

SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF KING

If you worked as a driver, mover, foreperson or in a similar job classification at Two Men and a Moving Van, Lion Movers, or Move for Less, a class action lawsuit may affect your rights.

*A court authorized this notice.
This is not a solicitation from a lawyer.*

A lawsuit was filed against Two Men and a Moving Van LLC, Lion Movers LLC and Move for Less LLC (collectively, “the Companies”) **alleging that they failed to pay drivers, movers, forepersons, and other similarly classified employees (“movers”) for all hours worked , including travel time; failed to properly compensate movers for overtime; and denied movers required meal and rest breaks.**

- The Companies have not appeared in the lawsuit to defend themselves.
- A Superior Court Judge in King County has certified the lawsuit as a class action on behalf of hourly-paid employees between April 30, 2021, through May 20, 2025. A trial is scheduled for later this year.
- Your legal rights may be affected by this case, depending on whether you act or don’t act.
- This Notice explains your options and the deadlines to exercise them.

SUMMARY OF YOUR RIGHTS AND OPTIONS	
DO NOTHING	By doing nothing, you will remain a member of the class. You will be bound by any resolution of the case, whether favorable or unfavorable to the class. Also, you will give up your right to sue the Companies separately about the same legal claims present in this lawsuit.
ASK TO BE EXCLUDED	If you ask to be excluded, you will not be a part of the lawsuit. If money or benefits are awarded later, you won’t share in those. You will keep any rights you may have to sue the Companies separately.

1. What is this notice about?

You are receiving this notice because records show (or you have attested) that you were employed as an hourly-paid driver, mover, foreperson, or in a similar job classification by the Companies at some time between April 30, 2021 and May 20, 2025.

A Superior Court Judge in King County, Washington has determined that a lawsuit filed against Two Men and a Moving Van LLC, Lion Movers LLC, and Move for Less LLC should proceed as a class action. The lawsuit is *Chunir v. Two Men and a Moving Van, et al.*, No. 24-2-09567-5 KNT. The Court ordered that a notice be sent to advise you of your rights in connection with this lawsuit.

You have the choice whether to participate in this class action lawsuit or not.

If you **want** to participate in the lawsuit, you do not need to do anything more right now. You will automatically be a part of the case and will receive more information in the future.

If you **do not want** to participate in the lawsuit, you must send the attached “Request to be Excluded” form by mail, email, or fax to the person(s) identified below. The Request must be delivered, transmitted, or postmarked on or before **August 29, 2025**.

2. What is this lawsuit about?

Plaintiff Franklin Chunir filed a lawsuit against the Companies. **He claims that the Companies failed to pay him and other movers for all hours worked, including travel time; did not properly compensate them for overtime; and denied them required meal and rest breaks. The Companies have not appeared in this lawsuit to defend themselves.**

The lawsuit seeks money damages, statutory penalties, interest, and attorneys’ fees and costs for the class of movers.

3. What is a class action?

A “class action” is a lawsuit in which one or more people (class representatives) bring claims on behalf of a group of similarly situated “class members.”

The outcome of a class action lawsuit (whether positive or negative) applies to all individuals who fall within the class, unless they ask to be excluded from the case.

4. Am I part of a class?

In this case, the Court has decided that the following people are potential class members:

All current and former hourly-paid employees who worked for Defendants as drivers, movers, forepersons, or in similar job classifications (together, “movers”) in Washington state at any time between April 30, 2021, and May 20, 2025.

5. Who is NOT included in a class action?

You are NOT a Class Member if you request to be excluded from this class action lawsuit.

6. I’m still not sure if I am included.

If you still aren’t sure whether you are a potential class member, you can request more information by contacting Class Counsel by mail, email, or phone:

Schroeter Goldmark & Bender
Attn: Gillian Crawford, paralegal for Carson Phillips-Spotts, Lindsay Halm, Adam Berger
401 Union Street, Suite 3400, Seattle, WA 98101
Tel: (206) 233-1236 or (1-800) 809-2234
Email: crawford@sgb-law.com

7. Who will represent the class members?

The Court has approved Franklin Chunir to represent the interests of the class (or, “Class Representative”) and has appointed the law firm of Schroeter Goldmark & Bender to serve as attorneys for the class (or, “Class Counsel”). More information about Class Counsel is available at www.sgb-law.com.

8. What do I need to do to take part in the class action?

If you want to participate in the class action against the Companies and you want to have the Class Representative and Class Counsel represent your interests, you are not required to do anything at this time.

9. What happens if I participate in the class action?

If you participate in the class action, you will be bound by any court decision in the case, whether favorable or unfavorable, and whether it results in a monetary recovery to the class or not. This means that you will lose any right to pursue similar claims if the Court rules against the class. You will not be responsible to pay for costs or fees to Class Counsel, but these amounts may be taken out of any recovery in the case. If you choose to participate in the class action, you may also engage an attorney of your own choosing, but at your own expense.

If you choose to be included in the class, the Companies are not permitted to retaliate against you in any way because of your participation.

10. Can I exclude myself from the class action?

Yes. If you do not want to participate in this lawsuit, you can opt out. If you want to be excluded, you must communicate your decision to Class Counsel by using the form attached as **Exhibit A** to this Notice.

Your request must be in writing and be delivered to Class Counsel by mail or email to the following address:

Schroeter Goldmark & Bender
Attn: Gillian Crawford, paralegal for Carson Phillips-Spotts, Lindsay Halm, Adam Berger
401 Union Street, Suite 3400, Seattle, WA 98101
Tel: (206) 233-1236 or (1-800) 809-2234
Email: crawford@sgb-law.com

Your request to be excluded must be received or postmarked by **August 29, 2025**.

11. What happens if I exclude myself from the class action?

If you exclude yourself from the class action (or, “opt out”), you will not be affected or bound by any rulings, judgment, or settlement in the case. You will retain your rights under the law and are free to pursue any possible claims on your own. This also means that you will not share in any recovery that might be paid to class members as a result of this lawsuit.

12. What is the time limit for requesting exclusion?

If you wish to be excluded from this lawsuit, you must return a completed Request to be Excluded to Class Counsel no later than **August 29, 2025**.

13. How can I obtain more information?

DO NOT CONTACT THE CLERK OF THE COURT OR THE JUDGE WITH INQUIRIES.

Any questions you have concerning this Notice or any changes of name or address may be directed to Class Counsel at the address, phone, and/or email listed above.

You may also examine and copy pleadings and other records in this litigation at any time during regular office hours at the Office of the Clerk, King County Superior Court, in either Seattle or Kent.

REQUEST TO BE EXCLUDED FROM THE CLASS

Please carefully read the attached Notice of Class Action before filling out this form.

DO NOT FILL OUT THE FORM IF YOU WANT TO REMAIN PART OF THE CASE AND BE REPRESENTED BY CLASS COUNSEL

If you want to **exclude** yourself from the Class (“opt out”), please check the box below, sign and date this form, make and keep a copy for your records, and return it to Class Counsel. The Request to Be Excluded must be sent by mail or scanned and emailed on or before **August 29, 2025**, to:

Schroeter Goldmark & Bender
Attn: Gillian Crawford, paralegal for Carson Phillips-Spotts, Lindsay Halm, Adam Berger
401 Union Street, Suite 3400, Seattle, WA 98101
Tel: (206) 233-1236 or (1-800) 809-2234
Email: crawford@sgb-law.com

- ☐ I want to be **excluded** from the class that has been certified in the case *Chunir v. Two Men and a Moving Van, et al.*, No. 24-2-09567-5 KNT (King Co. Superior Court).

PRINT NAME:

SIGNATURE:

ADDRESS:

PHONE:

EMAIL:

DATED:
