

**SUPERIOR COURT FOR THE STATE OF WASHINGTON
IN AND FOR PIERCE COUNTY**

Alexander Jones, et al v. Larson Motors, Inc.
Pierce County Superior Court Civil Case No. 23-2-07704-6

— NOTICE OF CLASS ACTION SETTLEMENT —

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

TO: All individuals who were employed by Larson Motors, Inc. and/or The Robert Larson Automotive Group, Inc. in Washington State in positions paid on a piece work, commission, or other productivity basis from June 23, 2020 through May 15, 2025.

AND TO: All individuals who were employed by Larson Motors, Inc. and/or The Robert Larson Automotive Group, Inc. in Washington State in positions paid on an hourly basis from June 20, 2021 through May 15, 2025.

PLEASE READ THIS NOTICE. A settlement in a class action may affect your rights. You may be entitled to a payment from the settlement. **YOU MUST SUBMIT A TIMELY AND VALID CLAIM FORM TO RECEIVE A SETTLEMENT PAYMENT.**

- Former employees brought claims against Larson Motors, Inc. and/or The Robert Larson Automotive Group, Inc. (hereafter “Larson”) alleging that Larson: (1) failed to properly accrue and allow the use of paid sick leave; and (2) failed to provide meal and rest periods in compliance with Washington law. Larson strongly denies these claims. The parties have reached a proposed Class Action Settlement.
- Larson strongly denies any fault, wrongdoing, or liability. If the Parties had not reached a Settlement, Larson would have continued to vigorously defend against Plaintiffs’ claims, including seeking a denial of class certification and a full defense verdict at trial. Larson agreed to this Settlement to avoid the risk, burden, and expense of further litigation, and as a means of making its employees whole for even any arguable claims relating to the lawsuit.
- The Class Action Settlement includes a total maximum Common Fund settlement payment by Larson of One Million, Eight Hundred Thousand Dollars (\$1,800,000).
- To qualify for a share of the common fund, you must have been employed by Larson in the State of Washington in a position paid on a piece work, commission, or other productivity basis between June 23, 2020, and May 15, 2025 or in a position paid on an hourly basis between June 20, 2021, and May 15, 2025; have not excluded yourself from the Class Action Settlement; and have submitted a timely and valid claim form.

Your Estimated Gross Settlement Award Before Taxes
<<SettAmt>>

**YOU MUST SUBMIT A TIMELY AND VALID CLAIM FORM IN
ORDER TO RECEIVE A SETTLEMENT PAYMENT.**

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
SUBMIT A TIMELY CLAIM FORM	The only way to get a Settlement payment.
ASK TO BE EXCLUDED	Get no payment. This is the only option that allows you to ever be a part of any other lawsuit against Larson with respect to the legal claims in this case.
OBJECT	Write to the Court if you do not like the Settlement and explain why. If the Settlement is approved, you will still receive a payment and you will give up rights relating to the legal claims in this case.
DO NOTHING	Get no payment. Give up rights related to the legal claims in this Case.

- These rights and options—**and the deadlines to exercise them**—are explained in this Notice.
- The Court in charge of this Case still has to decide whether to grant final approval of the Settlement. If the Court approves the Settlement, payments will be made after any appeals are resolved. Please be patient.

1. Why did I get this Notice?

Larson's records show that you were employed by Larson in the State of Washington in a position paid on a piece work, commission, or other productivity basis between June 23, 2020 and May 15, 2025 or in a position paid on an hourly basis between June 21, 2021 and May 15, 2025. The Court has authorized this Notice to be sent to you to inform you about a proposed settlement of a class action lawsuit, and about your options, before the Court decides whether to finally approve the Settlement. If the Court approves the Settlement, and after any appeals are resolved, payments will be made to Settlement Class Members who submit timely and valid claim forms to the Settlement Administrator.

This Notice explains the Case, the Class Action Settlement, your legal rights, what benefits are available, who is eligible for them, and how to get them.

2. What is this Case about?

The Plaintiffs, former employees Yarenis Esquivel-Caballero, Trevine Fernando, Michael Nugent, and Hector Avila Hernandez, claim that Larson violated Washington State wage and hour laws by: (1) failing to accrue and allow the use of paid sick leave; and (2) failing to provide legally compliant meal and rest periods. Larson has denied the Plaintiffs' claims.

The Honorable TaTeasha Monique Davis, of the Superior Court for the State of Washington in and for Pierce County, is overseeing this Class Action. The lawsuit is known as *Alexander Jones, et al v. Larson Motors, Inc.*, Pierce County Superior Court Civil Case No. 23-2-07704-6 (the "Case").

3. What is a class action and who is involved?

In a class action lawsuit, one or more people called a "Class Representative" sues on behalf of other people whom they believe have similar claims. The people together are a "Class" or "Class Members." The employee(s) who sued, and who represent(s) the Class, is/are called the Plaintiff(s).

The person the Plaintiff(s) sue(s) (in this case Larson) is/are called the Defendant(s). In a class action, one court resolves the issues for everyone in the Class—except for those people who choose to exclude themselves from the Class.

4. Why is there a Settlement?

The Court did not decide in favor of the Plaintiffs or Larson. Instead, both sides agreed to a Settlement. This allows the parties to avoid the cost of a trial, and the people affected will be entitled to compensation. The Class Representative and his attorney think the Settlement is best for everyone in the Class.

5. How do I know whether I am part of the Settlement?

As part of the Settlement of the Case, the Pierce County Superior Court has decided that everyone who fits the following description is a Class Member:

Settlement Class A: All individuals who are or were employed by Defendant in Washington State in positions paid on a piecework, commission, or other productivity basis from June 23, 2020, through May 15, 2025 (“Class A Settlement Class Period”).

Settlement Class B: All individuals who are or were employed by Defendant in Washington State in positions paid on an hourly basis from June 20, 2021, through May 15, 2025 (“Class B Settlement Class Period”).

If it is approved, the Settlement will cover all Settlement Class Members who have not timely and affirmatively excluded themselves from the Case.

TO RECEIVE ANY MONEY PURSUANT TO THE SETTLEMENT, YOU MUST SUBMIT A VALID AND TIMELY CLAIM FORM TO THE SETTLEMENT ADMINISTRATOR BY THE NOTICE DEADLINE.

6. What claims are covered by the Settlement?

The Settlement will resolve all of the claims of Settlement Class Members, whether known or unknown, that were brought or that could have been brought based on any facts alleged in the Case, including, but are not limited to any claims arising out of or relating to (1) any alleged failure by Larson to accrue and allow the use of paid sick leave; (2) any alleged missed, interrupted, shortened, untimely, unpaid, and/or non-compliant rest breaks and/or meal periods; and (3) any attendant claims for unpaid wages, overtime payments, premium payments, interest, exemplary damages, and attorney’s fees and costs relating to any of the foregoing.

7. What are the basic terms of the Settlement?

Subject to Court approval, the essential terms of the Settlement are as follows:

Larson will pay a maximum total of \$1,800,000 as part of the Settlement, apportioned as follows:

- **Class Fund:** Up to approximately \$1,105,000, which will be available for the payment of Settlement Awards to Settlement Class Members who do not timely opt out of this Settlement and who submit timely and valid claim forms.
- **Employer-side Payroll Taxes:** Up to approximately \$60,000 in employer-side payroll taxes on amounts attributable to wages.
- **Service Awards:** Up to \$10,000 each to Plaintiffs and Class Representatives Yarenis Esquivel-Caballero, Trevine Fernando, Michael Nugent, and Hector Avila Hernandez as service awards in recognition of their efforts in prosecuting the Case.
- **Settlement Administration Expenses Award:** Up to \$35,000 to the Settlement Administrator for the processing of the Settlement, including the expenses of providing notice to Settlement Class Members, handling the claims administration process, processing payments to Settlement Class Members, and handling tax reporting requirements.
- **Attorneys’ Fees and Costs Award:** Up to \$540,000 to Plaintiffs’ attorneys for the attorneys’ fees award and up to \$20,000 for actual litigation costs they have incurred and will incur through final judgment in representing Plaintiffs and the Settlement Class.

Monetary Relief: The amount available to the Settlement Class is intended to compensate Settlement Class Members for the wages and other compensation they allegedly lost and damages they are allegedly owed as a result of the practices alleged in the Case.

Distribution of Class Fund: Each Settlement Class Member who does not request exclusion and who submits a timely and valid Claim Form (enclosed with this notice) will receive a settlement payment. Each individual Settlement Class Member will be allocated a minimum settlement award of One Hundred Dollars (\$100.00). The remaining amounts from the Class Fund after minimum settlement allocations will be allocated to individual Settlement Class Members pro rata by dividing each Settlement Class Member's total W2 wages paid by Larson during the Settlement Class Period by the total aggregate W2 wages paid to all Settlement Class Members and then multiplying the resulting ratio by the remaining amounts in the Class Fund. If any checks have not been negotiated within one hundred twenty (120) days after distribution, the funds from those checks will be sent in the corresponding Settlement Class Member's name to the Unclaimed Property Fund for the State of Washington pursuant to the Unclaimed Property Act (RCW 63.29 et seq). Larson will not receive funds from any uncashed checks.

Tax Treatment of Settlement Awards: Fifty Percent (50%) of each Settlement Class Member's settlement payment will be treated as wages and subject to normal tax withholding and shall be reported to the taxing authorities and the Settlement Class Member on an IRS Form W-2. Fifty Percent (50%) of each Settlement Class Member's settlement award will be treated as non-wages (a combination of penalties, enhancements, and prejudgment interest) on which there will be no tax withholding and for which an IRS Form 1099-MISC (marked "Other Income") shall be issued to the taxing authorities and the Settlement Class Member.

Release of Claims: Upon final approval by the Court, the Settlement Class and each Settlement Class Member who has not submitted a valid and timely written request to be excluded from the Settlement will irrevocably release all Released Claims against Larson from June 23, 2020 for Class A and June 20, 2021 for Class B, through the date of preliminary approval. The release specifically includes any claims arising out of or relating to: (1) any alleged missed, interrupted, shortened, untimely, unpaid, and/or non-compliant rest breaks and/or meal periods; (2) any alleged failure to accrue or pay proper sick leave; and (3) any attendant claims for unpaid wages, overtime payments, premium payments, interest, exemplary damages, and attorneys' fees and costs relating to any of the foregoing.

This Release requires you to waive and precludes you from bringing any Released Claims against Defendant Larson Motors, Inc., as well as each of their respective (and as applicable) past, current, or future successors and assigns, together with each of their respective parent companies, subsidiaries, related or affiliated companies, members, shareholders, owners, investors, officers, directors, employees, agents, attorneys, and insurers, along with any other individual or entity who could be jointly or severally liable for any of the claims alleged in the Case or released by this Agreement.

Dismissal of Action: Upon final approval, the Court will enter a judgment of dismissal of the Case with prejudice but shall retain jurisdiction to enforce the terms of the settlement agreement.

8. How can I get a payment?

TO RECEIVE ANY MONEY PURSUANT TO THE SETTLEMENT, YOU MUST SUBMIT A VALID CLAIM FORM TO THE SETTLEMENT ADMINISTRATOR BY AUGUST 29, 2025.

9. When would I get my payment?

The Court will hold a hearing on September 26, 2025 to decide whether to finally approve the settlement. If the Pierce County Superior Court approves the settlement, the parties will then have to wait to see whether there is an appeal. This will take at least thirty (30) days and, if there is an appeal, can take up to a year or more to resolve. In the event of an appeal, information regarding the appeal's progress will be made available at www.LarsonMotorsSettlement.com. If there is no appeal, payments to individuals who submitted a timely and valid claim form are expected to go out within approximately sixty (60) days of the Court's final approval of the settlement. Please be patient.

10. Do I have a lawyer in this case?

The Court has decided that James B. Pizl and the law firm of Entente Law PLLC is qualified to represent you and all Settlement Class Members. This lawyer is called “Class Counsel.” You will not be charged for this lawyer. If you want to be represented by our own lawyer, you may hire one at your own expense.

11. How will the lawyer be paid?

As indicated above, Class Counsel will seek payment of their attorneys’ fees in the amount of \$540,000, and their litigation costs in an amount of up to \$20,000, each of which must be approved by the Court as part of the final approval of this Settlement. Class Counsel has been working on this case since approximately June 2023 and has not received any fees or reimbursements for the costs of the lawsuit.

12. How do I exclude myself from the Settlement?

If you fit the definition of a Settlement Class Member and want to exclude yourself from the Settlement, you must request exclusion in writing by August 29, 2025. You may be excluded as a member of the class by submitting a written request stating, “I request that I be excluded from the Class in the case of *Alexander Jones, et al v. Larson Motors, Inc.*, Pierce County Superior Court Case No. 23-2-07704-6.” The request must include your name, address, and signature. You must mail or email a copy of the letter to the Settlement Administrator at the following address postmarked no later than August 29, 2025:

Alexander Jones, et al v. Larson Motors, Inc.
c/o CPT Group Inc.
50 Corporate Park
Irvine, CA 92606
Email: LarsonMotorsSettlement@cptgroup.com
Phone: 1-888-317-3152

13. If I don’t like the Settlement, how do I tell the Court?

If you have not excluded yourself from the Class Action, and do not like the Settlement, you can object. You must do so in writing, and you must state the reasons why you think the Court should not approve the Settlement. If you object, be sure to include your name, address, and telephone number, the name of the Case (*Alexander Jones, et al v. Larson Motors, Inc.*, Pierce County Superior Court Case No. 23-2-07704-6), the reasons you object to the Settlement, and a signature. You must mail a copy of the objection to the following address **postmarked no later than August 29, 2025**:

James B. Pizl, Class Counsel
Entente Law PLLC
315 39th Ave SW, Suite 14
Puyallup, WA 98373

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

The Court will hold a Fairness Hearing at 9:00 a.m. on September 26, 2025, at the Pierce County Superior Court, Department 1, 930 Tacoma Ave S, Tacoma, WA 98402.

If there are objections, the Court will consider them. Judge Davis will listen to people who have asked to speak at the hearing (*see* Section 16). After the hearing, the Court will decide whether to grant final approval of the Settlement, including Class Counsel’s request for attorneys’ fees and litigation costs, Settlement Administration Expenses, and Service Awards for the named Plaintiffs. We do not know how long that decision will take.

15. Do I have to come to the hearing?

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

16. 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 a letter saying it is your “Notice of Intention to Appear in *Alexander Jones, et al v. Larson Motors, Inc.*, Pierce County Superior Court Case No. 23-2-07704-6.” Be sure to include your name, address, phone number, and your signature. Your Notice of Intention to Appear must be **postmarked no later than August 29, 2025**, and be sent to the Court, Class Counsel, and Defense Counsel at the three addresses set forth below:

COURT	CLASS COUNSEL	DEFENSE COUNSEL
Hon. TaTeasha Monique Davis Pierce County Superior Court Department 1 930 Tacoma Ave S, Room 334 Tacoma, WA 98402	James B. Pizl Entente Law PLLC 315 39 th Ave SW, Suite 14 Puyallup, WA 98373	William H. Walsh Cozen O’Connor 999 3 rd Avenue, Suite 1900 Seattle, WA 98104

17. What happens if I do nothing at all?

If you do nothing, you will get no payment. However, you will be bound by the other terms of the Settlement, including the Release of Claims described in Sections 6 and 7, above.

18. Are there more details about the Settlement?

This Notice summarizes the proposed Settlement. More details are in the Settlement Agreement. You can get a copy of the Settlement Agreement by visiting the website www.LarsonMotorsSettlement.com, which has a copy of the Settlement Agreement posted. Plaintiffs’ motion for final approval of the settlement agreement, including Class Counsel’s request for Attorney’s Fees, Litigation Costs, Service Awards for the named Plaintiffs, and Settlement Administration Expenses, and will be available for you to review on August 15, 2025 at www.LarsonMotorsSettlement.com.