IF YOU WERE EMPLOYED AT A PIZZA LOCA RESTAURANT IN CALIFORNIA AT ANY TIME FROM DECEMBER 2, 2012 TO MARCH 18, 2018, A CLASS ACTION LAWSUIT MAY AFFECT YOUR RIGHTS.

Felipe Villasenor, et al. v. Pizza Loca, Inc., et al. - Los Angeles County Superior Court, Case No. BC642655 Samuel Zarate, et al. v. La Pizza Loca, Inc., et al. - Los Angeles County Superior Court, Case No. BC642714

A court authorized this Notice. This is not a solicitation by a lawyer. You are not being sued.

NOTICE OF CLASS ACTION LAWSUIT

Felipe Villasenor and Samuel Zarate, who are former restaurant employees of La Pizza Loca, have sued Pizza Loca, Inc., La Pizza Loca Distribution, Inc. (collectively hereinafter, "La Pizza Loca") alleging that La Pizza Loca violated various provisions of the California Labor Code and the applicable Industrial Welfare Commission ("IWC") Wage Order.

The Court has allowed the lawsuit to be a class action on behalf of the following Class: All current and former non-exempt employees of La Pizza Loca, Inc., La Pizza Loca Distribution, Inc., and/or Crazy Pizza, Inc. in the State of California at any time during the period from December 2, 2012 to March 18, 2018, excluding employees who signed an arbitration agreement in connection with their employment

The Court has not decided whether La Pizza Loca did anything wrong and La Pizza Loca maintains it has done nothing wrong. There are no benefits available now, and there is no guarantee that there will be. However, your legal rights may be affected, and you have a choice to make now.

YOUR LEGAL RIGHTS AND OPTIONS	
DO NOTHING	You Can Stay In This Lawsuit And Await The Outcome But You Give Up Certain Rights.
	If you do nothing, you will remain part of the Class and will keep the possibility of getting money or benefits that may come from a trial or settlement. But you will give up any rights to sue La Pizza Loca in a separate action about the same legal claims in this lawsuit.
EXCLUDE YOURSELF FROM THE CLASS	You Can Exclude Yourself From The Class And You Will Not Get Any Benefits From This Lawsuit But You Get To Keep Your Rights.
	If you ask to be excluded from the Class and money or benefits are later awarded, you will not receive any money or benefits. But you will keep any rights you may have to sue La Pizza Loca in another proceeding about the same legal claims as alleged in this lawsuit.
	Please note that if you previously submitted a request for exclusion in this case regarding the release of your contact information or previously provided an exclusion form in response to the Notice that was mailed out in this lawsuit before 2020, you MUST submit another request for exclusion at this time if you wish to exclude yourself from participation in the lawsuit.

The options and the deadlines to exercise them are explained in this Notice. To ask to be excluded from the Class, you must do so no later than July 24, 2021.

La Pizza Loca may not retaliate against you if you choose to remain a part of the Class.

-1-QUESTIONS? CONTACT CLASS COUNSEL AT INFO@MATERNLAWGROUP.COM, OFFICE@BOYAMIANLAW.COM OR <u>TOM@FALVEYLAW.COM</u>

Why did I get this Notice?

The purpose of this Notice is to inform you of a lawsuit which is now pending in the Superior Court of the State of California, County of Los Angeles, against La Pizza Loca. As a current or former non-exempt employee of La Pizza Loca, Inc. in the State of California at any time during the period from December 2, 2012 to March 18, 2018, excluding those employees who signed an arbitration agreement in connection with their employment, you may be a member of the Class. This Notice is to advise you of how your rights may be affected by this lawsuit, so that you can make an informed decision whether you should remain in or request to be excluded from the Class.

What is this lawsuit about?

In this lawsuit, Plaintiffs allege that La Pizza Loca violated the California Labor Code and the applicable IWC Wage Order by failing to provide required meal periods; failing to provide required rest periods; failing to pay all wages due; failing to pay waiting time penalties; failing to furnish accurate itemized statements; and engaging in unfair and unlawful business practices.

Plaintiffs seek unpaid wages, statutory penalties, civil penalties, restitution, interest, attorneys' fees, and costs.

Pizza Loca denies Plaintiffs' allegations and maintains that it has not violated California law.

Has the Court Decided Who Is Right?

The Court hasn't decided whether La Pizza Loca, Inc. or the Plaintiffs are correct. By establishing the Class and issuing this Notice, the Court is not suggesting that the Plaintiffs will win or lose this case. The Court has not ruled on the merits of Plaintiffs' claims or Defendants' defenses.

What is a class action and who is involved?

In a class action, one or more people called "Class Representatives" sue on behalf of other people who they believe have similar claims. The Class Representatives and all of the people whose claims are being pursued in the case are called the "Class" or "Class Members." The companies they sued are called the Defendants. One court resolves the issues for everyone in the Class, except for those people who choose to exclude themselves from the Class.

Am I part of this Class?

If you are a current or former non-exempt employees of La Pizza Loca who worked for La Pizza Loca in California during the period from December 2, 2012 to March 18, 2018, and you did not sign an arbitration agreement in connection with your employment, you are a member of the Class.

You have to decide now whether to stay in the Class or ask to be excluded. Defendant cannot take retaliatory action against any participating class members.

Your rights and options are listed below.

What happens if I do nothing?

You remain part of the Class. If you remain part of the Class and the Class is awarded money or benefits, either as a result of trial or settlement, you will be notified about how to receive a share. If you do nothing now, regardless of whether Plaintiffs win or lose at trial, you will not be able to sue, or continue to sue, La Pizza Loca as part of any other lawsuit for the same legal claims that are the subject of the lawsuit. Further, if you remain in the Class, Class Counsel will receive all of your time and pay records. You will also be legally bound by any and all orders the Court issues and judgments the Court makes in this class action.

Please note that if you do nothing, you will remain part of the Class, even if you previously requested to be excluded from the release of your contact information in connection with this case, or previously provided an exclusion form in response to the Notice mailed before 2020.

QUESTIONS? CONTACT CLASS COUNSEL AT INFO@MATERNLAWGROUP.COM, OFFICE@BOYAMIANLAW.COM OR <u>TOM@FALVEYLAW.COM</u>

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Why would I ask to be excluded?

If you exclude yourself from the Class, you will not be part of the Class and will not receive any money or benefits if Plaintiffs are successful in winning this case or if the Parties reach a settlement. However, if you exclude yourself, you may be able to sue La Pizza Loca in a separate case for the claims in this lawsuit. If you exclude yourself, you will not be legally bound by any orders or judgments the Court makes in this case. If you bring your own lawsuit against La Pizza Loca after you exclude yourself, you may hire your own lawyer for that case and pursue your own claims. If you do exclude yourself, you should talk to a lawyer soon, so you can file any claim you have in time.

Please note that even if you previously submitted a request for exclusion from this case regarding the release of your contact information or previously provided an exclusion form in response to the Notice mailed prior to 2020, you MUST submit another request for exclusion at this time to exclude yourself from participation in the lawsuit.

How do I exclude myself from the Class?

To exclude yourself from the Class, you must send a written request for exclusion, **postmarked no later than July 24**, **2021**, to the address:

Zarate/Villasenor v. La Pizza Loca, Inc. Administrator c/o CPT Group, Inc. 50 Corporate Park Irvine, CA 92606

Your request for exclusion must contain the following: (1) the name of this case (*Zarate/Villasenor v. Pizza Loca*,); (2) your full name and current address; (3) a clear statement requesting to exclude yourself, such as "I wish to be excluded from the Class" and (4) your signature or the signature of your legal representative.

Administrator Phone: 1-888-373-2581

Do I have a lawyer in this case?

The Court appointed the Matern Law Group, PC, Boyamnian Law, Inc. and Law Offices of Thomas W. Falvey to represent Plaintiffs and all Class Members as "Class Counsel." For more information regarding Class Counsel, you can visit their website at <u>www.maternlawgroup.com</u>, <u>www.boyamianlaw.com</u> or <u>www.falveylaw.com</u>.

Should I get my own lawyer?

If you choose to remain in the Class, you do not need to hire a lawyer. But if you want your own lawyer, you will be responsible for hiring your own lawyer. For example, you can ask your attorney to appear in Court for you if you want someone other than Class Counsel to speak for you.

How will the lawyers be paid?

If Class Counsel are successful and obtain money or benefits for the Class, they may ask the Court for fees and expenses. If the Court grants Class Counsel's request, the fees and expenses will either be deducted from any money obtained for the Class or paid separately by La Pizza Loca.

How and when will the Court decide who is right?

If the case is not resolved by a settlement or otherwise resolved by motion, Class Counsel will have to prove Plaintiffs' claims in this lawsuit at a trial. There is no guarantee that Plaintiffs will win or that they will get any money for the Class. No trial date has been set.

> -3-QUESTIONS? CONTACT CLASS COUNSEL AT INFO@MATERNLAWGROUP.COM, OFFICE@BOYAMIANLAW.COM OR TOM@FALVEYLAW.COM

Will I get money after the trial?

At this time, the Court has not made a decision on the merits of this case. If the Class is successful at trial and obtains money or benefits as a result of the trial or a settlement, you will be notified about how to participate. We do not know how long this will take.

How can I get additional information?

You may obtain more information by contacting Class Counsel by email at <u>info@maternlawgroup.com</u>, <u>office@boyamianlaw.com</u>, or <u>tom@falveylaw.com</u> or by calling 310-531-1900, (818) 547-5300 or (626) 795-0205. Also, you can see relevant documents regarding the case at <u>www.cptgroupcaseinfo.com/pizzalocawagelawsuit</u>

PLEASE DO NOT CALL OR WRITE THE COURT ABOUT THIS NOTICE