

**NOTICE OF PENDENCY OF CLASS ACTION,
PROPOSED SETTLEMENT AND HEARING**

A court authorized this notice. This is not a solicitation from a lawyer.

- You are receiving this Notice because you have been identified as a TN visa holder recruited by SPJ or Allswell who worked at SL Alabama at any time during the period October 25, 2019 through the present. Plaintiffs filed this class action against SL Alabama, Allswell, SPJ Connect, and Youngjin Lee alleging that they misrepresented the terms of the jobs offered to you and other workers, breached employment contracts, violated federal statutes, and discriminated against you. SL Alabama, Allswell, SPJ Connect and Mr. Lee deny these allegations.
- You may be eligible to receive a payment from the class action. It is estimated that the average payment will be \$ 28,000 and will depend on the length of time you were employed.
- The two sides disagree about whether SPJ’s, Allswell’s and SL Alabama’s practices were proper. The parties have agreed to resolve their dispute by a settlement. The court has not made any ruling on the merits of the Plaintiff’s claims in this case, and no party has prevailed in this action.
- Your legal rights are affected. Read this notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT:	
Remain in the Settlement Class	If you wish to remain in the lawsuit, you do not have to do anything now. But if the Settlement is later approved, you will need to provide information as to how and where you would like to receive your settlement payment. Please contact the lawyers representing the former/present SL Alabama workers who worked pursuant to a TN visa. The lawyer contact information is set out in Section 14 below for more information about this process. If you remain in the settlement, you will release claims against the lawsuit defendants in exchange for payment. THE FOLLOWING PAGES PROVIDE MORE INFORMATION ABOUT THE SETTLEMENT AND WAY TO GET IN TOUCH WITH THE LAWYERS
Exclude Yourself	Get no benefit from the settlement. This is the only option that allows you to ever be part of any other lawsuit against SL Alabama, Allswell, SPJ Connect or Youngjin Lee about the legal claims in this case.
Object	Write to the Court about why you don’t like the settlement.

Go To A Hearing	Ask to speak in Court about the fairness of the settlement.
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The rights and options — **and the deadlines to exercise them** — are explained in this notice.

The Court still has to decide whether to approve this settlement, which may take some time. Please be patient.

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BASIC INFORMATION

1. Why did I get this notice package?

You are receiving this notice because it has been determined that you may be a member of a Settlement Class consisting of certain individuals who were recruited by Allswell, SPJ Connect and SL Alabama for employment at SL Alabama's production facility Alexander City, Alabama during the period of October 25, 2019 to present.

As such, the Court has approved this Notice because you have a right to know about a proposed settlement of the class action lawsuit, and about all of your options, before the Court decides whether to approve the settlement.

This package explains the lawsuit, the settlement, your legal rights, what benefits are currently available, who is eligible for them, and how to get them.

The Court in charge of the case is the United States District Court for the Northern District of Georgia, Newnan Division, the Hon. Timothy C. Batten, Jr., presiding. The case is known as *Peregrina, et al. v. SL Alabama, LLC, et al. Civil Action No. 3:23-cv-00206-TCB-RGV*. The people who sued are called the Plaintiffs, and SL Alabama, Inc., GB2G, Inc. d/b/a Allswell, SPJ Connect, Inc. and Youngjin Lee are the Defendants.

2. What is the lawsuit about?

Plaintiffs alleged they are Mexican nationals and non-U.S. citizens who actively sought job opportunities in the United States. Plaintiffs allege that Defendants posted job openings for positions with SL Alabama, LLC and assisted Plaintiffs in procuring TN visas from the U.S. Consulate to work in the United States. Plaintiffs allege that during the recruitment and hiring process, Defendants made false misrepresentations to Plaintiffs and the U.S. Consulate regarding the work Plaintiffs would perform in the United States and the wages they would receive. Plaintiffs allege that Defendants breached employment contracts, violated federal and Georgia RICO statutes, discriminated against class members, violated the forced labor and trafficking for forced labor provisions of the Trafficking Victims Protection Act, and violated federal wage laws under the Fair Labor Standards Act.

Defendants on the other hand, claim they acted in conformity with the law in all respects in connection with its practices regarding the recruitment and employment of TN Visas and their holders. Defendants deny, and continue to deny, any wrongdoing, as well as any and all allegations that Plaintiffs or the Settlement Class Members have suffered any damage whatsoever, have been harmed in any way, or are entitled to any relief as a result of any conduct on the part of Defendants as alleged by Plaintiffs in the Action.

This Notice is to inform you that there has been a proposed settlement reached. The Notice does not imply that there has been any finding of any violation of the law by Defendants or that

recovery could be had in a certain amount. Although the Court has authorized Notice to be given of the proposed settlement, this Notice does not express the opinion of the Court on the merits of the claims or defenses asserted by either side in the lawsuit. The Court has not made any ruling on the merits of the Plaintiffs' claims in this case, and no party has prevailed in this action.

3. Why is this a class action?

Class actions are lawsuits in which the claims and rights of many people are decided in a single court proceeding. Representative Plaintiffs ("Class Representatives") are named in the lawsuit to assert the claims of the entire class. This avoids the necessity for a large number of people to file similar individual lawsuits and enables the court system to resolve similar claims in an efficient and economical way. Class actions provide a vehicle whereby people with similar claims are treated alike. In a class action, the court is guardian of the class interests and supervises the prosecution of the class claims by Class Counsel to assure that the representation is adequate. Class members are not individually responsible for the costs or fees of counsel, which are subject to court award.

4. Why is there a settlement?

Settlement Class Counsel have investigated the facts and applicable law regarding the Class Representative's claims and Defendants' defenses. The parties have engaged in lengthy and "arms-length" negotiations in reaching this settlement, and have employed the services of a highly-skilled professional mediator. The Plaintiffs and Class Counsel believe that the proposed settlement is fair, reasonable and adequate and in the best interests of the class. Both sides agree that, by settling, Defendants are not admitting any liability or that it did anything wrong, but both sides want to avoid the uncertainties and substantial cost in time and money normally involved in litigation of this type. The Court has not yet decided this case in favor of the Class Representative or Defendants, individually or collectively.

Who Is In The Settlement

To see if you will receive benefits from this settlement, you first have to decide if you are a Class Member.

5. How do I know if I am part of the settlement?

You are a part of the settlement if you fall within the following class description:

All individuals who, between October 25, 2019 and the present, (1) were recruited by SPJ or Allswell, (2) were employed at SL Alabama's production facility, (3) directly received hourly wages from SL Alabama; and (4) were TN visa holders.

You are excluded from the class if you do not fit within the above definition.

6. I'm still not sure if I am included.

If you are still not sure whether you are included, you may contact Class Counsel (the lawyers for the class members) at the address listed in Paragraph 14 below. **PLEASE DO NOT CALL THE COURT.**

The Settlement Benefits - What You Get

7. What does the settlement provide?

The Settlement provides for payments to Settlement Class Members as follows based on the number of days they were employed at SL Alabama:

Group 1: Plaintiffs and Settlement Class Members employed at SL Alabama for up to eighty-nine (89) days each shall receive \$16,000.00 (1.632653 percent of the Gross Settlement Fund minus attorneys' fees, costs, and expenses).

Group 2: Plaintiffs and Settlement Class Members employed at SL Alabama between ninety (90) days and 500 days shall receive \$34,000.00 (3.469387 percent of the Gross Settlement Fund minus attorneys' fees, costs, and expenses).

Group 3: Plaintiffs and Settlement Class Members employed at SL Alabama more than 500 days shall receive \$24,000.00 (2.44898 percent of the Gross Settlement Fund minus attorneys' fees, costs, and expenses).

How You Receive Settlement Benefits

8. How can I get this benefit?

If you wish to receive a payment under the Settlement, you should send a completed Settlement Distribution Form to the lawyers ("Class Counsel") identified below. The Form requires that you (1) identify the name and address of the person to whom the settlement payment should be sent; (2) provide your date of birth and full name; and (3) sign the Form. You can send the form by email, attached to WhatsApp, or by mail to the Class Counsel lawyers. Their address information is below. Payments are not expected to be sent for at least five (5) months.

If you change your address before you received payment, you need to provide the Class Counsel (lawyers for the class) with your updated Settlement Distribution information.

Class Counsel representing the plaintiffs will contact you if you do not send the Settlement Distribution Form. Any questions about how to send information to receive the settlement can

be directed to the lawyers representing the class identified in Section 14 (“LAWYERS REPRESENTING YOU”) below.

Class Counsel may also require additional information or documents from you to confirm your identity, the location to which your share of the settlement payment should be sent, and the manner of providing that payment.

9. When would I get my benefit?

The Court will hold a hearing on October 22, 2024 to decide whether to approve the Settlement. If the Settlement is approved, there may be appeals. Any payments to Settlement Class Members will only be made after the Settlement is finally approved and after any appeal is resolved or if no one appeals and the time to appeal expires. This may take many months to occur, so please be patient.

10. What am I giving up to get a benefit or stay in the class?

Upon the Court’s final approval of the settlement, the class members who do not exclude themselves will release and forever discharge Defendants, all of its predecessors in interest, successors in interest, and any of their parents, subsidiaries, divisions or affiliates, and their officers, directors, employees, trustees, principals, attorneys, agents, representatives, vendors, shareholders, partners, limited partners, as well as any person acting or purporting to act on their behalf, from any and all claims, demands, debts, liabilities, actions, causes of action, obligations, damages, losses, and costs, relating in any way to or arising out of Defendants’ practices or conduct with respect to the class members recruitment, hiring and employment by Defendants.

On July 25, 2024, the Court entered a preliminary injunction barring and enjoining all Settlement Class Members from commencing or prosecuting any court actions asserting the settled claims, either directly, representatively, derivatively or in any other capacity, against Defendants, pending the final determination of whether this settlement should be approved. In order to file your own separate action asserting any of the settled claims against Defendants, you must exclude yourself from the settlement now. The Released Claims are also described more fully in Paragraphs 9 and 15 of the Class Action Settlement Agreement, which can be found attached hereto.

Excluding Yourself From The Settlement

11. How do I get out of the settlement?

If you choose to be excluded from the Settlement Class, you will not be bound by any judgment or other final disposition of the lawsuit. You will not receive any payment from the settlement and you will retain any claims against Defendants you might have. To request exclusion, you must state in

writing your desire to be excluded from the Settlement Class. You must sign your request for exclusion personally or by legal counsel. Requests seeking to exclude a class of persons are invalid and will not be accepted. Your request must include: (1) your full name and current address; (2) your signature; and (3) a specific statement that “I want to be excluded from the Settlement Class.” **This request for exclusion must be sent by first class mail, postmarked on or before September 20, 2024, addressed to:**

Daniel Werner James Radford RADFORD SCOTT, LLP 125 Clairemont Ave., Suite 380 Decatur, GA 30030 T (678) 271-0300 F (678) 271-0314 Rachel Berlin Benjamin Brian J. Sutherland BEAL SUTHERLAND BERLIN & BROWN LLC 2200 Century Parkway, Suite 100 Atlanta, GA 30345 T (404) 476-5305	Christopher B. Hall HALL & LAMPROS, LLP 300 Galleria Parkway, Suite 300 Atlanta, GA 30339 T (404) 876-8100 F (404) 876-3477
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If the request is not postmarked on or before September 20, 2024, your request for exclusion will be invalid, and you will be included in the Settlement Class automatically. If you do not request exclusion, you will be bound by the terms of the settlement approved by the Court, including without limitation, the judgment ultimately rendered in the case.

12. If I do not exclude myself, can I file my own claim or sue Defendant(s) for the same thing later?

No. Unless you exclude yourself, you give up any right to sue Defendants for the claims that this settlement resolves. If you have a pending lawsuit against Defendants, speak to your lawyer in that case immediately.

13. If I exclude myself, can I get benefits from this settlement?

No. If you exclude yourself, you are not part of the Settlement and you will not receive a payment. If you want a recovery against Defendants, you will have to file your own lawsuit at your own expense.

The Lawyers Representing You

14. Do I have a lawyer in this case?

The Court has conditionally appointed the Plaintiffs as Class Representatives. The Court has appointed the following attorneys as “Settlement Class Counsel:”

Daniel Werner
dwerner@radfordscott.com
James Radford
jradford@radfordscott.com
RADFORD SCOTT, LLP
125 Clairemont Ave., Suite 380
Decatur, GA 30030
WHATSAPP: Radford Scott, +1 (678) 271-0303
T (678) 271-0300
F (678) 271-0314

Rachel Berlin Benjamin
rachel@beal.law
Brian J. Sutherland
brian@beal.law
BEAL SUTHERLAND BERLIN &
BROWN LLC
2200 Century Parkway, Suite 100
Atlanta, GA 30345
WHATSAPP: +1 (914) 907-5154
T (404) 476-5305

Christopher B. Hall
HALL & LAMPROS, LLP
300 Galleria Parkway, Suite 300
Atlanta, GA 30339
WHATSAPP: +1 (404) 226-7480
T (404) 876-8100
F (404) 876-3477
chall@hallandlampros.com

Collectively, those lawyers have over eighty (80) years of experience practicing law. Settlement Class Counsel represent the interests of the Settlement Class. You may hire your own attorney to advise you, but if you hire your own attorney, you will be responsible for paying that attorney’s fees.

15. How will the lawyers be paid?

Settlement Class Counsel will apply to the Court for an award of reasonable attorneys' fees and expenses. They are requesting Court approval of a total sum of \$220,000 covering their attorneys' fees and expenses. Defendants have agreed to pay this amount if approved by the Court. You will not have to pay any attorneys' fees and expenses. The Court will ultimately decide the appropriate amount of any reimbursement of costs or any fee award to Settlement Class Counsel.

Objecting To The Settlement

16. How do I tell the Court that I don't like the settlement?

You can object to any aspect of the proposed settlement by filing and serving a written objection. You must sign your objection personally or by legal counsel. Your objection must state your full name and current address, as well as a statement confirming that you are a settlement class member. Please also provide your telephone number. You must also provide copies of any documents you intend to rely upon, the names and addresses of any witnesses who will appear on your behalf at the hearing, and the name of any counsel representing you. Your deposition may be taken in order to determine the grounds for your objection. The deposition must be limited to topics relating to the objection. Your objection must state why you object to the proposed settlement and any reasons supporting your position.

If you intend to appear in person or through your own attorney at the Fairness Hearing on October 22, 2024, described in Paragraph 18 below, you must include with your objection a notice of your intention to appear at the hearing.

You must mail any objection, along with any notice of intent to appear, postmarked on or before September 20, 2024, to Settlement Class Counsel, and counsel for Defendant SL Alabama and counsel for Defendants Allswell, SPJ, and Youngjin Lee. The address for SL Alabama's counsel is:

Michael L. Lucas
Allison Hawkins
BURR & FORMAN LLP
420 North 20th Street, Suite 3400
Birmingham, Alabama 35203

The address for Allswell's, SPJ's, and Youngjin Lee's counsel is:

John S. Gibbs III
Emily E. Schifter
TROUTMAN PEPPER HAMILTON SANDERS LLP
600 Peachtree St., NE

Suite 3000
Atlanta, GA 30308

The addresses for Settlement Class Counsel is:

Daniel Werner
James Radford
RADFORD SCOTT, LLP
125 Clairemont Ave., Suite 380
Decatur, GA 30030

Rachel Berlin Benjamin
Brian J. Sutherland
BEAL SUTHERLAND BERLIN &
BROWN LLC
2200 Century Parkway, Suite 100
Atlanta, GA 30345

Christopher B. Hall
HALL & LAMPROS, LLP
300 Galleria Parkway, Suite 300
Atlanta, GA 30339

Any Settlement Class member who does not file and serve an objection in the time and manner described above will not be permitted to raise that objection later.

17. What's the difference between objecting and excluding?

Objecting is simply telling the Court that you don't like something about the settlement. You can object only if you stay in the Class. Excluding yourself is telling the Court that you don't want to be part of the Class. If you exclude yourself, you have no basis to object because the lawsuit no longer affects you.

The Court's Fairness Hearing

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

There will be a hearing to consider approval of the proposed settlement on October 22, 2024, at the U.S. District Court for the Northern District of Georgia, Newnan Division, Lewis R. Morgan Federal Building & United States Courthouse, 18 Greenville Street Newnan, GA 30263-2789, Third Floor Courtroom. The hearing may be postponed to a later date without further notice. The

purpose of the hearing is to determine the fairness, reasonableness, and adequacy of the terms of settlement; whether the Settlement Class is adequately represented by the Class Representatives and Settlement Class Counsel; whether an order should be entered approving the proposed settlement; and the amount of any attorneys' fees and expenses to be awarded to Class Counsel or any incentive payments to the Class Plaintiff.

You will be represented at the hearing on the fairness of the settlement by Class Counsel, unless you choose to enter an appearance in person or through your own counsel. The appearance of your own attorney is not necessary to participate in the hearing on the fairness of the settlement.

19. Do I have to come to the hearing?

No. Class Counsel will represent the Class at the hearing, but you are welcome to come at your own expense. If you send any objection, you don't 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's not necessary.

20. May I speak at the hearing?

You may ask the Court for permission to speak at the Fairness Hearing. To do so, you must send with your objection a notice of intention to appear at the hearing as described in Paragraph 16 above. You cannot speak at the hearing if you excluded yourself.

Getting More Information

21. Are there more details about the settlement?

This Notice is only a summary. For a more detailed statement of the matters involved in the lawsuits or the Settlement, you may refer to the papers filed in this case during regular business hours at the office of the Clerk of the Court, United States District Court File: *Peregrina, et al. v. SL Alabama, LLC, et al.* Civil Action No. 3:23-cv-00206-TCB-RGV. The full Settlement Agreement and the pleadings filed in the case can be requested, in writing, from Class Counsel identified in Paragraph 14 above.

22. How do I get more information?

You can write, email, or WhatsApp to Class Counsel (the contact information is provided in Paragraph 14 above). Please do not contact the Court or Clerk's Office regarding this Notice.

SETTLEMENT DISTRIBUTION FORM

**To be sent by mail, email attachment, or WhatsApp
Attachment to Class Counsel:**

Daniel Werner
James Radford
RADFORD SCOTT, LLP
125 Clairemont Ave., Suite 380
Decatur, GA 30030
dwerner@radfordscott.com
WHATSAPP: Radford Scott, +1 (678) 271-0303

Complete Information and Signature Required

I _____, was recruited by SPJ or Allswell and worked as a TN visa holder at SL Alabama sometime during the period October 25, 2019 through the _____.

My date of birth is: _____

I request that settlement payment be sent to me by the following method (CHECK ONLY ONE):

- By inter-bank electronic transfer (bank account must be in the United States)
(THIS IS THE PREFERRED METHOD OF PAYMENT)

Name of Bank: _____

Address of Bank: _____

Routing Number: _____

Account Number: _____

Full Name of Account Holder: _____

Your phone number: _____

- By wire transfer (if transfer is to location outside the United States, payments may be made in installments)

Wire Transfer Service (e.g., Western Union): _____

Your full name matching the identification you will present to receive the funds:

Provide a copy of the government issued photo identification you will use for the transaction. Plaintiffs' counsel will contact you to for additional details.

- Check via private mail service (e.g., FedEx, UPS)
(checks cannot be delivered to a “Domicilio Conocido” address)

Your full name: _____
Your physical address: _____
City, state, country, postal code: _____
Your phone number: _____

- By United States First Class Mail

Your full name: _____
Your full name: _____
Your physical address: _____
City, state, country, postal code: _____

CLASS COUNSEL WILL DEDUCT FROM ANY SETTLEMENT PAYMENT ANY FEES THE BANK, WIRE SERVICE, OR MAIL SERVICE CHARGES FOR THE TRANSACTION.

I affirm that the above information is true to the best of my knowledge.

This ___ day of _____,

Signature