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12 *Attorneys for Plaintiffs MUSTAFA YOUSIF*  
13 *and SHARONE WALKER on behalf of themselves*  
14 *and all others similarly situated*

15 **UNITED STATES DISTRICT COURT**  
16 **DISTRICT OF NEVADA**

17 MUSTAFA YOUSIF and SHARONE  
18 WALKER on behalf of themselves and all  
19 others similarly situated,

20 Plaintiffs,

21 vs.

22 THE VENETIAN CASINO RESORT, LLC;  
23 LAS VEGAS SANDS, CORP. and DOES 1  
24 through 50, inclusive,

25 Defendants.

Case No.: 2:16-cv-02941-RFB-NJK

~~PROPOSED~~ ORDER APPROVING  
FLSA NOTICE

26 The Court Orders as follows:

- 27 1. The Court adopts the attached Notice and Consent to Join form for use in this  
28 case.
1. Notice of this lawsuit will be sent to all current and former employees of  
Defendants who worked as non-exempt employees, employed as housekeepers at any time  
during the relevant time period.

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1           3.       If it has not already done so, within fourteen (14) days of the date of this Order,  
2 Defendants will provide to Plaintiffs’ counsel a list in computer-readable format of the (a) full  
3 name; (b) current home address or last known address; (c) telephone number; (d) email  
4 address; and (e) Social Security number of each person who falls in the definition set forth in  
5 paragraph two (2) of this Order. Plaintiffs’ counsel will treat this information as confidential  
6 and will not disclose it to third parties.

7           4.       Within twenty-one (21) days of the date of this Order, Plaintiffs’ counsel, or a  
8 claims administration company that Plaintiffs’ counsel selects to process the mailing and opt-  
9 in forms, (hereinafter collectively referred to as “Claims Administrator”) shall translate the  
10 Notice and Consent to Join form into Spanish, and then shall mail a Notice, a Consent to Join  
11 form, and a postage pre-paid return envelope, to each person identified on the list discussed in  
12 Paragraph 3 of this Order.

13           5.       The Claims Administrator shall establish a website repository containing  
14 printer-friendly versions of the Class Notices and Consent to Join forms, any other documents  
15 the parties wish to make available, and contact information for the notice administrator and  
16 Plaintiff’s counsel, including a Consent to Join form that may be completed online, so long as  
17 the online form provides a means by which the individual signifies his or her assent to the  
18 statements listed on the form comparable to signature, such as by checking a box on a web  
19 page.

20           6.       Plaintiffs may commence a social media campaign on websites geared to reach  
21 the target audience directly and provide putative class members with the contact information  
22 for the notice administrator and Plaintiffs’ counsel as well as the website containing the  
23 electronic Notice and Consent to Join forms.

24           7.       Any person who wishes to opt in to this lawsuit must properly complete the  
25 Consent to Join form and return it to Plaintiffs’ counsel via hard copy by U.S. Mail or through  
26 a Web form.

27           8.       If any notice package is returned undeliverable, the Claims Administrator will,  
28 within fourteen (14) days thereafter, use the Social Security number provided by Defendants

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1 and attempt to obtain an alternative address for that addressee and mail the notice package to  
2 that alternate address. The Claims Administrator will keep record of: (a) the date on which  
3 any notice package is returned undeliverable; (b) the date on which the undeliverable notice  
4 package is sent to an alternate address; and (c) any updated addresses.

5 9. Plaintiffs' counsel will date-stamp and number each properly completed  
6 Consent to Join form and accompanying envelope (if any) that is sent to them. Plaintiffs'  
7 Counsel will send a copy of the Consent to Join forms it receives to counsel for Defendants on  
8 each Friday after the initial mailing.

9 10. Plaintiffs' counsel will file the list of the people who timely returned Consent  
10 to Join forms identified above with the Court within thirty days after receipt, or earlier.  
11 Plaintiffs' counsel will retain a copy of the list and the envelope in which the Consent to Join  
12 forms were received.

13 **IT IS SO ORDERED.**

14 Dated: September 24, 2018.



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16 RICHARD F. BOULWARE, II  
17 UNITED STATES DISTRICT JUDGE  
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