

NOTICE OF CLASS ACTION SETTLEMENT

<ClaimID> <Barcode>
<FirstName> <LastName>
<Address>
<City> <State> <Zip>

TO: <FirstName> <LastName>

Jake Long, et ano v. Trappers Sushi Silverdale, et al.
KING COUNTY SUPERIOR COURT OF WASHINGTON
Case No. 23-2-02318-8 SEA

This notice is to the following individuals in connection with a pending class action settlement:

Class Members. The Class Members for purposes of settlement shall comprise of all class members of (1) the EPOA Class, (2) the Salaried Manager Class, and (3) the Silenced No More Class, as defined according to the class definitions set forth below.

(1) EPOA Class Members. All current and former employees who worked at any restaurants owned by Trapper O’Keeffe that have operated in Washington State, and who were based or resided in the State of Washington, for any period of time from February 6, 2020, through November 10, 2025. Those individuals identified in the operative Complaint as being excluded from the EPOA Class are excluded.

(2) Salaried Manager Class Members. All current and former managerial employees who were paid a salary and worked at any restaurants owned by Trapper O’Keeffe that have operated in Washington State, and who were based or resided in the State of Washington, for any period of time from February 6, 2020, through November 10, 2025. Those individuals identified in the operative Complaint as being excluded from the Salaried Manager Class are excluded, as are hourly paid managers who were not paid a salary at any time during the class period.

(3) Silenced No More Class Members. All current and former employees who worked at any restaurants owned by Trapper O’Keeffe that have operated in Washington State, and who were based or resided in the State of Washington, for any period of time from June 9, 2022, through November 10, 2025. Those individuals identified in the operative Complaint as being excluded from the Silenced No More Class are excluded.

Based on Defendants’ records, you have been identified as being a member of the following Class or Classes: <Classes>

Read this notice carefully. Your legal rights could be affected whether you act or not.

The Superior Court of the State of Washington, King County (the “Court”) has preliminarily approved this class action lawsuit filed by Jake Long and Jeannea Winstead (“Class Representatives”) against Trapper O’Keeffe, Trappers Sushi Silverdale Inc., and Trappers Sushi Tacoma, Inc. (“Defendants”) for alleged wage and hour violations (the “Lawsuit”).

The Lawsuit is based on the following legal causes of action: (1) minimum wage act violations: RCW 49.46 et seq.; (2) breach of contract; (3) failure to pay wages on termination: RCW 49.48 et seq; (4) willful refusal to pay wages: RCW 49.52.050; (5) violation of Washington’s Silenced No More Act: RCW 49.44.211, and (6) violation of Washington’s Equal Pay and Opportunities Act (EPOA), RCW 49.58. Defendants deny all claims and maintain they have fully complied with the law.

<u>YOUR OPTIONS</u>	
DO NOTHING	You do not have to do anything in response to this notice. If you do nothing, you will remain eligible to automatically receive an Individual Class Payment if the Court grants final approval of the settlement. In such case, you will be bound by the release provisions in the settlement and release your claims in exchange for compensation.
OPT OUT	You may opt out of the Settlement by submitting a Request for Exclusion form. If you opt out, you may not object to the Settlement, you will not receive an Individual Class Payment, and you shall not be bound by the release provisions in the settlement.
OBJECT	You may object to the Settlement by submitting a written objection. If the Court grants final approval of the settlement despite your objection, you will remain eligible to automatically receive an Individual Class Payment if the Court grants final approval of the settlement. In such case, you will be bound by the release provisions in the settlement.

The Court’s final approval hearing is scheduled to take place on **May 29, 2026 at 1:00 p.m.** before the Hon. Maureen A. McKee at the King County Superior Court of Washington, via Zoom. You do not have to attend but you do have the right to appear. ***For more information, please carefully read this notice.***

1. WHAT IS THE ACTION ABOUT?

The Class Representatives are former employees of Defendants. The Class Representatives alleged Defendants violated Washington labor and employment laws as follows: (1) minimum wage act violations: RCW 49.46 et seq.; (2) breach of contract; (3) failure to pay wages on termination: RCW 49.48 et seq; (4) willful refusal to pay wages: RCW 49.52.050; (5) violation of Washington’s Silenced No More Act: RCW 49.44.211, and (6) violation of Washington’s Equal Pay and Opportunities Act, RCW 49.58. Plaintiffs are represented by Hones Law, PLLC and Rekhi & Wolk, P.S. (“Class Counsel”).

Defendants deny violating any laws or failing to pay any wages and contend they complied with all applicable laws.

2. WHAT ARE THE PROPOSED SETTLEMENT TERMS?

At the Final Approval Hearing, the Class Representatives, through Class Counsel, will ask the Court to approve a Gross Settlement Amount of at least \$3,900,000.00 and authorize the following payments from that amount: Service Payment to the Class Representatives of up to \$10,000 each); Attorneys' Fees in the amount of up to \$1,299,870.00, representing 33.33% of the Gross Settlement Amount; Litigation Costs (not to exceed \$85,000), and the Administration Expenses (not to exceed \$12,500) to be paid to the third-party settlement administrator.

After the above deductions in amounts approved by the Court (the "Net Class Fund"), the Administrator will calculate and distribute Individual Class Payments to Participating Class Members based on a pro-rata basis, based on Plaintiffs' damages calculations and the relative strength of their claims and recovery per Class Counsel's analysis. The Parties shall allocate the Net Settlement amount to Salaried Manager Class members as a percentage to Form W2 wages and as a percentage to Form 1099 interest and non-wage damages in the long-form Settlement Agreement. For all other Class Members, no portion of their individual awards will be allocated towards wages. The Wage Portion is subject to withholdings and will be reported on IRS W-2 Forms. Defendants will separately pay employer payroll taxes it owes on the Wage Portion. The Administrator will report the Non-Wage Portions of the Individual Class Payments on IRS 1099 Forms.

You will be treated as a Participating Class Member, participating in the settlement, unless you submit a valid Request for Exclusion by April 27, 2026 the "Response Deadline."

After the Judgment is final and Defendants have fully funded the settlement and separately paid all employer payroll taxes, Participating Class Members will be legally barred from asserting any of the claims released under the settlement against Defendants, Trapper O'Keeffe, his restaurants in Washington, and their insurers (including The Hartford), and other related individuals and entities ("Released Parties"), as follows:

In consideration of Individual Settlement Payments and the other terms and conditions of the Settlement, each Participating Settlement Class Member will irrevocably release and discharge the Released Parties from any and all claims that were or could have been asserted in this lawsuit for unpaid wages, specifically, but not limited to minimum wage act violations, breach of contract, failure to pay wages on termination, willful refusal to pay wages, violation of Washington's Silenced No More Act, and violation of Washington's Equal Pay and Opportunities Act arising from the Participating Settlement Class Member's employment with Defendant during the Settlement Class Period, including any and all associated liquidated damages, penalties, damages for willfulness, damages for overtime, attorneys' fees, costs, and interest related to or arising from those claims, whether founded on state, federal or local law. Participating Settlement Class Members will irrevocably release and discharge the Released Parties from any and all claims that were or could have been asserted in this lawsuit for violations of the Equal Pay and Opportunities Act and the Silenced No More Act, specifically, but not limited to, any statutory claims arising from the Participating Settlement Class Member's employment with Defendant during the Settlement Class Period, including any and all associated statutory damages, penalties, attorneys' fees, costs, and interest related to or arising from those claims, whether founded on state, federal or local law. Participating Settlement Class Member will irrevocably release and discharge the Released Parties from any and all claims for forms of damages, penalties, sanctions, attorneys' fees, cost, interest, or otherwise, that have been awarded, or could be awarded in the future, by the Court, including pursuant to any pending motions filed by Plaintiffs, including all discovery or other motions. This

Release does not release any claims that the law does not permit each Participating Settlement Class Member to release.

3. HOW IS MY INDIVIDUAL CLASS PAYMENT CALCULATED?

Class Counsel obtained employment information for each Class Member, including the position(s) they worked, how long they worked for the Defendant, and how much they earned. Class Counsel has analyzed that information to determine how much each Class Member would be owed based on the strength of their respective claims. The Individual Class Payments will be calculated based on that analysis as a proportion of the total Net Class Fund.

4. HOW WILL I GET PAID?

The Administrator will send, by U.S. mail, a single check to every Participating Class Member following the Effective Date of this Settlement. Your check will be sent to the same address as this notice. If you change your address, notify the Administrator as soon as possible.

5. HOW DO I OPT-OUT OF THE CLASS SETTLEMENT?

Complete the attached Request for Exclusion form and mail or email it to the Administrator before the Response Deadline. If you opt-out, you will not receive an Individual Class Payment and you will not be bound by the Release.

6. HOW DO I OBJECT TO THE SETTLEMENT?

Only Participating Class Members have the right to object to the Settlement by submitting a written objection to the Administrator before the Response Deadline. To object, please provide a written statement to the Administrator advising what you object to, why you object, and any facts that support your objection. Please sign the objection and identify the Action and include your name, current address, telephone number, and your approximate dates of employment.

Alternatively, a Participating Class Member can object (or personally retain a lawyer to object at your own cost) by attending the Final Approval Hearing. You (or your attorney) should be ready to tell the Court what you object to, why you object, and any facts that support your objection.

7. CAN I ATTEND THE FINAL APPROVAL HEARING?

You may, but are not required to, attend the Final Approval Hearing on May 29, 2026 at 1:00 p.m. before the Hon. Maureen A. McKee at the King County Superior Court of Washington, via Zoom. At the hearing, the judge will decide whether to grant Final Approval of the Settlement and how much of the Gross Settlement will be paid to Class Counsel, the Class Representatives, and the Administrator. The Court will invite comments from objectors, Class Counsel, and Defense Counsel before making a decision.

It is possible the Court will reschedule the Final Approval Hearing. Please review the Court's online docket or contact the Administrator or Class Counsel to verify the date and time of the Final Approval Hearing if you believe it may have been continued or otherwise changed.

8. HOW CAN I GET MORE INFORMATION?

The Agreement sets forth everything Defendants and Plaintiffs have promised to do under the proposed Settlement. The easiest way to read the Agreement, the Judgment, or any other Settlement documents is to go to <https://www.rekhiwolk.com/class-actions/trappers-sushi/>. You can also telephone or send an email to Class Counsel at the address below:

Class Counsel

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9. WHAT IF I LOSE MY SETTLEMENT CHECK OR FAIL TO CASH IT?

If you lose or misplace your settlement check, the Administrator will replace it if you request a replacement before the void date on the face of the original check. If your check is already void or you have otherwise failed to cash it, it will be provided to the Washington State Department of Revenue's Unclaimed Property program in your name, or a *cy pres* in compliance with applicable law. For more information, please review how to process a claim for your funds with the State of Washington, [WA Unclaimed Property](#).

**DO NOT CONTACT THE COURT OR THE COURT CLERK TO
OBTAIN INFORMATION ABOUT THE SETTLEMENT**