

EXHIBIT 2



United States District Court

*ANTONIO LOERA, JR. and CHARLOTTE DANIELS, on behalf
of themselves and all others similarly situated vs. COUNTY
OF ALAMEDA*

Case No. 3:23-cv-00792-LB

Notice of Class Settlement

Authorized by the U.S. District Court

**Did you work
unpaid time off-
the-clock time as
a Sheriff's Safety
Aide in and
around the
Oakland
International
Airport between
February 22,
2020, and
January 14,
2025?**

**There is a lawsuit
with a \$650,000
settlement
against Alameda
County.**

**You may be
entitled to
money, and your
rights could be
affected.**

**To know if you are
part of this
settlement and to
learn what comes
next, you should:**

Read this notice.

Important things to know:

- You are not being sued. This is not a solicitation from a lawyer. This Notice was authorized by U.S. District Court for the Northern District of California.
- If you take no action, you will be bound by the settlement, and your rights will be affected.
- You can learn more at: [[website](#)]

About this Notice

Why did I get this notice?

This is a court-authorized notice to inform you that you may be part of a lawsuit against Alameda County for violations of state and federal wage and hour law.

This lawsuit may affect your rights. Read this notice to learn more about the lawsuit and how to participate in it or opt out of it.

What do I do next?

Read this notice to understand the settlement and to determine if you are a class member. Then, decide which of these actions you want to take:

Options	What each option means:
Opt Out	Get no payment. This allows you to bring another lawsuit against Alameda County about the same issues.
Object	Tell the Court why you don't like the settlement.
Do Nothing	Get payment. Give up rights resolved by settlement.

Read on to understand the specifics of the settlement and what each choice would mean for you.

What are the most important dates?

Your deadline to object or opt out: **[date]**

Settlement approval hearing: **[date]**

Learning about the Lawsuit

What is this lawsuit about?

On February 22, 2023, the named plaintiffs, who worked as Sheriff's Safety Aides ("SSAs") at the Oakland International Airport, filed a lawsuit against Alameda County on behalf of themselves and all other individuals who worked as SSAs in and around the Oakland International Airport. SSAs are employees of Alameda County Sheriff's Office ("ACSO"), a department of Alameda County.

Plaintiffs allege that SSAs regularly worked time off-the-clock for the ACSO, before and after each scheduled shift, and that the ACSO discouraged SSAs from accurately reporting this compensable time.

This case seeks to recover unpaid overtime wages under the federal Fair Labor Standards Act ("FLSA") through a collective action and unpaid minimum wages under the California Labor Code based on SSAs' uncompensated off-the-clock work time through a class action.

Alameda County denies the allegations and says that these workers were properly paid under federal and state law.

The Court certified the collective action, and provisionally certified the class action for the purposes of settlement, but has made no decision yet about whether the workers' or the company's position in the lawsuit is correct.

Why is there a settlement in this lawsuit?

In March 2026, the parties signed a settlement agreement, which means they reached an agreement to resolve the lawsuit. Both sides want to avoid the cost and risk of continuing the case in court.

The Court has not decided this case in favor of either side.

Am I part of this lawsuit?

You may be part of this lawsuit if you are a "Class Member" or an "FLSA Class Member."

You are a "**Class Member**" if you were a Sheriff's Safety Aide who worked uncompensated time off-the-clock for the Alameda County Sheriff's Office in and around the Oakland International Airport at

What is a class action settlement?

A class action settlement is an agreement between the parties to resolve and end the case. Settlements can provide money to class members and changes to the practices that caused the harm.

any time during the “Class Period.”

You are an “**FLSA Class Member**” if you were a Sheriff’s Safety Aide who worked for the Alameda County Sheriff’s Office in and around the Oakland International Airport at any time during the “FLSA Class Period” and who timely submitted a signed Consent Form and Declaration.

The **Class Period** and the **FLSA Class Period** are both from February 22, 2020, through January 14, 2025.

Do I have a lawyer in this lawsuit?

In a class action, the court appoints class representatives and lawyers to work on the case and represent the interests of all the class members. For this case, the Court has appointed Rachel Terp of Terp Law P.C. and Sharon Vinick of Vinick Hyams LLP to represent the class. These are the lawyers who are bringing this case on your behalf.

What happens next in this lawsuit?

The Court will hold a Final Approval Hearing to decide whether to approve the proposed settlement. The hearing will be held at:

Where: Phillip Burton Federal Building | 450 Golden Gate Avenue | Courtroom B – 15th Floor | San Francisco, CA 94102

When: [date] 2026 at [time]

Note: The date may change without further notice to the Class Members. Check the settlement website or the Court’s PACER site to confirm the date has not changed.

The Court has directed the parties to send you this notice about the proposed settlement. Because the settlement of a class action decides the rights of all members of the proposed class, the Court must give final approval to the settlement before it can take effect. Payments will only be made if the Court approves the settlement.

You don’t have to attend the hearing, but you may do so at your own expense, if you do not request exclusion from the case. You may also ask the Court for permission to speak and express your opinion about the settlement. You may also enter an appearance through counsel, if you prefer.

If the Court does not approve the settlement or the parties decide to end it, it will not take effect and the lawsuit will continue.

Learning About the Settlement

What does the settlement provide?

Alameda County has agreed to pay \$650,000 into a settlement fund. This money will be divided among the Class Members and FLSA Class Members and after lawyer fees and costs, and service awards approved by the Court are allotted. Class Members will “release” their claims as part of the settlement, which means they cannot sue Alameda County for the same issues and legal violations raised in this lawsuit.

The settlement provides service awards of up to \$15,000 to each Plaintiff who brought this lawsuit, Antonio Loera and Charlotte Daniels, to compensate them for their work on the case. These payments are called "Class Representative Service Awards."

If there is money left over after the claims and expenses are paid, it will be donated to the East Bay Community Law Center. <https://ebclc.org/>

How much will my payment be?

Your payment amount will depend on the following factors:

- The number of Class Members who do not exclude themselves.
- Your dates of employment.
- Your number of weeks worked.
- The amount of the lawyer fees, costs, and service payments approved by the Court.

Your estimated payment amount appears on the Employment Information Sheet included with this notice

Deciding What to Do

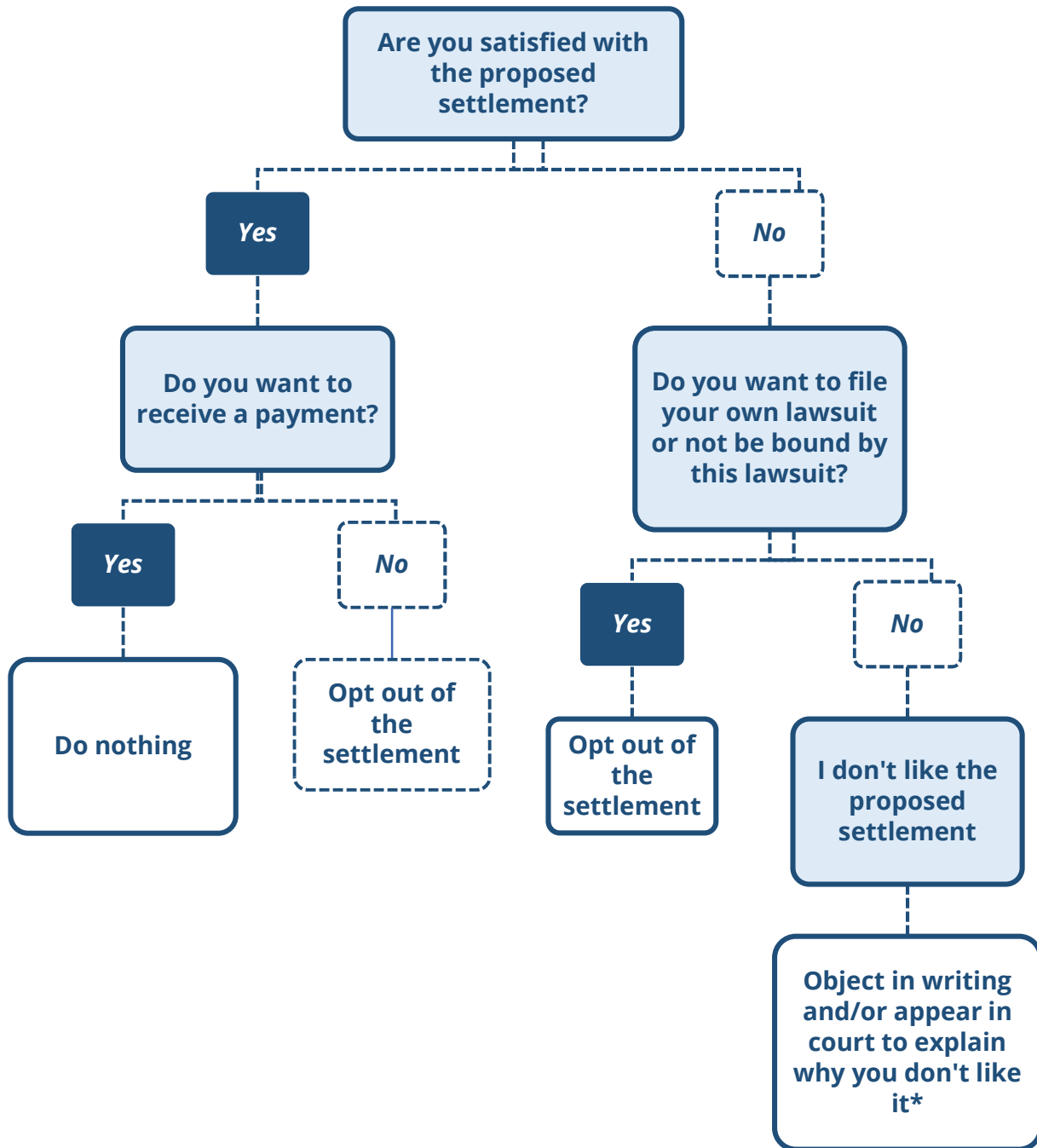
What are my options?

You have three options. You can opt out of the settlement, object to the settlement, or do nothing and stay in the settlement. This chart shows how your rights are affected by each option:

	Opt out	Object	Do Nothing
Can I receive settlement money if I . . .	NO	YES	YES
Am I bound by the terms of this lawsuit if I . . .	NO	YES	YES
Can I pursue my own case if I . . .	YES	NO	NO
Will the class lawyers represent me if I . . .	NO	NO	YES

Any judgments or settlements in this case, whether favorable or not, will bind all members who do not request exclusion.

What is the best path for me?



**You can object to the settlement AND still receive payment, if the Court approves the settlement.*

Opting Out

What if I don't want to be part of this settlement?

If you don't want to be part of the settlement, you can opt out, and the Court will exclude you from the lawsuit and settlement. If you do, you will not receive payment and cannot object to the settlement. However, you will not be bound or affected by anything that happens in this lawsuit and may be able to file your own case.

How do I opt out?

To opt out of the settlement, you must send an Exclusion Form or written request for exclusion to the settlement administrator expressing your desire to opt out and mail it by postmark [date] to the Settlement Administrator at:

[Settlement Administrator]

[Street address]

[City, State, Zip Code]

Your request must include your first and last name, signature, address, phone number, and last four digits of your social security number for verification.

Objecting

What if I disagree with 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 lawsuit will continue. If that is what you want to happen, you should object.

You must give reasons why you think the Court should not approve the settlement and say whether your objection applies to just you, a part of the class, or the entire class. The Court will consider your views.

Any objection to the proposed settlement must be in writing. If you file a timely written objection, you may, but are not required to, appear at the Final Approval Hearing, either in person or through your own attorney. If you appear through your own attorney, you are responsible for hiring and paying that attorney.

Objections may be submitted to the Settlement Administrator (information below) or to the Court either by filing them electronically or in person at any location of the United States District Court for the Northern District of California or by mailing them to the Class Action Clerk (information below).

The written objection must:

- (1) be submitted to the Settlement Administrator by [date], or if submitted to Court must be postmarked or filed by [date];
- (2) include the case name and number (*Loera et al. v. County of Alameda*, Case No. 3:23-cv-00792-LB)
- (3) included your full name;
- (4) states the reasons for your objection; and
- (5) your signature or the signature of your legal representative.

Class Action Clerk United States District Court for the Northern District of California Phillip Burton Federal Building 450 Golden Gate Avenue, 16th floor San Francisco, CA 94102	To file objections electronically, go to https://ecf.cand.uscourts.gov . You will need to create an account, and you may need to pay a fee.
--	---

Doing Nothing

What are the consequences of doing nothing?

If you do nothing, you will still get payment and be bound by the settlement and its “release” provisions. That means you won’t be able to start, continue, or be part of any other lawsuit against Alameda County about the issues in this case. A full description of the claims and persons who will be released if this settlement is approved can be found at [website].

Key Resources

How do I get more information?

This notice is a summary of the proposed settlement. To get a copy of the settlement agreement with all its terms or get answers to your questions:

- visit the case website at [website];
- reach out to the settlement administrator (information below);
- contact your class counsel (information below);

- access the Court docket in this case, for a fee, through the Court's Public Access to Court Electronic Records (PACER) system at <https://ecf.cand.uscourts.gov>; or
- visit the office of the Clerk of the Court for the United States District Court for the Northern District of California between 9:00 a.m. and 4:00 p.m., Monday through Friday, excluding Court holidays (address below)

Resource	Contact Information
Case website	[website]
Settlement Administrator	ILYM [Street address] [City, State, Zip Code] [Phone Number] [website]
Class Counsel	Terp Law P.C. info@terplaw.com 2831 Telegraph Avenue Oakland, CA 94609 Vinick Hyams LLP info@vinickhyams.com 66 Franklin Street, Suite 300 Oakland, CA 94607
PACER	To access the Court's eCourt Public Portal online found at https://ecf.cand.uscourts.gov , you will need to create an account. You can access documents by searching by case number. You may download images of every document filed in the case for a fee.
Court (DO NOT CONTACT)	United States District Court Northern District of California Phillip Burton Federal Building 450 Golden Gate Avenue, 16th floor San Francisco, CA 94102 PLEASE DO NOT TELEPHONE THE COURT OR THE COURT CLERK'S OFFICE TO INQUIRE ABOUT THIS SETTLEMENT OR THE CLAIM PROCESS.

Employment Information Sheet

Information on which your Individual Settlement Award will be calculated

- Dates of employment = _____*
- Total number of Compensable Workweeks
during the Class Period = _____*
- FLSA Settlement Award = _____**
- Estimated Individual Settlement Award = _____

* You may dispute the accuracy of this information with the Settlement Administrator.

** You will only receive an FLSA Settlement Award if you worked in and around the Oakland International Airport at any time during the "FLSA Class Period," and timely submitted a signed Consent Form and Declaration.

Exclusion Form

Submit this form to the Settlement Administrator to opt-out of the settlement

Dear Settlement Administrator:

My name is: _____
First Last

My address is:

My phone number is:

The last four digits of my social security number are:

I do not wish to be bound by this lawsuit or settlement as a Class Member. By this letter, I choose to opt out of the Class and the Settlement.

Date:

Signature: _____