

NOTICE OF CLASS ACTION SETTLEMENT

Amber Coyle v. Mosaic Sales Solutions US Operating Co., LLC.
Los Angeles County Superior Court Case No. 19STCV30088

This Notice provides important information about a proposed settlement in the above-referenced class action lawsuit (the “Action”) and your rights to participate in or exclude yourself from the Settlement. The Action was brought by Amber Coyle (“Plaintiff”) against Mosaic Sales Solutions US Operating Co., LLC (“Defendant”).

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
DO NOTHING	If you wish to participate in the Settlement, you do not need to do anything (see Section C.1). You will be paid your share of the Settlement benefits, in exchange for giving up any rights to sue for the Released Claims (see Section D).
EXCLUDE YOURSELF	<p>If you do not wish to participate in the Settlement, you will exclude yourself following the procedures described more fully below (see Section C.3). You will waive any right to be paid your share of the Settlement benefits and retain any rights to sue for the Released Claims (see Section D), in exchange for giving up any right to object to the Settlement.</p> <p>Your deadline to exclude yourself from the Settlement is December 12, 2022.</p>
OBJECT	<p>If you disagree with the Settlement, you will tell the Court why, following the procedures described more fully below (see Section C.2). The Court may or may not agree with your objection, and you may still be paid your share of the Settlement benefits, in which case you will be deemed as having given up any rights to sue for the Released Claims (see Section D). The Court has scheduled the Final Fairness Hearing in this matter for January 30, 2023, at 10:00 a.m. in Department 7 of the Los Angeles County Superior Court, located at 312 North Spring Street, Los Angeles, California (see Section E).</p> <p>However, if you exclude yourself from the Settlement, you may not object.</p> <p>Your deadline to object to the Settlement is December 12, 2022.</p>

The Court has scheduled the Final Fairness Hearing in this matter for January 30, 2023 at 10:00 a.m. in Department 7 of the Los Angeles County Superior Court, located at 312 North Spring Street, Los Angeles, California. See Section F below for more information.

Visit www.themosaicsettlement.com for more information and to view Settlement documents.

A. Summary Of The Claims

In her Complaint, Plaintiff contends that Defendant failed to reimburse employees who worked as brand ambassadors and/or product demonstrators (“Brand Ambassadors”) for all their business-related mileage expenses and all their business-related expenses for the costs of acquiring and using electronic communication devices, including cellular phones, tablets and/or computers. On behalf of herself and other Brand Ambassadors who worked for Defendant, Plaintiff seeks to recover in the Action unpaid expense reimbursement, interest, costs of suit and attorneys’ fees.

Defendant denies all of the allegations against it in the Lawsuit, maintains that it complied with all labor laws, and contends that, except for the purposes of Settlement, the claims in the Action may not be pursued as a class action. The Court has not decided whether or not Defendant violated any laws or whether any person is entitled to any damages or other relief.

B. Why You Are Receiving This Notice

On September 7, 2022, the Los Angeles County Superior Court (the “Court”) preliminarily approved a settlement of the Lawsuit on behalf of the Class Members. Class Members are all persons who worked for Defendant in California as a Brand Ambassador, at any time between August 27, 2015 and June 30, 2021, (the “Class Period”). According to Defendant’s records, you are a Class Member, and you have the right to participate in, object to, or exclude yourself from the Settlement. This letter explains your legal rights and options with respect to the Settlement.

C. The Terms Of The Settlement

Defendant has agreed to pay the Gross Settlement Amount of One Hundred Forty-Eight Thousand Dollars (\$148,000) in exchange for a release of the claims asserted in the Lawsuit. Payments to be made from the Gross Settlement Amount include 1) the cost of Settlement administration (estimated to be approximately \$20,500); 2) the amount of attorney’s fees (not to exceed \$49,333.33) and litigation costs (not to exceed \$13,250) awarded to Class Counsel; 3) the amount of Service Payment awarded to Plaintiff (not to exceed \$5,000); and 4) Settlement benefits to class members who do not exclude themselves from the Settlement. It is estimated that, after deducting the above expenses from the Gross Settlement Amount, the Net Settlement Amount of approximately Sixty Thousand Dollars (\$60,000) will be available for distribution to members of the Settlement Class. Each member of the Class who does not submit a timely request for exclusion from the Settlement shall receive an equal portion of the Net Settlement Amount.

1. Participate in the Settlement

To receive your share of Settlement benefits, you need not do anything. As long as you do not exclude yourself from the Settlement, you will receive a share of Settlement benefits following final approval of the Settlement.

It is presently expected that the amount of Settlement benefit to be received by each participating Class Member is approximately \$20. Depending on the Court’s Final Approval

Order and the number of class members who participate in the Settlement, the actual amount you will receive if the Court grants final approval of the Settlement may vary from the above estimated amount.

It is your responsibility to keep a current address on file with the Settlement Administrator as the Settlement Administrator will mail your payments to the address it has on file for you. So, if you move, please provide the Settlement Administrator your new address. You may provide the Settlement Administrator your new address by e-mailing, mailing, or faxing it to:

Coyle v. Mosaic Settlement
c/o Atticus Administration
PO Box 64053
St. Paul, MN 55164
Tel: 1-888-201-2155
Fax: 1-888-326-6411
Email: themosaicsettlement@atticusadmin.com

You may also contact Class Counsel and provide him your new address and he will forward it to the Settlement Administrator.

If you do not exclude yourself from the Settlement, you will upon final approval of the Settlement be bound by the release of claims described below and lose the right to sue Defendant for any of the claims asserted against Defendant in the Lawsuit or that could have been asserted based on the facts alleged in the Action.

2. Object to the Settlement

As long as you do not exclude yourself from the Settlement, you have the right to object to the Settlement. The objection must be sent by December 12, 2022 by regular mail to the Settlement Administrator at the following address: Coyle v Mosaic Settlement, c/o Atticus Administration, PO Box 64053, St. Paul, MN 55164. An objection must include: (a) the case name and number of the Action; (b) the objector's full name, signature, address, and telephone number, and the last four digits of his or her Social Security number, (c) a written statement of all grounds for the objection accompanied by any legal support for such objection, and (d) copies of any papers, briefs, or other documents upon which the objection is based. The Court will hear from any Class Member who attends the Final Fairness Hearing and asks to speak regarding his or her objection, *regardless* of whether a written objection was submitted.

3. Exclude Yourself from the Settlement

If you wish to exclude yourself from the Settlement, you must submit a written request for exclusion. The request for exclusion must be sent by December 12, 2022 by regular mail to the Settlement Administrator at the following address: Coyle v Mosaic Settlement, c/o Atticus Administration, PO Box 64053, St. Paul, MN 55164. A request for exclusion must: (a) contain the case name and number of the Action, (b) be signed by the Class Member, (c) contain the full name, address, telephone number, and the last four digits of the Social Security Number of the Class Member requesting exclusion, and (d) clearly state that the Class Member does not wish to be included in the Settlement.

If you exclude yourself from the Settlement, you will not be entitled to recover any Settlement benefits or object to the Settlement, but you will retain the right to bring any claims

you have or believe you have against Defendant. If you do not exclude yourself from the Settlement, you will upon final approval of the Settlement be bound by the release of claims described below and lose the right to sue Defendant for any of the claims asserted against Defendant in the Action or that could have been asserted against Defendant based on the facts alleged in the Action.

D. Release of Claims

Unless you exclude yourself from the Settlement, upon the date Defendant fully funds the Settlement, you will be deemed to have released any and all claims against Defendant and the Released Parties, from any and all claims, rights, demands, liabilities and causes of action under California law based on acts or omissions during the Release Period that were asserted in the Complaint in the Action or that could have been asserted in the Action based on the facts alleged in the Complaint, including claims for damages under Labor Code section 2802 and claims for restitution and injunctive relief pursuant to Business and Professions Code section 17200, *et seq.* based on the alleged failure of Defendant to reimburse Brand Ambassadors for all their business related mileage expenses or all their business related expenses for using or acquiring electronic communication devices, including cellular phones, tablets and/or computers.

E. Final Fairness Hearing

The Court has scheduled a Final Fairness Hearing for January 30, 2023 at 10:00 a.m. in Department 7 of the Los Angeles County Superior Court, located at 312 North Spring Street, Los Angeles, California. At the Final Fairness Hearing, the Court will decide whether or not to grant final approval to the Settlement. At the Final Fairness Hearing the Court will also decide the amounts of attorney’s fees, litigation costs, and the service payment to award. You have the right to appear at the Final Fairness Hearing and address the Court. You also have the right to retain an attorney, at your own expense, to speak on your behalf. You also have the option to appear at the Final Fairness Hearing by audio or video. Visit <https://www.lacourt.org/> for directions and instructions for remote appearances. Notice of any Court Order Granting Final Approval of the Settlement and Judgment will be given via the Settlement website, www.themosaicsettlement.com.

F. Where to Get More Information

If you want more information about the lawsuit or the Settlement, you can contact the attorneys for the Settlement Class at the address, email or telephone number listed below or any other advisor of your choice.

Peter Hart
Law Offices of Peter Hart
12121 Wilshire Boulevard, Suite 525
Los Angeles, CA 90025
Tel: (310) 478-5789
Email: hartpeter@msn.com

You may also obtain more information about the Settlement by visiting www.themosaicsettlement.com. You may view and obtain copies of lawsuit related documents in the Court’s file by visiting the Court’s website at www.lacourt.org.

DO NOT CONTACT THE COURT WITH QUESTIONS