

NOTICE ABOUT YOUR PRIVACY RIGHTS

You are receiving this Notice because you worked at the curbside recyclables facility located at 6733 Consolidated Way, San Diego, CA 92121 pursuant to an agreement with the City of San Diego to provide waste management services, inclusive of management of recyclable materials from March 1, 2015 through September 1, 2019.

What This Is About.

PEDRO GUZMAN, REYNALD PIERRE, and BLANCA PETRONA JAIMES ("Plaintiffs"), have filed a class action lawsuit against Source One Staffing LLC, Allan Company, Inc., Cedarwood-Young Company (doing business as Allan Company), INVO PEO, INC. III and OS4 Labor LLC ("Defendants"). The lawsuit is entitled *Pedro Guzman, et al., v. Allan Company, Inc., et al.*, and is pending in San Diego County Superior Court, Case No. 37-2019-00011626-CU-OE-CTL. **This is not a lawsuit against you, and you are not being sued.** Plaintiffs assert claims on behalf of themselves and other hourly workers who worked for Defendant Cedarwood-Young Company, either directly or through Defendants Source One Staffing, LLC or OS4 Labor LLC, at 6733 Consolidated Way, San Diego, CA 92121 pursuant to an agreement with the City of San Diego to provide waste management services, inclusive of management of recyclable materials, from March 1, 2015 through September 1, 2019 and who allegedly were subjected to violations of the San Diego Living Wage Ordinance (the "Class"). The lawsuit claims that the Class was not paid all wages, benefits and overtime due under the San Diego Living Wage Ordinance. Plaintiffs seek to recover wages, penalties and attorneys' fees for these claims. The Court has certified this case as a class action against Defendants Cedarwood-Young Company (doing business as Allan Company), Source One Staffing LLC, and OS4 Labor LLC, which if successful at trial, would permit them to recover money and attorneys' fees for themselves and other workers.

Defendants deny Plaintiffs' allegations and specifically contend that the work performed at 6733 Consolidated Way, San Diego, CA 92121 was outside the coverage of the Living Wage Ordinance and contend that direct employees were paid wage rates complying with or exceeding those required by the Living Wage ordinance. Defendants also deny that this case is appropriate for class action treatment and contend that Plaintiffs are not entitled to recover anything - no damages, no wages, no penalties, no attorneys' fees - for themselves or anyone else.

The Court has not issued any opinion as to whether or not Plaintiffs' claims have any merit.

Why You Are Receiving This Notice.

Plaintiffs' attorneys are conducting an investigation regarding their allegations. Plaintiffs' attorneys have asked Defendants to provide your name, home address, and phone number(s), so they can contact you about the lawsuit. Plaintiffs have also asked Defendants to provide your wage statements and time records ("Payroll Records") so they can determine whether you have been paid all wages, benefits and overtime due. Defendants have not yet released any of your private information. You are being provided the opportunity to opt out of your information being shared with the Plaintiffs' attorneys in this matter, if you so choose.

Your Options

You may prevent the disclosure of your personal contact information and Payroll Records or you may allow it.

Option 1: Do Nothing. If you do not object or otherwise opt out before May 31, 2024, then your name, home address, phone number(s) and Payroll Records will be provided to Plaintiffs' attorneys, who may contact you.

Option 2: Opt out from the Disclosure of Your Name, Contact Information and Payroll Records. If you do not want your information disclosed to Plaintiffs' attorneys, then before May 31, 2024 you must either complete, sign and send the enclosed postcard, or you may before that date submit a signed, written statement indicating you do not want your information disclosed.

If you have any questions about this Notice or wish to exercise your option to prevent the disclosure of your personal contact information, please contact: CPT Group, Inc., 50 Corporate Park, Irvine, CA 92606, Telephone: 1-(888) 373-2581. You also have the right to seek independent legal counsel regarding your rights. Please do not contact the Court with questions. If you would like the names and contact information of the lawyer involved in the case, you may request and obtain that information from CPT Group.