

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

*Hudson v. Sterling Jewelers, Inc. et al.* (Case no.: 2:17-cv-09301-DSF-JEM)

**As a current or former employee in California of Sterling Jewelers, Inc. or Signet Jewelers Limited compensated by the hour and commissions, you may be entitled to receive money from a class action settlement.**

*The United States District Court, Central District of California has authorized this Class Notice.  
This is not a solicitation from a lawyer.*

CPT ID: <<ID>>

<<FullName>>

<<Address1>> <<Address2>>

<<City>>, <<State>> <<Zip>>

YOU MAY BE ENTITLED TO RECEIVE MONEY FROM A CLASS ACTION SETTLEMENT IF YOU ARE A CURRENT OR FORMER EMPLOYEE COMPENSATED BY THE HOUR AND COMMISSIONS WHO WORKED FOR STERLING JEWELERS, INC. OR SIGNET JEWELERS LIMITED IN CALIFORNIA AFTER NOVEMBER 28, 2013.

- A proposed settlement of \$1,500,000 (the “Gross Settlement Amount”) will be used to pay claims to current and former employees compensated by the hour and commissions who worked for Sterling Jewelers, Inc. or Signet Jewelers Limited (“Defendants”) in California after November 28, 2013 (such periods of time, the “Class Period” and such employees, the “Class Members”).
- The settlement resolves a lawsuit entitled *Hudson v. Sterling Jewelers, Inc. et al.* (Case no.: 2:17-cv-09301-DSF-JEM) (the “Lawsuit”) over whether Defendants properly paid employees overtime and wages, properly provided meal periods, properly reimbursed business expenses, provided accurate itemized wage statements, timely paid wages and compensation, properly paid earned wages and compensation, improperly deducted wages, violated California’s Unfair Competition Law, and are subject to penalties under the Private Attorneys General Act (PAGA). This settlement avoids the costs and risks from continuing the Lawsuit, pays money to persons like you, and releases Defendants from alleged liability.
- The Court has not made a determination of the validity of the claims in the Lawsuit. Defendants deny any and all liability arising from any of the claims and contend that at all relevant times they properly compensated all employees and fully complied with all applicable laws.
- Class Members will receive a payment based on the number of workweeks worked, rounded up to the nearest full workweek, during the Class Period.
- **PLEASE READ THIS CLASS NOTICE CAREFULLY. YOUR LEGAL RIGHTS ARE AFFECTED BY IT.**

### HOW MUCH WILL I GET?

You worked a total number of workweeks: <<WorkWeeks>>, during the Class Period.

It is expected that you will receive approximately <<estAmount>>

### YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT

DO NOTHING	Receive a payment and give up your legal rights to pursue claims released by the settlement of the Lawsuit.
OPT OUT	Receive no payment and retain your legal rights to pursue claims that would otherwise be released by the settlement of the Lawsuit. You may opt out by following the procedures set forth below.
OBJECT TO THE SETTLEMENT	If you do not opt out, you may submit a written objection to the Settlement Administrator, <i>Hudson v. Sterling Jewelers, Inc.</i> , c/o CPT Group, Inc., 50 Corporate Park, Irvine, CA 92606, stating why you object to the settlement, including all supporting facts, and they will forward your concerns to counsel which will then be provided to the Court. More information on this process is set forth below.
DISPUTE THE WORKWEEK CALCULATION	If you feel that you worked a different amount of workweeks than identified above, you may dispute that calculation by following the procedures set forth below.
ATTEND A HEARING	You have the right to attend a final approval of the settlement and fairness hearing that will be conducted by the Court, but you are not required to attend. Class Members may appear at the fairness hearing to speak or make an oral objection without mailing any letter or providing advance notice.

### IMPORTANT INFORMATION ABOUT THE PROPOSED SETTLEMENT

#### 1. Why did I get this Class Notice?

This notice informs you of your rights to share in the settlement and, if you so choose, to “opt out” of the settlement or to object to the settlement terms. On September 30, 2019 at 1:30 p.m., in the United States District Court, Central District of California, there was hearing on a motion for preliminary approval of the class action settlement. The Court certified a class action for settlement purposes only and directed that you receive this notice because you have a right to know about the proposed settlement in the Lawsuit and about all of your options before the Court rules on whether to finally approve the settlement. If the Court finally approves the settlement, and after any objections and appeals are resolved, a “Settlement Administrator” appointed by the Court will make the payments that the settlement allows. This Class Notice explains the Lawsuit, the proposed settlement, your legal rights, and what benefits are available and how to receive them.

The Court in charge of this case is the United States District Court, Central District of California. The person who sued is called “Plaintiff” and the organizations he sued are called “Defendants.”

## 2. What is the Lawsuit about?

In the Lawsuit, Larry Hudson, the representative Plaintiff (“Plaintiff”), alleged multiple violations of the California Labor Code, the California Business and Professions Code, and the California Private Attorneys General Act (“PAGA”), including causes of action for: 1) failure to pay overtime, 2) failure to provide meal periods, 3) failure to reimburse business expenses, 4) failure to provide itemized wage statements, 5) failure to timely pay wages or compensation, 6) violation of California’s Unfair Competition Law, 7) failure to pay earned wages or compensation, 8) unlawful deduction of wages, and 9) claims for penalties under PAGA.

## 3. Why is there a settlement?

The parties disagree on the probable outcome of the case with respect to liability, damages, and how much money could be recovered if the Plaintiff won at trial. Defendants believe that Plaintiff would not prevail if this case went to trial. The Court has not decided in favor of Plaintiff or Defendants. There has been no trial in this case. Instead, both sides recognize the risks, expenses, and disruption associated with continued litigation and they have chosen to resolve their differences by entering into a settlement. By doing so, the parties can avoid the cost of a trial, yet Class Members are still entitled to receive payments if they comply with the instructions in this Class Notice. The parties entered into this settlement after arms-length negotiations while using the services of an experienced and neutral mediator. Plaintiff and his counsel (“Class Counsel”) believe that the proposed settlement is fair and reasonable and is in the best interest of the Class Members.

## 4. What is a class action settlement?

The Court must approve the terms of the proposed settlement as fair and reasonable. Once approved, the settlement will affect all Class Members, except those who have properly opted out. This Class Notice explains your legal rights, the terms of the settlement, what you must do to participate, and the amount of money you may receive. Please read this entire Class Notice carefully.

## 5. What should I do to get money from this settlement?

You can do nothing, and if you are entitled to a payment you will be paid.

Be mindful, however, that if this Class Notice reaches you and the address where you now live is different, you need to contact the Settlement Administrator and provide updated information so that any future correspondence or the settlement check itself reaches you and is not returned as an address unknown.

## 6. How much will my payment be?

As set forth in the parties’ Joint Stipulation of Class Settlement (which is available for review on the website identified in section 17, below), Defendants have agreed to pay the Gross Settlement Amount of \$1,500,000. After deducting the class representative enhancement payment, the portion of the PAGA penalty payment that shall be paid to California Labor & Workforce Development Agency, the Settlement Administration costs, and Class Counsel’s fees and expenses, the balance of the Gross Settlement Amount (the “Net Settlement Amount”) will be available for payment to all Class Members that do not opt out of the settlement. The settlement payments will be apportioned to each Class Member on a pro-rata basis, based on the number of workweeks worked during the Class Period.

Your estimated recovery is set forth on the top of Page 2 of this Notice.

If you do not dispute your workweek calculation, and do not opt out of the settlement, you will be bound by the settlement and receive a settlement payment. **In other words, you do not need to take any action to receive a settlement payment.**

#### 7. When would I get my payment?

The Court will hold a final approval and fairness hearing on **January 27, 2020 at 1:30 p.m.** to decide whether to grant final approval of the proposed settlement. If the Court approves the settlement and anyone objects, there may be appeals. It is always uncertain when these objections and appeals can be resolved, and resolving them can take time. To check on the progress of the settlement, call the Settlement Administrator at (888) 803-8826, or contact Class Counsel (see below for Class Counsel's contact information). *Please be patient.*

#### 8. What am I releasing?

Upon the Court's final approval of the settlement, and except as to such rights or claims as may be created by the settlement, Plaintiff and Class Members who have not effectively opted-out of the settlement as described below, fully release and discharge Defendants, and all of their past and present owners, officers, directors, shareholders, employees, agents, assigns, attorneys, insurers, brands and concepts, parent companies, subsidiaries, and affiliates, and their respective predecessors, successors, assigns, and any individual or entity that could be jointly liable with Defendants, without limitation ("Released Parties") of and from all claims for wages, damages, unpaid costs, penalties, liquidated damages, benefits, fringes, interest, attorneys' fees, litigation costs, restitution, or equitable relief, which Plaintiff, the Class, and/or any Class Member had, or may claim to have, against any of the Released Parties, that were alleged or that could have been alleged arising out of the facts, circumstances, and primary rights at issue in the First Amended Class Action Complaint for Damages during the Class Period ("Released Claims"). These claims include without limitation: claims for (1) all unpaid wages and unpaid overtime wages; (2) failure to provide meal periods and claims regarding meal period premium pay; (3) failure to reimburse expenses; (4) failure to provide accurate wage statements; (5) failure to timely pay wages or compensation upon termination and during employment; (6) failure to pay all earned wages; (7) unlawful deductions of wages; (8) claims for violation of California Business and Professions Code §§ 17200, et seq.; and (9) claims for civil penalties under PAGA.

The time period covered by this release is November 28, 2013 through October 8, 2019, inclusive.

#### 9. How can I opt out of this settlement?

You can opt out of this settlement and retain your rights. To do so, you must submit a written, signed request to opt out of the settlement. You will have 45 days from the date of mailing of this Class Notice to do so. Your Opt-Out request must be mailed to the Settlement Administrator, *Hudson v. Sterling Jewelers, Inc.*, c/o CPT Group, Inc., 50 Corporate Park, Irvine, CA 92606 and be postmarked no later than **December 19, 2019**, or it will not be considered and you will be bound by the settlement.

#### 10. Do I have a lawyer in this case?

The Court has appointed Shadie L. Berenji of BERENJI LAW FIRM, APC 8383 Wilshire Blvd., Suite 708, Beverly Hills, California 90211; Telephone: (310) 855-3270; Facsimile: (310) 855-3751, to

represent you and other Class Members in the Lawsuit. This lawyer is called Class Counsel. Class counsel will be compensated from the Total Settlement Amount as discussed in this Class Notice. If you want to be represented by your own lawyer, you may hire one at your own expense.

#### 11. How will the lawyers be paid?

Class Counsel will ask the Court to award them fees up to 1/3 (one-third) of the Gross Settlement Amount. Class Counsel will also ask the Court to award them reasonable costs incurred in connection with the Lawsuit. The Court may choose to award less than the amount requested by Class Counsel.

#### 12. How do I object to the settlement?

You can ask the Court to deny approval by filing an objection. You cannot ask the Court to order a larger settlement; the Court can only approve or deny the settlement. If the Court denies the settlement, no settlement payments will be sent out and the Lawsuit may continue. If that is what you want to happen, you must object.

You may object to the proposed settlement in writing. You may also appear at the final approval and fairness hearing, either in person or through your own attorney. If you appear through your own attorney, you are responsible for paying that attorney. All written objections and supporting papers must (a) clearly identify the case name and number (*Hudson v. Sterling Jewelers, Inc. et al.*, Case no.: 2:17-cv-09301-DSF-JEM), (b) be submitted to the Court either by mailing them to the Clerk of Court, United States District Court Central District of California located at First Street Courthouse, 350 West 1st Street, Los Angeles, California 90012, or by filing them in person at the United States District Court Central District of California First Street Courthouse, and (c) be filed or postmarked on or before **December 19, 2019**.

#### 13. How do I dispute my workweek calculation?

To dispute the number of workweeks with which you have been credited, you must submit evidence to the Settlement Administrator showing that the workweek information is inaccurate. Such evidence must be mailed to the Settlement Administrator at *Hudson v. Sterling Jewelers, Inc.*, c/o CPT Group, Inc., 50 Corporate Park, Irvine, CA 92606 and postmarked on or before December 19, 2019. The Settlement Administrator shall decide the dispute. Defendants' records will be presumed correct, but the Settlement Administrator will evaluate the evidence submitted and make a final decision on the merits of the dispute.

#### 14. When and where will the Court decide whether to approve the settlement?

The Court will hold a fairness hearing on **January 27, 2020 at 1:30 p.m.** at the United States District Court Central District of California located at First Street Courthouse, 350 West 1st Street, Courtroom 7D, Los Angeles, California 90012. The date and time of the fairness hearing can change without notice. At this hearing, the Court will consider whether the settlement is fair, reasonable, and adequate. If there are objections and they have been properly lodged, the Court will consider them. The Court will listen to people who have asked to speak at the hearing. The Court may also decide how much to pay to Class Counsel. At or after the hearing, the Court will decide whether to approve the settlement. We do not know how long this decision will take.

**15. Do I have to come to the hearing?**

No. Class Counsel will answer any questions that the Court may have. But, you are welcome to come at your own expense. If you sent an objection, you do not have to come to Court to talk about it. As long as you mailed your written objection on time, the Court will consider it. You may also pay your own lawyer to attend, but it is not required.

**16. May I speak at the hearing?**

You may ask the Court for permission to speak at the fairness hearing. Class Members may appear at the fairness hearing to speak or make an oral objection without mailing any letter or providing advance notice.

**17. What happens if I do nothing at all?**

If the Court approves the settlement, you will participate in the settlement and receive payment. You will be bound by the release as set forth herein.

**GETTING MORE INFORMATION**

This Class Notice summarizes the proposed settlement. You may call or contact Class Counsel or the Settlement Administrator if you would like more information about the case. You may call (888) 803-8826 or write the Settlement Administrator, *Hudson v. Sterling Jewelers, Inc.*, c/o CPT Group, Inc., 50 Corporate Park, Irvine, CA 92606.

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The Settlement Administrator has also setup a website which has links to this Class Notice and other documents related to the proposed settlement, including the Joint Stipulation of Class Settlement. The website is: [www.cptgroup.com/sterlingjewelerssettlement](http://www.cptgroup.com/sterlingjewelerssettlement).

**PLEASE DO NOT TELEPHONE THE COURT OR THE COURT CLERK'S OFFICE TO  
INQUIRE ABOUT THIS SETTLEMENT OR THE CLAIM PROCESS.**