

NOTICE OF OVERTIME LAWSUIT
AGAINST INTEGRATING TECHNOLOGY, INC.
dba IRON WOMAN CONSTRUCTION AND
ENVIRONMENTAL SERVICES, INC.
AND OF
YOUR RIGHT TO FILE OPT-IN CLAIM

TO: All current and former employees of Integrating Technology, Inc. dba Iron Woman Construction and Environmental Services, Inc. who worked more than forty (40) hours in one or more work weeks as truck drivers at any time within the past three (3) years.

RE: United States District Court Case No. 1:08-CV-01986-RPM
District of Colorado Judge Richard P. Matsch

April N. Coleman; and
James Apodaca; and
Cheryl L. Bartels; and
William S. Warford; and
Sterling Neloms; and
Richard Bogart

Plaintiffs

-vs-

Integrating Technology & Standards, Inc. dba
Iron Woman Construction & Environmental Services, Inc.; and
Shaun S. Egan

Defendants

COURT-APPROVED NOTICE OF COLLECTIVE ACTION AND RIGHT TO OPT-IN

1) PURPOSE OF NOTICE.

This Notice is to inform you of a collective action lawsuit in which you are potentially eligible to participate, to advise you how this action may affect your rights under the Fair Labor Standards Act (FLSA) and to inform you of how to participate in making a claim if you wish to do so. The Court has approved the form of this Notice. In approving the Notice, the Court has taken no position regarding the merits of Plaintiffs' claims.

2) DESCRIPTION OF THE LAWSUIT

On September 15, 2008, a lawsuit was filed by April N. Coleman, James Apodaca, Cheryl Bartels, William Warford, Sterling Neloms, and Richard Bogart against Integrating Technology & Standards, Inc. dba Iron Woman Construction & Environmental Services, Inc ("Iron Woman") and Shaun S. Egan. The lawsuit was filed on behalf of the Plaintiffs individually and as representatives of all other similarly situated employees who choose to file consents to participate in this action. The lawsuit alleges that Iron Woman engaged in a company wide practice of failing to credit truck drivers for all hours worked, including pre-trip inspections, post-trip inspections, waiting time, time spent traveling from the garage to job sites and time spent traveling between job sites. The suit also alleges that Iron Woman did not pay for all overtime hours worked at the rate of one and on-half (1 ½) times the applicable rate of pay. The lawsuit seeks recovery of unpaid wages, an equal amount in liquidated damages, attorney fees, and reimbursement of costs incurred in the lawsuit.

The Defendants dispute and contest all claims that have been asserted by Plaintiffs. Defendants deny any wrongdoing or liability.

3) COURT ORDERED NOTICE

The Court has determined that this case should be conditionally certified as a representative action and that notice should be given to similarly situated employees. Further, the Court has approved the form of this Notice. In approving the Notice, the Court has taken no position regarding the merits of Plaintiffs' claims.

3) YOUR RIGHT TO PARTICIPATE IN THIS ACTION.

This Court has determined that the lawsuit may proceed at this stage as a collective action on behalf of the following class:

All current and former employees of Integrating Technology, Inc. dba Iron Woman Construction and Environmental Services, Inc. who worked more than 40 hours in one or more work weeks as truck drivers at any time within the past three (3) years.

If you believe that you fall into this class, then you have a right to participate in the lawsuit.

4) HOW AND WHEN TO JOIN THIS LAWSUIT.

Enclosed you will find a consent to become a party plaintiff form ("Consent Form"). If you choose to join this lawsuit and to participate in any recovery that may result, you must read, sign, and return the Consent Form to Plaintiffs' counsel by either:

- a) Faxing the attached "Consent Form" to Plaintiffs' counsel at (303) 832-4701; or
- b) Mailing the attached "Consent Form" to:

David Roloff
Attorney at Law
4450 Arapahoe Ave., Suite 100
Boulder, CO 80303

A pre-addressed envelope is included.

You are not required to pay any money to participate.

The signed Consent Form must be faxed or postmarked by August 3, 2009.

Should the enclosed Consent Form be lost or misplaced, or if you have any questions you may contact Plaintiffs' counsel listed in paragraph 8 of this notice.

5) EFFECT OF JOINING THE LAWSUIT.

If you choose to join this lawsuit you will be bound by the judgment, whether it is favorable or unfavorable. You will also be bound by - and may share in - any settlement that may be reached on behalf of the class. Any such settlement would be subject to Court approval. You may also be required to cooperate in discovery, to respond to written questions, sit for a deposition, or testify in court. You may also, if the Plaintiffs are unsuccessful in this lawsuit and the Court so orders, be responsible for paying a portion of the Defendants' costs incurred in defending themselves in this lawsuit.

6) YOUR RIGHT TO NOT PARTICIPATE IN THIS LAWSUIT.

You do not have to participate in this lawsuit. If you choose not to join this lawsuit you will not be affected by any judgment or settlement, whether favorable or unfavorable, and will not be entitled to share in any amount recovered. Further, you are free to commence an independent lawsuit if you wish to pursue a claim independent of this

collective action, but you will be responsible for all costs, including attorneys' fees, associated with your lawsuit.

7) RETALIATION PROHIBITED.

Federal law prohibits employers from discriminating or retaliating against any employee for participating in a lawsuit or claim under the FLSA.

9) LEGAL REPRESENTATION, COSTS AND ATTORNEY FEES.

If you elect to join this lawsuit and agree to be represented by the named Plaintiffs through their attorneys, you will be represented by counsel designated below:

DAVID ROLOFF
Attorney at Law
4450 Arapahoe Ave., Suite 100
Boulder, CO 80303

Telephone: (303) 832-4700
Fax: (303) 832-4701
E-mail: davro48@aol.com

-and-

RICHARD T. BUSH, ESQ.
Green Haines Sgambati Co., L.P.A.
16 Wick Avenue, Suite 400
P.O. Box 849
Youngstown, Ohio 44501-0849

Telephone: (330) 743-5101
Fax: (330) 743-3451
E-Mail: rbush@green-haines.com

If you return the Consent Form attached to this notice, you are agreeing to designate the representative Plaintiffs and Plaintiffs' counsel as representatives to make decisions on your behalf concerning the litigation. You have a right to consult with an

attorney about this matter. If you wish to be represented by other counsel, you may retain another attorney, but you will be responsible for paying that attorney. Further, that attorney will be required to enter an appearance in this case.

The representative Plaintiffs have entered into a contingency fee agreement with Plaintiffs' counsel. Under that agreement, if there is no recovery, you, as an opt-in plaintiff who has chosen to be represented by Plaintiffs' counsel, will not be responsible for attorney fees or costs incurred by Plaintiffs' counsel in the litigation. If there is a recovery, Plaintiffs' counsel will receive a contingency fee equal to one-third (1/3) of the total amounts recovered, unless the Court makes a separate or different award of attorney fees or unless the parties agree to a separate award of attorney fees to be paid by Defendants. Further, in the event there is a recovery, Plaintiffs' counsel will be entitled to reimbursement of expenses advanced. If there is no recovery, opt-in Plaintiffs will not be responsible to reimburse Plaintiffs' counsel for expenses advanced but may be responsible, if the Court so orders, for paying a portion of the Defendants' costs incurred in defending themselves in this lawsuit.

10) YOUR RIGHT TO FURTHER INFORMATION

If you would like to discuss this lawsuit or seek further information, please feel free to call, write, or e-mail class Plaintiffs' counsel.

THIS NOTICE HAS BEEN AUTHORIZED BY THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLORADO, HONORABLE RICHARD P. MATSCH, DISTRICT JUDGE. THE COURT HAS TAKEN NO POSITION REGARDING THE MERITS OF THE CLAIMS OR DEFENSES.

PLEASE DO NOT CONTACT THE COURT DIRECTLY REGARDING THIS MATTER.

Mailing Date:	June 5, 2009
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