

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA

NOTICE OF PENDENCY OF CLASS ACTION,
PROPOSED SETTLEMENT AND FINAL APPROVAL HEARING DATEPLEASE READ THIS NOTICE CAREFULLY
YOUR LEGAL RIGHTS MAY BE AFFECTED**If you are a non-U.S. citizen who was deputed to the U.S. by Tata Consultancy Services or Tata Sons, a settlement in a class action lawsuit may affect your rights.***A court authorized this notice. This is not a solicitation from a lawyer.*इस सामूहिक कार्रवाई नोटिस की प्रतिलिपि www.TataClassAction.com पर हिंदी में उपलब्ध है

PLEASE TAKE NOTICE that a class action lawsuit is now pending in the United States District Court for the Northern District of California before the Honorable Claudia Wilken. You may have previously received a notice about this class action lawsuit. This notice is to advise you of a settlement in that lawsuit that may affect your rights and under which you may be entitled to a settlement payment.

- Non-U.S. citizen employees sued Tata Consultancy Services and Tata Sons (“TCS”) alleging that TCS: (1) breached employees’ contracts by forcing employees to pay back to TCS their federal and state tax refunds, deducting their Indian salary from their pay and not paying them their promised amount of compensation in the United States, and (2) failed to pay employees in California their earned wages and failed to provide accurate wage statements to them.
- The Court allowed the lawsuit to be a class action on behalf of all non-U.S. citizens employed by TCS (1) in the United States from February 14, 2002 to June 30, 2005, and who were deputed to the United States after January 1, 2002 and before June 30, 2005 or (2) in California at any time from February 14, 2002 through June 30, 2005, and who were deputed to California after January 1, 2002 and before June 30, 2005.
- The Court has not concluded that TCS did anything wrong.

QUESTIONS? CALL 1-800-XXX-XXXX TOLL FREE, OR VISIT WWW.TATACLASSACTION.COM
इस सामूहिक कार्रवाई नोटिस की प्रतिलिपि www.TataClassAction.com पर हिंदी में उपलब्ध है

- A settlement has been reached between the parties in this lawsuit (which will be referred to in this Notice as "the Settlement"). On [REDACTED], the Court entered an order preliminarily approving the proposed settlement and authorizing this Notice. The purpose of this Notice is to inform you of the lawsuit and the Settlement so you can make an informed decision as to whether you should participate in the Settlement and receive a Settlement payment or, alternatively, how you can request to be excluded from the Settlement if you choose to do so. If you do not request exclusion you can also object to the Settlement or any part of the Settlement.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT:	
You Can Receive Money	Class members who submit an Address Verification Form will receive money for their share of the Settlement Fund, if the Court approves the Settlement. See Section [REDACTED] below.
You Can Object to the Settlement	Class members may object to any part of the Settlement by writing to the Settlement Administrator. See Section [REDACTED] below.
You Can Exclude Yourself from the Settlement	Class members who file a Request for Exclusion will not receive any payment from this Settlement. This is the only option that allows you to be part of another lawsuit against TCS about the legal claims in this case. See Section [REDACTED] below.
You Can Go to a Hearing	Class members may attend the Settlement approval hearing on [REDACTED], 2013 and present objections to the Court. You do not have to attend the hearing to receive money under the Settlement, to be excluded from the Settlement, or to have an objection to the Settlement considered by the Court. See Section [REDACTED] below.
You Can Do Nothing	Class members who do nothing will receive no money from this settlement and will not be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against TCS about the legal issues in this case, ever again. See Section [REDACTED] below.

- These rights and options – and the deadlines to exercise them – are explained below.
- **Any questions? Read on and visit www.TataClassAction.com.**

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BASIC INFORMATION

1. Why did I get this notice package?

TCS's records show that you have performed work for Tata Consultancy Services or Tata Sons ("TCS") in the United States and/or California during the relevant time period.

The Court sent you this notice because you have a right to know about a proposed settlement of a class action lawsuit, and about all of your options, before the Court decides whether to approve the settlement. If the Court approves the settlement and after objections and appeals are resolved, a Settlement Administrator appointed by the Court will make the payments that the settlement allows. You will be informed of the progress of the settlement.

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

Judge Claudia Wilken of the United States District Court for the Northern District of California is overseeing this class action. The lawsuit is known as *Vedachalam, et al., v. Tata Consultancy Services*, Civil Action No. 06-0963 (CW) (N.D. Cal.).

2. What is this lawsuit about?

This lawsuit is about whether TCS: (1) breached its employment contracts with non-U.S. citizens deputed from India to the United States by forcing employees to pay back to TCS their federal and state tax refunds, deducting their Indian salary from their pay and not paying them their promised amount of compensation in the United States; and (2) violated California law by depriving non-U.S. citizens deputed from India to California of their earned wages and accurate wage statements.

3. Why is this a class action?

In a class action lawsuit, one or more people called "Plaintiffs" (in this case Gopi Vedachalam and Kangana Beri) sue on behalf of other people who have similar claims ("Class Members"). The Plaintiffs are also called "Class Representatives" because they represent the Class Members. The attorneys representing the Class Representatives and Class Members are called "Class Counsel." The company they sued (in this case TCS) is called the Defendant. One court resolves the issues for everyone in the Class (except for those people who choose to exclude themselves from the Class). Judge Claudia Wilken of the United States District Court for the Northern District of California is overseeing this class action.

4. Why is there a settlement?

The Court did not decide in favor of Plaintiffs or Defendants. Instead, both sides agreed to a settlement. That way, they avoid the cost of a trial, and the people affected will receive compensation. The Class Representatives and Class Counsel think the settlement is best for all Class Members.

WHO IS IN THE SETTLEMENT

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

Judge Wilken certified two classes: (1) a National Class and (2) a California Class. Anyone who falls into these descriptions is a Class Member.

The National Class includes all non-U.S. citizens who were employed by TCS in the United States at any time from February 14, 2002 through June 30, 2005, and who were deputed to the United States after January 1, 2002 and before June 30, 2005.

The California Class includes all non-U.S. citizens who were employed by TCS in California at any time since February 14, 2002 through June 30, 2005, and who were deputed to the United States after January 1, 2002 and before June 30, 2005.

6. Are there exceptions to being included?

If you never worked for TCS in the U.S., worked for TCS but not under a deputation, or only worked in the U.S. outside the time periods described in section 5, above, you are *not* a Class Member.

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

If you are still not sure whether you are included, you can get free help in determining whether you are a Class Member at www.TataClassAction.com, or by contacting Class Counsel (your lawyers in this case), whose information is listed in section 5, below. Or you can fill out and return the Address Verification Form described in question 8, to see if you qualify.

THE SETTLEMENT BENEFITS – WHAT YOU GET

8. What does the settlement provide?

TCS has agreed to create a \$29,750,000 fund, the majority of which will be divided among all Class Members who send in a valid Address Verification Form. This fund will also be used to pay for the costs of settlement administration, Class Counsel's attorneys' fees and costs (in an amount to be approved by the Court), and the Class Representative and Testifying Declarant Service Payments (in amounts to be approved by the Court).

9. How much will my payment be?

You will receive a *pro rata* portion of the Net Settlement Fund that remains after the costs of notice and settlement administration, and attorneys' fees, costs, and expenses, and Class Representative and Testifying Declarant service payments are deducted from the total settlement fund. This individual *pro rata* portion is referred to below as your Cash Award, and it will be calculated as described below in this section. With this notice, you are also receiving a separate statement that shows your estimated Cash Award (included in the document titled, "Address

Verification Form and Summary Sheet”). The calculation of this estimate assumes that the Court will grant the amounts requested for attorneys’ fees, costs, and Class representative service payments, and administrative costs (as described in Section). If the Court reduces these amounts, your Cash Award may be larger than the estimate given. The calculation of this estimate also assumes that all Class Members will submit a valid and timely Address Verification Form. If fewer than all do so, your Cash Award may be larger than the estimate given.

The Settlement Administrator will pay Cash Awards only to Class Members who submit a valid and timely Address Verification Form; Class Members who submit valid and timely Address Verification Forms will be called “Claimant Class Members” below. Your Cash Award will be calculated based on two figures: (1) the total amount you repaid to TCS in tax refund checks (or in estimates of tax refund amounts) during the Class Period; and (2) the accumulated interest since you paid this amount to TCS.

Ninety percent (90%) of the Net Settlement Fund will be divided among Claimant Class Members based on the amount of tax refunds they repaid to TCS; this is called the “Tax Refund Portion” of the Net Settlement Fund. Ten percent (10%) of the Net Settlement Fund will be divided among Claimant Class Members based on the accumulated interest; this is called the “Interest Portion” of the Net Settlement Fund.

Tax Refund Portion:

If you submit a valid and timely Address Verification Form, you will be given a share of the Tax Refund Portion of the Net Settlement Fund. Your share of the Tax Refund Portion will be calculated by dividing the total amount that you repaid to TCS in tax refund checks during the Class Period by the total amount that all Claimant Class Members repaid to TCS in tax refund checks during the Class Period. In other words, your *pro rata* share of the Tax Refund Portion is a fraction, where the numerator is the total tax refund amount that you repaid to TCS during the Class Period and the denominator is the total tax refund amount that all Claimant Class Members repaid to TCS during the Class Period. You will receive this fraction of the monetary value of the Tax Refund Portion of the Net Settlement Fund as your Tax Refund Award.

If TCS does not have records that show that you repaid any tax refund checks to TCS during the Class Period, you can either: send the Settlement Administrator proof of the amount that you repaid to TCS during the Class Period; or receive a default amount of at least \$250, plus \$50 for each six month period that you worked for TCS in the United States during the Class Period.

To recap, the Settlement Administrator will calculate your Tax Refund Award using the following formula:

$$\begin{array}{rcl}
 \frac{\text{[Your tax refunds repaid to TCS]}}{\text{[All tax refunds repaid to TCS by all Claimant Class Members]}} & \times & \begin{array}{l} \text{90\% of the net settlement} \\ \text{fund, which excludes the} \\ \text{amount awarded for} \\ \text{attorneys' fees and service} \\ \text{payments} \end{array} & = & \begin{array}{l} \text{Your Tax Refund} \\ \text{Award} \end{array}
 \end{array}$$

Interest Portion

If you submit a valid and timely Address Verification Form, you will also be given a share of the Interest Portion of the Net Settlement Fund. Your share of the Interest Portion will be calculated as follows. First, your “Interest Amount” will be calculated by multiplying your total tax refund payments (or default amount discussed above) first by the number of months since you were first deputed to the United States during the Class Period and then by the statutory interest figure of 10% per year. Then, your Interest Amount will be divided by the total interest amounts for all Claimant Class Members. The result will be your share of the Interest Portion. In other words, as with the Refund Portion, your *pro rata* share of the Interest Portion is a fraction, with your Interest Amount as the numerator and the total Interest Amounts of all Claimant Class Members as the denominator. To calculate the money that you will receive as your Interest Award, this fraction will be multiplied by the monetary value of the Interest Portion of the Net Settlement Fund.

To recap, the Settlement Administrator will calculate your Interest Award using the following formula:

$$\begin{array}{rcl} \text{[Interest on your tax refunds repaid to TCS]} & & \\ \hline & \times & \text{10\% of the net settlement fund, which excludes the amount awarded for attorneys' fees and service payments} \\ \text{[Interest on tax refunds repaid to TCS by all Claimant Class Members]} & & = \text{Your Interest Award} \end{array}$$

TCS's Records

TCS's records will be used to determine the amount of tax refunds that you repaid to TCS and the number of months that have passed since you were first deputed to the United States during the Class Period. TCS's records will be presumed to be correct unless evidence to the contrary is timely submitted to the Settlement Administrator. The document included with this notice titled, “Address Verification Form and Summary Sheet,” states what TCS's records show for the dates that you were deputed for TCS during the Class Period and the amount that you repaid in tax refund checks to TCS.

If you dispute the tax refund amount or the date that you were first deputed to the United States during the Class Period that is listed in TCS's records, you may submit documentary evidence to the Settlement Administrator. You must do this within 180 days of when you received the notice that shows the incorrect information. If you submit such documentary evidence, the Settlement Administrator will determine the allocation based on a review of both your records and TCS's records. In the absence of any records from you or TCS, the default amount listed above in the Tax Refund section will apply.

To recap, a Class Member who submits a valid and timely Address Verification Form will receive a Cash Award, which will be calculated by (1) multiplying the Class Member's individual Tax Refund share by the amount of the Tax Refund Portion; (2) multiplying the Class Member's individual Interest share by the amount of the Interest Portion; and (3) adding these two amounts. In other words:

Your Tax Refund Award + Your Interest Award = Your Cash Award

HOW YOU GET A PAYMENT

10. How can I get a payment?

To qualify for payment, you must send in an Address Verification Form. An Address Verification Form is attached to this Notice. You may also get an Address Verification Form on the internet at www.TataClassAction.com. Read the instructions carefully, fill out the form, sign it, and either: (1) mail it postmarked no later than [redacted] to [insert mailing address]; (2) submit it on the Settlement website at www.TataClassAction.com by no later than [redacted]; or (3) email it to the Settlement Administrator at [insert email address] by no later than [redacted].

If your address changes after you submit your Address Verification Form, please advise the Settlement Administrator using the email address or mailing address listed above.

11. When would I get my payment?

The Court will hold a hearing on [redacted], to decide whether to approve the settlement. If Judge Wilken approves the settlement after that, there may be appeals. It's always uncertain whether these appeals can be resolved, and resolving them can take time, perhaps more than a year. Everyone who sends in an Address Verification form will be informed of the progress of the settlement. Please be patient. Please check the Settlement website for updates.

After the Settlement Administrator issues Settlement checks, you will have up to 180 days to cash your check. After that time, if there are uncashed checks totaling more than \$100,000, the funds will be redistributed to all class members who sent in Address Verification Forms in a second distribution. If there are uncashed checks totaling less than \$100,000, the money will be designated to be donated to one or more U.S.-based charitable organizations that are dedicated to worker or immigrant issues. The Settlement website will update Class Members on the organizations designated to receive such funds by [insert date]. It is critical that you advise the Settlement Administrator if you change your address so that your Settlement check does not go uncashed.

12. What am I giving up to get a payment or stay in the Class?

You give up the right to sue TCS for the same claims and same time periods that this lawsuit addresses. It also means that all of the Court's orders will apply to you and legally bind you.

EXCLUDING YOURSELF FROM THE SETTLEMENT

13. How do I get out of the settlement?

To exclude yourself from the settlement, you must send a letter by mail or email saying that you want to be excluded from the class in *Vedachalam v. Tata Consultancy Services* and that you understand that you will not receive money from this lawsuit. Be sure to include your full name, address, telephone number, your signature, and include the following statement: “I request to be excluded from this class action settlement. I have received notice of the settlement and understand that if I am excluded from the class action settlement, I will not receive any money as a result of the settlement.” No request for exclusion will be valid unless all of the information described above is included. You may obtain an [Exclusion Request](#) form at the website, www.TataClassAction.com.

If sent by mail, you must send your exclusion request postmarked no later than [redacted] to:

Vedachalam v. Tata Exclusions
P.O. Box 0000
City, ST 00000-0000

If sent by email, you must send your exclusion request form to the Settlement Administrator at [insert address] no later than [redacted].

If you ask to be excluded, you will not get any settlement payment, and you cannot object to the settlement. You will not be legally bound by anything that happens in this lawsuit. You may be able to sue (or continue to sue) TCS in the future. All Settlement Class members—i.e., those who *do not exclude themselves* in accordance with the terms set forth herein—will be bound by all determinations and judgments in the Action.

14. If I don't exclude myself, can I sue TCS for the same thing later?

No. By staying in this lawsuit, you give up the right to sue TCS for the same claims and same time periods that this lawsuit addresses. If you have a pending lawsuit against TCS, speak to your lawyer in that lawsuit immediately because, depending on the claims in any such lawsuit, you may need to exclude yourself from this Class to continue your lawsuit. The process for excluding yourself from the settlement is described above in section [redacted], above. The exclusion deadline is [redacted].

15. If I exclude myself, can I get money from this lawsuit?

No. If you exclude yourself, do not send in an Address Verification Form to ask for any money. But, you may sue, continue to sue, or be part of a separate lawsuit against TCS.

THE LAWYERS REPRESENTING YOU

16. Do I have a lawyer in this case?

Your lawyers are Lieff Cabraser Heimann & Bernstein, LLP, and Rukin Hyland Doria & Tindall LLP. The Court appointed these two law firms to serve as Class Counsel, determining that they are qualified to represent you and all Class Members. They are experienced in handling similar cases against other employers. More information about these law firms, their practices, and their lawyers' experience is available at www.lieffcabraser.com and www.rhdtdlaw.com. If you want to be represented by your own lawyer, you may hire one at your own expense.

17. How will the lawyers be paid?

Class Counsel will ask the Court for attorneys' fees and expenses in the amount of 30% of the total settlement fund, or \$8,925,000, to be paid from the Settlement Fund. In addition, Class Counsel have applied to the Court for reimbursement from the Settlement Fund of up to \$270,000 in expenses they have incurred in prosecuting the case on behalf of the Class during the last seven years. Class Counsel have also requested incentive awards to Class Representatives Gopi Vedachalam (in an amount not to exceed \$35,000) and Kangana Beri (in an amount not to exceed \$25,000) and to Testifying Declarants (not to exceed \$1,000 each). Class Counsel's application for attorneys' fees, costs, and Class Representative and Testifying Declarant service payments will be available to review on Class Counsel's website at [redacted] and on www.TataClassAction.com by [insert date]. You won't have to pay separately for these fees and expenses. The Court may award less than these amounts. TCS has agreed not to oppose these fees and expenses.

OBJECTING TO THE SETTLEMENT

You can tell the Court that you do not agree with the settlement or some part of it.

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

If you're a Class Member, you can object to the settlement if you do not like any part of it. You can give reasons why you think the Court should not approve it. The Court will consider your views. To object, you must send a letter by mail or email saying that you object to *Vedachalam v. Tata Consultancy Services*. Your objection must also state your full name and address.

If sent by mail, you must send your objections postmarked no later than [redacted] to:

Vedachalam v. Tata Objections

P.O. Box 0000

City, ST 00000-0000

If sent by email, you must send your objection to the Settlement Administrator at [insert address] no later than [redacted].

If you choose to file an objection to the terms of this Settlement, you may represent yourself or appear through your own attorney. If you appear through your own attorney, you are responsible for paying that attorney. You do not need to hire a lawyer or appear in Court in order for the Court to consider your written objection. DO NOT TELEPHONE THE COURT.

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

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

THE COURT'S FAIRNESS HEARING

The Court will hold a hearing to decide whether to approve the settlement. This is called a "Fairness Hearing." You may attend and you may ask to speak, but you do not have to.

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

The Court will hold a Fairness Hearing at _____ p.m. on _____, at the United States District Court for the Northern District of California, 1301 Clay Street, Oakland, CA 94612 in Courtroom Two, Fourth Floor. The date of this hearing may change without further notice being sent directly to you. If the date changes, the new date will be posted on the website at www.TataClassAction.com. Please check the website if you are planning to come to the hearing or if you are interested in determining whether or not the hearing date has changed.

At this hearing, the Court will consider whether the settlement is fair, reasonable, and adequate. If there are objections, the Court will consider them. Judge Wilken will listen to people who have asked to speak at the hearing. The Court may also decide how much to pay Class Counsel. After the hearing, the Court will decide whether to approve the settlement. We do not know how long these decisions will take.

21. Do I have to come to the hearing?

No. Class Counsel will answer questions Judge Wilken may have. But you are welcome to come to the hearing at your own expense. If you send 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's not necessary.

22. 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 that it is your "Notice of Intention to Appear in *Vedachalam v. Tata Consultancy Services*." Be sure to include your name, address, telephone number, and your signature. Your Notice of Intention to Appear must be postmarked no later than _____, and be sent to the

Settlement Administrator, at the address or email address on **page __, in question __**. You cannot speak at the hearing if you excluded yourself.

IF YOU DO NOTHING

23. What happens if I do nothing at all?

If you do nothing, you will not receive money from this settlement. Also, you will not be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against TCS about the legal issues in this case, ever again.

GETTING MORE INFORMATION

24. Are there more details about the settlement?

This notice summarizes the proposed settlement. More details are in a Settlement Agreement. You can get a copy of the Settlement Agreement by writing to _____, or by visiting www.TataClassAction.com. For more detailed information, you may review the complete court files of the Action at the office of the Clerk of the Court for the United States District Court for the Northern District of California, 1301 Clay Street, Oakland, CA 94612, during regular business hours or electronically at www.cand.uscourts.gov.

25. How do I get more information?

You can call 1-800-**000-0000** toll free; write to **Tata Class Action**, _____; or visit the website at www.TataClassAction.com, where you will find answers to common questions about the settlement, an Address Verification Form, plus other information to help you determine whether you are a Class Member and whether you are eligible for a payment.

Please do not call the Court or the Court clerk's office to inquire about this settlement. They will be unable to help you.

**BY ORDER OF THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF CALIFORNIA**

Dated: _____, 2013

The Honorable Claudia Wilken
United States District Judge

ADDRESS VERIFICATION FORM AND SUMMARY SHEET
U.S. DISTRICT COURT FOR THE
NORTHERN DISTRICT OF CALIFORNIA
Vedachalam, et al., v. Tata Consultancy Services, Case No. 06-0963 (CW)

ADDRESS VERIFICATION FORM INSTRUCTIONS:

To receive money from the settlement, the Claims Administrator needs your current address so that it can mail a check to you. Please complete this Address Verification Form and either:

(1) mail it postmarked no later than _____ to [insert mailing address];

(2) submit it on the Settlement website at www.TataClassAction.com by no later than _____; or

(3) email it to the Settlement Administrator at [insert email address] by no later than _____.

By submitting the below form, I confirm that a settlement check may be sent to me at the below address:

Name (First, Middle, and Last): _____

Address: _____

City, State, Country, Postal or Zip Code: _____

Home Telephone Number: _____

Only Class Members or their legal representatives may submit an Address Verification Form. Any executor, administrator, guardian, conservator, or trustee who submits an Address Verification Form on behalf of a Class Member or his or her estate must (1) sign the Address Verification Form on the Class Member's behalf; (2) indicate his or her title as representative (i.e., executor, trustee, etc.); and (3) submit proof of his or her authority to act on the Class Member's behalf.

Based on TCS's records, and assuming that every Class Member eligible to file an Address Verification Form does so, your estimated Cash Award is [Estimated Settlement Share]. Your share is based on TCS's records, showing that you were deputed by TCS to the United States during the Class Period [define] from _____ to _____ and showing that, during this time period, you repaid \$ _____ in tax refund checks back to TCS.

If you believe that these dates of employment are incorrect or that you repaid more than this amount in tax refunds, you may submit any documents that you have to support your position along with a letter stating the dates that you believe you worked during the Class Period or the amount that you believe that you repaid in tax refunds. The Settlement Administrator will make

a determination regarding your challenge of these dates or amounts based on the information that you provide and TCS's records.

Your actual settlement share may be more than this amount, depending on the actual number of Address Verification Forms filed.

By signing below, I declare that I have read the entire Notice of Class Action Settlement and this Address Verification Form. I submit this Address Verification Form to participate in the settlement of this lawsuit, and to receive my share of the settlement. By signing below, I confirm that I am a member of the Class and that all of the information I have provided in this Notice and Address Verification is true and correct to the best of my knowledge.

Dated: _____

Signature _____

Print Name _____

IF YOU DO NOT RETURN THIS ADDRESS VERIFICATION FORM BY [INSERT DEADLINE], YOU WILL RECEIVE NO MONEY UNDER THE SETTLEMENT