

**JAKE LONG & JEANNEA WINSTEAD V. TRAPPER O'KEEFFE, TRAPPERS SUSHI OF SILVERDALE, INC., &
TRAPPERS SUSHI TACOMA, INC.**
SUPERIOR COURT FOR THE STATE OF WASHINGTON IN AND FOR KING COUNTY
CASE NO. 23-2-02318-8 SEA

If you have worked as a salaried manager for a Trappers Sushi or the Burche restaurant in the State of Washington at any time since February 6, 2020, please carefully read this Notice. It may affect your rights.

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

Following is a summary of the lawsuit and your rights.

- Two former salaried managers, Jake Long and Jeannea Winstead (“Plaintiffs”), have sued Trapper O’Keeffe, Trappers Sushi of Silverdale Inc., and Trappers Sushi Tacoma, Inc. (“Defendants”) based on alleged violations of Washington State wage and hour laws. Plaintiffs allege that the restaurants owned by Mr. O’Keeffe in Washington State (Trappers Sushi and Burche restaurants) improperly classified their salaried managers as exempt from overtime, and thereby violated Washington law for failing to pay for all hours worked including off the clock worked and overtime compensation as well as failing to provide for and pay for missed meal and rest breaks.
- Defendants deny all of the claims and allegations in the lawsuit and assert that they have complied with all applicable state wage and hour laws.
- The Court has “certified” the lawsuit to proceed as a class action with respect to the claims asserted by Plaintiffs on behalf of salaried managers employed in the State of Washington who worked for Defendant O’Keeffe’s Washington restaurants at any time since February 6, 2020.

- The Court has not decided whether Plaintiffs' claims have any merit, or whether Defendants did anything wrong. There is no money available at this time, and there is no guarantee that there ever will be. 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 you will be bound by the outcome of the lawsuit, whether that result is favorable or unfavorable. If you choose to do nothing in response to this Notice and stay in the lawsuit, you give up any rights to seek relief from Defendants separately about the same legal claims in this lawsuit.
OR	
ASK TO OPT OUT (BE EXCLUDED) FROM THE LAWSUIT	Not be bound by the outcome of the lawsuit. Keep rights. If you ask to opt out (be excluded) from the lawsuit, you will not be part of this class action lawsuit and you will not be bound by the outcome of the lawsuit (whether favorable or unfavorable). You will retain any rights you may have to seek relief against Defendants separately about the same legal claims in this lawsuit. By retaining any rights you may have to seek relief against Defendants separately about the same legal claims in this lawsuit, you will not be entitled to any recovery Plaintiffs and the Class may obtain from Defendants whether through settlement or at a trial.

Your options are explained in this Notice. To ask to opt out of the lawsuit (be excluded), you must act by **Monday, March 10, 2025**.

- Plaintiffs and their lawyers must prove the claims against Defendants at a trial. As of the date this Notice was finalized, a trial date has been scheduled for April 28, 2025 (please check <https://www.rekhiwolk.com/class-actions/trappers-sushi/> for updates). If Plaintiffs prevail in the lawsuit, you will be notified about how to receive your share of any recovery.
- Any questions? Read this Notice and visit <https://www.rekhiwolk.com/class-actions/trappers-sushi/>**

BASIC INFORMATION

1. Why did I get this Notice?

Defendants' records show that you work or worked at Defendant O'Keeffe's Washington restaurants as a salaried manager since February 6, 2024.

This Notice explains that the Court has allowed, or "certified," the lawsuit to proceed as a class action that may affect you. You have legal rights and options that you may exercise before a trial or settlement, if any.

The trial is to decide whether the claims being made against Defendants by Plaintiffs (both individually and on behalf of the class) are correct. The Superior Court of Washington for King County is overseeing this class action. The case is currently assigned to Judge Maureen McKee. The lawsuit is known as *Long, et ano. v. Trappers Sushi Silverdale Inc., et al.* Case No. 23-2-02318-8 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, Plaintiffs Jake Long and Jeannea Winstead) sue on behalf of other people who may have similar claims. The people and the Class Representatives together are called a “Class” or “Class Members.” Because this case has two certified classes, the class of certified salaried managers is called the “Salaried Manager Class.” The persons or companies that have been sued (in this case Trapper O’Keeffe, Trappers Sushi of Silverdale Inc., and Trappers Sushi Tacoma Inc.) are called the Defendants. One court resolves the issues for everyone in the two Classes—except for those people who choose to exclude themselves by opting out per this Notice.

3. What is this lawsuit about?

The Class Representatives claim Defendants have violated Washington wage and hour laws and regulations by subjecting salaried managers to a practice of docking their salary if they fail to meet an hourly work quota. Plaintiffs allege such a practice is unlawful under Washington law resulting in unpaid wages owed to the Salaried Manager Class, including: (1) failing to pay wages for all time worked, including off-the-clock work and overtime, (2) failing to provide and pay for mandatory rest breaks and meal breaks, (3) breaching their agreements by failing to pay full salaries each pay period, (4) failing to pay for wages earned upon termination of employment, and (5) willfully refusing to pay wages owed by statute, regulation and/or contract. (Plaintiffs also allege Defendants violated Washington’s Silenced No More Act based on confidentiality agreements entered into by Silenced No More Class Members after June 9, 2022, claims which are brought on behalf of another certified class. It is possible you may be a member of both classes. For more information, visit the URL below.)

Defendants deny all of the above claims and allegations. Defendants maintain all salaried managers were properly classified as exempt from overtime and they have been paid all required wages. Defendants also deny that they have violated the Silenced No More Act in any way.

Plaintiffs’ First Amended Complaint in this lawsuit is available at <https://www.rekhiwolk.com/class-actions/trappers-sushi/>.

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 can be found in the Court’s Order Granting Stipulated Motion for Class Certification, which is available at <https://www.rekhiwolk.com/class-actions/trappers-sushi/>.

THE SALARIED MANAGERS’ CLASS 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 with respect to the claims discussed in Question 3, above. By establishing the Classes and issuing this Notice, the Court is not suggesting that the Class Representatives will win or lose this case. The Class Representatives must prove their claims at a trial.

6. What are the Class Representatives asking for?

On behalf of themselves and the Salaried Manager Class Members, the Class Representatives seek money damages for the alleged unpaid wages and missed breaks as well as exemplary damages, interest on the money damages, attorneys' fees, and litigation costs. Defendants deny that Plaintiffs or the members of the Salaried Manager Class are entitled to any damages or other recovery.

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, and the two sides have not decided on any settlement. There is no guarantee that any money or benefits will ever be obtained. If they are, you will be notified about how to receive a share.

WHO IS IN THE SALARIED MANAGER 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 Salaried Manager Class Members: All current and former managerial employees who worked for Defendants, including Trapper O'Keeffe and all restaurants owned by Trapper O'Keeffe which have operated in Washington State, for any period of time from February 6, 2020, until ninety (90) days prior to trial.

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, corporate officers, Board members, 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 Salaried Manager Class or ask to opt out (be excluded) from the lawsuit, and you need to decide this now.

9. What happens if I do nothing at all?

If you worked as a salaried manager at a Trappers Sushi or the Burche restaurant in Washington at any time from February 6, 2020, you will automatically be included in the lawsuit. In other words, if you do nothing, then you stay in the Salaried Manager Class.

If you are a Class Member, you don't have to do anything now if you want to stay in this lawsuit and be bound by the outcome of the lawsuit (whether favorable or unfavorable). If the Class Representatives prevail in the lawsuit at trial, or the parties reach agreement on a settlement of the lawsuit, all Class Members will be notified about how to obtain their share of any recovery.

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 opt out of (be excluded from) the lawsuit?

If you do not want to participate in this lawsuit, you must ask to be excluded. Deciding whether to stay in or opt out of the lawsuit is a decision for you to make. No one may force you to stay in or exclude yourself from the lawsuit or retaliate against you based on your decision whether to stay in or opt out of the Class. You may ask to opt out of the lawsuit for any reason.

If you wish to retain any rights you may have against Defendants for the claims asserted in the lawsuit, and not be bound by the results of the lawsuit, you need to opt out from the lawsuit. If you choose to opt out of the lawsuit and retain your individual rights, you should be aware that those rights may be subject to a statute of limitations (time limit).

If you opt out from the lawsuit, you will not be bound by the outcome of the lawsuit—whether favorable or unfavorable to Plaintiffs or Defendants.

11. How do I ask to opt out of the lawsuit and exclude me from the Salaried Manager Class?

To ask to opt out of the lawsuit and be excluded from the Salaried Manager Class, you must send a written request to the Notice Administrator using the contact information below.

The request must include: the case name: (1) *Long, et ano. v. Trappers Sushi Silverdale Inc., et al.* Case No. 23-2-02318-8 SEA., (2) the date, (3) a short note that says you desire to be excluded, and (4) your signature. The request must be signed by you.

Any written request sent by mail must be postmarked by Monday, March 10, 2025.

The Notice Administrator's mailing address is:

Long v Trappers
c/o Atticus Administration
PO Box 64053
Saint Paul, MN 55164

THE LAWYERS REPRESENTING YOU

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 Hones Law, PLLC are qualified to represent you and all Class Members. Together the lawyers are called "Class Counsel." They have experience in handling similar cases against other employers. More information about Rekhi & Wolk, P.S., or Hones Law, PLLC is available at www.rekhiwolk.com or www.honeslaw.com.

13. Should I get my own lawyer?

If you choose to stay in the lawsuit and remain in the Salaried Manager 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 recover money or benefits for the Salaried Manager 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 Salaried Manager Class or paid separately by Defendants.

THE TRIAL

The Court has scheduled a trial for April 28, 2025, to decide who will prevail. This date may change.

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

As long as the case is not resolved by a settlement or other decision, Class Counsel will have to prove Plaintiffs', and the Salaried Manager Class's 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 Salaried Manager 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?

Salaried Manager 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 Salaried Manager 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 Salaried Manager Class obtains money or benefits as a result of any court decision, trial or settlement (that may or may not be reached), 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.

GETTING MORE INFORMATION

18. Are more details available?

You may visit the website www.rekhiwolk.com/class-actions/trappers-sushi/, where you will find the Court's Order Granting Stipulated Motion for Class Certification, Plaintiffs' First Amended Complaint, and Defendant's current Answer. You may also get more information by calling Class Counsel.

Additional information is available at:
www.rekhiwolk.com/class-actions/trappers

The lawyers representing the Class are:

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Friday, January 24, 2025