DAVIS V INTEGRITY TRAFFIC SETTLEMENT
C/O ATTICUS ADMINISTRATION
PO BOX 64053
SAINT PAUL MN 55164

<<barcode text>> - <<SEQ ID>>

Claimant ID: <<secondary ID>>
<<FULL NAME>>
<<ADDRESS1>> <<ADDRESS 2>>
<<CITY>> <<STATE>> << ZIP>>

KING COUNTY SUPERIOR COURT – THE STATE OF WASHINGTON

If you worked for Integrity Traffic, a Class Action Settlement may affect your rights.

A Court authorized this Notice. This is not a solicitation from a lawyer.
Please read this Notice carefully.

- This Notice provides information about a proposed class action settlement ("Settlement") of a Lawsuit brought by Erin Davis ("Plaintiff") against Integrity Traffic OR, LLC and David Fleischman ("Integrity Traffic" or "Defendants").
- In this case, Plaintiff claims she and other hourly-paid employees did not receive pay for all hours worked, prevailing wages, and legally compliant meal periods.
- Defendants deny any wrongdoing and deny all the allegations in Plaintiff's Lawsuit. Defendants resolved this case as a business decision to avoid the risk, cost, and inconvenience of litigation.
- Plaintiff and Defendants (the "Parties") have negotiated and reached a proposed Settlement and have presented it to the King County Superior Court for approval. If the Settlement is approved, Defendants will pay $560,000 to cover: wage payments and other damages to Class Members; Attorneys' Fees and Costs; administrative fees; and a payment to Plaintiff for her efforts in the case.
- You have the option to participate in the Settlement or not.

SUMMARY OF YOUR RIGHTS AND OPTIONS	
DO NOTHING	If you do nothing, you will receive a settlement payment. In exchange, you will give up ("release") any rights to sue Defendants separately for any released claims, including those relating to unpaid time, overtime, prevailing wages, and noncompliant meal breaks.
ASK TO BE EXCLUDED	If you ask to be excluded, you will not share in the Settlement funds and you cannot object to any of the terms of Settlement; however, you will keep any rights you have to sue (or not sue) Defendants at your own expense.
OBJECT TO THE SETTLEMENT	If you don't like the Settlement, you can file an objection and tell the Court why. If the Court approves the Settlement anyway, you will be bound by it.

1. Why am I getting this Notice?

You are receiving this Notice because Integrity Traffic records show that you worked as a non-exempt, hourly employee as a flagger, traffic control supervisor, or similar position at some point between September 16, 2021, and March 1, 2025.
The Court ordered that this Notice be sent to advise you of your rights.

If you **want** to participate, you do not need to do anything. You will automatically be a part of the Settlement and will receive a payment.

If you **do not want** to participate, you must complete and return the Form attached to this Notice called a "Request To Be Excluded."

2. What is this Lawsuit about?

Plaintiff Erin Davis, a former employee, alleges that Integrity Traffic failed to compensate Class Members for all hours worked (including drive time), failed to provide legally compliant meal periods, and failed to pay overtime and prevailing wages. Defendants deny the allegations in the Lawsuit and deny any wrongdoing.

The Honorable Patrick Oishi of the King County Superior Court is overseeing this lawsuit, referred to as: *Davis v. Integrity Traffic OR, LLC, et al.*, No. 24-2-24610-0 SEA.

3. What is a Class Action and who represents me?

A "Class Action" is a lawsuit where one individual brings claims on behalf of a group of other similarly situated "Class Members." In this case, Plaintiff brings claims for unpaid wages, missed meal breaks, and prevailing wages, on behalf of herself and other hourly-paid Class Members.

Plaintiff is represented by the law firm of Schroeter Goldmark & Bender. The Court has determined that these lawyers are qualified to represent the class. If you want to hire your own lawyer, you may do so at your own expense.

4. Am I a Class Member?

As part of the Settlement, the Court has decided that everyone who fits the following description is a Class Member:

> All hourly-paid current and former employees who worked for Defendant Integrity Traffic OR, LLC at any time between September 16, 2021, and March 1, 2025, as a flagger, lead flagger, traffic control supervisor, or similar job classification.

5. What are the reasons for the proposed Settlement?

The Court did not decide in favor of the Plaintiff or Defendants in this case. Instead, both sides agreed to a Settlement after they exchanged pay and time data, conducted independent research and damages analyses, and engaged an experienced mediator to assist with negotiations.

Plaintiff and her attorneys have determined that the Settlement is fair and reasonable and in the best interests of the Class after considering many factors, including the expense, uncertainty, and delay of further litigation.

Defendants have concluded that further litigation of the case would be burdensome, expensive, and time-consuming. While they deny any wrongdoing, Defendants have agreed to the Settlement to fully resolve the claims against them.

6. What are the terms for the proposed Settlement?

The following is a summary of the terms of the Settlement. A complete copy of the Settlement Agreement is on file with the Clerk of the Court at the King County Superior Court.

Integrity Traffic agrees to pay a total amount of **$560,000** (the "Gross Settlement Amount") to cover the following:

- **Settlement Class Payments.** At least **$400,000** (the "Net Settlement Amount") will be paid to Class Members who decide to participate. The Net Settlement Amount will be allocated to participating Class Members on a pro rata basis, based on the unpaid wages and interest Class Counsel and their expert calculate as owing. The exact amount of the individual payment will depend on how many Class Members participate. For tax purposes, the amounts paid to Class Members will be divided: (i) 33% to back wages, subject to payroll taxes, and reported on a Form W-2; and (ii) 67% to interest and exemplary damages, which is taxable income reported on a Form 1099, but not subject to payroll taxes.

- **Attorneys' Fees and Costs.** Class Counsel have been investigating this Lawsuit since mid-2024 and will continue to work on it through completion, but have not yet received any pay for their services. If the Court approves it, the Gross Settlement Amount will be used to pay attorneys' fees and costs at 25% of the Gross Settlement Fund (or $140,000). This amount includes Class Counsel's out-of-pocket costs, which are currently under $5,000.

- **Class Representative Award.** If the Court approves it, the Gross Settlement Amount will cover an award of up to $10,000 to Plaintiff Erin Davis in recognition of her efforts in serving as a Class Representative.

- **Settlement Administrator Fees.** Finally, if approved, the Gross Settlement Fund will be used to pay $9,750 to an experienced administrator, Atticus Administration, LLC, to handle settlement logistics, such as issuing and mailing checks to each Class Member and processing payroll taxes and tax forms.

7. What is the legal effect of the Settlement?

If the Court approves the Settlement, the Judge will enter a final order dismissing the Lawsuit.

Additionally, Defendants will be "released" from claims that were or could have been brought in the Lawsuit related to unpaid regular and overtime wages, failure to pay for all hours worked, failure to pay required prevailing wages, failure to provide or pay for legally compliant meal periods, double or punitive damages, interest, attorneys' fees, costs, and expenses, as outlined in Paragraph 4 of the Parties' Settlement Agreement.

If you choose to participate in the Settlement and receive a payment, you will be bound by this release, meaning you will not be permitted to file a separate lawsuit against Defendants for all released claims.

8. What do I need to do to take part in the Settlement? When will I be paid?

If you want to participate in the Settlement, you are not required to do anything. If the Court approves the Settlement at a final hearing, and if no appeal is filed, payments will be mailed approximately 60 days after final approval.

9. Can I exclude myself from the Settlement?

Yes. If you **do not want** to participate in the Settlement, you can opt out of the case. If you opt out, you will not receive any payment from the Settlement. You will retain your rights under the law and are free to pursue any possible claims on your own at your own expense.

If you want to be excluded, you must communicate your decision by using the "Request for Exclusion" Form, attached to this Notice. Your Form must be postmarked or received by August 3, 2026.

10. Can I participate in the Settlement, but object to a term of the Settlement?

Yes, you can participate in the Settlement, but still object to some aspect or term of the Settlement. If you wish to do so, you must submit a **written objection** to the Clerk of the Court at least five (5) court days prior to the Final Hearing. You must also provide a copy of your written objection to:

Mary Dardeau, Class Counsel
Paralegal
Re: Integrity Traffic Class Action
Schroeter Goldmark & Bender
401 Union Street, Suite 3400
Seattle, WA 98101
email: dardeau@sgb-law.com
phone: 206-622-8000

AND

Patrick Madden, Defense Counsel
Re: Integrity Traffic Class Action
Arnold & Porter
1420 5th Avenue, Suite 1400
Seattle, WA 98101
email: Patrick.Madden@arnoldporter.com
phone: 206-288-0114

Any written objection must contain your name, address, phone number, email, and the substance of your objection. If you file a timely objection, you may appear in person at the final hearing (date below) to explain your position. You may hire an attorney at your own expense to represent you at this hearing. Only settlement Class Members who object to the proposed Settlement according to these procedures will be permitted to appeal any decision related to the Settlement. Settlement Class Members who fail to present objections in the manner outlined in this Notice will have waived the right to object.

11. Can anyone retaliate against me for participating or excluding myself?

No one is permitted to punish you in any way if you choose to participate in or exclude yourself from this Settlement.

12. When will the Court decide whether to approve the Settlement?

On September 18, 2026, at 9:30 a.m. at the King County Superior Court in Seattle, Washington, the Court will conduct a hearing to determine whether the proposed Settlement is fair, adequate, and reasonable. Attorneys for Plaintiff and Integrity Traffic will attend.

NOTE: If you wish to attend the hearing you are welcome to do so, but you are **not** required to attend to receive a settlement payment. If you wish to **speak** at the hearing, you must notify Class Counsel by September 11, 2026.

The date and time of the hearing is subject to change without further notice. Please confirm the date, time, and location with Class Counsel or the Clerk's Office if you wish to attend.

13. How can I obtain more information?

DO NOT CONTACT THE COURT, THE JUDGE, OR DEFENDANTS' ATTORNEYS WITH QUESTIONS.

Any questions you have concerning this Notice or any changes of name or address may be directed to: 1-800-243-3130 or integritytrafficsettlement@atticusadmin.com.

More details and a full copy the Settlement Agreement are available at this website https://www.atticusadmin.com/integrity-traffic-class-action. You may also review 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, Washington.

<<barcode text>>

Claimant ID: <<secondary ID>>

REQUEST TO BE EXCLUDED

Please carefully read the Notice mailed with this form before you go any further.

Do not fill out this form if you want to participate in the Settlement and receive a payment.

If you **do not want** to participate in the Settlement and receive a payment, please check the box below, sign and date this form, and return it to the address listed here. This Form must be mailed or emailed by August 3, 2026:

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☐ I want to be **excluded** from the Class Action Settlement in the case *Davis v. Integrity Traffic OR, LLC, et al.*, No. 24-2-24610-0 SEA (King County Superior Court).

PRINT NAME: _____

SIGNATURE: _____

ADDRESS: _____

_____

PHONE: _____

EMAIL: _____

DATED: _____

<<barcode text>> - <<SEQ ID>>

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