

Exhibit 1

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

AYISHA RANDLE, on behalf of  
herself and all those similarly situated,

Plaintiff,

v.

1:14-cv-245-WSD

ALLCONNECT, INC.,

Defendant.

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**NOTICE OF COURT CERTIFICATION OF COLLECTIVE ACTION IN  
FEDERAL OVERTIME LAWSUIT AGAINST ALLCONNECT, INC.**

**THIS NOTICE AND ITS CONTENTS HAVE BEEN AUTHORIZED BY THE UNITED STATES DISTRICT COURT, HONORABLE WILLIAM S. DUFFEY, JR., DISTRICT JUDGE. THIS NOTICE IS FOR THE SOLE PURPOSE OF PROVIDING YOU WITH INFORMATION CONCERNING YOUR RIGHT TO JOIN THIS LAWSUIT. THE COURT HAS NOT YET EXPRESSED ANY OPINION ABOUT THE MERITS OF THE CLAIMS ASSERTED OR THE DEFENSES RAISED, AND YOU SHOULD NOT INTERPRET THE SENDING OF THIS NOTICE AS ANY INDICATION OF THE COURT'S OPINION OF THE ULTIMATE OUTCOME OF THIS CASE. PLEASE DO NOT CONTACT THE COURT OR THE COURT CLERK WITH QUESTIONS ABOUT THIS LAWSUIT OR NOTICE.**

**To:** All persons currently or formerly employed by Allconnect, Inc. ("Allconnect") as a "Home Service Consultant" in Atlanta, Georgia, who were paid on an hourly basis and who claim they worked over 40 hours for Defendant in one or more workweeks from January 28, 2011, to the present and who claim they were not paid one and one half their regular rate for all hours worked over 40 in a workweek.

## **I. INTRODUCTION**

You may be eligible to join the above-captioned collective action lawsuit alleging violation of federal overtime wage (the “Lawsuit”).

The Lawsuit alleges that Allconnect wrongfully failed to pay its Home Service Consultants overtime pay for those hours Home Service Consultants were required to work off the clock in excess of 40 hours in one or more workweeks. The Lawsuit asserts that overtime compensation for this alleged off-the-clock work was required to be calculated at a rate not less than one and one half times the employee’s regular rate for all hours worked over 40 in a workweek.

Allconnect denies that it failed to pay any overtime compensation owed. Allconnect claims its employees were prohibited from accepting calls or performing any other work “off-the-clock.” Allconnect asserts that Home Service Consultants reviewed their hours worked at the end of each pay period and were given the opportunity to either confirm or dispute their hours so that they could be paid properly. Allconnect claims it paid Home Service Consultants all overtime pay earned.

## **II. YOUR RIGHT TO PARTICIPATE IN THE LAWSUIT**

If you were employed by Allconnect as a “Home Service Consultant” in Atlanta, Georgia at any time from January 28, 2011, to the present and were paid on an hourly basis and were allegedly not paid at a rate not less than one and one half your regular rate for all hours worked over 40 in a workweek, you may join the Lawsuit by opting-in. To do so, complete fully the attached “Consent to Join” form and mail, fax or e-mail it, within 45 days of the date of this Notice, to Plaintiff’s Counsel at the following address:

Amanda Farahany  
Severin Roberts  
Barrett & Farahany  
1100 Peachtree St., N.E., Suite 500  
Atlanta, Georgia 30309  
E-Mail: vsroberts@bf-llp.com  
Telephone: (404) 214-0120  
Facsimile: (404) 214-0125

It is entirely your decision whether to participate in the Lawsuit. You are not required to take any action if you do not wish to participate. If a Consent to Join form from you is not received by Plaintiff's Counsel within 45 days from the date of this notice, you will not be included as a participant in the Lawsuit.

### **III. EFFECT OF JOINING THE LAWSUIT**

If you choose to join the Lawsuit, you will be bound by any judgment or settlement in this case, whether it is favorable or unfavorable. By opting-in, you designate Ayisha Randle as your agent to make binding decisions on your behalf concerning the litigation.

If you join this action and become a participant, you may be required to provide information in the case. If you do not prevail on your claim, court costs and expenses could be assessed against the Plaintiff and opt-in Plaintiffs, including you.

This notice shall not be interpreted to mean that the Court has determined that you are or may be entitled to any monetary recovery if you opt into the Lawsuit. A Consent to Join form, if timely received, simply allows you to indicate your desire to participate in this litigation. The Court later will decide if you are "similarly situated" to the Plaintiff sufficient to allow you to continue as a participant in this case.

#### **Counsel for Plaintiff**

If you choose to participate in the Lawsuit and agree to be represented by the named Plaintiff through her attorneys, your counsel in this case will be Barrett & Farahany, LLP. Alternatively, you may seek to join the Lawsuit and retain counsel of your choice at your own expense. If you wish to retain your own counsel, your attorney must file your Consent to Join form with the Court and enter an appearance in this action.

### **IV. IF YOU CHOOSE NOT TO JOIN THE LAWSUIT**

If you choose not to join the collective action, you will not be affected by any judgment rendered or settlement reached in this case and you will be free to file your own lawsuit in any federal District Court where such a lawsuit may properly be brought.

**V. NO RETALIATION IS PERMITTED**

Federal law prohibits anyone from discriminating or retaliating against you for joining or deciding not to join in the Lawsuit.

**VI. FURTHER INFORMATION**

If you have questions about this Notice, or about the Lawsuit, you may contact Plaintiff's counsel, Barrett & Farahany, at the telephone number or address listed on page 2 of this Notice.

Date of Notice: \_\_\_\_\_