settlement, your legal rights, what benefits are available, who is eligible for them, and how to get them.

WHAT IS THIS LAWSUIT ABOUT?

Plaintiff Frank Sica filed a putative class action lawsuit on September 30, 2020 and a First Amended Complaint on November 19, 2020, on behalf of himself and other hourly on-site employees who worked for Madison in California during the Class Period, September 30, 2016 through September 30, 2021, inclusive. The operative First Amended Complaint alleges causes of action against Defendant on a class basis for: (1) unfair business practices; (2) failure to provide meal periods; (3) failure to pay wages for all hours worked; (4) failure to provide accurate itemized wage statements; and (5) waiting time penalties. The complaint also alleges claims under the California Private Attorneys General Act of 2004 ("PAGA").

DO I HAVE AN ATTORNEY?

You do not need to hire your own attorney. You are already represented by Class Counsel (see below for their contact information). However, you may hire your own attorney at your own expense if you choose.

WHAT IS THE CASE STATUS?

Madison denies all of Plaintiff's allegations, denies that it violated any law, and contends that at all times it complied with federal, state and local laws. The settlement is not an admission by Madison of any wrongdoing or an indication that any law was violated.

The Court did not decide in favor of Plaintiff or Defendant. Nor has it decided whether this case could proceed as a class action.

Instead of going through class certification or to trial, and after a thorough investigation into the facts of this lawsuit, both sides agreed to a settlement. The class claims were settled because Class Counsel and the Class Representative believe that the terms of the Settlement, which include monetary benefits, are fair and reasonable in light of the strength and weaknesses of the claims and other factors.

WHO IS IN THE CLASS?

You are part of the Settlement if you are a member of the Class, which includes all individuals who worked for Madison as an hourly on-site employee in California during the period from and including September 30, 2016 through September 30, 2021.

All Class Members are also Aggrieved Employees, who are defined to include all current and former hourly on-site employees who worked for Madison in California at any time between September 14, 2019 and September 30, 2021, inclusive.

WHAT ARE THE TERMS OF THE SETTLEMENT?

In exchange for the release of claims against it and final judgment on the Action, Defendant will pay \$650,000 plus the employer's share of payroll taxes ("Maximum Settlement Amount"), which includes all payments contemplated by the Settlement, including all payments to Class Members, a service award to Plaintiff, Class Counsel's attorneys' fees and costs, employee-side taxes, a payment to the California Labor and Workforce Development Agency ("LWDA") as part of the settlement of the PAGA claim, all payments to Aggrieved Employees, and settlement administration costs. The "Net Settlement Amount" is the amount remaining after deduction of Class Counsel's attorneys' fees and costs, the service awards to Plaintiffs, the PAGA Payment, and the settlement administration costs, all of which will be distributed to Class Members who do not opt out.

Subject to Court approval, the Maximum Settlement Amount will be allocated at follows:

- **Individual Settlement Payments:** Class Members who do not opt out are eligible to receive money from the Net Settlement Amount as an Individual Settlement Payment, which is calculated as described below. The Net Settlement Amount is estimated to be approximately \$403,000. Your estimated gross Individual Settlement Payment from the Net Settlement Amount is listed on the first page of this Notice.

- **Class Representative Service Award:** Plaintiff will request from the Court an award of \$7,500 in recognition of his efforts and risks in assisting with the prosecution of the Action. This amount will be paid from the Maximum Settlement Amount, and any amount not awarded will revert to the Net Settlement Amount for distribution.
- **Class Counsel Award:** Class Counsel will request that the Court approve up to 30% of the Maximum Settlement Amount (\$195,000 of the \$650,000 settlement) as attorneys' fees for litigation and resolution of this Action and actual costs and expenses (estimated not to exceed \$17,500), as supported by declaration. This amount will be paid from the Maximum Settlement Amount, and any amount not awarded will revert to the Net Settlement Amount for distribution.
- **Settlement Administration:** The cost of settlement administration shall not exceed \$7,000, which pays for tasks such as mailing and tracking this Notice, tracking Requests for Exclusion and Notices of Objection, mailing checks and tax forms, and reporting to the parties and the Court.
- All checks issued to Class Members shall remain valid and negotiable for 180 calendar days after the date of their issuance. Any undeliverable or uncashed checks will then be voided and sent to Legal Aid at Work.
- The \$20,000 PAGA Payment is required by law to be split 75% to the LWDA and 25% to the Aggrieved Employees. Therefore, \$15,000 will be distributed to the LWDA and \$5,000 will be distributed to Aggrieved Employees. Your estimated Individual PAGA Payment is listed on the first page of this Notice.

WHAT CAN I RECEIVE FROM THE CLASS SETTLEMENT?

If you do not opt out of the Settlement, you will automatically receive your share of the Net Settlement Fund after the Court approves the Settlement. Your estimated share, that is your estimated gross Individual Settlement Payment, and your total Qualified Shifts from Defendant's records used to calculate it, are listed on the first page of this Notice. Approximately one-third (33.33%) of the Individual Settlement Payment will be designated as wages for which an IRS Form W-2 shall issue, and approximately two-thirds (66.67%) shall be designated as penalties and interest, for which an IRS Form 1099 may issue.

HOW IS MY PORTION OF THE CLASS SETTLEMENT CALCULATED?

Your Individual Settlement Payment is your pro rata share of the Net Settlement Amount based on your total Qualified Shifts, which is the total number of individual days that you worked as an hourly on-site employee for Madison in California (based on Defendant's records) during the Class Period (September 30, 2016 through September 30, 2021, inclusive). Your Qualified Shifts worked will be divided by the total number of Qualified Shifts worked for all Settlement Class Members, resulting in your Payment Ratio. The Payment Ratio then will be multiplied by the Net Settlement Amount to determine your gross Individual Settlement Payment, except that no gross Individual Settlement Payment will be less than \$25.

Your Individual Settlement Payment may vary from the estimated payment listed on this form if any Class Members opt out of the Settlement and depending upon the amounts that the Court approves for awards to Class Counsel, the Class Representative, and the Settlement Administrator.

ONLY if you disagree with the Qualified Shifts worked stated on page one of this Notice, email or mail a letter to the Settlement Administrator explaining why you disagree. Be as specific as possible and include copies of any supporting documents, such as paystubs. The decision of the Settlement Administrator will be final. Disputes must be mailed to the address below and must be postmarked no later than May 31, 2022:

Simpluris, Inc.
Sica v. Madison Industrial Services Team
P.O. Box 26170
Santa Ana, CA 92799
Phone: (888) 369-3780
Email: madisonindustrialsettlement@simpluris.com

WHAT WILL I RECEIVE FROM THE PAGA SETTLEMENT?

All Class Members also qualify as Aggrieved Employees and thus will also will receive an Individual PAGA Payment. Your Individual PAGA Payment will be based on your pro rata share of the 25% of the PAGA Payment (\$5,000) based on your number of Qualified Pay Periods during the PAGA Period, which is September 14, 2019 through September 30, 2021, inclusive. Your total Qualified Pay Periods will be divided by the total Qualified Pay Periods for all Aggrieved Employees, resulting in your Payment Ratio. The Payment Ratio will then be multiplied by \$5,000 to determine your Individual PAGA Payment.

WHAT HAPPENS IF I DO NOTHING?

If you do nothing and the Court approves the Settlement at the Final Approval Hearing, you will be issued your Individual Settlement Payment (if you qualify as a Class Member) and your Individual PAGA Payment (if you qualify as an Aggrieved Employee,) in one check without any further action needed from you.

To ensure receipt of your settlement payment, you must notify the Settlement Administrator of any change in your name, mailing address and/or telephone number. **It is your responsibility to keep the Settlement Administrator informed of your updated information, and your settlement payment will be mailed to the last known address that the Settlement Administrator has on file for you.**

WHEN AND WHERE IS THE FINAL APPROVAL HEARING?

The Court will hold the Final Approval Hearing on August 4, 2022 in Courtroom TBD of the United States District Court for the Northern District of California, 1301 Clay Street, Oakland, California 94612, to decide whether to approve the Settlement. If the Court approves the Settlement, your Settlement share will be mailed to you within approximately 45 days from the Effective Date of the Settlement.

Please be advised that the date of the Final Approval Hearing may change without further notice to the Class Members, and/or the hearing may be conducted virtually. The Settlement Administrator will post any changes to the settlement website (www.MadisonIndustrialSettlement.com). Class Members are therefore advised to check the settlement website, the Court's website (<https://www.cand.uscourts.gov/judges/westmore-kandis-a-kaw/>), or contact Class Counsel or the Settlement Administrator to confirm that the date and location has not been changed.

WHAT CLAIMS AM I GIVING UP IF I REMAIN PART OF THE SETTLEMENT?

Unless you exclude yourself, you will remain a Settlement Class Member, and you will be bound by the terms of the Settlement, including the Release of the Released Claims as described below. That means you will be unable to sue, or to continue to sue, or be part of any other lawsuit about the Released Claims. It also means that all of the Court's orders in this Action will apply to you and legally bind you.

Released Claims

The "Released Claims" means and includes all claims against the Released Parties arising between September 30, 2016 and September 30, 2021, inclusive, under state, federal, or local law, whether statutory, arising out of the claims expressly pleaded in the operative First Amended Complaint on file in the Action (i.e., Labor Code §§ 201, 202, 203, 204b, 226, 226.3, 226.7, 510, 512, 1194, 1194.2, 1197.1, 1198, and 1199, and Business & Professions Code §§ 17200, *et seq.* claims based on alleged violations of these Labor Code provisions) and all other claims, such as those under the California Labor Code, Wage Orders, regulations, and/or other provisions of law, that could have been pleaded based on the facts pleaded in the First Amended Complaint, together with interest, fees, and costs related to those claims. The Release Period for the Released Claims shall be the same as the Class Period, i.e., the time period from and including September 30, 2016 through September 30, 2021.

The Release will extend to Defendant Madison Industrial Services Team, Limited Partnership and all of Defendant's parent companies, subsidiaries, divisions, concepts, related or affiliated companies and its or their shareholders, officers, directors, employees, agents, attorneys, insurers, re-insurers, predecessors- or successors-in-interest, and assigns, and any individual or entity that could be liable for any of the Released Claims (collectively, the "Released Parties").

WHAT CLAIMS ARE RELEASED BY THE SETTLEMENT OF PAGA CLAIMS?

If this Settlement is approved, then Plaintiff Sica, individually and as representative acting as a proxy or agent of the LWDA, a State of California Executive Branch Agency, in this Action, agrees to release the Released Parties of and from any and all allegations and claims for PAGA civil penalties based on any and all underlying Labor Code violations alleged in the operative Complaint or in Plaintiff's letter to the LWDA dated September 14, 2020.

WHAT SHOULD I DO IF I DO NOT WANT TO BE PART OF THE SETTLEMENT?

If you do not wish to participate in this Settlement, you may exclude yourself (generally called "opting out") by submitting a written or email Request for Exclusion to the Settlement Administrator. Your request to opt-out must (a) be in writing; (b) state your name, address, and the last four digits of your social security number or Employee ID number; and (c) include a typed or handwritten statement requesting exclusion from the Settlement Class and stating in substance: "I wish to opt out of the settlement of the class action lawsuit entitled *Sica v. Madison*."

You may also opt-out using the online form located at the web portal www.MadisonIndustrialSettlement.com

If mailed, you must personally sign the Request for Exclusion and may not have someone sign for you. You may not submit a Request for Exclusion on behalf of a group or anyone else. Your Request for Exclusion must be emailed, submitted via the online web portal, or signed and mailed via United States first class mail postmarked no later than May 31, 2022 to:

Simpluris, Inc.
Sica v. Madison Industrial Services Team
P.O. Box 26170
Santa Ana, CA 92799
Phone: (888) 369-3780

If you submit a timely Request for Exclusion, then upon its receipt you shall not be a member of the Settlement Class, you shall be barred from participating in any portion of the Settlement, and you may not object to the Settlement.

If you submit a timely Request for Exclusion, you may then pursue, at your own expense, any claims you may have against Madison. If you do not submit a complete and timely written Request for Exclusion, you will be included in the Settlement Class, and you will be bound by the terms of the Settlement (including the Released Claims described above), whether or not you objected to the Settlement.

NOTE: Aggrieved Employees in a PAGA action may not opt-out of a PAGA settlement. Thus, in a settlement involving both class and PAGA claims, employees may only opt-out from participating in the class portion of the settlement. If you submit a timely Request for Exclusion, you will still receive an Individual PAGA Payment representing your portion of the PAGA Payment.

WHAT SHOULD I DO IF I WANT TO OBJECT TO THE SETTLEMENT?

Any Class Member who has not asked to be excluded from this Settlement may object to the Settlement. You can ask the Court to deny approval by filing an objection. You can't ask the Court to order a different settlement; the Court can only approve or reject the Settlement. If the Court denies approval, no Settlement Payments will be sent out and the Action will continue. If that is what you wish to happen, you must object.

Please also keep in mind that objecting is not the same as requesting to be excluded. Submitting an objection will **not** exclude you from the Settlement Class. **If your objection is overruled, you will still be bound by the Settlement.**

If you wish to object to the Settlement, you may submit your written Notice of Objection to the Court at the address below in person (or at any other location of the United States District Court for the Northern District of California in person) or by mail stating the basis or reason(s) for your objection to the Settlement. You may object to any of the terms in the Settlement Agreement. A written Notice of Objection must be signed by you and include: (1) the case name and number (*Sica v. Madison Industrial Services Team, Limited Partnership*, Case No. 4:20-cv-08347-KAW); (2) your name; (3) your address; (4) the last four digits of your Social Security number or Employee ID number; (5) the basis for your objection and any supporting documents; and (6) if you intend to appear at the final approval hearing. Class Members who fail to make objections in the manner specified above may be deemed to have waived any objections and be foreclosed from making any objections (whether by appeal or otherwise) to the Settlement. The failure to submit a written objection does not waive a Settlement Class Member's right to appear and orally object at the final approval hearing.

The written Notice of Objection must be filed in person or mailed via United States first-class mail postmarked no later than May 31, 2022, to:

United States District Court
Class Action Clerk
1301 Clay Street, Suite 400S
Oakland, California 94612

If you have submitted a written objection, you may, but are not required to, appear at the Final Approval Hearing set for August 4, 2022, in Courtroom TBD of the United States District Court for the Northern District of California, 1301 Clay Street, Oakland, California 94612 and discuss your objections with the Court and the parties. The Final Approval Hearing may be continued to another date without further notice. You should check the Settlement Administrator's website (www.MadisonIndustrialSettlement.com) or the Court's PACER website (<https://ecf.cand.uscourts.gov/>) to confirm the date has not been changed.

You have the right to retain your own attorney, at your own expense, to submit a Notice of Objection or appear on your behalf at the Final Approval Hearing.

You cannot both object and opt-out. If you submit both a Request for Exclusion and a Notice of Objection, the Notice of Objection will be invalid, while the Request for Exclusion will be valid.

HOW DO I GET ADDITIONAL INFORMATION?

This Notice only summarizes the proposed Settlement and its terms. For more information or the precise terms and conditions of the Settlement: access relevant case documents including the Settlement Agreement and the motions for final approval and attorneys' fees and costs at the Settlement Administrator's website (www.MadisonIndustrialSettlement.com); contact Class Counsel at the below address, phone number or email addresses; access the Court docket by visiting the office of the Clerk of Court at any of the locations listed at <https://cand.uscourts.gov/about/locations/> between 9:00 a.m. and 1:00 p.m., Monday through Friday, excluding Court holidays; or access the Court docket for a fee at the Court's PACER website, <https://ecf.cand.uscourts.gov/>.

If you have further questions regarding this case or Settlement, you may contact Class Counsel, whose contact information is provided below:

Eric A. Grover
eagrover@kellergrover.com
Robert W. Spencer
rspencer@kellergrover.com
KELLER GROVER LLP
1965 Market Street
San Francisco, California 94103
Telephone: (415) 543-1305
Facsimile: (415) 543-7861

Scot Bernstein
swampadero@sbernsteinlaw.com
Law Offices of Scot D. Bernstein,
A Professional Corporation
101 Parkshore Drive, Suite 100
Folsom, California 95630
Telephone: (916) 447-0100
Facsimile: (916) 933-5533

In addition to contacting Class Counsel, you may contact the Settlement Administrator at (888) 369-3780 or visit the Settlement Administrator's website at (www.MadisonIndustrialSettlement.com).

PLEASE DO NOT WRITE OR TELEPHONE THE COURT OR THE COURT CLERK'S OFFICE TO INQUIRE ABOUT THIS SETTLEMENT OR THE CLAIM PROCESS.