

NOTICE OF PAGA SETTLEMENT

Re: **Selena Evins v. Pepperbush Holdings, LLC, et al.**
San Diego County Superior Court, Case No. 37-2024-00023225-CU-OE-CTL

You have received the enclosed check in connection with the Settlement (“Settlement”) of the above-referenced lawsuit (“Lawsuit”) brought by former employee Selena Evins (“Plaintiff”) against Pepperbush Holdings, LLC (“Defendant”) for civil penalties pursuant to the Private Attorneys General Act, Labor Code sections 2698, *et seq.* (“PAGA”).

Plaintiff claimed she and other non-exempt, hourly-paid employees of Defendant employed at any time from April 24, 2024, to February 27, 2025 (“PAGA Period”), in California were subjected to various Labor Code violations.

Defendant adamantly denies all allegations and liability. To avoid further time and expense of protracted and uncertain litigation, however, Defendant and Plaintiff have agreed to settle the Lawsuit. The Settlement, approved by the Court on June 27, 2025, resolves the alleged claims brought on behalf of all California past and present hourly-paid, non-exempt employees of Defendant employed at any time during the PAGA Period (“PAGA Group”).

Pursuant to the Court’s Order Approving PAGA Settlement (“Approval Order”), a payment of \$125,000.00 was approved in settlement of this Lawsuit. As discussed in detail below, significant fees and costs will be deducted from the \$125,000.00 settlement payment, leaving only a small portion to be split among approximately 143 employees who worked during the PAGA Period, including you. Upon the date of entry of that Approval Order, and payment of all funds due under this Settlement, the California Labor & Workforce Development Agency (“LWDA”) and PAGA Group, including Plaintiff, fully release and forever discharge the Defendant (and other Released Parties as defined in the PAGA Settlement Agreement) from all claims for PAGA penalties during the PAGA Period that were alleged, or reasonably could have been alleged, based on the facts contained in the Operative Complaint, and the PAGA Notice dated May 19, 2024 (“PAGA Notice”) that was sent to Defendant and the LWDA by Plaintiff, which includes the PAGA claims based on Defendant’s alleged failure to: pay minimum and overtime wages, provide meal periods and rest periods, maintain accurate records for hours worked, timely pay wages at termination, provide accurate itemized wage statements, reimburse necessary business expenses, and all other claims and allegations made or which could have reasonably been made in the Lawsuit based on the facts and allegations pled in the Operative Complaint and PAGA Notice. The Parties intend this release to be limited to claims for civil penalties only.

After accounting for PAGA Counsel’s attorneys’ fees of \$41,662.50 and reimbursement of litigation costs of \$25,000.00, and settlement administration costs of \$5,995.00, the remaining sum will be divided pursuant to California law as follows: \$39,256.88 (75%) to the LWDA and \$13,085.63 (25%) to all PAGA Group employees to be shared on a proportionate basis. The enclosed check represents your share based upon the number of PAGA Pay Periods you worked during the PAGA Period. An IRS 1099 form is enclosed. You will be solely responsible for paying federal, state, or local taxes, if any, on the amount of your check.

Regardless of whether you negotiate the enclosed check, by way of this Settlement and the corresponding Approval Order, for the PAGA Period, each PAGA Group employee has fully released Defendant and other Released Parties for all claims for civil penalties under PAGA that were alleged, or could have been alleged, based on the facts contained in the PAGA Notice and Plaintiff’s Operative Complaint filed in the Action.

Your enclosed check is valid for 180 days from the date of its issuance. ***It is strongly recommended that you cash or deposit this check immediately.*** After the 180 days expires, you cannot cash the check, it will be null and void, and the amount will be forwarded to the State of California Controller’s Office Unclaimed Property Division for further handling. **Even if you fail to cash the enclosed check, you will still be deemed to have released all claims arising from the Lawsuit, including all claims set forth in the release of claims described above.**

If the check is lost or misplaced, please contact the Administrator immediately at 800-355-0700 to have it reissued. If you have any questions about your check, please contact Apex Class Action LLC.