Jones v. LA Live Theatre, LLC, et al.

Los Angeles County Superior Court, Case No. BC687908

YOUR NAME, ADDRESS, AND TELEPHONE NUMBER WILL BE DISCLOSED TO PLAINTIFF'S LAWYERS UNLESS YOU TAKE ACTION.

YOU MAY ELECT NOT TO PROVIDE YOUR NAME, ADDRESS, AND TELEPHONE NUMBER TO PLAINTIFFS' COUNSEL ON THE GROUNDS OF PRIVACY.

You are receiving this Notice because you have worked for either LA Live Theatre LLC or L.A. Arena Company, LLC (together "Staples Center") at some time between December 21, 2013 and the present. The Notice describes your rights to privacy and outlines the steps you must take if you do not want your name, address, and telephone number turned over to Plaintiff's lawyers.

Plaintiff Mayra Jones ("Plaintiff") worked for Staples Center as a non-exempt employee. Plaintiff filed a class action (the "Lawsuit") against Staples Center alleging it failed to: (1) pay overtime and minimum wages for all hours worked; (2) provide meal periods and rest breaks; (3) provide and maintain compliant wage statements; (4) timely pay wages upon termination; and (5) reimburse necessary business expenses. Staples Center strongly denies Plaintiff's claims and the allegations in the Lawsuit.

Plaintiff's attorneys wish to obtain your name, home or cell phone number, and home address so that they may contact you in order to gather information about the Lawsuit. The purpose of this Notice is to inform you about the Lawsuit so that you can decide whether to agree to the disclosure of your contact information to Plaintiff's attorneys.

THEREFORE, if you <u>do not want</u> your contact information provided to the Plaintiff's attorneys, you <u>must</u> <u>do one of the following on or before March 11, 2020:</u>

- 1. Sign and return the enclosed (postage pre-paid) postcard to *Jones v. LA Live Theatre* c/o Phoenix Settlement Administrators, PO Box 7208, Orange, CA 92863; OR
- 2. Log on to the following website http://www.phoenixclassaction.com/jones-v-staples/ and follow the prompts to indicate that you object to the disclosure of your personal information; OR
- 3. Send an email to the following address: notice@phoenixclassaction.com to indicate that you do not want your personal information released to Plaintiff's attorneys.

Your choice to return the enclosed postcard or to discuss your experience as a Staples Center employee with the lawyers for either side in the Lawsuit will not affect your employment with Staples Center in any way. This Notice is not an expression of any opinion by the Court as to the merits of any claim or defense asserted by either side in the Lawsuit.

Nothing in this Notice requires you to speak with or respond to the attorneys for Plaintiff or Staples Center, to answer any questions, or call them and speak with them on the telephone regarding the Lawsuit. Should you wish to contact either party's attorneys, the contact information for the lawyers for Plaintiff and Staples Center are listed on the reverse:

Plaintiff's Attorneys are:
Brandon Brouillette
Brooke W. Waldrop
Capstone Law APC

1875 Century Park East, Suite 1000

Los Angeles, CA 90067

Email: info@lalivelawsuit.com Telephone: (855) 414-6109 Staples Center's Attorneys are:

Robin J. Samuel

Baker & McKenzie LLP

1901 Avenue of the Stars, Suite 950

Los Angeles, CA 90067 Telephone: (310) 201-4728

Email: robin.samuel@bakermckenzie.com

Tao Y. Leung Michael DeLarco

Hogan Lovells US LLP

1999 Avenue of Stars, Suite 1400 Los Angeles, California 90067 Telephone: (310) 785-4600

Email: tao.leung@hoganlovells.com

PLEASE DO NOT CONTACT THE COURT REGARDING THIS NOTICE