

RETURN THIS FORM BY JUNE 3, 2023

CONSENT TO JOIN AS FLSA OPT-IN PLAINTIFF AND RELEASE OF CLAIMS FORM
Chandler, et al. v. International Marine and Industrial Applicators, LLC,
Case No. 2:22-cv-00339-BJR

Name/Address Changes:

I received the Notice of Settlement and Release of Claims Form involving Defendant International Marine and Industrial Applicators, LLC (“Defendant”), which informed me that, if the settlement is approved by the Court, I will receive compensation for my federal claims if I return this Consent to Join as FLSA Opt-in Plaintiff and Release of Claims Form (“Release”) by **JUNE 3, 2023**. By signing this Release, I acknowledge my acceptance of the settlement and understand that I am bound by the terms of the Release and the final judgment if the Court approves the settlement.

By signing and returning this Release, I hereby consent to join the *Chandler, et al. v. International Marine and Industrial Applicators, LLC* lawsuit as an opt-in plaintiff and make a claim against Defendant under the Fair Labor Standards Act (“FLSA”).

By signing and returning this release, I acknowledge that I am currently or was formerly employed by Defendant as a non-exempt traveler between February 18, 2019 and September 30, 2022, and that during this time period there were occasions when I worked more than 40 hours per week and received a per diem allotment during that workweek.

By signing and returning this Release, I agree that in exchange for my total settlement payment, I hereby knowingly, voluntarily, and completely release the Released Parties defined below from/for all known and unknown claims for unpaid wages, overtime compensation, liquidated damages, penalties, interest, and attorneys’ fees and costs under the FLSA, 29 U.S.C. § 201, *et. seq.*, arising from my employment with Defendant accrued up to and including September 19, 2022.

I understand that the Released Parties include Defendant and Defendant’s current and former parent, subsidiaries, sister companies, and any other affiliated companies

I also acknowledge that I have carefully read the Release and fully understand its meaning, intent and terms, have had the opportunity to consult with counsel, and have voluntarily entered into it.

Date: _____

Signature: _____

Mail, Fax, or Email to Simpluris:

Chandler, et al. v. International Marine and Industrial Applicators, LLC

c/o Settlement Administrator

P.O. Box 26170

Santa Ana, CA 92799

Email: IMIAsettlement@simpluris.com

Fax: (714) 824-8591

Telephone: (833) 512-8326

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ALPHONSA CHANDLER; NICHOLAS GORE;
BRENT MERITY; and ERIC VAUGHAN, each
individually and on behalf of all others similarly
situated,

Plaintiffs,

v.

INTERNATIONAL MARINE AND
INDUSTRIAL APPLICATORS, LLC, a Florida
Corporation,

Defendant.

No. 2:22-cv-00339-BJR

**NOTICE OF CLASS ACTION
SETTLEMENT, CONSENT TO
JOIN AS FLSA OPT-IN
PLAINTIFF, AND RELEASE OF
CLAIMS**

PLEASE READ THIS NOTICE OF CLASS ACTION SETTLEMENT, CONSENT TO JOIN AS FLSA OPT-IN PLAINTIFF, AND RELEASE OF CLAIMS (“NOTICE”) CAREFULLY. YOU MAY BE ENTITLED TO RECEIVE A PAYMENT PURSUANT TO THE PROPOSED SETTLEMENT DESCRIBED IN THIS NOTICE.

YOUR RIGHTS MAY BE AFFECTED BY PROCEEDINGS IN THIS LAWSUIT.

A U.S. FEDERAL COURT HAS AUTHORIZED THIS NOTICE

YOU ARE NOT BEING SUED

You are receiving this Notice because you have been identified as someone eligible to receive money from a proposed settlement of a class and collective action lawsuit. The lawsuit is captioned *Chandler, et al. v. International Marine and Industrial Applicators, LLC*, Case No. 2:22-cv-00339-BJR, and is pending before District Court Judge Barbara J. Rothstein in the United States District Court for the Western District of Washington (“Lawsuit”). This Notice summarizes your rights and obligations as a member of the class that was certified for settlement purposes. This Notice also summarizes your rights and obligations as a potential FLSA Opt-in Plaintiff, should you choose to join this Lawsuit as a party plaintiff.

Please read this Notice carefully, as your legal rights are affected by this Settlement, and you have a choice to make now.

A Summary of Your Rights and Choices

You May:	Effect of Choosing the Option:	Due Date:
Be eligible for Compensation for your Washington Claims	• You will be a participating Settlement Class Member and <u>you will receive compensation</u> for alleged wage violations under Washington law. • You will release all known and unknown Washington state law wage claims for unpaid wages, overtime compensation, exemplary damages, penalties, and interest, arising from your employment with Defendant as a traveler through September 19, 2022, and will be bound by the terms of the Settlement as to those claims. See the full release language in Section 8 below.	<u>There is nothing to do if you want compensation for Washington claims.</u>

Exclude Yourself (Opt-out) from receiving Compensation for your Washington Claims	- You will <u>not</u> receive payment from this settlement. - You will retain your right to sue Defendant for your Washington state law claims. - To exclude yourself from participating in the Settlement of your Washington state law claims you <u>must</u> send a written notice of your decision to exclude yourself. See the release language in Section 9 below.	<u>Written notice postmarked no later than June 3, 2023.</u>
Be eligible for additional Compensation for your Federal Claims	- You will be a participating FLSA Opt-in Plaintiff and Settlement Member of the federal Collective Action, and <u>will receive additional compensation</u> to release federal claims. - You will release all known and unknown federal Fair Labor Standards Act (“FLSA”) claims for unpaid wages, overtime compensation, liquidated damages, penalties, and interest, arising from your employment with Defendant as a traveler through September 19, 2022, and will be bound by the terms of the Settlement as to those claims. See the full release language in Section 9 below. - If you do <u>not</u> submit a signed Consent to Join as FLSA Opt-in Plaintiff Form you will <u>not</u> receive additional compensation for federal claims and will not release your FLSA claims.	<u>Submit a signed Consent to Join as FLSA Opt-In Plaintiff and Release of Claims Form and send/postmark no later than June 3, 2023.</u>
File an Objection	If you do not exclude yourself, you can remain a participant in the Settlement and still write to the Court explaining why you disagree with the Settlement.	<u>The Objection must be sent/postmarked no later than June 3, 2023.</u>
Appear at the Hearing	- If you do not exclude yourself, you can also ask to speak to the Court about the fairness of the Settlement. - You must send written notice of your desire to appear in advance.	<u>The Written Notice must be sent/postmarked no later than June 3, 2023.</u>

1. WHY DID I GET THIS NOTICE?

The United States District Court for the Western District of Washington directed that this Notice be sent to you because Defendant’s records show that you worked for Defendant in Washington as a traveler who received per diem at some time from February 18, 2019 to September 19, 2022. Therefore, you may be entitled to money pursuant to the terms of the Settlement.

If you are a member of the Washington Settlement Class as defined in Section 4 below, this proposed Settlement will affect your legal rights. If you are a member of the Federal Settlement Collective as defined in Section 4 below, you can also join the Lawsuit as a party plaintiff, which will also affect your legal rights. Therefore, it is important that you read this Notice carefully. You have choices to make as detailed in the chart above before the Court decides whether or not to grant final approval of the Settlement.

2. WHAT IS A CLASS ACTION AND COLLECTIVE ACTION?

In a class action lawsuit, one or more people called “Named Plaintiffs” or “Class Representatives” sue one or more defendants on behalf of other people who may have similar claims. All of these people together are a “Class” or “Class Members.” The court can determine whether it will allow a lawsuit to proceed as a class action. In a class action, one court resolves the common issues for everyone in the Class except for those people who choose to exclude themselves from the Class. This class action was brought under applicable Washington state wage and hour laws. The Court did not make a decision about whether the case could go forward as a class action on the merits, but the parties agreed to it and the Court approved it for purposes of this settlement. To participate in this class action you don’t need to do anything.

A collective action is similar to a Class Action, but seeks to recover for violations of federal wage law. In this lawsuit, Plaintiffs also brought a collective action under federal wage laws. Like a Class Action, in a Collective Action, one or more people called “Plaintiffs” sue one or more defendants on behalf of other people who may have similar claims. The court can determine whether it will allow a lawsuit to proceed as a collective action. If a court allows the case to proceed as a collective action, potential members of the collective class are given an opportunity to participate in the lawsuit as an Opt-in Plaintiff and must submit a Consent to Join in the lawsuit. If potential collective members do not consent to join the lawsuit, they are excluded from the collective. To participate in this Collective Action you must Opt-In by signing the attached form.

3. WHAT IS THIS CASE ABOUT?

This class action was first brought by Plaintiffs Alphonsa Chandler, Nicholas Gore, Brent Merity, and Eric Vaughan (collectively “Class Representatives”), on behalf of themselves and all other similarly situated individuals who worked as travelers in Washington and were paid a per diem by Defendant (collectively “Plaintiffs”). Plaintiffs in this case allege that Defendant violated federal law, and Washington state wage and hour laws, by improperly paying travelers for overtime hours worked. costs.

IMIA denies Plaintiffs’ claims. IMIA maintains that it properly paid its traveler employees all of their overtime wages at the proper overtime rate and that it fully complied with the FLSA and Washington state wage and hour laws in the manner and method in which it compensated traveler employees. IMIA asserts that per diem was properly paid to employees to reimburse them for their reasonable expenses incurred while working as traveler employees, and so the per diem was properly excludable from overtime pay under federal and state wage and hour laws.

The Court has not made a determination of the merits of Plaintiffs’ claims or Defendant’s defenses.

This case has been settled as described below.

4. WHO ARE THE SETTLEMENT CLASS MEMBERS?

The Court preliminary certified the following Washington Class for settlement of Washington claims:

Any individual who worked as a non-exempt traveler and received per diem for Defendant International Marine and Industrial Applicators LLC (“Defendant”) in Washington state at any time from February 18, 2019, until September 19, 2022.

Persons who meet this definition of the Washington Class are considered part of the **Washington Settlement Class** unless they choose to exclude themselves from the settlement by opting out (as described in section 11 below).

The Court also preliminarily certified the following Collective Action for settlement of federal claims:

Any individual who worked as a non-exempt traveler and received per diem for Defendant International Marine and Industrial Applicators LLC (“Defendant”) at any time from February 18, 2019, until September 19, 2022.

Persons who meet this definition may also take part in the Collective Action by signing and returning the Consent to Join as FLSA Opt-In Plaintiff and Release of Claims form by June 3, 2023, and will be considered part of the **Federal Settlement Collective**.

5. WHY IS THE CASE BEING SETTLED?

This matter is being settled because both sides have agreed to a settlement of this case. While Defendant denies liability and maintains that its traveler employees were compensated for all hours worked, it has agreed to a settlement with the plaintiffs to avoid the costs and risks of trial and appeal.

6. WHAT ARE THE SETTLEMENT BENEFITS?

A tentative Settlement has been reached in this case, subject to Court Approval. A lump sum payment of two million five hundred thousand dollars (\$2,500,000.00) will be paid by Defendant as the Gross Settlement Amount, to settle this matter upon final approval of the settlement, in consideration of the entry of a final judgment and the dismissal of this Lawsuit with prejudice and the release of claims referenced herein.

The Gross Settlement Amount will be distributed as follows:

- \$750,000 For funding the Settlement of the Washington Claims
- \$1,000,000 for funding the Settlement of federal FLSA Claims
- \$750,000 for attorneys' fees, costs and service awards

Your individual settlement offer is based on a formula that took into consideration a number of factors specific to you, including: 1) the number of eligible weeks you worked as a non-exempt traveler and received overtime pay and per diem from February 18, 2019 until September 19, 2022; 2) payroll earnings information for you provided by Defendant; and 3) your work location.

Considering these factors and the data Defendant provided, Class Counsel determined each potential Settlement Class Member's individual settlement offer by allocating to each his/her pro rata share of the total settlement reached for each claim.

The Settlement Agreement, if approved, provides monetary benefits to all Participating Settlement Class Members.

7. HOW DO I RECEIVE SETTLEMENT BENEFITS?

If you are a Washington Settlement Class Member as defined in Section 4 above, you do not need to do anything in order to remain eligible to receive your proportional pre-tax settlement amount for Washington claims. If you complete a signed Consent to Join as FLSA Opt-In Plaintiff and Release of Claims form by **June 3, 2023**, you will be eligible to receive an additional amount for your federal claims.

8. WHAT HAPPENS IF I DO NOTHING?

If you do nothing and you qualify as a class member for the Washington State claims as defined in Section 4 above, (1) you will receive your proportionate share of the \$750,000 allocated to the Washington Claims; (2) you will be bound by the terms and conditions of the Settlement; and (3) you will give up the right to sue for the following claims:

Each member of the Washington Settlement Class who is a Settlement Class Member shall knowingly, voluntarily and completely release the Released Parties as defined below from/for all known and unknown Washington state law claims asserted in Plaintiffs' Amended Complaint arising from his or her employment with Defendant as a non-exempt traveler employee who received per diem between February 18, 2019, until September 19, 2022, including claims for unpaid wages, overtime, exemplary damages, interest, and attorneys' fees and costs.

The Released Parties are Defendant and Defendant's current and former parent, subsidiaries, sister companies, and any other affiliated companies.

Should you have any questions about the scope of the Release, you may contact Class Counsel at the numbers or addresses listed at the end of the Notice.

Defendant will not take any adverse action against any individual because he or she participates or declines to participate in the settlement.

9. WHAT HAPPENS IF I RETURN A SIGNED CONSENT TO JOIN AS FLSA OPT-IN PLAINTIFF AND RELEASE OF CLAIMS FORM?

If you return a signed Consent to Join as FLSA Opt-In Plaintiff and Release of Claims form by **June 3, 2023**, you will be bound by any rulings or judgments, whether favorable or unfavorable, made over the course of this lawsuit. Your interests will be represented by the Plaintiffs' attorneys at the law firms of Rekhi & Wolk, P.S. and Terrell Marshall Law Group PLLC in Seattle, Washington.

A tentative Settlement has also been reached in this case, subject to Court approval. If the Court approves the settlement, then by signing a Consent to Join as FLSA Opt-in Plaintiff and Release of Claims form, (1) you will be eligible to receive additional compensation; (2) you will be bound by the terms and conditions of the Settlement; and (3) you will give up the right to sue Defendant for claims as follows:

Each FLSA Opt-in Plaintiff shall knowingly, voluntarily and completely release the Released Parties as defined above from/for all known and unknown claims for overtime compensation, liquidated damages, penalties, interest, and attorneys' fees and costs under the FLSA, 29 U.S.C. § 201, *et. seq.*, arising from his or her employment with Defendant as a non-exempt traveler who received per diem up to and including September 19, 2022.

Should you have any questions about the scope of the Release, you may contact Class Counsel at the numbers or addresses listed at the end of the Notice.

For your convenience, a postage-paid envelope is provided with this Notice. You may also fax the form to **(714) 824-8591** or email it to **IMIASettlement@simpluris.com**. It is not necessary to return an original copy.

Defendant will not take any adverse action against any individual because he or she participates or declines to participate as an Opt-in Plaintiff or in the settlement.

10. WHY WOULD I WANT TO BE EXCLUDED FROM THE SETTLEMENT CLASS?

You do not have to take part in the settlement. You can exclude yourself from the Washington settlement by “opting out.” You can exclude yourself from the FLSA settlement by **not** completing the attached Consent to Join as FLSA Opt-in Plaintiff and Release of Claims form. If you exclude yourself, you will not get the benefits of the settlement and you cannot object to the settlement. Any Court orders will not apply to you. By excluding yourself, you keep any right to file or proceed with a lawsuit against Defendant regarding the subjects raised in this lawsuit, subject to any applicable statute of limitations.

Should you choose to proceed with such a lawsuit, you will have to represent yourself or hire and pay your own lawyer for that lawsuit and prove your own claims.

11. HOW DO I EXCLUDE MYSELF FROM THE WASHINGTON SETTLEMENT CLASS?

If you are a member of the Washington Settlement Class and wish to be excluded, you must send in a written request that includes all of the following:

- Your legal name, current address and telephone number;
- The name and number of the lawsuit: *Chandler, et al. v. International Marine and Industrial Applicators, LLC*, Case No. 2:22-cv-00339-BJR; and
- A statement, signed personally by you, clearly stating that you want to be excluded from the Settlement Class.

All exclusion requests must be mailed to Simpluris, who is administering this settlement, at the following address:

Chandler, et al. v. International Marine and Industrial Applicators, LLC
c/o Settlement Administrator
P.O. Box 26170
Santa Ana, CA 92799
Email: IMIASettlement@simpluris.com
Fax: (714) 824-8591
Telephone: (833) 512-8326

All exclusion requests MUST be sent/postmarked by June 3, 2023. Class Counsel will provide all exclusion requests to the Court and Defendant’s lawyers.

Any requests for exclusion must contain your personal signature which shall indicate to the Court that you wish to be excluded from the Washington Settlement Class. You cannot exclude yourself by phone or by email message. Further, if you do not follow these instructions properly, you will lose your right to exclude yourself. There are no exceptions.

12. HOW DO I EXCLUDE MYSELF FROM THE FEDERAL SETTLEMENT COLLECTIVE?

To be included in the Federal Settlement Collective, you must complete the attached Consent to Join as FLSA Opt-in Plaintiff and Release of Claims form. If you wish to be excluded from the Federal Settlement Collective, you should **not** complete or submit the attached form.

13. HOW DO I OBJECT TO THE SETTLEMENT?

If you object to any aspect of the settlement, but do not want to be excluded from it, you may file an objection to it. This means that you can tell the Court why you disagree with the settlement or some of its terms. The Court will consider your views but may approve the settlement anyway.

You can object only if you do not exclude yourself from the Settlement Class. If you exclude yourself, you cannot object.

To object, either you or a lawyer of your own choosing must prepare and file a written objection to the Court, with copies to Class Counsel and counsel for Defendant. The objection must contain all of the following:

1. The name and title of the lawsuit, *Chandler, et al. v. International Marine and Industrial Applicators, LLC*, No. 2:22-cv-00339-BJR;
2. A written statement of objections, in clear and concise terms, and the legal and factual arguments supporting each objection;
3. You must state whether the objection applies only to you, to a specific subset of the class, or to the entire class;
4. A statement of whether or not you or your lawyer will ask to appear at the Final Approval Hearing to talk about your objections, and, if so, how long you will need to present your objections; and
5. Copies of documents (if any) you or your lawyer will present at the Final Approval Hearing.

Your objection must be filed with the Court and sent/postmarked to counsel no later than **June 3, 2023**. Any objection received after that date may be rejected. Objections must be mailed to Class Counsel and Counsel for Defendant at the following addresses:

Hardeep S. Rekhi
Gregory A. Wolk
REKHI & WOLK, P.S.
529 Warren Avenue North, Suite 201
Seattle, Washington 98109
Telephone: (206) 388-5887
Fax: (206) 577-3924
Email: hardeep@rekhiwolk.com
Email: greg@rekhiwolk.com

Melissa Mordy
Kate Tylee Herz
DAVIS WRIGHT TREMAINE LLP
929 180th Avenue, Suite 1500
Bellevue, WA 98004-4786
Telephone: 425.646.6100
Fax: 425.646.6199
Email: missymordy@dwt.com
katetyleeherz@dwt.com

Toby J. Marshall
Erika L. Nusser
TERRELL MARSHALL LAW GROUP PLLC
936 North 34th Street, Suite 300
Seattle, Washington 98103
Telephone: (206) 816-6603
Fax: (206) 319-5450
Email: tmarshall@terrellmarshall.com
Email: enusser@terrellmarshall.com

Katie Loberstein
Scott Prange
920 Fifth Avenue, Suite 3300
Seattle, WA 98104-1610
Telephone: 206.622.3150
Fax: 206.757.7700
Email: katieloberstein@dwt.com
scottprange@dwt.com

14. SETTLEMENT CHECKS AND TAXATION

If you do not exclude yourself from the Settlement, you will receive your settlement amount in two settlement checks once the Court has approved the settlement and the conditions of the Settlement Agreement are satisfied. One-half of the settlement amount, which will be paid by one of the checks, will be allocated as wages and will be reported on an IRS Form W-2. Payroll and income taxes **will be** withheld from this settlement check. The second half of the settlement amount, which will be paid by a separate check, will be allocated as liquidated damages, penalties, and interest and will be reported on an IRS Form 1099. Payroll taxes **will not be** withheld from this payment. If you accept the settlement, you shall be solely responsible for the payment of any local, state, or federal taxes resulting from or attributable to the payments received under the settlement. You should consult a tax preparer if you have any tax-related questions.

You will have one hundred and eighty (180) days to cash your settlement checks before your settlement checks are voided. After that date, any uncashed check amounts may be donated to charity or redistributed to other class members or Defendant.

15. DO I HAVE A LAWYER REPRESENTING MY INTERESTS IN THIS CASE?

Yes. The Court has appointed the following law firm to represent you and other Class Members. These lawyers are referred to as Class Counsel and include:

Hardeep S. Rekhi and Gregory Wolk of the law firm Rekhi & Wolk, P.S. and Toby J. Marshall and Erika L. Nusser of the law firm Terrell Marshall Law Group, PLLC. Class Counsel can be reached at the following address and numbers:

Rekhi & Wolk, P.S.
529 Warren Avenue North, Suite 201
Seattle, Washington 98109
Phone: (206) 388-5887
Fax: (206) 577-3924
Email: hardeep@rekhiwolk.com; greg@rekhiwolk.com

Terrell Marshall Law Group PLLC
936 North 34th Street, Suite 300
Seattle, Washington 98103
Telephone: (206) 816-6603
Fax: (206) 319-5450
Email: tmarshall@terrellmarshall.com; enusser@terrellmarshall.com

You will not be charged directly by Class Counsel for their services, but they will ask the Court to award them a fee from the Settlement. More information about Class Counsel and their experience is available at the following websites: www.rekhiwolk.com and www.terrellmarshall.com.

You may hire your own attorney, if you wish; however, you will be responsible for any fees and expenses that the attorney charges you.

16. HOW WILL THE LAWYERS BE PAID?

As part of the settlement, Defendant has agreed to pay Class Counsel an amount up to \$750,000 (25% of the Gross Settlement Amount of \$2,500,000) for attorneys' fees, out-of-pocket litigation expenses awards that Class Counsel has paid to litigate the case and Class service awards. The payment will be subject to court approval.

17. HOW WILL THE CLASS REPRESENTATIVES BE PAID?

To compensate the Class Representatives for their efforts in litigating this case and assisting in securing the settlement in this litigation on behalf of the Settlement Class, Class Counsel will request that Plaintiffs Chandler, Gore, Merity, and Vaughan be awarded a service payment of \$10,000 each. This amount will come out of the fund created for attorney fees' costs and service awards. The Class Representative awards are subject to Court approval.

18. WHEN AND WHERE WILL THE COURT DECIDE WHETHER TO APPROVE OF THE SETTLEMENT?

The settlement is subject to court approval and satisfaction of all conditions set forth in the Settlement Agreement filed with the Court. Class Counsel will be jointly filing a motion with the Court on or before **June 5, 2023**, requesting final approval of the settlement. The Court will hold a Final Approval Hearing on June 5, 2023, at 10:00 a.m. At this hearing, the Court will consider whether or not the Settlement is fair, reasonable, and adequate. If there are written objections, the Court will consider them, and the Court will listen to people who have asked to speak at the hearing. After the hearing, the Court will decide whether or not to approve the Settlement.

The Hearing will be held before Judge Barbara J. Rothstein at the United States Courthouse in Seattle: 700 Stewart Street, Seattle, Washington 98101.

19. DO I HAVE TO ATTEND THE HEARING?

No. Class Counsel will answer questions the Court may have, but you may appear at your own expense, or pay your own lawyer to attend the hearing, if you have provided notice of your intention to appear as described in Section 12. If you send a written objection, the Court will consider it.

20. IF I HIRE MY OWN LAWYER, CAN MY LAWYER APPEAR AT THE FINAL APPROVAL HEARING TO TELL THE COURT ABOUT MY OPINIONS REGARDING THE SETTLEMENT?

Yes. As long as you do not exclude yourself, you have the right to appear through your own counsel at the Final Approval Hearing, if your counsel has provided notice of his/her intention to appear as described in Section 12. You may also appear without a lawyer and directly tell the Court your opinions about the settlement so long as your Notice of Appearance and any written objections you may have are submitted by **June 3, 2023**. Note that if you choose to have a lawyer appear on your behalf, the cost of having that lawyer appear will be at your own expense.

21. WHERE DO I OBTAIN MORE INFORMATION?

If you have questions about the settlement and want additional information, you may contact Class Counsel:

Hardeep S. Rekhi
Gregory A. Wolk
REKHI & WOLK, P.S.
529 Warren Avenue North, Suite 201
Seattle, Washington 98109
Telephone: (206) 388-5887
Fax: (206) 577-3924
Email: hardeep@rekhiwolk.com
Email: greg@rekhiwolk.com

Toby J. Marshall
Erika L. Nusser
TERRELL MARSHALL LAW GROUP PLLC
936 North 34th Street, Suite 300
Seattle, Washington 98103
Telephone: (206) 816-6603
Fax: (206) 319-5450
Email: tmarshall@terrellmarshall.com
Email: enusser@terrellmarshall.com

The specific terms of the settlement have also been filed with the Court. You can look at and copy these documents at any time during regular office hours at Clerk of the Court, United States District Court, Western District of Washington, 700 Stewart Street, Suite 2310, Seattle, Washington 98101. If you have a Public Access to Court Electronic Records (“PACER”) account, you may view the documents on the Court’s Case Management/Electronic Court Filing website: www.pacer.gov. Documents are also available at www.rekhiwolk.com/****.