

January 16, 2015

NOTICE OF COLLECTIVE ACTION LAWSUIT

Steven Neal v. Air Drilling Associates, Inc., 3:14-cv-01104-JMM
United States District Court, Middle District of Pennsylvania

TO: [INSERT NAME]

PLEASE READ THIS NOTICE CAREFULLY

INTRODUCTION

This Notice has been approved by the Federal Court. It informs you of the existence of a collective action lawsuit seeking unpaid overtime wages.

It has been determined that you are eligible to participate in the lawsuit.

DESCRIPTION OF THE LAWSUIT

In May 2014, Steven Neal (“Plaintiff”) started this lawsuit against Air Drilling Associates, Inc. (“the Company”). Since that time, three additional individuals have joined the lawsuit. The lawsuit is proceeding in the United States District Court in Scranton, PA and is assigned to United States District Judge James M. Munley.

The lawsuit alleges that the Company violated the law by failing to pay field employees for working beyond their scheduled 12-hour shifts. The lawsuit seeks to recover unpaid overtime wages in addition to liquidated damages, attorney’s fees, and litigation expenses.

The Company denies liability and asserts that its pay practices are legal, and that it pays its employees for all hours worked, including overtime.

The Federal Court has not yet decided who will win the lawsuit.

RETALIATION PROHIBITED

If you join the lawsuit, federal law prohibits the Company from retaliating against you as a result of your participation.

HOW TO JOIN THE LAWSUIT

You may join the lawsuit by completing the enclosed “Consent to Join” form and returning it in the enclosed envelope to Plaintiffs’ lawyers at the following address:

Winebrake & Santillo, LLC
715 Twining Road, Suite 211
Dresher, PA 19025

Your return envelope must be postmarked by **March 21, 2015**. If you fail to meet this deadline, you will not be allowed to participate in the lawsuit.

EFFECT OF JOINING THE LAWSUIT

If you join the lawsuit, you will be bound by the judgment of the Federal Court on all issues, including the reasonableness of any settlement. If the Federal Court finds in favor of Plaintiffs, you will receive a money payment. If the Federal Court finds in favor of the Company, you will receive nothing.

EFFECT OF NOT JOINING THE LAWSUIT

If you do not join the lawsuit, you will not be impacted by any judgment or settlement resulting from the lawsuit.

YOUR LEGAL REPRESENTATION IF YOU JOIN

If you join the lawsuit, you will be represented by Winebrake & Santillo, LLC, 715 Twining Road, Suite 211, Dresher, PA 19025; Ph: (215) 884-2491; Website: www.winebrakelaw.com.

You will not be required to pay any fees to the above law firm. The firm has taken this case on a “contingency” basis. If the lawsuit is unsuccessful, the firm will receive nothing. If the lawsuit results in a recovery, the firm will ask the Federal Court to award legal fees separate and apart from your recovery.

Please call the above law firm if you have any questions or desire any additional information about the lawsuit.

THIS NOTICE HAS BEEN AUTHORIZED BY UNITED STATES DISTRICT JUDGE JAMES M. MUNLEY. THE JUDGE HAS TAKEN NO POSITION REGARDING THE LAWSUIT’S MERITS.