

CLASS ACTION NOTICE

SPOKANE COUNTY SUPERIOR COURT

Case No. 23-2-00428-32 Hawk v. Dog Sciences, LLC d/b/a Unleashed Academy & Mary Davies

A court authorized this notice. This is not a solicitation. This is not a lawsuit against you and you are not being sued. However, your legal rights are affected by whether you act or don't act.

If you are or were a Behaviorist or dog trainer and classified as an independent contractor of Dog Sciences, LLC d/b/a Unleashed Academy and/or Mary Davies between January 31, 2020, and the present please read this notice.

A class action may affect your legal rights.

The lawsuit alleges that Defendants Dog Sciences, LLC d/b/a Unleashed Academy and/or Mary Davies misclassified Behaviorists and/or dog trainers as independent contractors and failed to pay minimum wage and overtime.

The Spokane County, Washington Superior Court has allowed this lawsuit to proceed as a class action for all persons who have worked as dog trainers or Behaviorists and classified as Independent Contractors for Defendants in Washington at any time between January 31, 2020 and the date of the final disposition of this action.

The Court has expressed no opinion regarding the merits of the claims.

PLEASE READ THIS NOTICE CAREFULLY. IF YOU ARE A MEMBER OF AT LEAST ONE OF THE CLASSES, THIS LAWSUIT WILL AFFECT YOUR RIGHTS.

1. Why did I get this Notice?

You received this Notice because the Court in charge of this lawsuit has ordered that this Notice be sent to members of the Class and you were identified as a member of the class. The Court in charge of this case is the Spokane County Superior Court and the case is called *Hawk v. Dog Sciences, LLC d/b/a Unleashed Academy & Mary Davies* Case No. 23-2-00428-32.

The purpose of this Notice is to inform you about this lawsuit, the certification of the Class, and your options of staying in the classes or asking to be excluded from the case.

2. What Is this Lawsuit About?

Plaintiffs allege that Defendants violated the Washington State Minimum Wage Act (MWA) state law by improperly classifying Behaviorists/dog trainers as independent contracts and, because of the alleged improper classification, failing to pay Behaviorists/dog trainers minimum wage and overtime pay when they worked more than 40 hours per week.

Defendants have denied the claims in this lawsuit.

The Court has not decided whether Defendants violated the law. By allowing the case to go forward as a class action and this Notice to be issued, the Court is not suggesting that Plaintiffs will win or lose.

3. What is a class action?

In a class action, one or more people called class representatives (in this case, Suzanne Hawk) sue on behalf of people who have similar claims. If the Court “certifies” the class (i.e., approves the case for class treatment), the Court resolves the issues for all class members except for those who “exclude” themselves from the class (otherwise known as “opting out” of the class and the class action).

4. What Are My Options?

DO NOTHING	You do not need to do anything to be included in the class.
EXCLUDE YOURSELF	If you do not want to be included in the lawsuit, you must send a letter asking to be excluded postmarked no later than January 12, 2024, and will not be bound by the outcome of the lawsuit or share in any money recovered in it.

5. Do I have a Lawyer in this Case?

Yes. The Court has appointed Matthew Crotty and Casey Bruner of Riverside Law Group, PLLC, as Class Counsel. Unless you elect to exclude yourself from the lawsuit, you will be represented by Class Counsel in the litigation.

Although it is not necessary, you have the right, if you wish to do so, to retain your own attorney at your own expense.

If you have questions about the lawsuit, you may contact Class Counsel at the addresses below:

Matthew Crotty, mzc@riverside-law.com (509) 850 7011
Casey Bruner, cmb@riverside-law.com (509) 952 8182

905 W. Riverside Ave. Ste. 208
Spokane, WA 99201

6. How Will the Lawyers be Paid?

Class Counsel will not charge you directly for their work in this case. If Plaintiff recovers money, Class Counsel will be paid whatever attorneys’ fees the Court orders. Those fees may be subtracted from the recovery obtained from Defendants or be paid separately by Defendants, or they may be paid under a combination of the two.

7. What are my Options?

After reviewing this Notice, you have two options. You must decide at this stage whether you want to: (1) remain a Class Member and share in any money recovered in the lawsuit; (2) opt-out and exclude yourself from the Classes and lawsuit.

OPTION #1: REMAIN A CLASS MEMBER

8. How Do I Remain in the Class?

If you are a member of the Classes and you do not request to be excluded, you will remain a part of the Class and share in any money recovered in the lawsuit, but give up the opportunity to sue Defendants separately for the claims Ms. Hawk has asserted. You will be bound by any ruling, settlement or judgment regarding the claims in this case, whether favorable or unfavorable.

If your contact information changes after you receive this Notice, you should contact Class Counsel at the addresses in Section 5.

OPTION #2: OPTING OUT OF THE CLASSES

9. Who Should Opt Out of the Class?

If you want to keep the right to sue or continue to sue any of the Defendants regarding their failure to pay minimum wage and overtime,” then you should take steps to exclude yourself from this class action. This is called “opting out” of the class action. If you opt out, you will receive no benefits under the lawsuit. You will be able to assert your claim on your own, but Defendants will retain the right to assert any and all defenses to your claim, including the defense that your claim is untimely.

10. How Do I Opt Out of the Class?

To opt out of the Classes, you must mail a written, signed statement that you are opting out of the class action to Class Counsel at:

Matthew Crotty
905 W. Riverside Ave. Ste. 208
Spokane, WA 99201

To be effective, the opt-out statement must (1) contain your name, address, email(s), and telephone number(s); (2) contain the title of the lawsuit, *Hawk v. Dog Sciences, LLC et. al.* (3) include a written statement stating “I wish to be excluded from the Classes,” and (4) be signed and dated.

To be effective, this opt-out statement must be mailed via First Class United States Mail, postage prepaid and must be postmarked on or before January 12, 2024.

Please note that if you submit a timely and valid request for exclusion, you will have no benefits under this lawsuit and will no longer be represented by Class Counsel.

11. Where Can I get More Information?

This Notice summarizes the lawsuit and the Classes certified by the Court. If you have questions, please contact Class Counsel at the contact information in Section 5 above.

There is also information and certain important documents from the case posted on the following website <https://crottyandson.com/hawk-v-unleashed/>

Again, the important deadlines are:

Last Day To “Opt-Out” of the Class: January 12, 2024

MARY DAVIES, DOG SCIENCES, LLC AND THEIR AGENTS MAY NOT COMMUNICATE WITH YOU ABOUT THIS NOTICE OR THIS LAWSUIT AND MAY NOT RETALIATE AGAINST YOU FOR NOT OPTING OUT OF THE CLASS.

PLEASE DO NOT CALL OR CONTACT THE COURT, THE OFFICE OF THE CLERK OF COURT, OR DEFENDANT WITH QUESTIONS REGARDING THIS NOTICE.

Dated November 7, 2023