

# NOTICE OF SETTLEMENT AND OPPORTUNITY TO PARTICIPATE IN SETTLEMENT OF LAWSUIT

*This Notice is authorized by the Circuit Court in the 15<sup>th</sup> Judicial Circuit in and for Palm Beach County. This is not a solicitation from a lawyer.*

- A settlement has been entered to resolve a collective action lawsuit that has been filed under the Fair Labor Standards Act (“FLSA”) on behalf of current or former non-exempt field-based Photographers (however titled) employed by Dealer Specialties, LLC, of Dominion Enterprises (“Dominion”) who were employed in New York during the period from April 17, 2017, to May 5, 2023; employed in California during the period from April 17, 2019 to May 5, 2023; and employed elsewhere in the United State during the period between April 17, 2020 to May 5, 2023 (the “Relevant Settlement Period”). The lawsuit alleges that Dominion failed to properly pay all Photographers for all hours worked. Dominion denies the allegations.
- The case is titled *Nall v. Dominion Enterprises*, Case No. 50-2023-CA-011274 filed in the 15<sup>th</sup> Judicial Circuit Court in Palm Beach County, Florida (“the Litigation”).
- This Notice describes important terms of the Settlement Agreement and Release of Claims (“Settlement”). Dominion does not believe that it did anything wrong, and Dominion contends that it paid all employees correctly. However, Dominion has entered into this settlement to avoid litigation costs and business disruptions.
- You may participate in the Settlement by fully completing and submitting the enclosed Consent to Join Settlement, Release, and Claim Form by March 2, 2024.
- If you participate in the Settlement, you will receive an estimated settlement payment of \$<<estAmt>>, which is based on the number of applicable weeks you were employed as a Photographer for Dominion during the Relevant Settlement Period. In exchange, you will be releasing Dominion from all wage and hour and related claims..
- Half of your estimated settlement payment will be subject to deductions for payroll taxes and other legally required withholdings. The other half of your estimated settlement payment will be treated as non-wage income without withholdings, but it will be reported to the IRS on form 1099.

<b>SEND IN THE CLAIM FORM AND RELEASE.</b>	<p><b>Receive a settlement payment. Give up or “release” certain claims.</b></p> <p>By timely fully completing and submitting the Consent to Join Settlement, Release, and Claim Form, you will receive your estimated settlement payment and release unpaid wage claims against Dominion that are covered by the Settlement. You may obtain a copy of the Settlement Agreement by contacting the Settlement Claims Administrator.</p>
<b>DO NOTHING.</b>	<p><b>You do not give up any rights; however, you will not receive a settlement payment.</b></p> <p>If you do nothing and do not send back your Consent to Join Settlement, Release, and Claim Form, you will not receive any settlement payment and will not release any claims. However, the statute of limitations will continue to run on your claim.</p>

**How do I participate in this action and receive a settlement payment?**

You must fully complete and return the Consent to Join Settlement, Release, and Claim Form to the Settlement Claims Administrator by March 2, 2024. The Settlement Claims Administrator's contact information is:

**Dominion Dealer Specialties, LLC Litigation Settlement Claims Administrator c/o**

Nall v Dominion Enterprises

c/o CPT Group, Inc.

50 Corporate Park

Irvine, CA 92606

Phone: 1-888-347-1013

Fax: (949) 419-3446

Email: [DominionSettlement@cptgroup.com](mailto:DominionSettlement@cptgroup.com)

Website: [www.DominionSettlement.com](http://www.DominionSettlement.com)

You can also submit a claim form online by visiting the website above, or you may also return the Claim Form by mail to the above address in the enclosed pre-paid envelope or send it by e-mail, or facsimile.

If the address to which this Notice was sent is no longer your address, you should immediately advise the Settlement Claims Administrator, at the address listed above and on the Claim Form.

**Who are the attorneys who represent the Named Plaintiffs?**

The Shavitz Law Group, P.A. represents the Named Plaintiffs and have negotiated the settlement terms. As part of the Settlement, subject to Court approval, the law firm will be paid one-third of the Settlement to compensate them for their attorneys' fees, plus their out-of-pocket costs and expenses for litigating and settling the Lawsuit. You will not have to pay the attorneys any of their fees, costs or expenses out-of-pocket.

Information about the firm is available at <https://www.shavitzlaw.com>, or by e-mail at [info@shavitzlaw.com](mailto:info@shavitzlaw.com), or by phone at 800-616-4000.

**Can I get more information about the Settlement?**

If you would like more information about the Settlement, you may contact the Settlement Claims Administrator, c/o CPT Group, Inc. at 1-888-347-1013, [DominionSettlement@cptgroup.com](mailto:DominionSettlement@cptgroup.com) or 50 Corporate Park, Irvine, CA 92606 or Plaintiffs' Counsel, or Plaintiffs' Counsel, Shavitz Law Group, at [info@shavitzlaw.com](mailto:info@shavitzlaw.com) or 800-616-4000.