

The above individuals are referred to as the “**Class Members.**”

You are receiving this notice because, according to the Defendants’ records, you are a Class Member covered by the Lawsuit because you worked as a Dancer at the Club during the relevant time period.

As a Class Member, you have a right to obtain information about the Lawsuit and, if you so choose, to exclude yourself from the Lawsuit.

2. What is the Lawsuit about?

Employees working in Pennsylvania are generally are entitled to minimum wages of \$7.25 for each hour worked. Pennsylvania employers are also generally prohibited from making deductions from the compensation of their employees.

In this lawsuit, Plaintiff alleges that she and other Dancers at the Club were “employees” of Defendants under Pennsylvania law based on the nature of their work relationship with Defendants. As a result, Defendants violated Pennsylvania wage and hour law by having a uniform practice of: (i) not paying Dancers any compensation for performing at the Club; and (ii) making various deductions to the compensation that Dancers receive from Club patrons through mandatory fees and fines.

Defendants deny that they violated the law. According to the Defendants, these practices are legal because Dancers at the Club are not “employees” who are entitled to the protections of Pennsylvania wage and hour law.

3. Have Plaintiff and the Class Members Already Won this Lawsuit?
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No. So far, the Court only has decided that the Lawsuit can proceed as a class action on behalf of Plaintiff and the Class Members. The Court has not yet ruled on the underlying merits of Plaintiff’s legal claim that Defendants violated Pennsylvania wage and hour law by failing to pay Class Members minimum wages and making improper deductions to their compensation.

4. Who will serve as the Class Members’ lawyer?
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The Court has designated the law firms of Winebrake & Santillo, LLC and Saltz, Mongeluzzi, Barrett & Bendesky, P.C. to serve as “Class Counsel” and to represent the interests of Plaintiff and the Class Members in this case.

If you have questions or would like additional information, you can contact: Winebrake & Santillo, LLC, 715 Twining Road, Suite 211, Dresher, PA 19025 (Phone: 215-884-2491; Website: www.winebrakelaw.com).

These firms represent your legal interests and are available to answer your questions in strict confidence. If you call, please identify yourself as a “Class Member” in the “Lou Turk’s Lawsuit” and ask to speak with one of the attorneys working on the Lawsuit.

5. How can I participate in the Lawsuit?

If you received this notice in an envelope addressed to you, then you are a Class Member. If you have any questions about your status as a Class Member, please call the law firm identified in Section 4.

As a Class Member, you do not need to do anything to participate in the Lawsuit.

If you do nothing, you will remain a Class Member and your right to obtain a recovery from Defendants will be determined by the outcome of the Lawsuit (whether favorable or unfavorable) or by any settlement of the Lawsuit.

6. How do I exclude myself from the Lawsuit?

You are not required to remain a Class Member. If you do not want to participate in the Lawsuit, you must prepare a letter simply stating that you want to be “excluded from the *Passe v. 500 Jansen, Inc.* Class Action Lawsuit.” Please send this letter to:

Lou Turk’s Class Action Lawsuit
Winebrake & Santillo, LLC
715 Twining Road, Suite 211
Dresher, PA 19025

Your letter must include your name, address, and phone number. Be sure to write clearly, and be sure to sign the letter.

In order to be valid, your exclusion letter must be postmarked on or before December 5, 2017.

Class Counsel will ensure that all exclusion letters are properly filed with the Court.

If you exclude yourself from the Lawsuit, you will not be bound by the outcome of the Lawsuit (whether favorable or unfavorable) or any settlement of the Lawsuit.

If you exclude yourself from the Lawsuit, you will be free to retain your own lawyer and, if you choose, bring your own individual lawsuit against the Defendants.

7. How do the lawyers representing Plaintiff and the Class Members get paid?

You are *not* personally responsible for paying any fees to the lawyers representing Plaintiff and the Class Members.

If Plaintiff and the Class Members win or settle the Lawsuit, the lawyers identified in Section 4 will ask the Court to either require the Defendants to pay their legal fees/expenses or allow them to recover their legal fees/expenses as a percentage of the Class Members’ total recovery. Any payments to the lawyers must be approved by the Court as fair and reasonable.

If Plaintiff and the Class Members lose the Lawsuit, the lawyers will not be paid any fees or expenses.

8. How do I obtain more information?

You can obtain more information by calling or writing the law firm identified in Section 4.

Date: June 5, 2017

Approved as to Form: Honorable Charles B. Burr, II
Delaware County Court of Common Pleas