

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 civilly detained child-support debtors who worked in the Lackawanna County Recycling Center on or after May 3, 2006

RE: Unpaid wage lawsuit filed against Lackawanna County, Lackawanna Recycling Center, Inc., and the Lackawanna County Solid Waste Management Authority (Middle District of Pennsylvania, No. 3:14-cv-1891)

This Notice is to inform you of your right to join a collective action lawsuit filed against Lackawanna County, Lackawanna Recycling Center, Inc., and the Lackawanna County Solid Waste Management Authority (“FLSA Defendants”). Among other claims, the lawsuit seeks to recover unpaid wages that may be owed to people who, on or after May 3, 2006, worked in the Lackawanna County Recycling Center (the “Center”) while detained at Lackawanna County Prison after a finding of civil contempt for failure to pay child support.

If you wish to join this suit, you must complete and return the attached Consent to Join Form to the address indicated below so that it is received by **December 2, 2025**.

The Court has authorized this notice but has not yet decided whether Defendants violated the law.

I. WHAT THIS LAWSUIT IS ABOUT

As detailed in their Second Amended Complaint, filed December 6, 2019, Plaintiffs William L. Burrell, Jr., Joshua Huzzard, and Dampsey Stuckey (the “Named Plaintiffs”), sued the FLSA Defendants, alleging (among other claims) that they were not paid in accordance with applicable federal wage-and-hour laws during their work for the FLSA Defendants at the Center. Specifically, they allege that the FLSA Defendants failed to pay lawfully owed wages in violation of the federal Fair Labor Standards Act.

The lawsuit seeks to recover what the Named Plaintiffs believe that they and others 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 people. This case may be joined by all civilly detained child-support debtors who worked in the Center on or after May 3, 2006, who elect to join this action.

III. HOW TO JOIN THIS LAWSUIT

If you have received this notice, you have been identified as a person who may be entitled to join this lawsuit. Enclosed, you will find a Consent to Participate in Collective Action form and an addressed envelope. **To join this lawsuit, you must complete and sign the Consent to Participate in Collective Action Form, and send it by email, U.S. mail, or fax to:**

Lackawanna Recycling Lawsuit
c/o Analytics Consulting LLC
P.O. Box 2006
Chanhassen, MN 55317-2006

Email: LackawannaRecyclingLawsuit@noticeadministrator.com

Fax: 952-404-5750

Online: www.collectiveaction.io/Lackawanna

The form should be received by **December 2, 2025**. 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 may be 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 the 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 Plaintiffs 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 the plaintiffs are successful, costs expended and fees incurred by counsel on their behalf will be deducted from the settlement or judgment first or paid separately by the FLSA Defendants. **IF THIS LAWSUIT IS NOT SUCCESSFUL, YOU WILL NOT BE RESPONSIBLE FOR PAYING ANY ATTORNEYS' FEES.**

V. NO 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, you 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, please do not contact the court.

If you have questions, please contact the Claims Administrator, Analytics, at

Email: LackawannaRecyclingLawsuit@noticeadministrator.com

Phone: 888-246-7048

Lackawanna Recycling Lawsuit

c/o Analytics Consulting LLC

P.O. Box 2006

Chanhasen, MN 55317-2006