

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

LATOYA CALDER, et al.,

*

Plaintiffs,

*

Civil No. BPG-12-2350

v.

*

GGC-BALTIMORE, LLC,

*

Defendant.

*

* * * * *

NOTICE OF COLLECTIVE ACTION LAWSUIT

TO: INDIVIDUALS WHO HAVE WORKED AS EXOTIC DANCERS AT THE GENTLEMEN’S GOLD CLUB IN BALTIMORE, MARYLAND (HEREINAFTER REFERRED TO AS “DEFENDANT”)

RE: YOUR PARTICIPATION IN A LAWSUIT AGAINST DEFENDANTS TO RECOVER UNPAID WAGES UNDER THE FAIR LABOR STANDARDS ACT

**YOU SHOULD READ THIS NOTICE BECAUSE IT MAY
AFFECT YOUR LEGAL RIGHTS.**

I. INTRODUCTION

The purpose of this Notice is to inform you of the existence of a lawsuit in which current and/or former employees of Defendant are seeking to recover unpaid minimum wage compensation and overtime wages. This Notice will advise you of how your rights may be affected by this lawsuit and instruct you on the procedure to follow in order to participate in the suit yourself, if you so choose.

II. FACTUAL BACKGROUND

Latoya Calder and Jennifer McDaniel (hereafter, “Plaintiffs”) have filed a lawsuit in the United States District Court for the District of Maryland alleging that Defendant unlawfully failed to pay them legally required minimum wage compensation and overtime wages while they were employed by Defendant. Defendant denies these claims and denies any liability for unpaid minimum wage compensation or overtime wages. The Court has not determined whether Defendant has done anything wrong. However, you have a choice to assert your legal rights in this case.

III. YOUR PARTICIPATION IN THE SUIT

You may be entitled to participate in this lawsuit as a plaintiff if you worked as an exotic dancer at the Gentlemen's Gold Club in Baltimore, Maryland at any time since from March 1, 2012 through June 26, 2012, and were not paid by Defendant for all non-overtime hours worked at an hourly rate at least equal to the federal minimum wage or for all overtime hours worked each week in excess of forty (40) at the overtime rate of one-and-one-half (1½) times the higher of your regular rate of pay or the minimum wage rate.

However, you are not automatically included as a plaintiff in the suit. If you want to join, you must complete the enclosed "Consent to Join Lawsuit" form and return it to The Zipin Law Firm, LLC no later than October 1, 2013.

Your continued right to participate in the suit may depend upon a later decision by the Court that you and the Plaintiffs are "similarly situated" in accordance with Federal Law.

Please note that the longer you wait, the less your claim may be worth, as the statute of limitations continues to run until your "Consent to Join Lawsuit" is filed with the Court. If you have any questions or concerns, please direct all such inquiries to Gregg C. Greenberg, Esquire at the telephone number shown below.

IV. NO RETALIATION AGAINST YOU IS PERMITTED

Federal law prohibits Defendant from discharging you or taking any other adverse employment action against you because you have exercised your legal right to join this lawsuit or because you have otherwise exercised your rights under the Fair Labor Standards Act.

V. YOUR RIGHT TO DECLINE PARTICIPATION IN THIS LAWSUIT

If you do not want to join this lawsuit, do nothing. If you do not return the "Consent to Join Lawsuit" form on or before October 1, 2013, you will not be a party in this case and will be entitled to no recovery from this lawsuit. In determining whether you want to be included or excluded from this lawsuit, you may want to consult with your own attorney. A decision not to participate in the lawsuit will not affect your rights to pursue possible claims on an individual basis.

VI. EFFECT OF JOINING THIS LAWSUIT

If you return the "Consent to Join Lawsuit" form on or before October 1, 2013:

(1) Please note that you have the right to obtain your own counsel to represent you in this action. If you do not choose to join this lawsuit with your own attorney, you will be represented in the case by attorneys Gregg C. Greenberg, Esquire, and The Zipin Law Firm, LLC.

(2) You will receive notice of any significant court rulings affecting the case, as well as notice of any dismissal of claims, proposed settlements, or judgments rendered.

(3) You will be bound by any judgment or other final disposition of the lawsuit, including any settlement agreed to between Plaintiffs and Defendant, whether that disposition is favorable or unfavorable.

(4) You may be required to respond to written questions, and otherwise provide information, including the giving of testimony at deposition and/or in Court.

VII. NOTICE OF THE ATTORNEYS IN THE CASE

The following attorney is designated as counsel for the Plaintiffs in this lawsuit:

Attorney for Plaintiffs:

Gregg C. Greenberg, Esq.

The Zipin Law Firm, LLC

8403 Colesville Road, Suite 610

Silver Spring, Maryland 20910

(301) 587-9373 (ph)

(301) 587-9397 (fax)

Email: ggreenberg@zipinlaw.com

VIII. CHANGE OF ADDRESS

If you move after receiving this notice, or if it was misaddressed, you should supply your correct name and address to Gregg C. Greenberg, Esquire at the address listed above. This is important so that future notices reach you.

IX. MISCELLANEOUS

The information in this notice is only a summary of the litigation. You may review and copy the pleadings and all other court records of this lawsuit during regular business hours in the Office of the Clerk, United States District Court for the District of Maryland. Do not call the court. The court has taken no position in this case regarding the merits of this lawsuit. Further information may be obtained from Plaintiffs' counsel.