

LEGAL NOTICE

Colombians who provided housekeeping services at U.S. resorts through MasterCorp may qualify for a payment in a \$4.95 million USD class action settlement

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

Para una notificación en español, visite www.ColombianHousekeeperSettlement.com

- A proposed settlement has been reached in a class action lawsuit called *Jane Doe, et al. v. MasterCorp, Inc.*, Case No. 1:24-cv-00678 (E.D. Va.) (the “Settlement”). The Settlement is between Jane Doe, John Doe 1, and John Doe 2 (collectively “Plaintiffs”), on behalf of the proposed Settlement Class, and MasterCorp, Inc. (“MasterCorp” or “Defendant”).
- You are a Settlement Class Member if:
 - ✓ You are a Colombian National or of Colombian origin;
 - ✓ You were paid by Perennial Pete, LLC or one of its affiliated entities or companies, including SM Cleaning Solutions Inc.; WD Cleaning Solutions Inc.; DM Cleaning Solutions Inc.; JM Cleaning Solutions Inc.; EV Cleaning Solutions Inc.; EM Cleaning Services and Solutions Inc.; SD Cleaning Services and Solutions Inc.; and
 - ✓ You provided housekeeping services at resorts in the United States where MasterCorp was responsible for housekeeping between March 19, 2021 and May 15, 2024.
- Plaintiffs claim that MasterCorp subjected Settlement Class Members to unfair and unlawful practices. These included working Settlement Class Members for long hours without overtime pay, and immigration-related wrongful conduct that made Settlement Class Members feel vulnerable. MasterCorp denies it has committed any wrongdoing or violated any state or federal law. The Court has not decided who is right or wrong. Instead, the parties have agreed to the Settlement to avoid the risks, uncertainty, expense, and burden of litigation.
- If the Settlement is approved by the Court, MasterCorp will pay **\$4,950,000** in U.S. dollars. After deducting costs associated with attorneys’ fees and reasonable costs to Class Counsel, service awards to Plaintiffs, settlement administration and notice costs to the Settlement Administrator, and any applicable taxes, the funds are available to Settlement Class Members who submit timely Claim Forms. Any remaining funds will be distributed to St. Jude, for undocumented-immigrant-related services.
- If you are a Settlement Class Member, your legal rights are affected whether or not you act. ***Please read this notice carefully.***

QUESTIONS? Visit www.ColombianHousekeeperSettlement.com or call toll-free from the U.S. at 1-888-825-1238 or from Colombia at 01-800-519-1529

YOUR LEGAL RIGHTS AND OPTIONS		
FILE A CLAIM	<ul style="list-style-type: none"> • Receive a payment • Be bound by the Settlement • Give up your individual right to sue or continue to sue MasterCorp for the claims in this case 	Submit online or postmarked by November 01, 2024
ASK TO BE EXCLUDED (“OPT OUT”)	<ul style="list-style-type: none"> • Remove yourself from the Settlement Class and receive no payment • Keep your individual right to sue or continue to sue MasterCorp for the claims in this case 	Postmarked by November 01, 2024
OBJECT	<ul style="list-style-type: none"> • Tell the Court what you do not like about the Settlement — You will still be bound by the Settlement, and you may still file a claim 	Postmarked by November 01, 2024
ATTEND THE HEARING	<ul style="list-style-type: none"> • Ask to speak in Court about the Settlement — If you want your own attorney to represent you, you must pay for him or her yourself • File your Notice of Intent to Appear by November 01, 2024 	November 22, 2024
DO NOTHING	<ul style="list-style-type: none"> • Receive no payment • Give up your right to sue or continue to sue MasterCorp for the claims in this case 	

- These rights and options—**and the deadlines to exercise them**—are explained in this notice. The deadlines may be moved, canceled, or otherwise modified, so please check the Settlement Website, www.ColombianHousekeeperSettlement.com, regularly for updates and further details.
- The Court in charge of this case still has to decide whether to approve the Settlement. **Payments will be made after the Court approves the Settlement.** Please be patient.

QUESTIONS? Visit www.ColombianHousekeeperSettlement.com or call toll-free from the U.S. at 1-888-825-1238 or from Colombia at 01-800-519-1529

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BASIC INFORMATION

1. Why is there a notice?

You have a right to know about the proposed Settlement in this class action lawsuit and about your rights and options before the Court decides whether to approve the Settlement.

The Court in charge of this case is the United States District Court for the Eastern District of Virginia. The case is called *Jane Doe, et al. v MasterCorp, Inc.*, Case No. 1:24-cv-00678. The Settlement is between Jane Doe, John Doe 1, and John Doe 2 (collectively “Plaintiffs”), on behalf of the proposed Settlement Class, and MasterCorp, Inc. (“MasterCorp” or “Defendant”).

2. What is this lawsuit about?

Plaintiffs claim that MasterCorp subjected Settlement Class Members to wrongful labor and immigration-related wrongful conduct in violation of 18 U.S. Code sections 1581 et seq. (“TVPRA”); failed to pay the workers all compensation due to them in violation of 29 U.S. Code sections 201 et seq. (“FLSA”) and the wage and hour laws of various states; engaged in discrimination on the basis of national origin in violation of federal and state anti-discrimination statutes; and committed common law fraud and negligence. The major claims in this lawsuit for which Plaintiffs are seeking relief on an individual and class basis are their claims asserting violations of TVPRA, discrimination on the basis of national origin, and their common law claims.

3. What is this a class action?

In a class action, one or more people called Plaintiffs sue on behalf of people who have similar claims. All these people are a class or class members.

4. Why is there a settlement?

MasterCorp denies it has committed any wrongdoing or violated any state or federal law pertaining to wrongful labor or immigration-related wrongful conduct, payment of wages, hours of work, or earnings in any form, or discrimination on the basis of national origin. The Court has not decided who is right or wrong. Instead, the parties have agreed to the Settlement to avoid the risks, uncertainty, expense, and burden of further litigation. Plaintiffs and their attorneys think the Settlement is in the best interest of the Settlement Class and is fair, reasonable, and adequate.

WHO IS IN THE SETTLEMENT CLASS?

5. Am I part of the Settlement Class?

The Settlement Class includes all workers who are Colombian Nationals or of Colombian origin who were paid by Perennial Pete, LLC or one of its affiliated entities or companies, and who provided housekeeping services at resorts in the United States where MasterCorp was responsible for housekeeping services between March 19, 2021 and May 15, 2024.

6. What if I am still not sure if I am included in the Settlement Class?

If you are not sure whether you are a Settlement Class Member, or have any other questions about the Settlement, visit www.ColombianHousekeeperSettlement.com, or call toll-free from the U.S. at 1-888-825-1238 or from Colombia at 01-800-519-1529.

7. I am not sure I was authorized to work. Can I still participate?

Yes. You can still participate as long as you submit a timely Claim Form online or postmarked by **November 01, 2024**.

SETTLEMENT BENEFITS – WHAT SETTLEMENT CLASS MEMBERS GET

8. What does the Settlement provide?

If the Settlement is approved by the Court, MasterCorp will pay a Settlement Amount of **\$4,950,000** in U.S. dollars for:

1. Payments to Settlement Class Members who file a valid and timely claim;
2. Attorneys' fees and reasonable costs to Class Counsel (not to exceed one third of the Settlement Amount plus their reasonable costs);
3. Service awards to Plaintiffs (maximum amount of \$7,500 in U.S. dollars each);
4. Settlement administration and notice costs to the Settlement Administrator; and
5. Any applicable taxes.

Payments will be distributed equally among all Settlement Class Members who file a valid and timely claim.

9. What can I get from the Settlement?

Settlement Class Members who file a valid and timely claim will receive an equal share of the NET Settlement Amount. The NET Settlement Amount is the **\$4,950,000** Settlement Amount less attorneys' fees and reasonable costs, service awards, settlement administration costs, and any applicable taxes.

There are an estimated 205 Settlement Class Members. If all 205 file a claim, they will each receive 1/205 of the Net Settlement Amount. If fewer Class Members file a claim, payments will increase equally on a *pro rata* share. For example, if only 125 Settlement Class Members file a claim, each will receive 1/125 of the Net Settlement Amount. However, there is a cap. The maximum payment any Settlement Class Member can get is 5/205 of the Net Settlement Amount. Any remaining funds in the NET Settlement Amount will be distributed to St. Jude for undocumented-immigrant-related services.

HOW TO GET A PAYMENT

10. How can I get a payment?

To be eligible to receive a payment from the Settlement, you must complete and submit a timely Claim Form. The Claim Form can be obtained online at www.ColombianHousekeeperSettlement.com or by writing the Settlement Administrator at the

QUESTIONS? Visit www.ColombianHousekeeperSettlement.com or call toll-free from the U.S. at 1-888-825-1238 or from Colombia at 01-800-519-1529

address listed below. All Claim Forms must be submitted online or postmarked by **November 01, 2024**.

Colombian Housekeeper Settlement
c/o JND Legal Administration
PO Box 91308
Seattle WA 98111
www.ColombianHousekeeperSettlement.com

If you do not submit a valid Claim Form by **November 01, 2024**, you will not receive a payment, but you will be bound by the Court's judgment.

11. When will I get my payment?

Payments will be made to Settlement Class Members who submit a valid and timely Claim Form after the Court grants "final approval" to the Settlement. If the Court approves the Settlement, there may be appeals. It's always uncertain whether these appeals can be resolved and resolving them can take time. Please be patient.

12. What am I giving up to receive a payment or stay in the Settlement?

If you are a Settlement Class Member, unless you exclude yourself from the Settlement, you cannot sue, continue to sue, or be part of any other lawsuit against MasterCorp about the claims released in this Settlement. It also means that all the decisions by the Court will bind you. The Released Claims and Releasees are defined in the Settlement Agreement and describe the legal claims that you give up if you stay in the Settlement. The Settlement Agreement is available at www.ColombianHousekeeperSettlement.com.

EXCLUDING YOURSELF FROM THE SETTLEMENT

If you do not want a payment from the Settlement or you want to keep the right to sue or continue to sue MasterCorp on your own about the claims released in this settlement, then you must take steps to get out. This is called excluding yourself—or it is sometimes referred to as "opting out" of the Settlement.

13. How do I get out of the Settlement?

To exclude yourself (or "opt out") from the Settlement, you must submit an Opt-Out Letter. Your Opt-Out Letter must include the following:

- Your name, current street address, and telephone number;
- Documents or testimony sufficient to establish your membership in the Settlement Class;
- A statement saying that you want to be excluded from the Settlement;
- The case name and number (*Jane Doe, et al. v MasterCorp, Inc.*, Case No. 1:24-cv-00678); and
- Your signature.

Your exclusion request must be postmarked by November 01, 2024 to:

QUESTIONS? Visit www.ColombianHousekeeperSettlement.com or call toll-free from the U.S. at 1-888-825-1238 or from Colombia at 01-800-519-1529

Colombian Housekeeper Settlement – Exclusions
c/o JND Legal Administration
PO Box 91308
Seattle, WA 98111

If you ask to be excluded from the Settlement, you will not get any payment from the Settlement, and you cannot object to the Settlement.

If you do not include the required information or timely submit your Opt-Out Letter, you will remain a Settlement Class Member and will not be able to sue MasterCorp about the claims in this lawsuit.

14. If I do not exclude myself, can I sue MasterCorp for the same thing later?

No. Unless you exclude yourself, you give up any right to sue MasterCorp for the claims that the Settlement resolves. If you have a pending lawsuit against MasterCorp, speak to your lawyer in that lawsuit immediately. You must exclude yourself from the Settlement to continue your own lawsuit. If you properly exclude yourself from the Settlement, you will not be bound by any orders or judgments related to the Settlement.

15. If I exclude myself, can I still get a Settlement payment as part of this class action?

No. You will not get money from the Settlement if you exclude yourself. If you exclude yourself from the Settlement, do not send in a Claim Form asking for benefits from the Settlement.

THE LAWYERS REPRESENTING YOU

16. Do I need to hire my own lawyer?

No. The Court has appointed Rachel Geman from Lief, Cabraser, Heimann & Bernstein, LLP and Mark Hanna from Murphy Anderson PLLC as Class Counsel. You will not be charged for these lawyers. If you want to be represented by your own lawyer, you may hire one at your own expense.

17. How will the lawyers be paid?

Class Counsel will file a motion seeking a fee award not to exceed one third of the Settlement Amount plus reasonable costs. Any attorney fee award is ultimately determined by the Court. Class Counsel's motion for fees and costs, and for Plaintiffs' service awards, will be available at www.ColombianHousekeeperSettlement.com before October 18, 2024 so that you have an opportunity to comment on the motion.

OBJECTING TO THE SETTLEMENT

18. How do I tell the Court if I do not like the Settlement?

Any Settlement Class Member who does not timely and properly opt out of a settlement may object to the proposed Settlement. Objections must be submitted in writing to the Settlement Administrator postmarked by **November 01, 2024**.

QUESTIONS? Visit www.ColombianHousekeeperSettlement.com or call toll-free from the U.S. at 1-888-825-1238 or from Colombia at 01-800-519-1529

The written objection must include:

- The case name and number (*Jane Doe, et al. v MasterCorp, Inc.*, Case No. 1:24cv-00678);
- Your name, address, and telephone number;
- Documents or testimony sufficient to establish your membership in the Settlement Class;
- A detailed statement of your objection;
- Whether you are requesting the opportunity to appear and be heard at the Final Approval Hearing;
- The identity of all counsel (if any) representing you who will appear at the Final Approval Hearing;
- Copies of any papers, briefs, or other documents upon which your objection is based; and
- Your signature, in addition to the signature of your attorney (if any).

Your objection must be mailed postmarked by **November 01, 2024** to:

Colombian Housekeeper Settlement – Objection
c/o JND Legal Administration
PO Box 91308
Seattle, WA 98111

19. What is the difference between objecting and excluding?

Objecting is simply telling the Court that you don't like something about the Settlement. You can object to the Settlement only if you do not exclude yourself from the Settlement. Excluding yourself from the Settlement is telling the Court that you don't want to be part of the Settlement. If you exclude yourself from the Settlement, you have no basis to object to the Settlement because it no longer affects you.

THE COURT'S FINAL APPROVAL HEARING

20. When and where will the Court decide whether to approve the Settlement?

The Court will hold a Final Approval Hearing on November 22, 2024 at 10:00 a.m. ET at the United States District Courthouse for the Eastern District of Virginia, Albert V. Bryan U.S. Courthouse, 401 Courthouse Square, Alexandria, VA 22314..

At the hearing, the Court will consider whether to give final approval to the Settlement and grant Class Counsel's request for attorneys' fees not to exceed one third of the Settlement Amount plus reasonable costs; service awards to Plaintiffs at a maximum amount of \$7,500 in U.S. dollars each; as well as reimbursement for expenses incurred for settlement administration, including notice and taxes.

21. Do I have to come to the hearing?

No. Class Counsel will answer any questions that the Court may have, but you may come at your own expense. If you submit an objection, you don't have to come to Court to talk about it. As long as you filed and served your written objection on time to the Settlement Administrator, the Court will consider it. You may also pay your own lawyer to attend.

QUESTIONS? Visit www.ColombianHousekeeperSettlement.com or call toll-free from the U.S. at 1-888-825-1238 or from Colombia at 01-800-519-1529

22. May I speak at the hearing?

Yes. You may ask the Court for permission to speak at the Final Approval Hearing. To do so, you must send a letter saying that it is your “Notice of Intention to Appear.” Your request must include your name, address, and telephone number, as well as the name, address, and telephone number of the person that will appear on your behalf, as well as copies of any papers, exhibits, or other evidence that you or your counsel will present to the Court in connection with the Final Approval Hearing. Your request must be mailed to the Settlement Administrator postmarked by **November 01, 2024**.

If you do not provide a Notice of Intention to Appear in complete accordance with the deadline and specifications provided above, you may not be allowed to speak or otherwise present any views at the Final Approval Hearing.

IF YOU DO NOTHING

23. What happens if I do nothing at all?

If you do nothing, you will not get a payment from the Settlement. Unless you exclude yourself, you will not be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against MasterCorp about the legal issues in this case, ever again.

GETTING MORE INFORMATION

24. How do I get more information?

This notice summarizes the proposed Settlement. You can visit www.ColombianHousekeeperSettlement.com to review the complete settlement documents, papers, and pleadings filed in this litigation, or contact the Settlement Administrator for more information:

Colombian Housekeeper Settlement
c/o JND Legal Administration
PO Box 91308
Seattle WA 98111

1-888-825-1238 (from U.S.)
01-800-519-1529 (from Colombia)

PLEASE DO NOT CONTACT THE COURT OR THE COURT CLERK’S OFFICE

QUESTIONS? Visit www.ColombianHousekeeperSettlement.com or call toll-free from the U.S. at 1-888-825-1238 or from Colombia at 01-800-519-1529