

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF ARKANSAS
FAYETTEVILLE DIVISION**

**AMANDA SCHATZ, Individually and
on Behalf of All Others Similarly Situated**

PLAINTIFF

V.

CASE NO. 5:20-CV-05066

**QUAPAW HOUSE, INC. and
CASEY BRIGHT**

DEFENDANTS

IMPORTANT NOTICE TO POTENTIAL CLASS MEMBERS

TO: Individuals employed by Quapaw House, Inc. (“QHI”) and Casey Bright, CEO, at any point since January 1, 2020

RE: Lawsuit alleging violations of Arkansas wage laws against QHI and Casey Bright

YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT

Do Nothing	No action is required of you to remain in the class action asserting violations of Arkansas law. You will be bound by any judgment or settlement entered as to the class claims. If a judgment or settlement is reached in favor of the class, you may receive compensation.
Exclude Yourself	If you wish to be excluded from the class, you must send a request to be excluded from the class to the Class Counsel listed below, whose contact information is included in this notice. If you exclude yourself from the class, you will not be bound by any judgment or settlement in this case, and you will not receive compensation if the class recovers.

INTRODUCTION

The purpose of this notice is: (1) to inform you of the existence of a class action lawsuit filed against QHI and Casey Bright; (2) to advise you of how your rights may be affected by this lawsuit; and (3) to instruct you on the procedure for participating in this lawsuit. You have been sent this notice because employment records indicate that you may be an eligible class member.

This notice was authorized by the United States District Court for the Western District of Arkansas at Plaintiff’s request. This Notice is not an expression by the Court of

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any opinion concerning the merits of this lawsuit. Plaintiff claims that QHI and Bright have each violated Arkansas law by failing to pay employees wages owed following termination and by taking deductions for benefits that were not delivered. A Clerk's default has been entered against them for failure to answer, but the Court has not entered a default judgment or decided the issue of damages suffered by any employee. The receipt of this Notice does not indicate that you have a valid claim, that you are entitled to recovery, or that you will recover.

DESCRIPTION OF LAWSUIT

Plaintiff Amanda Schatz is a former employee of QHI and Bright who brought this lawsuit individually and on behalf of all others employed by QHI and Bright since January 1, 2020. Plaintiff contends that QHI and Bright failed to pay her in full the wages owed upon her termination, as required by Arkansas law. She also claims that QHI and Bright improperly deducted wages from her pay for benefits that were not in turn delivered by QHI or Bright.

Plaintiff has sued QHI and Bright to recover wages due on behalf of the entire class. Plaintiff is also seeking attorneys' fees and costs. If Plaintiff succeeds, you may receive compensation at the resolution of this lawsuit.

HOW TO EXCLUDE YOURSELF FROM THIS LAWSUIT

Plaintiff asserts that QHI and Bright's conduct violated Arkansas Code § 11-4-405. To remain a class member and continue to assert this claim under Arkansas law, no action is required of you. If you remain a class member, you will be bound by any judgment or settlement entered in this matter.

However, if you wish to remove yourself from the class, you can do so by mailing a request to opt out to Plaintiff's counsel below stating that you wish to be excluded. Please make sure that any request to be excluded is signed and that the case name and number are included. The request must be received by no later than [90 days]. You do not need to provide any reason for your decision to exclude yourself. Information regarding the specific opt-out requirements is available from Class Counsel, George M. Rozzell or Kristin Pawlik, Telephone: (479) 621-0006, Facsimile (479) 631-6890.

NO RETALIATION PERMITTED

If you are a current employee of QHI or Bright, you will not be retaliated against for participating in this lawsuit. Under federal law, it is unlawful for QHI or Bright to terminate you or retaliate against you for participating in this lawsuit. Neither QHI nor Bright will take any retaliatory measures against any current employees who participate in this lawsuit.

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COUNSEL

If you choose to join this suit, you will be agreeing to representation by Class Counsel, identified below. Class Counsel have taken this case on a contingency fee. They may be entitled to receive attorneys' fees and costs from QHI and Bright should there be a recovery or judgment in favor of the Class. If there is a recovery, Class Counsel will apply to receive 35% of any settlement obtained or money judgment entered in favor of the Class, or their fees will be paid separately by QHI or Bright. If there is no recovery or judgment in the Class's favor, Class Counsel will not seek any attorneys' fees or costs from anyone.

Class Counsel are:

George M. Rozzell
Kristin Pawlik
Miller | Butler | Schneider
Pawlik | Rozzell
112 W. Center St. Ste 555, Fayetteville, AR 72701
224 S. 2nd Street, Rogers, AR 72756
Telephone: (479) 621-0006
Facsimile: (479) 631-6890
Email: grozzell@arkattorneys.com
kpawlik@arkattorneys.com

You may also choose to hire a different lawyer to represent you at your own expense.

QHI and Casey Bright are unrepresented.

Further information about this suit may be obtained by contacting Class Counsel.

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