

NOTICE OF COLLECTIVE ACTION LAWSUIT

*A court has authorized this Notice. This is not a solicitation from a lawyer.
Please review this Notice carefully, as it details certain legal rights that you may have.*

TO: All persons compensated or classified by Strickland Waterproofing as Independent Contractors

RE: Lawsuit regarding alleged failure to pay lawfully owed wages filed against Strickland Waterproofing Company, Inc. (“Strickland”) (Civil Action No. 3:20-cv-00076 (U.S. District Court for the Western District of Virginia))

This Notice is to inform you of your right to join a collective action lawsuit filed against Strickland Waterproofing Company, Inc. The lawsuit seeks to recover unpaid wages that may be owed to current and former employees of Strickland. If you wish to join this suit, you must complete and return the attached Consent to Participate in Collective Action to the address indicated below so that it is received back by **August 5, 2022**.

The Court has authorized this notice but has not decided whether Defendants have violated federal or Virginia law. This notice does not imply in any way the Court’s endorsement of Plaintiffs’ claims.

I. WHAT THIS LAWSUIT IS ABOUT

On December 22, 2020, former and current employees of Strickland (the “Named Plaintiffs”), sued Strickland alleging that employees Strickland were improperly classified as independent contractors and paid less than they should have been paid. Specifically, Named Plaintiffs claim that they were not paid at the properly calculated overtime rate and had monies illegal deducted from their paychecks.

The lawsuit seeks to recover what Plaintiffs believe that they should have been paid plus liquidated damages, attorneys’ fees, and court costs.

II. WHO CAN JOIN

Named Plaintiffs brought this suit collectively on behalf of all similarly situated employees. This case may be joined by any person who worked for Strickland at any time on or after June 23, 2018 and was classified or treated by Strickland as an independent contractor.

III. HOW TO JOIN THIS LAWSUIT

If this notice was addressed to you, you have been identified as a person who may be entitled to join this lawsuit. **To join this lawsuit, you must complete and sign the Consent to Join Suit form, and send it by email or U.S. mail to:**

Farias et al. v. Strickland Waterproofing Company Inc.
c/o Analytics Consulting LLC
P.O. Box 2006
Chanhassen, MN 55317-2006
Email: Strickland@noticeadministrator.com

The form should be received back by **August 5, 2022**. If you do not return the Consent to Participate in Collective Action form in time for Named Plaintiffs’ counsel to file it with the court by the above deadline, you may not be able to participate in this lawsuit.

Whether or not you join this suit, your claim is subject to certain statutes of limitations and you may lose your right to possibly recover money if you do not file suit promptly. Whether or not you join, you have a right to retain your own counsel regarding these matters.

IV. LEGAL EFFECT OF JOINING THIS LAWSUIT

If you decide to join this lawsuit, and remain as a party in it, you will be bound by any judgment entered by the Court. You may therefore be entitled to a portion of the money that the Court may award if Plaintiffs prevail. While this lawsuit is proceeding, with the assistance of counsel, you may have to answer written questions under oath or give sworn testimony. By joining this lawsuit, you designate Named Plaintiffs as your agent to make decisions on your behalf concerning all matters pertaining to this lawsuit. Unless you timely indicate to counsel for Named Plaintiffs that you no longer wish Named Plaintiff to represent your interests, you will be bound to decisions and agreements made by Named Plaintiffs, including agreements with Named Plaintiffs' counsel regarding attorneys' fees and costs.

This lawsuit is being brought without prepayment of costs or attorneys' fees. If plaintiffs are successful, costs expended and fees incurred by counsel on behalf of plaintiffs will be deducted from settlement or judgment first, or paid separately by Defendants. **IF THIS LAWSUIT IS NOT SUCCESSFUL YOU WILL NOT BE RESPONSIBLE FOR PAYING ANY ATTORNEYS' FEES.**

V. LEGAL EFFECT OF NOT JOINING THIS LAWSUIT

If you choose not to join this lawsuit, you need not do anything. If you do not join, your rights will not be affected by any judgment or settlement rendered in this lawsuit.

VI. FURTHER INFORMATION IS AVAILABLE

If you have any questions about this lawsuit, do not contact the court.

If you have questions, Rachel Nadas, one of the attorneys for the Plaintiffs, may be contacted by calling 202-899-2991 or by emailing rnadas@hfajustice.com.