

<<DATE>>

<<FIRST\_NAME>> <<LAST\_NAME>>  
<<ADDRESS 1>>  
<<ADDRESS 2>>

**Re: Payment From *Diaz v. 3M Company***

Dear <<FIRST\_NAME>> <<LAST\_NAME>>:

Enclosed you will find a check made payable to you. This is your payment from the settlement of the lawsuit entitled *Jennifer Diaz v. 3M Company.*, Orange County Superior Court Case No. 30-2019-01051635-CU-OE-CXC.

That case was filed against 3M Company (“3M”) pursuant to the California Private Attorneys General Act of 2004, Cal. Lab. Code § 2698 *et seq.* (called “PAGA”). The claim was brought on behalf of the State of California and all similarly situated “aggrieved employees” of 3M. “Aggrieved employees” means all current and former hourly-paid or non-exempt employees who worked 3M in the State of California from November 28, 2017 to March 13, 2018. You have been identified as one of the employees on whose behalf the case was brought. This payment is being made to you in exchange for a release of PAGA claims for the alleged failure to provide complete and accurate itemized wage statements during the time period of November 28, 2017 to March 13, 2018.

The plaintiff in the case claimed that 3M owed penalties under PAGA for certain California Labor Code violations stemming from the alleged failure to provide complete and accurate itemized wage statements during the time period of November 28, 2017 to March 13, 2018. 3M denies that it did anything wrong or that it owes any penalties. The parties agreed to resolve the case, and as part of that settlement, 3M agreed to pay a certain amount of money categorized as PAGA penalties. The total settlement amount is \$299,999.00, and the following deductions were made from the total settlement amount: (1) attorneys’ fees in the amount of \$99,999.66; (2) litigation costs in the amount of \$14,580.89; (3) a payment of \$5,000.00 to Plaintiff in exchange for a general release of her claims against 3M; and (4) \$8,850.00 to Phoenix Settlement Administrators for the cost of settlement administration. Under the PAGA statute, the amount remaining after the above deductions (equal to \$171,568.45) gets divided between the State (75%, equal to \$128,676.33) and the employees (25%, equal to \$42,892.12). The 25% distributed to employees was calculated based on each employee’s respective number of pay periods worked for 3M from November 28, 2017 to March 13, 2018. The enclosed check represents your portion of the penalties allocated to the employees.

If you have any questions, you can contact the claims administrator:

Phoenix Settlement Administrators  
P.O. Box 7208  
Orange, CA 92863

Very Truly Yours,