

NOTICE OF SETTLEMENT OF UNPAID OVERTIME LAWSUIT INVOLVING THE CELLULAR CONNECTION STORE MANAGERS

A court authorized this Notice. This is not a solicitation from a lawyer.

- A settlement has been entered to resolve a lawsuit on behalf of former exempt-classified and salary-paid Store Managers at The Cellular Connection.
- On June 10, 2021, Plaintiffs filed a lawsuit titled *Anderson, et al. v. The Cellular Connection, LLC*, 2021-CA-007204-AXX, seeking alleged unpaid overtime wages for exempt-classified Store Managers.
- This Notice describes important terms of the Settlement Agreement and Release of Claims (“Agreement”). You are receiving this Notice because The Cellular Connection’s records indicate you worked as an exempt-classified Store Manager for at least one workweek between May 18, 2018, and December 31, 2019.
- You may participate in the Settlement by submitting the enclosed Claim Form and Release by September 27, 2021.
- If you participate in the Settlement, you will receive a settlement payment, which is based on the number of weeks you worked as an exempt-classified Store Manager for The Cellular Connection between May 18, 2018 and December 31, 2019. Half of your payment will be subject to deductions for payroll taxes and other legally required withholdings. The other half of your payment will be treated as non-wage income.
- **Your legal rights may be affected, and you have a choice to make now:**

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT:	
SEND IN THE CLAIM FORM AND RELEASE.	<p>Receive a settlement payment. Give up certain claims.</p> <p>By completing the Claim Form and Release and sending it to the proper address by September 27, 2021, you will be paid the amount described above and you will be bound by the Judgment entered by the Court. You will also give up the right to sue the Defendant for claims arising from the same facts alleged in the Lawsuit.</p>
DO NOTHING.	<p>You do not give up any rights; however, you will not receive any payment under the settlement.</p>

What is this lawsuit and who is involved?

In this Lawsuit, former Store Managers allege they worked more than 40 hours per week but were not paid overtime wages. Rather, they claim that they were only paid a salary and that they are owed overtime wages for the hours they worked above 40 in a workweek. The Named Plaintiffs brought the case as a collective action on behalf of all Store Managers who worked for The Cellular Connection within the relevant time period for the case from May 18, 2018, through December 31, 2019.

The Cellular Connection denies these allegations and contends that all Store Managers were properly compensated for all hours worked, were properly classified as exempt, and were not eligible for overtime pay.

The Parties agreed to settle the disputed claims. The Court has not made any determination as to the merits of Plaintiffs' alleged claims or as to The Cellular Connection's defenses.

How do I receive a settlement payment?

You must complete and return the Claim Form and Release to the Claims Administrator according to the directions on the Claim Form and Release.

Your payment will be sent to you directly at the address which you provide on the Claim Form and Release.

What am I giving up in exchange for a settlement payment?

Once you submit your Claim Form and are sent a payment, you cannot sue or continue to sue The Cellular Connection for claims asserted or which could have been asserted in the Lawsuit for overtime pay that accrued during your employment as an exempt-classified Store Manager from May 18, 2018 through December 31, 2019. The release of claims also includes, without limitations, all state and federal claims for unpaid overtime wages, and related overtime wage claims for penalties, interest, liquidated damages, attorneys' fees, costs, and expenses.

Who are the attorneys who represent the Plaintiffs?

The Shavitz Law Group, P.A. and LeVan Muhic Stapleton LLC represent the Named Plaintiffs and have negotiated the settlement terms. As part of the Settlement, the firms will be paid one-third of the Settlement to compensate them for their attorneys' fees, plus their out-of-pocket costs and expenses for litigating and settling the Lawsuit. You will not have to pay the attorneys any of their fees, costs or expenses.

If you have any questions, you may contact Plaintiffs' Counsel at:

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You have the right to retain your own attorney at your own expense, but you are not required to do so. If you choose to submit a Claim Form and do not retain your own attorney, you will be represented by the attorneys listed above.

Can I get more information about the Settlement?

If you would like more information about the Settlement, you may contact Plaintiffs' counsel at the numbers above; or you may contact the Claims Administrator, Atticus Administration, PO Box 64053, St. Paul, MN 55164; 1-800-227-7163, TCCsettlement@atticusadmin.com; or you may visit www.TCCsettlement.com.