

NOTICE OF UNPAID OVERTIME WAGE LAWSUIT

*This is a Court-Authorized Notice and is Not a Solicitation from a Lawyer.
The Court Has Made No Finding as to the Merits of This Case at this Time.*

If you are a current or former hourly employee of ContactUS, LLC and/or ContactUS Technology, LTD. d/b/a ContactUS Communications (collectively “ContactUS”) who is/was employed in any of ContactUS’s facilities or remotely and were scheduled to work 40 or more hours in any workweek(s) beginning November 9, 2018 to the present, then please read this notice carefully because a collective action lawsuit may affect your rights.

DEADLINE FOR JOINING: NOVEMBER 25, 2022

What Is this Case About?

This case is about ContactUS’s policy and/or practice of requiring off-the-clock, unpaid work for performing substantive work duties. Khadeza Pyfrom (“Plaintiff”), an hourly customer service representative, filed this lawsuit against ContactUS. In the lawsuit, Plaintiff alleges that ContactUS required its hourly, customer support employees to remain off the clock at any point where they were not actively on calls with customers, whether occurring before, during, or after that employee’s scheduled shift. Plaintiff alleges that ContactUS was able to accomplish this off-the-clock work by either requiring employees not to clock in, requiring employees to clock themselves out, or having a manager/supervisor clock out the employee. This unpaid work could include activities such as troubleshooting issues with ContactUS’s systems, calling ContactUS’s technical support line and waiting for help from technical support representatives, or being marked as “in reserve” by ContactUS when not actively on a call (but is not limited to the foregoing). Plaintiff alleges in this lawsuit that this policy and/or practice resulted in Plaintiff and others like her not being paid all of their overtime compensation. In addition to Plaintiff, the following individuals have joined this case: Deidra Danison, Bonnie Eubanks, Naleesha Hale, Sherry Tussing, and Dasarie Williams.

Plaintiff further alleges that ContactUS’s policy and/or practice as summarized above applied to all of ContactUS’s hourly, non-exempt customer support employees, regardless of whether they worked in a physical call center or from home. Accordingly, Plaintiff filed this lawsuit on her own behalf and on behalf of ContactUS’s other hourly, non-exempt customer support employees.

ContactUS denies Plaintiff’s allegations and asserts that it has properly compensated its employees for all hours worked.

The lawsuit is styled *Pyfrom, on behalf of herself and others similarly situated v. ContactUS, LLC*, Case No. 2:21-cv-4293, in the U.S. District Court for the Southern District of Ohio (the “Case”).

The parties are actively litigating the Case, and the Court has made no finding as to the merits of the Case at this time.

Why Is this Notice Being sent?

The Court has conditionally certified this Case as a collective action for the group of individuals defined above. You are receiving this Notice because ContactUS’s records suggest that you fit the definition of that group of individuals. As such, under the Fair Labor Standards Act, you have the right to be informed of this case and your right to join.

What Happens If I join the Case?

If you join, the lawyers listed on this Notice will represent you. You will be bound by any Court ruling, judgment, or settlement, whether favorable or unfavorable. If money is recovered in the Case, you may be entitled to receive a share of that money.

While the Case is proceeding, you may be required to respond to written questions, produce documents, and/or provide testimony at a deposition and/or trial.

Please understand that it is illegal for an employer to retaliate against you for joining this Case and illegal for an employer to discourage you from joining the Case.

How Do I Join the Case?

You must complete the enclosed Consent Form by answering all of the questions and then return the form by mail, fax, or email as provided in the Consent Form.

Please note: You are not a member of the Case until you return the enclosed Consent Form and the Form is filed with the Court by Plaintiff's counsel. Also note that your statute of limitations will continue to run until you join. If you return the Consent Form, you will be represented by the following attorneys:

Matthew J.P. Coffman
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What if I do not join the Case?

You have no obligation to join the Case. However, if you do not join the Case and money is recovered, you will not be entitled to a share of any of that money.

How quickly must I act to join the Case?

If you decide to join the Case, complete and return the signed consent form as set forth in the Consent Form. The completed Consent Form must be faxed, emailed, or postmarked no later than **November 25, 2022** in order for you to join.

PLEASE DO NOT CONTACT THE COURT REGARDING THIS NOTICE