

To: All individuals who performed service work from January 19th, 2011, to the present at catered events held at the catering owned, operated, managed, or catered by Defendants Giorgio's Catering LLC, Fox Hill Country Club Caterers Inc., George Regini and/ or George Regini, Jr. (collectively "Defendants"), including all catered events at the facility commonly known as "Giorgios."

- This notice has been authorized by the Honorable Judge George Nolan, J.S.C. and may affect your legal rights. This is not a solicitation from a lawyer.
- Named Plaintiff commenced this action on behalf of himself and a putative class of individuals who performed food service work at catered events held at Defendants' primary catering venue known as "Giorgio's" from January 2011 to the present
- Defendants deny any wrongdoing and/or liability.
- Receipt of this notice does not mean that you are entitled to receive any monetary recovery. No determination has been made by the Court that you are owed any unpaid wages and the Court is not endorsing the merits of this lawsuit or the defenses at this time.

1. Why did I get this notice?

The purpose of this notice is to inform you of the existence of this lawsuit, and to advise you of how your rights may be affected by this lawsuit.

2. What is a class action?

A class action is a lawsuit where one or more persons sue not only for themselves, but also for other people who have similar claims. These other people are known as Class Members. In a class action, one court resolves the issues for all Class Members, except for those who exclude themselves from the Class. Honorable Judge George Nolan, J.S.C., New York State Supreme Court, Suffolk County, is presiding over this class action.

3. How do I join this lawsuit?

If you performed work for Defendants at Defendants' New York locations at any time from January 19, 2011, to the present and were not a manager or supervisor, you are a member of the Class, and do not need to do anything to join this lawsuit. It is suggested that you speak with a representative of Leeds Brown Law, P.C., the attorneys appointed as Class Counsel. Leeds Brown Law is located at One Old Country Road, Suite 347, Carle Place, New York, 11514, www.leedsbrownlaw.com and can be contacted via phone at (516) 873-9550 or via email at mtompkins@leedsbrownlaw.com. You have the right to consult with an attorney of your own choosing at your own expense and to initiate your own action if you do not wish to participate in this class action lawsuit. The attorneys working on the case are Michael A. Tompkins, Brett R. Cohen, and Jeffrey K. Brown.

4. How do I exclude myself from this lawsuit?

If you wish to opt-out and be excluded from the Class, then you must take steps to exclude yourself from this case.

If you intend to exclude yourself, you must mail a written, signed statement to Class Counsel by mail or e-mail sent to Michael A. Tompkins, Esq., of Leeds Brown Law, P.C., One Old Country Road, Suite 347, Carle Place,

New York, 11514, mtompkins@leedsbrownlaw.com.

If you decide to exclude yourself from this lawsuit, you may not be eligible to receive any benefits in the event that a settlement or judgment is obtained.

5. If I don't exclude myself from this lawsuit, can I sue Defendants for the same thing later?

If you do not exclude yourself from this lawsuit, you give up any rights to sue Defendants for the New York Labor Law claims brought in this case or potentially those which could have been brought in this case, or in the future in the event there is a change in existing law. You also waive the right to recover liquidated damages, which cannot be recovered on a class wide basis in New York.

However, if you exclude yourself from this lawsuit, you have the right to bring a similar lawsuit on your own behalf and will preserve your right to recover liquidated damages.

6. Do I have a lawyer in this case?

The law firm of Leeds Brown Law, P.C., One Old Country Road, Suite 347, Carle Place, New York 11514 has been designated as legal counsel to represent you and the other Class Members. These lawyers are called Class Counsel.

If you are represented by Leeds Brown Law, P.C., any attorney fees will be paid out of any recovery that is obtained. If there is a recovery, the fees may be part of a settlement obtained or money judgment entered in favor of Plaintiffs, or may be ordered by the court to be paid by the Defendants, or may be a combination of both. If you are represented by Leeds Brown Law, P.C. and Plaintiffs do not recover anything in this lawsuit, **you will not have to pay any attorneys' fees.**

7. Can the Defendants fire me or otherwise retaliate against me for participating in this lawsuit?

No. New York law prohibits Defendants from retaliating against you because you are a class member or participate in this lawsuit.

8. May I participate in this lawsuit if I am in the United States illegally?

Yes. New York courts have consistently held that individuals can recover unpaid wages and gratuities for work actually performed regardless of immigration status. It is illegal for Defendants or their attorneys to retaliate by reporting you to immigration authorities.

9. What if I still have questions?

If you have any questions about this lawsuit, or would like further information about this notice, you can contact Class Counsel Michael A. Tompkins, Esq. of Leeds Brown Law, P.C. at **(516) 873-9550**, or e-mail him at mtompkins@leedsbrownlaw.com

You have a right to participate in this action even if you are an undocumented immigrant or if you were paid in cash.

PLEASE DO NOT CONTACT THE COURT WITH QUESTIONS INVOLVING THIS LAWSUIT