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UPDATED NOTICE OF CLASS ACTION LAWSUIT

Hoffman v. Tagle & Partners, LLC, et al.

No. 24-2-15794-8 SEA

The Court authorized this communication. This is not a solicitation from a lawyer.

Re: *Hoffman v. Tagle & Partners, LLC, et al.*

Dear <<FIRST NAME>> <<LAST NAME>>:

You previously received a notice about this class action lawsuit. The Court ordered that you receive updated information about this case. **Please read the following information carefully. Your rights may be affected.**

The Judge assigned to the case found that some baristas may have felt pressured or discouraged from participating in the case. As a result, the Court invalidated any prior requests to be excluded (or “opt out”) from the Class and ordered that you and other baristas be provided a second opportunity to decide whether to participate in this lawsuit.

If you **want** to participate in the lawsuit, you do not need to do anything. 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 mail the “request to be excluded” portion of the attached Notice by January 8, 2026, even if you previously submitted such a request.

For more information, please review the attached Notice or contact Class Counsel at dardeau@sgb-law.com.

Any change of name or address can be directed to 1-800-305-9833 or Beehivelawsuit@atticusadmin.com.

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

Hoffman v. Tagle & Partners, LLC, et al., No. 24-2-15794-8 SEA

If you worked as a barista for Tagle & Partners, LLC at Beehive Espresso or Everett's Best Coffee, 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 Tagle & Partners, LLC (T&P) and Alan Tagle (Tagle) based on T&P's alleged failure to pay baristas for all hours worked, failure to provide paid sick leave, tip/wage conversion, and alleged restrictions on the ability of baristas to work a second job.
- T&P and Tagle deny the allegations in the lawsuit, deny any wrongdoing, and believe T&P has properly compensated baristas it employs.
- A Superior Court Judge in King County has certified the lawsuit as a class action on behalf of hourly-paid employees (baristas) who worked at any of T&P's coffee stands between July 15, 2021 through June 10, 2025.
- A trial is scheduled for January 12, 2026. The Court has not decided yet whether T&P or Tagle have done anything wrong or whether baristas are owed any backpay or other damages.
- 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. Also, you will give up your right to sue T&P and/or Tagle 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 is awarded later, you won't share in those awards. You will keep any rights you may have to sue T&P and/or Tagle separately, at your own expense.

1. What is this Notice about?

You are receiving this Notice because company records show that you may have worked as a barista for Tagle & Partners, LLC (T&P) at some point between July 15, 2021 and June 10, 2025.

A Superior Court Judge in King County, Washington has determined that a lawsuit filed against Tagle & Partners, LLC and Alan Tagle should proceed as a class action. The lawsuit is *Hoffman v. Tagle & Partners, LLC, et al.*, No. 24-2-15794-8 SEA. 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 from the Class [Exhibit A]” form by mail, email, or other method of delivery to the person(s) identified below. The Request must be delivered, transmitted, or postmarked on or before January 8, 2026, **even if you previously submitted such a request.**

2. What is this lawsuit about?

Plaintiff Eilish Hoffman filed a lawsuit against T&P and Tagle. She claims T&P did not pay her and other baristas for all hours worked, failed to provide paid sick leave, received (converted) wages and tips from employees, and restricted their ability to work at a second job. The lawsuit seeks money damages, statutory penalties, interest, and attorneys’ fees and costs for the class of baristas.

T&P and Tagle deny the allegations in the lawsuit, deny any wrongdoing, and believe T&P has properly compensated baristas and otherwise complied with the law. T&P and Tagle have retained their own legal counsel to defend the lawsuit.

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 persons who worked as a barista at any of Defendants’ coffee stands between July 15, 2021 and June 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: Mary Dardeau, paralegal for Class Counsel
401 Union Street, Suite 3400
Seattle, Washington 98101
Tel: (206) 233-1257 or (1-800) 809-2234
Email: dardeau@sgb-law.com

7. Who will represent the Class Members?

The Court has approved Eilish Hoffman to represent the interests of the Class (or, "Class Representative") and has appointed Lindsay Halm, Andrew Boes, and Hong (Chen-Chen) Jiang of the law firm of Schroeter Goldmark & Bender together with Jeremiah Miller and Janae Choquette of the Fair Work Center to serve as attorneys for the Class (or, "Class Counsel"). More information about Class Counsel is available at www.sgb-law.com and www.fairworkcenter.org.

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

If you want to participate in the class action against T&P and Tagle 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 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, T&P and Tagle 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 Atticus Administration, LLC (Atticus) by using the form attached as **Exhibit A** to this Notice.

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

Hoffman v Tagle & Partners Lawsuit
c/o Atticus Administration, LLC
PO Box 64053
Saint Paul, MN 55164
Email: Beehivelawsuit@atticusadmin.com

Your request to be excluded must be received or postmarked by January 8, 2026, **even if you previously submitted a request to be excluded from this case.**

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 January 8, 2026.

13. How can I obtain more information?

DO NOT CONTACT THE CLERK OF THE COURT, THE JUDGE, OR DEFENDANTS’ ATTORNEYS WITH INQUIRIES.

Any questions you have concerning this Notice or any changes of name or address may be directed to 1-800-305-9833 or Beehivelawsuit@atticusadmin.com. You can download this Notice, and certain other case documents, on Class Counsel’s website: sgb-law.com/practice-areas/class-actions.

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.

BARCODE

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REQUEST TO BE EXCLUDED FROM THE CLASS [Exhibit A]

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, and return it to Class Counsel. **You will need to do so even if you previously submitted a request to be excluded from this case.** The Request to Be Excluded must be sent by mail or scanned and emailed on or before January 8, 2026, to:

Hoffman v Tagle & Partners Lawsuit
c/o Atticus Administration, LLC
PO Box 64053
Saint Paul, MN 55164
Email: Beehivelawsuit@atticusadmin.com

- ☐ I want to be **excluded** from the Class that has been certified in the case *Hoffman v. Tagle & Partners, et al.*, No. 24-2-15794-8 SEA (King Co. Superior Court).

PRINT NAME:

SIGNATURE:

ADDRESS:

PHONE:

EMAIL:

DATED:

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