

**COURT APPROVED NOTICE OF CLASS ACTION SETTLEMENT AND HEARING DATE  
FOR FINAL COURT APPROVAL**

*(McCurdy v. C.H. Folsom, Inc., No. 23CV014158)*

***The Superior Court for the State of California, County of Sacramento authorized this Notice.  
Read it carefully! It is not junk mail, spam, an advertisement, or solicitation by a lawyer. You are not being sued.***

You may be eligible to receive money from a class action lawsuit (“Action”) against C.H. Folsom, Inc. doing business as Cliff House of Folsom Brewhouse Grille (“Defendant” or the “Company”) for alleged wage and hour violations.

The California Superior Court, County of Sacramento, has granted preliminary approval to a proposed class action and Private Attorneys General Act (“PAGA”) settlement. Because your rights may be affected by this settlement, it is important you read this Notice of Class Action Settlement.

The Action was filed by Dustin McCurdy on a classwide and PAGA basis. The Action seeks payment of (1) wage and hour claims and other relief for a class of non-exempt employees for the Company (“Class Members”) during the Class Period (December 27, 2019 to February 5, 2024); and (2) penalties under the California Private Attorney General Act (“PAGA”) for all non-exempt employees for the Company during the PAGA Period (December 27, 2022 to February 5, 2024) (“Aggrieved Employees”). Excluded from the definition of “Class Members” are individuals who signed severance agreements with Defendant or one of the Released Parties.

In the Action, Plaintiff sued on behalf of himself and all other similarly-situated employees, here the Class Members and Aggrieved Employees and the settlement of this Action resolves claims for the Class Members and Aggrieved Employees as described in this Notice.

The proposed Settlement has two main parts: (1) a Class Settlement requiring Defendant to fund Individual Class Payments, and (2) a PAGA Settlement requiring Defendant to fund Individual PAGA Payments and pay penalties to the California Labor and Workforce Development Agency (“LWDA”).

Based on Defendant’s records, and the Parties current assumptions, **your Individual Class Payment is estimated to be \$ [REDACTED] (less withholding) and your Individual PAGA Payment is estimated to be \$ [REDACTED]**. The actual amount you may receive likely will be different and will depend on a number of factors. (If no amount is stated for your Individual PAGA Payment, then according to Defendant’s records you are not eligible for an Individual PAGA Payment under the Settlement because you didn’t work during the PAGA Period.)      INSERT NAME

The above estimates are based on Defendant’s records showing that **you worked [REDACTED] workweeks during the Class Period and you worked [REDACTED] workweeks** during the PAGA Period. If you believe that you worked more workweeks during either period, you can submit a challenge by the deadline date. See Section 4 of this Notice.

The Court has already preliminarily approved the proposed Settlement and approved this Notice. The Court has not yet decided whether to grant final approval. Your legal rights are affected whether you act or do not act. Read this Notice carefully. You will be deemed to have carefully read and understood it. At the Final Approval Hearing, the Court will decide whether to finally approve the Settlement and how much of the Settlement will be paid to Plaintiff and Plaintiff’s attorneys ( Class Counsel ). The Court will also decide whether to enter a judgment that requires Defendant to make payments under the Settlement and requires Class Members and Aggrieved Employees to give up their rights to assert certain claims against Defendant.