NOTICE OF SETTLEMENT OF PAGA REPRESENTATIVE ACTION

Alex Rad v. 4 Over, LLC., et al.
Superior Court of the State of California, County of Los Angeles Case No. 23STCV07319

[Aggrieved Employee] [Address]
[Address]

You are receiving this notice in connection with a Court-approved settlement (the "Settlement") in the lawsuit entitled *Alex Rad v. 4 Over, LLC., et al.*, filed in Superior Court of the State of California for the County of Los Angeles, Case No. 23STCV07319 (the "Action"), brought on a representative basis under the Labor Code Private Attorneys' General Act of 2004 codified at California Labor Code section 2698, *et seq*. ("PAGA"). The plaintiff in the lawsuit is Alex Rad ("Plaintiff") and the defendant is 4 Over, LLC ("Defendant"). The Settlement provides for recovery of civil penalties for alleged violations of the California Labor Code on behalf of all Aggrieved Employees, defined as all persons currently or formerly employed by 4 Over, LLC., either directly or through any subsidiary, staffing agency, or professional employer organization, as non-exempt, hourly-paid employees during the period between December 27, 2021, through June 27, 2025 ("PAGA Period") in the State of California. The PAGA statute provides that 75% of any recovery pursuant to the Settlement be paid to the State of California and 25% of any recovery be paid to the PAGA Members.

Defendant denies all claims and allegations in the Action, denies that it owes any penalties and asserts that it has fully complied with all applicable Labor Code provisions. Nevertheless, to avoid further costs and time in defending the Action, Defendant has settled the Action. By settling the lawsuit, Defendant is not admitting that they have done anything wrong.

Effective on the date when Defendant fully funds the entire Gross Settlement Amount, Plaintiff and all Aggrieved Employees are deemed to release, on behalf of themselves and their respective former and present representatives, agents, attorneys, heirs, administrators, successors, and assigns, Released Parties from all claims, rights, demands, liabilities and causes of action that arose during the PAGA Period for civil penalties under PAGA that were alleged, or reasonably could have been alleged, based on the facts stated in the Operative Complaint and the PAGA Notice for PAGA civil penalties, including, but not limited to, pursuant to Labor Code sections 210, 226.3, 558, 1174.5, 1197.1 and 2699, in connection with alleged violations of Labor Code sections 201, 202, 203, 204, 226, 226.3, 226.7, 246, et seq., 432, 510, 512, 558, 1174, 1194, 1194.2, 1197, 1197.1, 1198.5, 2699 and 2810.5, among others.

"Released Parties" means Defendant and each of their former and present directors, officers, shareholders, owners, members, attorneys, insurers, predecessors, successors, assigns, subsidiaries, and affiliates.

By an Order dated [Approval Date], the Superior Court of California approved the Settlement of the Released Claims. By approving the Settlement, the Court did not decide in favor of either Plaintiff or Defendant.

According to Defendant's records, you are an Aggrieved Employee and are therefore entitled to a share of the Settlement based upon the Court-approved allocation. Enclosed with this Notice is your settlement check for your share. The settlement check shall remain valid for one hundred eighty (180) days. Thereafter, the settlement check shall be canceled and funds associated with such checks shall be transmitted to the California Controller's Unclaimed Property Fund in the name of the Aggrieved Employee..

Defendant's record indicate that you worked [Eligible Workweeks] Workweeks as a non-exempt, hourly-paid employee in California during the PAGA Period. Based on these records, your estimated payment as a PAGA Member would be [$Estimated Award].

Please Note: One hundred percent (100%) of the payment you are receiving in connection with the Settlement will be considered penalties reported on IRS Form 1099, and may be subject to local, state or federal tax withholdings and will be reported to the IRS and state tax authorities. You should rely on your own tax advisors as to the tax consequences of your settlement payment. Neither Plaintiff nor Defendant have made any representations or warranties regarding the taxation of your settlement payment. Nothing in this Notice or any other communication shall constitute or be construed or relied upon as tax advice.

PLEASE DO NOT CALL OR WRITE THE COURT OR OFFICE OF THE CLERK TO ASK QUESTIONS ABOUT THE SETTLEMENT. IF YOU HAVE ANY QUESTIONS, YOU MAY CALL OR WRITE TO THE SETTLEMENT ADMINISTRATOR AT:

INSERT NAME OF ADMINISTRATOR
WEBSITE
Phone: