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Attorneys for Plaintiffs
MELISSA WEISMAN and SCOTT ATHEY

[Additional attorneys listed on next page]

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO**

MELISSA WEISMAN, individually, and on
behalf of other members of the general public
similarly situated;

Plaintiff,

v.

GENERAL ATOMICS, a California
corporation; GENERAL ATOMICS
AERONAUTICAL SYSTEMS, INC., a
California corporation; and DOES 1 through
100, inclusive;

Defendants.

Case No. 37-2021-00000331-CU-OE-CTL

Assigned for All Purposes to:
Honorable Katherine Bacal
Department C-69

CLASS ACTION

**PARTIES' JOINT SUBMISSION FOR
CONTINUED HEARING ON MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

[Declaration of Julie Green and Proposed
Order filed concurrently herewith]

Motion for Preliminary Approval Hearing:

Hearing Date: March 3, 2023

Hearing Time: 1:30 p.m.

Hearing Place: Department C-69

Complaint Filed: January 5, 2021

FAC Filed: July 21, 2021

SAC Filed: January 19, 2023

Trial Date: None Set

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10 Attorneys for Defendants
11 GENERAL ATOMICS and GENERAL ATOMICS
AERONAUTICAL SYSTEMS, INC.
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1 On Friday, February 17, 2023, the Parties appeared before the Court at the hearing on
2 Plaintiffs' Motion for Preliminary Approval of Class Action and PAGA Settlement.

3 At the hearing, the Parties answered the Court's questions that were posed in the tentative
4 ruling issued by the Court on February 16, 2023. Following this discussion during the hearing,
5 the Court ordered the Parties to submit an amended proposed Class Notice that: (1) clarified that
6 the release of claims described in the Class Notice matched the release of claims described in the
7 Parties' settlement agreement and, specifically, included references to the California Industrial
8 Welfare Commission Wage Order, and (2) clarified that Class Members who receive re-mailed
9 Class Notice would receive extensions of the deadlines to exercise their rights to opt out of or
10 object to the settlement based on the date of remailing. The Court ordered the Parties to file the
11 amended proposed Class Notice no later than February 24, 2023.

12 In accordance with the Court's Order, the Parties timely submit the amended proposed
13 Class Notice. Attached hereto as Exhibit 1 is a redlined version of the amended proposed Class
14 Notice showing the Court the changes that have been made to the originally submitted proposed
15 Class Notice. Attached hereto as Exhibit 2 is a clean version of the amended proposed Class
16 Notice.

17 ///

18 ///

19 ///

1 Dated: February 24, 2023

JUSTICE LAW CORPORATION

2
3 By



Douglas Han
Attorneys for Plaintiffs
MELISSA WEISMAN and SCOTT ATHEY

4
5
6 Dated: February 24, 2023

MORGAN, LEWIS & BOCKIUS LLP

7
8
9 By



Eric Meckley
Attorneys for Defendants GENERAL
ATOMICS and GENERAL ATOMICS
AERONAUTICAL SYSTEMS, INC

EXHIBIT 1

*A court has authorized this notice. This is not a solicitation.
This is not a lawsuit against you and you are not being sued.
Your legal rights are affected whether you act or do not act.*

NOTICE OF CLASS ACTION AND PAGA REPRESENTATIVE SETTLEMENT

To: All current and former non-exempt employees of General Atomics who performed work within the State of California at any time from July 11, 2016, through January 16, 2023 (the “Class”). The Class includes non-exempt employees who performed work for General Atomics and affiliated companies including General Atomics Aeronautical Systems, Inc. (“GA-ASI”), Diazyme Laboratories, Inc. (“Diazyme”), and General Atomics Systems Integration, LLC (“SI”).

CLASS MEMBERS ARE ELIGIBLE TO RECEIVE A MONETARY PAYMENT FROM THE CLASS AND PAGA SETTLEMENT DESCRIBED IN THIS NOTICE.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
DO NOTHING	To receive a settlement payment, you do not need to do anything. Your payment will be mailed to you automatically after the Court grants final approval of the settlement.
CHANGE AND UPDATED CONTACT AND ADDRESS INFORMATION	Update your address with the Settlement Administrator in the event you change your address to ensure your check is sent to the correct address. You must keep a current address on file with the Settlement Administrator to ensure receipt of your check.
EXCLUDE YOURSELF FROM THE CLASS SETTLEMENT	If you do not want to participate in the class settlement, you may exclude yourself of the class portion of the settlement (referred to as “opting out”). If you exclude yourself from the class settlement, you will not receive any payment from the Settlement Pool (defined below). This is the only option that would allow you the ability to pursue your own potential claims in a separate lawsuit against General Atomics relating to the claims being resolved by this Settlement. If you are a California Private Attorneys’ General Act (“PAGA”) Member (defined below), however, even if you exclude yourself from the class settlement, you still will receive a payment related to the settlement of PAGA claims and will be bound by the release of PAGA claims.
OBJECT TO THE CLASS SETTLEMENT	You may write to the Court to assert any contention that the settlement is not fair, adequate or reasonable.
GO TO THE HEARING BEFORE THE COURT	You may ask to address the Court at the hearing regarding whether the settlement is fair, adequate and reasonable.

- **YOUR RIGHTS AND OPTIONS – AND THE DEADLINES TO EXERCISE THEM – ARE EXPLAINED IN GREATER DETAIL BELOW.**
- **GENERAL ATOMICS, GA-ASI, DIAZYME AND SI WILL NOT RETALIATE IN ANY MANNER AGAINST YOU FOR PARTICIPATING OR CHOOSING NOT TO PARTICIPATE IN THIS SETTLEMENT.**

BACKGROUND REGARDING THE LAWSUIT

1. Why did I receive this notice?

You received this notice because General Atomics' records identify you as someone who performed work for General Atomics, GA-ASI, Diazyme or SI at some time from July 11, 2016, through January 16, 2023, which makes you a Class Member during the Class Period. The purpose of this notice is to explain the Lawsuit, the pending Settlement, your legal rights, what benefits are available, who is eligible for them, and how to get them.

The Court responsible for approving the settlement is the Superior Court of the State of California, County of San Diego, and the case is known as *Melissa Weisman, et al. v. General Atomics, et al.*, Case No. 37-2021-00000331-CU-OE-CTL ("Action"). There was a hearing on [REDACTED], 2023 in the Court at which time the Court preliminarily approved the Settlement and directed that you receive this notice. The Court will hold a Final Approval Hearing concerning the Settlement on [REDACTED], 2023 at [REDACTED], in Department C-69 of the San Diego County Superior Court, Hall of Justice located at 330 West Broadway, San Diego, California 92101. The Final Approval Hearing may be continued to another date without further notice.

2. What is this Class and PAGA Lawsuit about?

Plaintiff Melissa Weisman filed her putative class action complaint against General Atomics and GA-ASI on January 5, 2021, alleging claims against General Atomics and GA-ASI for (1) failure to pay minimum and overtime wages under Labor Code §§ 510, 1194, 1197, and 1198; (2) failure to provide meal periods and rest breaks and pay any associated premiums due under Labor Code §§ 226.7 and 512; (3) failure to timely pay wages during employment under Labor Code §§ 204 and 210; (4) failure to timely pay wages upon termination under Labor Code §§ 201-203; (5) failure to provide complete and accurate wage statements under Labor Code §§ 226, 226.3, and 1174; (6) failure to reimburse all necessary business expenses under Labor Code §§ 2800 and 2802; and (7) unfair business practices under Business and Profession Code section 17200, *et seq.*

Plaintiff Scott Athey filed a representative action complaint against General Atomics and GA-ASI on May 27, 2022, alleging a single cause of action for civil penalties under PAGA for (1) failure to pay minimum and overtime wages under Labor Code §§ 510, 1194, 1197, and 1198; (2) failure to provide paid sick leave under Labor Code § 246; (3) failure to provide meal periods and rest breaks and pay any associated premiums due under Labor Code §§ 226.7 and 512; (4) failure to timely pay wages during employment under Labor Code §§ 204 and 210; (5) failure to timely pay wages upon termination under Labor Code §§ 201-203; (6) failure to provide complete and accurate wage statements under Labor Code §§ 226, 226.3, and 1174; (7) failure to keep complete and accurate payroll records under Labor Code § 1174; and (8) failure to reimburse all necessary business expenses under Labor Code §§ 2800 and 2802 (the "PAGA Action").

On [REDACTED], 2023, Plaintiffs filed an amended complaint in the Action, alleging claims for (1) failure to pay minimum and overtime wages under Labor Code §§ 510, 1194, 1197, and 1198; (2) failure to provide meal periods and rest breaks and pay any associated premiums due under Labor Code §§ 226.7 and 512; (3) failure to timely pay wages during employment under Labor Code §§ 204 and 210; (4) failure to timely pay wages upon termination under Labor Code §§ 201-203; (5) failure to provide complete and accurate wage statements under Labor Code §§ 226, 226.3, and 1174; (6) failure to reimburse all necessary business expenses under Labor Code §§ 2800 and 2802; (7) unfair business practices under Business and Profession Code section 17200, *et seq.*; (8) failure to provide paid sick leave under Labor Code § 246; and (9) penalties under PAGA, California Labor Code §§2698, *et seq.*, based upon alleged Labor Code violations described above.

General Atomics and GA-ASI deny all allegations in the Lawsuit and contend that they have fully complied with the California Labor Code. The settlement is not an admission of any wrongdoing by General Atomics, GA-ASI, Diazyme or SI or an indication that any law was violated or that this case was suitable for class or

representative treatment. As a result of arms-length negotiations at a mediation on November 16, 2022, with an experienced wage and hour mediator, Jeffrey A. Ross, Esq., the Parties reached a class action and PAGA representative action settlement that is subject to Court approval.

3. Why is there a settlement?

The Court has not decided in favor of Plaintiffs Melissa Weisman or Scott Athey, or in favor of General Atomics and GA-ASI, nor has the Court made any decision as to whether this case could proceed on a class or representative basis. There was no trial. Instead, both sides agreed to a no-fault settlement of the Lawsuit.

4. Who are the Parties in this Lawsuit?

Plaintiffs Melissa Weisman and Scott Athey were employed by General Atomics in California and performed work for GA-ASI.

Defendants are General Atomics and GA-ASI.

5. Who are the Attorneys for the Parties?

Counsel for Plaintiffs and the Class

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Counsel for General Atomics and GA-ASI

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THE TERMS OF THE SETTLEMENT

6. What is the Settlement Amount?

The proposed Settlement provides for a maximum payment of \$7,500,000.00 (referred to as the “Maximum Settlement Amount”). From the Maximum Settlement Amount, Class Counsel will apply to the Court for attorneys’ fees of \$2,500,000.00 and \$25,000.00 in costs; a Class Representative service payment of \$10,000.00 to Ms. Melissa Weisman and \$10,000.00 to Mr. Scott Athey for their work and efforts prosecuting this case, for undertaking the risks of payment of costs (in the event of an unsuccessful outcome of this Lawsuit); a \$350,000 payment to the California Labor Workforce Development Agency (“LWDA”) and to the PAGA Members as settlement for claims for civil penalties under PAGA (the “PAGA Payment”); and settlement administration expenses to CPT Group, Inc., estimated at \$50,500.00. The exact amount of the attorneys’ fees, litigation costs, class representative service payment, and settlement administration expenses will be determined by the Court at the Final Approval hearing. The remaining portion of the Maximum Settlement Amount, the “Settlement Pool,” is currently estimated to be approximately \$4,554,500.00. The Settlement Pool will be apportioned and paid out as Individual Settlement Payments to the Settlement Class Members, who are the Class Members who do not request to be excluded (“opt out”) of the settlement.

7. How will the Individual Settlement Payments to Settlement Class Members be calculated?

Settlement Class Members will receive Individual Settlement Payments from the Settlement Pool. **A claim form is not required.** Class Members who opt out of the class settlement will not receive an Individual Settlement Payment and will not be bound by the class portion of this Settlement.

Each Settlement Class Member's Individual Settlement Payment will be a pro rata share of the Settlement Pool based on the number of workweeks that each Class Member performed work as a non-exempt employee while employed by General Atomics during the Class Period (July 11, 2016, through January 16, 2023) ("Eligible Workweeks") as a proportion of all Eligible Workweeks for all Settlement Class Members.

All Individual Settlement Payments to Settlement Class Members shall be allocated as follows for tax purposes: 70% of each Individual Settlement Payment reflects a compromise of a claim for alleged unpaid wages; 30% of each Individual Settlement Payment reflects compromise of a claim for alleged interest and penalties. The portion of the Individual Settlement Payment attributable to unpaid wages will be subject to regular and/or applicable payroll and income tax withholdings and will be reported on an IRS Form W-2. Settlement Class Members will receive an IRS Form 1099 for the portion of the Settlement Payment attributable to alleged interest and penalties if required by law. Settlement Class Members will be responsible for correctly characterizing the Individual Settlement Payment for tax purposes and paying taxes due, if any.

Your total estimated Eligible Workweeks is [REDACTED]. Based on that, your anticipated approximate Individual Settlement Payment is [REDACTED].

8. How will the PAGA Payment be allocated to the LWDA and PAGA Members?

The Parties will ask the Court to approve the \$350,000 PAGA Payment in settlement of claims for civil penalties under PAGA. As required under PAGA, 75% of the PAGA Payment, or \$262,500.00, will be paid to the California Labor and Workforce Development Agency. The remaining 25% of the PAGA Payment, or \$87,500.00, will be distributed to the PAGA Members as Individual PAGA Payments.

Not all Class Members are PAGA Members entitled to an Individual PAGA Payment. If you are a PAGA Member, you are entitled to receive an Individual PAGA Payment; no claim form is required. Because PAGA Members cannot opt out of the PAGA settlement, if you are a PAGA Member and you opt out of the class settlement, you will still receive an Individual PAGA Payment and be bound by the PAGA settlement.

Each PAGA Member's Individual PAGA Payment will be a pro rata share of the 25% of the PAGA Payment to be distributed to PAGA Members. It will be based on the number of pay periods that each PAGA Member performed work as a non-exempt employee while employed by General Atomics during the PAGA Period (July 11, 2020, through January 16, 2023) ("Eligible Pay Periods") as a proportion of all Eligible Pay Periods for all PAGA Members. For tax purposes, 100% of the Individual PAGA Payments will be allocated as penalties for which an IRS Form 1099 will be issued, if required by law.

Your total estimated Eligible Pay Periods is [REDACTED]. Based on that, your anticipated approximate Individual PAGA Payment is [REDACTED].

HOW TO GET A PAYMENT

9. How can I get a settlement payment?

If you do nothing, you will automatically receive your Individual Settlement Payment and Individual PAGA Payment (if any) approximately 45 days after the Court approves the Settlement at a Final Approval Hearing. You must notify the Settlement Administrator of any change in your name, mailing address and/or telephone number if the information shown on this Notice is not correct. **It is your responsibility to keep the**

Settlement Administrator informed of any change in your address. Settlement payments will be mailed to the last known address the Settlement Administrator has on file for you. You can contact the Settlement Administrator by U.S. Mail, email or phone at [REDACTED] if you need to update contact information.

10. What do I do if I believe my Eligible Workweeks or Eligible Pay Periods are incorrect?

If you believe the Eligible Workweeks and Eligible Pay Periods above are not correct, you may send a letter to the Settlement Administrator indicating what you believe to be the correct information. Your letter must be postmarked on or before [REDACTED], 2023. [45 days within mailing of Notice/ Note: if the original mailing of this Notice to you was returned to the Settlement Administrator as undeliverable, then the 45-day period for your response will run from the date of re-mailing the Notice to you.] You should include any documents or other information which supports what you believe support that you worked a different number of Eligible Workweeks or Eligible Pay Periods. The Settlement Administrator will resolve any dispute regarding these issues based on General Atomics' records and any information you provide.

11. When can I expect to receive a settlement check?

Individual Settlement Payments and Individual PAGA Payments will be mailed to Settlement Class Members and PAGA Members approximately 45 days after the Court grants final approval of the Settlement.

Settlement checks should be cashed promptly upon receipt. Proceeds of checks which remain uncashed after 180 days from the date of issuance will be forwarded to the State of California Unclaimed Property Fund in the name of each Settlement Class Member and/or PAGA Member who did not cash his or her settlement check. If your settlement check is lost or misplaced, you should contact the Settlement Administrator immediately to request a replacement.

WHAT HAPPENS IF THE COURT APPROVES THE SETTLEMENT

12. What am I giving up to get an Individual Settlement Payment?

If the Court approves this Settlement and unless you exclude yourself, you will become a Settlement Class Member, and that means that you cannot sue, continue to sue, or be part of any other lawsuit against General Atomics concerning the legal claims being resolved in this Settlement. Specifically, you will be giving up or "releasing" the claims described below:

Release of Claims: Upon Final Approval, the Settlement Class Members, shall be deemed to have fully, finally, and forever released General Atomics and all affiliated parties and entities (including past and present affiliates, parents, subsidiaries (including, but not limited to, General Atomics Aeronautical Systems, Inc., Diazyme Laboratories, Inc. and General Atomics Systems Integration, LLC), predecessors, related entities, owners, members, successors, shareholders, divisions, and each of these entities' past and present directors, officers, employees, partners, shareholders, members and representatives) ("General Atomics Releasees"), from all claims, rights, demands, liabilities, and causes of action for (a) unpaid overtime premiums under Labor Code §§ 510 and 1198; (b) unpaid meal period premiums under Labor Code §§ 226.7 and 512(a) and the applicable California Industrial Welfare Commission Wage Order; (c) unpaid rest period premiums under Labor Code § 226.7 and the applicable California Industrial Welfare Commission Wage Order; (d) unpaid minimum wages under Labor Code §§ 1194 and 1197; (e) failure to timely pay final wages under Labor Code §§ 201, 202, and 203; (f) failure to maintain and provide accurate itemized wage statements under Labor Code §§ 226, 226.2, and 226.3; (g) failure to reimburse business expenses under Labor Code §§ 2800 and 2802; (h) failure to provide paid sick leave under Labor Code § 246; (i) all claims for the alleged violation of California Business & Professions Code §§ 17200, *et seq.*, based upon the alleged failure to pay overtime premiums, provide compliant meal and rest breaks, failure to provide accurate and itemized wage

statements, failure to pay all wages, failure to timely pay wages, and/or failure to reimburse business expenses; and (j) all claims for interest, penalties, attorneys' fees, costs and any other monetary relief based upon the claims described above and including, but not limited to, pursuant to Labor Code §§210, 218.5, 218.6, Code of Civil Procedure §1021.5, and/or Civil Code §§ 3287(b) and 3289, costs, attorneys' fees, injunctive relief, declaratory relief, or accounting that are based on or related to the alleged Labor Code and Business & Professions Code violations referenced in sub-sections (a) through (i) above, that accrued or accrue through the Class Period (the "Released Class Claims").

13. What PAGA Claims are released by this Settlement?

If the Court approves this Settlement, then Plaintiffs, as representatives of the State of California and on behalf of the LWDA and the PAGA Members, will fully and finally release the General Atomics Releasees from all claims for civil penalties under PAGA asserted in the PAGA Action, asserted in any PAGA letters sent by Plaintiff Athey to the LWDA, and all claims that could have been reasonably alleged in the Action and the PAGA Action arising from the same alleged facts alleged in the Operative Complaint and/or the PAGA Action and ascertained in the course of the Action and PAGA Action, during the PAGA Period including for (a) failure to pay minimum and overtime wages under Labor Code §§ 510, 1194, 1197, and 1198; (b) failure to provide paid sick leave under Labor Code § 246; (c) failure to provide meal periods and rest breaks and pay any associated premiums due under Labor Code §§ 226.7 and 512 [and the applicable California Industrial Welfare Commission Wage Order](#); (d) failure to timely pay wages during employment under Labor Code §§ 204 and 210; (e) failure to timely pay wages upon termination under Labor Code §§ 201-203; (f) failure to provide complete and accurate wage statements under Labor Code §§ 226, 226.3, and 1174; (g) failure to keep complete and accurate payroll records under Labor Code § 1174; and (h) failure to reimburse all necessary business expenses under Labor Code §§ 2800 and 2802 (the "Released PAGA Claims").

EXCLUDING YOURSELF FROM THE CLASS SETTLEMENT

14. How do I opt out of the class settlement?

If you wish to pursue your own separate lawsuit against General Atomics and/or GA-ASI for the claims asserted in the Lawsuit, or if you otherwise wish not to participate in the class settlement for whatever reason, you should exclude yourself from this case (that is, opt out of the class portion Settlement). However, you cannot opt out of the PAGA portion of the settlement. Class Members who opt out of this Settlement and who are also PAGA Members will still be bound by the PAGA portion of the Settlement and will receive an Individual PAGA Payment.

To opt out of the class portion of the Settlement and the Released Class Claims, you must provide a signed and dated letter to the Settlement Administrator requesting to be excluded. The letter must state in substance:

"I want to opt out of the class action settlement in the lawsuit entitled *Melissa Weisman, et al. v. General Atomics, et al.*, Case No. 37-2021-00000331-CU-OE-CTL filed in the Superior Court of California, County of San Diego."

The opt out request letter must include the case name, case number, your full name, current address, and last four digits of your social security number, must be signed by you, and must be postmarked and mailed to the Settlement Administrator at the following address (or in the enclosed envelope) on or before [REDACTED], 2023. [45 days within mailing of Notice] [Note: if the original mailing of this Notice to you was returned to the Settlement Administrator as undeliverable, then the 45-day period for you to opt out will run from the date of re-mailing the Notice to you.](#) Requests to opt out postmarked after the deadline will be invalid.

Melissa Weisman, et al. v. General Atomics, et al.
Settlement Administrator
c/o CPT Group, Inc.
P. O. Box _____
_____, _____

15. If I don't exclude myself from the class settlement, can I sue General Atomics for the same thing later?

No. Unless you exclude yourself, you give up any right to sue the General Atomics Releasees for the claims being released by this Settlement, the Released Class Claims. If you have a claim or lawsuit already filed against General Atomics or any of the General Atomics Releasees, you should speak to your lawyer in that case immediately. You may need to exclude yourself from this Settlement to continue your own lawsuit. You cannot exclude yourself from the PAGA portion of the Settlement.

OBJECTING TO THE SETTLEMENT

16. How do I tell the Court that I don't like the Settlement?

If you don't think the Settlement is fair, you can object to some or all of the Settlement. You can either object to the Settlement in person at the Final Approval Hearing or you can submit a written objection. Written objections and notices of intent to appear at the Final Approval Hearing must be mailed to the Settlement Administrator and postmarked on or before _____, 2023, [\[45 days within mailing of Notice\]](#) at the following address:

Melissa Weisman, et al. v. General Atomics, et al.
Settlement Administrator
c/o CPT Group, Inc.
P. O. Box _____
_____, _____

[Note: if the original mailing of this Notice to you was returned to the Settlement Administrator as undeliverable, then the 45-day period for you to opt out will run from the date of re-mailing the Notice to you.](#)
The written objection should state your name, address and describe all legal and factual reasons that you object to the terms of the settlement. You should also include or attach any documents upon which your objection is based.

THE COURT'S FINAL APPROVAL HEARING

17. When and where will the Court decide whether to grant final approve the settlement?

The Court will hold a Final Approval hearing in Department 6-69 of the Superior Court of California, County of San Diego, Hall of Justice located at 330 West Broadway, San Diego, California 92101 on _____ 2023, at _____ p.m. At this hearing the Court will determine whether the Settlement should be finally approved as fair, reasonable, and adequate. The Court will also be asked to approve Class Counsel's request for attorneys' fees and costs, the Class Representatives' service payment, and the Settlement Administrator's fees and expenses.

The Court may reschedule the Final Approval hearing without further notice to Class Members. However, any Class Member who has filed a Notice of Intention to Appear at the Final Fairness hearing will be notified by Class Counsel of any rescheduling of the date and time of the Final Fairness hearing.

18. Do I have to come to the hearing?

No. Class Counsel will answer any questions the Judge may have. But you are welcome to come at your own expense. If you timely submit a written objection, you don't have to come to Court to talk about it. You may also hire and pay your own lawyer to attend if you so desire.

GETTING MORE INFORMATION

19. Whom may I contact if I have questions about the settlement?

You may contact Class Counsel at the contact information listed above in Paragraph 5 if you have any questions about the Settlement. You may also contact the court-appointed Settlement Administrator, CPT Group, Inc., by calling toll free 1-800 [REDACTED], or you can write to *Melissa Weisman, et al. v. General Atomics, et al.*, Class Action Settlement Administrator at [address].

PLEASE DO NOT CONTACT THE CLERK OF THE COURT, THE JUDGE, OR ANY MANAGERS, SUPERVISORS, OR ATTORNEYS OF GENERAL ATOMICS, GA-ASI, DIAZYME, OR SI FOR INFORMATION.

EXHIBIT 2

*A court has authorized this notice. This is not a solicitation.
This is not a lawsuit against you and you are not being sued.
Your legal rights are affected whether you act or do not act.*

NOTICE OF CLASS ACTION AND PAGA REPRESENTATIVE SETTLEMENT

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EXCLUDE YOURSELF FROM THE CLASS SETTLEMENT	If you do not want to participate in the class settlement, you may exclude yourself of the class portion of the settlement (referred to as “opting out”). If you exclude yourself from the class settlement, you will not receive any payment from the Settlement Pool (defined below). This is the only option that would allow you the ability to pursue your own potential claims in a separate lawsuit against General Atomics relating to the claims being resolved by this Settlement. If you are a California Private Attorneys’ General Act (“PAGA”) Member (defined below), however, even if you exclude yourself from the class settlement, you still will receive a payment related to the settlement of PAGA claims and will be bound by the release of PAGA claims.
OBJECT TO THE CLASS SETTLEMENT	You may write to the Court to assert any contention that the settlement is not fair, adequate or reasonable.
GO TO THE HEARING BEFORE THE COURT	You may ask to address the Court at the hearing regarding whether the settlement is fair, adequate and reasonable.

- **YOUR RIGHTS AND OPTIONS – AND THE DEADLINES TO EXERCISE THEM – ARE EXPLAINED IN GREATER DETAIL BELOW.**
- **GENERAL ATOMICS, GA-ASI, DIAZYME AND SI WILL NOT RETALIATE IN ANY MANNER AGAINST YOU FOR PARTICIPATING OR CHOOSING NOT TO PARTICIPATE IN THIS SETTLEMENT.**

BACKGROUND REGARDING THE LAWSUIT

1. Why did I receive this notice?

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The Court responsible for approving the settlement is the Superior Court of the State of California, County of San Diego, and the case is known as *Melissa Weisman, et al. v. General Atomics, et al.*, Case No. 37-2021-00000331-CU-OE-CTL ("Action"). There was a hearing on [REDACTED], 2023 in the Court at which time the Court preliminarily approved the Settlement and directed that you receive this notice. The Court will hold a Final Approval Hearing concerning the Settlement on [REDACTED], 2023 at [REDACTED], in Department C-69 of the San Diego County Superior Court, Hall of Justice located at 330 West Broadway, San Diego, California 92101. The Final Approval Hearing may be continued to another date without further notice.

2. What is this Class and PAGA Lawsuit about?

Plaintiff Melissa Weisman filed her putative class action complaint against General Atomics and GA-ASI on January 5, 2021, alleging claims against General Atomics and GA-ASI for (1) failure to pay minimum and overtime wages under Labor Code §§ 510, 1194, 1197, and 1198; (2) failure to provide meal periods and rest breaks and pay any associated premiums due under Labor Code §§ 226.7 and 512; (3) failure to timely pay wages during employment under Labor Code §§ 204 and 210; (4) failure to timely pay wages upon termination under Labor Code §§ 201-203; (5) failure to provide complete and accurate wage statements under Labor Code §§ 226, 226.3, and 1174; (6) failure to reimburse all necessary business expenses under Labor Code §§ 2800 and 2802; and (7) unfair business practices under Business and Profession Code section 17200, *et seq.*

Plaintiff Scott Athey filed a representative action complaint against General Atomics and GA-ASI on May 27, 2022, alleging a single cause of action for civil penalties under PAGA for (1) failure to pay minimum and overtime wages under Labor Code §§ 510, 1194, 1197, and 1198; (2) failure to provide paid sick leave under Labor Code § 246; (3) failure to provide meal periods and rest breaks and pay any associated premiums due under Labor Code §§ 226.7 and 512; (4) failure to timely pay wages during employment under Labor Code §§ 204 and 210; (5) failure to timely pay wages upon termination under Labor Code §§ 201-203; (6) failure to provide complete and accurate wage statements under Labor Code §§ 226, 226.3, and 1174; (7) failure to keep complete and accurate payroll records under Labor Code § 1174; and (8) failure to reimburse all necessary business expenses under Labor Code §§ 2800 and 2802 (the "PAGA Action").

On [REDACTED], 2023, Plaintiffs filed an amended complaint in the Action, alleging claims for (1) failure to pay minimum and overtime wages under Labor Code §§ 510, 1194, 1197, and 1198; (2) failure to provide meal periods and rest breaks and pay any associated premiums due under Labor Code §§ 226.7 and 512; (3) failure to timely pay wages during employment under Labor Code §§ 204 and 210; (4) failure to timely pay wages upon termination under Labor Code §§ 201-203; (5) failure to provide complete and accurate wage statements under Labor Code §§ 226, 226.3, and 1174; (6) failure to reimburse all necessary business expenses under Labor Code §§ 2800 and 2802; (7) unfair business practices under Business and Profession Code section 17200, *et seq.*; (8) failure to provide paid sick leave under Labor Code § 246; and (9) penalties under PAGA, California Labor Code §§2698, *et seq.*, based upon alleged Labor Code violations described above.

General Atomics and GA-ASI deny all allegations in the Lawsuit and contend that they have fully complied with the California Labor Code. The settlement is not an admission of any wrongdoing by General Atomics, GA-ASI, Diazyme or SI or an indication that any law₁₆ was violated or that this case was suitable for class or

representative treatment. As a result of arms-length negotiations at a mediation on November 16, 2022, with an experienced wage and hour mediator, Jeffrey A. Ross, Esq., the Parties reached a class action and PAGA representative action settlement that is subject to Court approval.

3. Why is there a settlement?

The Court has not decided in favor of Plaintiffs Melissa Weisman or Scott Athey, or in favor of General Atomics and GA-ASI, nor has the Court made any decision as to whether this case could proceed on a class or representative basis. There was no trial. Instead, both sides agreed to a no-fault settlement of the Lawsuit.

4. Who are the Parties in this Lawsuit?

Plaintiffs Melissa Weisman and Scott Athey were employed by General Atomics in California and performed work for GA-ASI.

Defendants are General Atomics and GA-ASI.

5. Who are the Attorneys for the Parties?

Counsel for Plaintiffs and the Class

JUSTICE LAW CORPORATION
Douglas Han
Shunt Tatavos-Gharajeh
Lizette Rodriguez
751 N. Fair Oaks Avenue, Suite 101
Pasadena, CA 91103
Telephone: (818) 230-7502

Counsel for General Atomics and GA-ASI

MORGAN, LEWIS & BOCKIUS LLP
Eric Meckley
Andrew Frederick
One Market, Spear Street Tower
San Francisco, CA 94105-1596
Telephone: (415) 442-1000

THE TERMS OF THE SETTLEMENT

6. What is the Settlement Amount?

The proposed Settlement provides for a maximum payment of \$7,500,000.00 (referred to as the “Maximum Settlement Amount”). From the Maximum Settlement Amount, Class Counsel will apply to the Court for attorneys’ fees of \$2,500,000.00 and \$25,000.00 in costs; a Class Representative service payment of \$10,000.00 to Ms. Melissa Weisman and \$10,000.00 to Mr. Scott Athey for their work and efforts prosecuting this case, for undertaking the risks of payment of costs (in the event of an unsuccessful outcome of this Lawsuit); a \$350,000 payment to the California Labor Workforce Development Agency (“LWDA”) and to the PAGA Members as settlement for claims for civil penalties under PAGA (the “PAGA Payment”); and settlement administration expenses to CPT Group, Inc., estimated at \$50,500.00. The exact amount of the attorneys’ fees, litigation costs, class representative service payment, and settlement administration expenses will be determined by the Court at the Final Approval hearing. The remaining portion of the Maximum Settlement Amount, the “Settlement Pool,” is currently estimated to be approximately \$4,554,500.00. The Settlement Pool will be apportioned and paid out as Individual Settlement Payments to the Settlement Class Members, who are the Class Members who do not request to be excluded (“opt out”) of the settlement.

7. How will the Individual Settlement Payments to Settlement Class Members be calculated?

Settlement Class Members will receive Individual Settlement Payments from the Settlement Pool. **A claim form is not required.** Class Members who opt out of the class settlement will not receive an Individual Settlement Payment and will not be bound by the class portion of this Settlement.

Each Settlement Class Member's Individual Settlement Payment will be a pro rata share of the Settlement Pool based on the number of workweeks that each Class Member performed work as a non-exempt employee while employed by General Atomics during the Class Period (July 11, 2016, through January 16, 2023) ("Eligible Workweeks") as a proportion of all Eligible Workweeks for all Settlement Class Members.

All Individual Settlement Payments to Settlement Class Members shall be allocated as follows for tax purposes: 70% of each Individual Settlement Payment reflects a compromise of a claim for alleged unpaid wages; 30% of each Individual Settlement Payment reflects compromise of a claim for alleged interest and penalties. The portion of the Individual Settlement Payment attributable to unpaid wages will be subject to regular and/or applicable payroll and income tax withholdings and will be reported on an IRS Form W-2. Settlement Class Members will receive an IRS Form 1099 for the portion of the Settlement Payment attributable to alleged interest and penalties if required by law. Settlement Class Members will be responsible for correctly characterizing the Individual Settlement Payment for tax purposes and paying taxes due, if any.

Your total estimated Eligible Workweeks is [REDACTED]. Based on that, your anticipated approximate Individual Settlement Payment is [REDACTED].

8. How will the PAGA Payment be allocated to the LWDA and PAGA Members?

The Parties will ask the Court to approve the \$350,000 PAGA Payment in settlement of claims for civil penalties under PAGA. As required under PAGA, 75% of the PAGA Payment, or \$262,500.00, will be paid to the California Labor and Workforce Development Agency. The remaining 25% of the PAGA Payment, or \$87,500.00, will be distributed to the PAGA Members as Individual PAGA Payments.

Not all Class Members are PAGA Members entitled to an Individual PAGA Payment. If you are a PAGA Member, you are entitled to receive an Individual PAGA Payment; no claim form is required. Because PAGA Members cannot opt out of the PAGA settlement, if you are a PAGA Member and you opt out of the class settlement, you will still receive an Individual PAGA Payment and be bound by the PAGA settlement.

Each PAGA Member's Individual PAGA Payment will be a pro rata share of the 25% of the PAGA Payment to be distributed to PAGA Members. It will be based on the number of pay periods that each PAGA Member performed work as a non-exempt employee while employed by General Atomics during the PAGA Period (July 11, 2020, through January 16, 2023) ("Eligible Pay Periods") as a proportion of all Eligible Pay Periods for all PAGA Members. For tax purposes, 100% of the Individual PAGA Payments will be allocated as penalties for which an IRS Form 1099 will be issued, if required by law.

Your total estimated Eligible Pay Periods is [REDACTED]. Based on that, your anticipated approximate Individual PAGA Payment is [REDACTED].

HOW TO GET A PAYMENT

9. How can I get a settlement payment?

If you do nothing, you will automatically receive your Individual Settlement Payment and Individual PAGA Payment (if any) approximately 45 days after the Court approves the Settlement at a Final Approval Hearing. You must notify the Settlement Administrator of any change in your name, mailing address and/or telephone number if the information shown on this Notice is not correct. **It is your responsibility to keep the**

Settlement Administrator informed of any change in your address. Settlement payments will be mailed to the last known address the Settlement Administrator has on file for you. You can contact the Settlement Administrator by U.S. Mail, email or phone at [REDACTED] if you need to update contact information.

10. What do I do if I believe my Eligible Workweeks or Eligible Pay Periods are incorrect?

If you believe the Eligible Workweeks and Eligible Pay Periods above are not correct, you may send a letter to the Settlement Administrator indicating what you believe to be the correct information. Your letter must be postmarked on or before [REDACTED], 2023. *[45 days within mailing of Notice]* Note: if the original mailing of this Notice to you was returned to the Settlement Administrator as undeliverable, then the 45-day period for your response will run from the date of re-mailing the Notice to you. You should include any documents or other information which supports what you believe support that you worked a different number of Eligible Workweeks or Eligible Pay Periods. The Settlement Administrator will resolve any dispute regarding these issues based on General Atomics' records and any information you provide.

11. When can I expect to receive a settlement check?

Individual Settlement Payments and Individual PAGA Payments will be mailed to Settlement Class Members and PAGA Members approximately 45 days after the Court grants final approval of the Settlement.

Settlement checks should be cashed promptly upon receipt. Proceeds of checks which remain uncashed after 180 days from the date of issuance will be forwarded to the State of California Unclaimed Property Fund in the name of each Settlement Class Member and/or PAGA Member who did not cash his or her settlement check. If your settlement check is lost or misplaced, you should contact the Settlement Administrator immediately to request a replacement.

WHAT HAPPENS IF THE COURT APPROVES THE SETTLEMENT

12. What am I giving up to get an Individual Settlement Payment?

If the Court approves this Settlement and unless you exclude yourself, you will become a Settlement Class Member, and that means that you cannot sue, continue to sue, or be part of any other lawsuit against General Atomics concerning the legal claims being resolved in this Settlement. Specifically, you will be giving up or "releasing" the claims described below:

Release of Claims: Upon Final Approval, the Settlement Class Members, shall be deemed to have fully, finally, and forever released General Atomics and all affiliated parties and entities (including past and present affiliates, parents, subsidiaries (including, but not limited to, General Atomics Aeronautical Systems, Inc., Diazyme Laboratories, Inc. and General Atomics Systems Integration, LLC), predecessors, related entities, owners, members, successors, shareholders, divisions, and each of these entities' past and present directors, officers, employees, partners, shareholders, members and representatives) ("General Atomics Releasees"), from all claims, rights, demands, liabilities, and causes of action for (a) unpaid overtime premiums under Labor Code §§ 510 and 1198; (b) unpaid meal period premiums under Labor Code §§ 226.7 and 512(a) and the applicable California Industrial Welfare Commission Wage Order; (c) unpaid rest period premiums under Labor Code § 226.7 and the applicable California Industrial Welfare Commission Wage Order; (d) unpaid minimum wages under Labor Code §§ 1194 and 1197; (e) failure to timely pay final wages under Labor Code §§ 201, 202, and 203; (f) failure to maintain and provide accurate itemized wage statements under Labor Code §§ 226, 226.2, and 226.3; (g) failure to reimburse business expenses under Labor Code §§ 2800 and 2802; (h) failure to provide paid sick leave under Labor Code § 246; (i) all claims for the alleged violation of California Business & Professions Code §§ 17200, *et seq.*, based upon the alleged failure to pay overtime premiums, provide compliant meal and rest breaks, failure to provide accurate and itemized wage

statements, failure to pay all wages, failure to timely pay wages, and/or failure to reimburse business expenses; and (j) all claims for interest, penalties, attorneys' fees, costs and any other monetary relief based upon the claims described above and including, but not limited to, pursuant to Labor Code §§210, 218.5, 218.6, Code of Civil Procedure §1021.5, and/or Civil Code §§ 3287(b) and 3289, costs, attorneys' fees, injunctive relief, declaratory relief, or accounting that are based on or related to the alleged Labor Code and Business & Professions Code violations referenced in sub-sections (a) through (i) above, that accrued or accrue through the Class Period (the "Released Class Claims").

13. What PAGA Claims are released by this Settlement?

If the Court approves this Settlement, then Plaintiffs, as representatives of the State of California and on behalf of the LWDA and the PAGA Members, will fully and finally release the General Atomics Releasees from all claims for civil penalties under PAGA asserted in the PAGA Action, asserted in any PAGA letters sent by Plaintiff Athey to the LWDA, and all claims that could have been reasonably alleged in the Action and the PAGA Action arising from the same alleged facts alleged in the Operative Complaint and/or the PAGA Action and ascertained in the course of the Action and PAGA Action, during the PAGA Period including for (a) failure to pay minimum and overtime wages under Labor Code §§ 510, 1194, 1197, and 1198; (b) failure to provide paid sick leave under Labor Code § 246; (c) failure to provide meal periods and rest breaks and pay any associated premiums due under Labor Code §§ 226.7 and 512 and the applicable California Industrial Welfare Commission Wage Order; (d) failure to timely pay wages during employment under Labor Code §§ 204 and 210; (e) failure to timely pay wages upon termination under Labor Code §§ 201-203; (f) failure to provide complete and accurate wage statements under Labor Code §§ 226, 226.3, and 1174; (g) failure to keep complete and accurate payroll records under Labor Code § 1174; and (h) failure to reimburse all necessary business expenses under Labor Code §§ 2800 and 2802 (the "Released PAGA Claims").

EXCLUDING YOURSELF FROM THE CLASS SETTLEMENT

14. How do I opt out of the class settlement?

If you wish to pursue your own separate lawsuit against General Atomics and/or GA-ASI for the claims asserted in the Lawsuit, or if you otherwise wish not to participate in the class settlement for whatever reason, you should exclude yourself from this case (that is, opt out of the class portion Settlement). However, you cannot opt out of the PAGA portion of the settlement. Class Members who opt out of this Settlement and who are also PAGA Members will still be bound by the PAGA portion of the Settlement and will receive an Individual PAGA Payment.

To opt out of the class portion of the Settlement and the Released Class Claims, you must provide a signed and dated letter to the Settlement Administrator requesting to be excluded. The letter must state in substance:

"I want to opt out of the class action settlement in the lawsuit entitled *Melissa Weisman, et al. v. General Atomics, et al.*, Case No. 37-2021-00000331-CU-OE-CTL filed in the Superior Court of California, County of San Diego."

The opt out request letter must include the case name, case number, your full name, current address, and last four digits of your social security number, must be signed by you, and must be postmarked and mailed to the Settlement Administrator at the following address (or in the enclosed envelope) on or before [REDACTED], 2023. [45 days within mailing of Notice] Note: if the original mailing of this Notice to you was returned to the Settlement Administrator as undeliverable, then the 45-day period for you to opt out will run from the date of re-mailing the Notice to you. Requests to opt out postmarked after the deadline will be invalid.

Melissa Weisman, et al. v. General Atomics, et al.
Settlement Administrator
c/o CPT Group, Inc.
P. O. Box _____
_____, _____

15. If I don't exclude myself from the class settlement, can I sue General Atomics for the same thing later?

No. Unless you exclude yourself, you give up any right to sue the General Atomics Releasees for the claims being released by this Settlement, the Released Class Claims. If you have a claim or lawsuit already filed against General Atomics or any of the General Atomics Releasees, you should speak to your lawyer in that case immediately. You may need to exclude yourself from this Settlement to continue your own lawsuit. You cannot exclude yourself from the PAGA portion of the Settlement.

OBJECTING TO THE SETTLEMENT

16. How do I tell the Court that I don't like the Settlement?

If you don't think the Settlement is fair, you can object to some or all of the Settlement. You can either object to the Settlement in person at the Final Approval Hearing or you can submit a written objection. Written objections and notices of intent to appear at the Final Approval Hearing must be mailed to the Settlement Administrator and postmarked on or before _____, 2023, [45 days within mailing of Notice] at the following address:

Melissa Weisman, et al. v. General Atomics, et al.
Settlement Administrator
c/o CPT Group, Inc.
P. O. Box _____
_____, _____

Note: if the original mailing of this Notice to you was returned to the Settlement Administrator as undeliverable, then the 45-day period for you to opt out will run from the date of re-mailing the Notice to you. The written objection should state your name, address and describe all legal and factual reasons that you object to the terms of the settlement. You should also include or attach any documents upon which your objection is based.

THE COURT'S FINAL APPROVAL HEARING

17. When and where will the Court decide whether to grant final approve the settlement?

The Court will hold a Final Approval hearing in Department 6-69 of the Superior Court of California, County of San Diego, Hall of Justice located at 330 West Broadway, San Diego, California 92101 on _____ 2023, at _____ p.m. At this hearing the Court will determine whether the Settlement should be finally approved as fair, reasonable, and adequate. The Court will also be asked to approve Class Counsel's request for attorneys' fees and costs, the Class Representatives' service payment, and the Settlement Administrator's fees and expenses.

The Court may reschedule the Final Approval hearing without further notice to Class Members. However, any Class Member who has filed a Notice of Intention to Appear at the Final Fairness hearing will be notified by Class Counsel of any rescheduling of the date and time of the Final Fairness hearing.

18. Do I have to come to the hearing?

No. Class Counsel will answer any questions the Judge may have. But you are welcome to come at your own expense. If you timely submit a written objection, you don't have to come to Court to talk about it. You may also hire and pay your own lawyer to attend if you so desire.

GETTING MORE INFORMATION

19. Whom may I contact if I have questions about the settlement?

You may contact Class Counsel at the contact information listed above in Paragraph 5 if you have any questions about the Settlement. You may also contact the court-appointed Settlement Administrator, CPT Group, Inc., by calling toll free 1-800 [REDACTED], or you can write to *Melissa Weisman, et al. v. General Atomics, et al.*, Class Action Settlement Administrator at [address].

PLEASE DO NOT CONTACT THE CLERK OF THE COURT, THE JUDGE, OR ANY MANAGERS, SUPERVISORS, OR ATTORNEYS OF GENERAL ATOMICS, GA-ASI, DIAZYME, OR SI FOR INFORMATION.

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PROOF OF SERVICE
1013A(3) CCP

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 751 N. Fair Oaks Ave., Ste. 101 Pasadena, California 91103. My electronic service address is manderson@justicelawcorp.com

On February 27, 2023, I served the foregoing document described as

PARTIES' JOINT SUBMISSION FOR CONTINUED HEARING ON MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT

for the following case: **Weisman, et al. v. General Atomics, et al.**
LWDA/Court Case No.: **LWDA Case No.: CM-869101-22**
 Court Case No.: 37-2021-00000331-CU-OE-CTL
 San Diego County Superior Court

on interested parties in this action by electronically submitting as follows:

State of California
Labor & Workforce Development Agency
800 Capitol Mall, MIC-55
Sacramento, California 95814

[X] BY ELECTRONIC SUBMISSION

Pursuant to California Senate Bill No. 836, I caused the documents described above to be electronically submitted by and through the procedure stated on the website of the State of California Labor and Workforce Development Agency.

[X] STATE

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on February 27, 2023, at Pasadena, California.



Mariah Anderson