

SUPERIOR COURT FOR THE STATE OF WASHINGTON IN AND FOR KING COUNTY
NO. 21-2-10485-8 SEA

If you worked as an hourly security guard for West Coast Security, West Coast Security Concepts, Inc. and/or Anthony Lombardi at any time since August 9, 2018, please carefully read this notice. It may affect your rights.

This is a court-ordered notice. This is not a solicitation from a lawyer.

- Two former employees, Andrew Radulescu and Justin Green (“Plaintiffs”), have sued West Coast Security, West Coast Security Concepts, Inc. and Anthony Lombardi (“Defendants”) based on alleged violations of Washington state and Seattle wage and hour laws and regulations. In particular, Plaintiffs allege that Defendants willfully: (1) failed to pay the Class members for all time worked, including overtime; (2) failed to provide adequate meal and rest breaks to the Class members; (3) failed to pay the Class members for their missed meal and rest breaks; (4) failed to pay the Class members at the applicable minimum wage / minimum compensation and overtime rates for all time worked; (5) made unlawful deductions from Class members’ pay; (6) failed to reimburse the Class members for business expenses they advanced on behalf of Defendants; and (7) failed to pay the Class members all wages due at the end of their employment.
- Defendants have not responded to the allegations in the lawsuit.
- The Court has “certified” the lawsuit to proceed as a class action as to Plaintiffs’ claims asserted on behalf of all current and former hourly employees who worked as security guards or officers for any of the Defendants at any time since August 9, 2018, and who were based, or resided, in the State of Washington during such employment (“Class”).
- The Court has not decided whether Defendants did anything wrong. There is no money available now and no guarantee there will be. The Court has yet to rule on the allegations’ merits. However, your legal rights are affected, and you have a choice to make now:

YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT	
DO NOTHING	Stay in this lawsuit. Await the outcome. Give up certain rights. By doing nothing, you will stay in this lawsuit as a member of the class and keep the possibility of participating in any damages that may come from a trial, default judgment, or a settlement, if any. However, you give up any rights to seek relief from Defendants separately about the same legal claims in this lawsuit.
OR	

ASK TO BE EXCLUDED	Get out of this lawsuit. Get no potential benefits from it. Keep rights. If you ask to be excluded (“opt out”), you will not be part of this class action lawsuit and you will not share in any money or benefits that may be awarded later, if any. However, you keep any rights to seek relief against Defendants separately about the same legal claims in this lawsuit.
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- Your options are explained below. To exclude yourself, you must act by **December 18, 2023**.
- Plaintiffs and their lawyers must prove the claims against Defendants at trial or obtain a favorable default judgment ruling. A trial date is scheduled for May 6, 2024. If money or benefits are obtained from this lawsuit, you will be notified about how to receive a share.
- **Questions? Read this notice, visit <https://www.rekhiwolk.com/class-actions/west-coast-security/>, or call 206-388-5887.**

BASIC INFORMATION

1. Why did I get this notice?

Defendants’ and/or their vendors’ records show that you work, or worked, for Defendants as an hourly security guard in the state of Washington at some point since August 9, 2018.

This notice explains that the Court has allowed, or “certified,” the lawsuit to proceed as a class action and that decision may affect you. You have legal rights and options that you may exercise before a trial, a default judgment ruling, or a settlement, if any.

The Court must decide whether the claims being made against Defendants, on your behalf, are correct. The Superior Court of Washington in and for King County is overseeing this class action. The case is currently assigned to Judge Joe Campagna. The lawsuit is known as *Radulescu, et ano v. West Coast Security, et al.*, Case No. 21-2-10485-8 SEA.

2. What is a class action and who is involved?

In a class action lawsuit, one or more people called “Class Representatives” (in this case, Andrew Radulescu and Justin Green) file a lawsuit on behalf of themselves and other people who may have similar claims. The people and the Class Representatives together are called a Class or Class Members. The people and entities Plaintiffs sued (in this case West Coast Security, West Coast Security Concepts, Inc. and Anthony Lombardi) are called the Defendants. One court resolves the issues for everyone in the Class—except for those people who choose to exclude themselves from the Class by opting out as provided for in this Notice.

3. What is this lawsuit about?

The Class Representatives claim Defendants have violated Washington and Seattle wage and hour laws and regulations, as described in the first bullet point of this Notice.

Defendants have not responded to the above allegations.

More information about Washington state wage and hour laws and employee rights can be found at the website of the Washington State Department of Labor and Industries, www.lni.wa.gov/WorkplaceRights/.

Plaintiffs' operative Complaint in this lawsuit is available at <https://www.rekhiwolk.com/class-actions/west-coast-security/>.

4. Why is this lawsuit a class action?

The Court decided that this lawsuit can be a class action with respect to the claims asserted by the Class Representatives because it meets the requirements of Washington State Superior Court Civil Rule 23, which governs class actions in Washington State Superior Court. In determining that the lawsuit may proceed as a class action, the Court *did not* rule on the merits of Plaintiffs' claims or determine that Defendants have violated the law.

More information about why the Court is allowing this lawsuit to be a class action is in the Court's Order Granting Plaintiffs' Motion for Class Certification, which is available at <https://www.rekhiwolk.com/class-actions/west-coast-security/>.

THE CLAIMS IN THE LAWSUIT

5. Has the Court decided who is right?

The Court has not decided whether Defendants or the Class Representatives are correct as to the claims mentioned in Question 3, above. By establishing the Class and having this notice issued, the Court is not suggesting that the Class Representatives will win or lose this case. The Class Representatives must prove the claims at trial or obtain a default judgment ruling.

6. What are the Class Representatives asking for?

On behalf of themselves and the Class, the Class Representatives seek money damages for Defendants' alleged unlawful conduct, as well as exemplary and liquidated damages, interest on the money damages, Court imposed sanctions, attorneys' fees, and litigation costs.

7. Is there any money available now?

No money or benefits are available now because the Court has not yet decided whether Defendants did anything wrong. There is no guarantee that money or benefits ever will be obtained. If they are, you will be notified about how to receive a share.

WHO IS IN THE CLASS?

You need to decide whether you are affected by this lawsuit.

8. Am I part of this Class?

A Superior Court Judge decided that the following individuals are Class Members: All current and former hourly employees who worked for West Coast Security, West Coast Security Concepts Inc., and/or Anthony Lombardi as security guards or officers for any period of time from August 9, 2018, through 90 days before final resolution of this matter, who were based or resided in the State of Washington during such employment, and for whom Plaintiffs timely obtain last known contact information.

Excluded from the Class are Defendants, any entity in which Defendants have a controlling interest or which has a controlling interest of Defendants, and Defendants' legal representatives, assignees and successors. Also excluded are the Judge to whom this case is assigned and any member of the Judge's immediate family.

YOUR RIGHTS AND OPTIONS

You must decide whether to stay in the Class or ask to be excluded, and you need to decide this now.

9. What happens if I do nothing at all?

If you meet the definition of a Class Member as set forth above in Section 8, then you are included in the lawsuit. In other words, if you do nothing, then you stay in the Class.

If you are a Class Member, you don't have to do anything now if you want to stay in this lawsuit and keep the possibility of getting money or benefits from this lawsuit. If the Class Representatives obtain money or benefits on behalf of the Class, all Class Members will be notified about how to obtain a share.

Keep in mind that if you do nothing now, regardless of whether Plaintiffs win or lose at the trial, you will not be able to sue Defendants as part of any other lawsuit about the same claims that are the subject of this lawsuit. You will also be bound by all the orders the Court issues and judgments the Court makes in this lawsuit.

10. What happens if I ask to be excluded?

If you do not want to participate in this lawsuit, you must ask to be excluded. No one may force you to exclude yourself or retaliate against you based on your decision to remain in the Class. You may ask to be excluded from the lawsuit for any reason.

If you want to make your own claim against Defendants for Washington and/or Seattle wage and hour violations during your employment (and within the applicable statute of limitations) instead of being part of this class action, you need to ask to be excluded from the Class.

If you exclude yourself from the Class—which also means to remove yourself from the Class and is sometimes called “opting out” of the Class—you won’t get any money or benefits from this lawsuit even if the Class Representatives obtain them on behalf of the Class. If you do wish to exclude yourself from the Class so that you can file your own claim against Defendants, you should be aware that your claim(s), if any, may be subject to a statute of limitations (time limit).

11. How do I ask the Court to exclude me from the Class?

To ask to be excluded, you must send a written request to Class Counsel using the contact information below.

The request must include the case name, the date of your request, a short note saying you desire to be excluded from the Class, and be signed by you. Any written request sent by mail must be postmarked by **December 18th, 2023**.

The mailing address to send the exclusion request is:

Rekhi & Wolk,
529 Warren Ave. N. #201,
Seattle, WA 98109

THE LAWYERS REPRESENTING THE CLASS

12. Do I have a lawyer in this case?

The Court has decided that the Seattle, Washington law firms of Rekhi & Wolk, P.S. and Donovan Employment Law, PLLC are qualified to represent you and all Class Members. Together the lawyers are called “Class Counsel.” Together, they have handled similar claims against other employers. More information about Rekhi & Wolk, P.S., or Donovan Employment Law, PLLC is available at www.rekhiwolk.com or www.donovanemploymentlaw.com

13. Should I get my own lawyer?

If you remain in the Class, you do not need to hire your own lawyer because Class Counsel is working on your behalf. If you want your own lawyer, you will have to retain and potentially pay that lawyer.

14. How will the lawyers be paid?

If Class Counsel get money or benefits for the Class, they will ask the Court for fees and costs. You won’t have to pay these fees and costs directly. If the Court grants Class Counsel’s request, the fees and costs will be either deducted from any money obtained for the Class or paid separately by Defendants.

THE TRIAL

The Court has scheduled a trial for May 6, 2024, to decide who is right in this case. This date is subject to change.

15. How and when will the Court decide who is right?

If the case is not resolved by a settlement or by the Court issuing a favorable default judgment ruling, Class Counsel will have to prove Plaintiffs' claims at a trial. During the trial, a jury or judge will hear all the evidence and decide who is right about the claims in the lawsuit. There is no guarantee that Plaintiffs will win or that they will get any money for the Class. If Plaintiffs lose, you will also be bound by that decision as related to any claims adjudicated against Defendants.

16. Do I have to come to the trial?

Class Members often do not need to attend the trial, although they are free to do so. Class Counsel will present the case for the Class, and Defendants will present its defenses. However, it is possible that you or any Class Members may be contacted later in the case to provide testimony or information. You or your own lawyer may come at your own expense.

17. Will I get money after the trial?

If the Class obtains money or benefits, you will be notified about how to participate. We do not know how long this will take. The Court has yet to rule on the merits of Plaintiffs' claims and any such ruling—whether for or against the Plaintiffs—may be subject to appeal. Even if Plaintiffs obtain a favorable judgment, they will need to collect from Defendants.

GETTING MORE INFORMATION

18. Are more details available?

Visit the website <https://www.rekhiwolk.com/class-actions/west-coast-security/>, where you will find the Court's Order Granting Plaintiffs' Motion for Class Certification and Plaintiffs' operative Complaint. You may also get more information by contacting Class Counsel:

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