

Exhibit A

NOTICE OF RIGHT TO OPT-IN TO LAWSUIT

TO: ALL CURRENT AND FORMER EMPLOYEES WHO WORKED FOR QUICK LANE OIL & LUBE, INC. AS OIL CHANGE TECHNICIANS BETWEEN AUGUST 2, 2013 AND AUGUST 2, 2016 AND WHO WERE NOT COMPENSATED FOR ALL HOURS WORKED INCLUDING ONE AND ONE-HALF THE REGULAR RATE FOR HOURS IN EXCESS OF 40 IN A WORKWEEK

RE: FAIR LABOR STANDARDS ACT LAWSUIT FILED AGAINST QUICK LANE OIL & LUBE, INC.

1. **INTRODUCTION**

This Notice is to inform you about a lawsuit in which you may be eligible to make a claim for damages under the Fair Labor Standards Act (FLSA), 29 U.S.C. § 201 *et seq.*, to advise you of how your rights may be affected by this lawsuit, and to instruct you on the procedure for participating in this lawsuit, if you so choose.

2. **DESCRIPTION OF THE LAWSUIT**

Plaintiffs Tom Totte, Cody Hitch, and John Merrell, on behalf of themselves and other employees similarly situated, filed a lawsuit in the U.S. District Court for the Eastern District of Michigan against Quick Lane Oil & Lube, Inc. and Talha Hares.

The lawsuit alleges defendants violated the FLSA minimum-wage and overtime-wage provisions, 29 U.S.C. §§ 206, 207, by not paying employees at least the minimum wage for all hours worked and not paying employees the overtime rate of 1.5 times the regular rate of pay for hours worked in excess of 40 hours in a workweek. Plaintiffs allege that they are entitled to recover wages and also seek an equal amount as liquidated damages, in addition to attorneys' fees and costs. This litigation is in the early pretrial stage.

Defendants deny that additional money is owed to employees for time worked.

3. **PERSONS ELIGIBLE TO RECEIVE THIS NOTICE**

The U.S. District Court for the Eastern District of Michigan has approved this Notice to be distributed to:

ALL CURRENT AND FORMER EMPLOYEES WHO WORKED FOR QUICK LANE OIL & LUBE, INC. AS OIL CHANGE TECHNICIANS BETWEEN AUGUST 2, 2013 AND AUGUST 2, 2016 AND WHO WERE NOT COMPENSATED FOR ALL HOURS WORKED INCLUDING ONE AND ONE-HALF THE REGULAR RATE FOR HOURS IN EXCESS OF 40 IN A WORKWEEK.

4. NO OPINION EXPRESSED AS TO MERITS OF LAWSUIT

This notice is meant only to provide employees who are eligible to receive information about their right to join this lawsuit if they wish.

Although the notice and its contents have been authorized by the Court, **the Court takes no position regarding any claims or defenses.** There is no assurance that the Court will grant relief in this case.

5. YOUR RIGHT TO PARTICIPATE IN THIS LAWSUIT

If you meet the description in paragraph 3, and believe defendants failed to compensate you at least the minimum wage and one and one-half your regular rate of pay for hours worked in excess of 40 hours, you are eligible to participate in this lawsuit.

There is no cost to you to participate, but there is no guarantee of recovery either. If a violation of the FLSA is proven, the law allows you to recover damages for regular hours worked in which you were not paid the minimum wage and overtime hours in which you were not paid one and one-half times your regular rate of pay, plus an equal amount in liquidated (double) damages as a penalty.

It is entirely your own decision whether to join this lawsuit.

6. EFFECT OF JOINING THIS LAWSUIT

If you choose to join this lawsuit, you will be bound by any judgment on any claim you may have under the FLSA, whether favorable or unfavorable. That means that, if you win, you may be eligible to share in the monetary award; if you lose, no money will be awarded, and you will not be able to file another lawsuit regarding the matters raised in the lawsuit.

While this lawsuit is proceeding, you may be required to respond under oath to written questions, to have your deposition taken, to produce documents, and/or to testify in court at a trial or hearing in the Theodore Levin U.S. Courthouse in Detroit, Michigan.

7. NO LEGAL EFFECT IN NOT JOINING THIS LAWSUIT

If you choose not to join this lawsuit, you will not be affected or bound by any judgment, favorable or unfavorable, on any claims brought under the FLSA alleged in this lawsuit. You will retain all rights, if any, that you may have under the FLSA and may file your own lawsuit or complaint with the U.S. Department of Labor, subject to time limitations.

YOUR LEGAL REPRESENTATION IF YOU JOIN

If you join the lawsuit, the attorneys retained to represent the plaintiffs are:

Law Offices of Bryan Yaldou, PLLC
23000 Telegraph Rd., Suite 5
Brownstown, MI 48134

If you choose to join this lawsuit, the law firm listed above will represent you unless you obtain an attorney. You are not required to pay attorneys' fees or court costs at this time. If plaintiffs prevail, plaintiffs' counsel will seek an order requiring defendants to pay reasonable attorneys' fees and expenses. The Court must approve any award of attorneys' fees.

You have the option to retain an attorney of your own choice to represent you.

8. HOW TO JOIN THIS LAWSUIT

If you wish to join this lawsuit, you must complete, sign and mail the enclosed Consent to Sue form in the envelope provided to:

[CLAIMS ADMINISTRATOR]

Once your Consent to Sue form is received, it will be filed with the Court to initiate your claim in the case. The deadline to join this case is ____, 2017.

If you file a Consent to Sue form, your continued right to participate in this lawsuit may depend upon a later decision by the Court that you and plaintiffs are similarly situated.

9. DEADLINE

You have 60 days from the date of this notice to return your Consent to Sue form to the claims administrator.

10. NO RETALIATION PERMITTED

The FLSA prohibits employers from discriminating or retaliating against any person for filing a claim for compensation, assisting or testifying in a lawsuit under the FLSA, or participating in a proceeding or exercising rights under the FLSA.

11. FURTHER INFORMATION

For further information about this lawsuit, you may contact the claims administrator.

**DO NOT CONTACT THE COURT REGARDING THIS LAWSUIT
CONSENT TO SUE**

I state that I worked as an employee of defendants and was not compensated for all hours that I worked including one and one-half my regular rate of pay for hours worked in excess of 40 hours in a workweek.

I hereby consent to sue Quick Lane Oil & Lube, Inc. and Talha Hares for damages including unpaid wages under the FLSA. I designate the Law Offices of Bryan Yaldou, PLLC to represent me in this matter.

Signed: _____

Dated: _____

Name (Print): _____

Address: _____

City/State/ZIP: _____

Telephone No.: _____