

PLEASE READ CAREFULLY
THIS NOTICE RELATES TO YOUR PRIVACY RIGHTS

**TREVOR MORTON V. ASSOCIATED MICROBREWERIES, LTD; ASSOCIATED
MICROBREWERIES, INC. D/B/A/ KARL STRAUSS BREWING CO.**
Superior Court of the State of California, County of San Diego
Case No. 37-2020-00016542-CU-OE-CTL

«IMbFullBarcodeEncoded»

«FirstName» «LastName»

«Address1» «Address2»

«City», «State» «Zip»-«ZipDPC3»

SIMID «SIMID»
«Barcode_Encoded_113012»

**TO: CURRENT AND FORMER NON-EXEMPT EMPLOYEES OF ASSOCIATED
MICROBREWERIES, LTD. AND ASSOCIATED MICROBREWERIES, INC. (KARL
STRAUSS BREWING COMPANY) OF YOUR OPTION TO OBJECT TO THE DISCLOSURE
OF YOUR CONTACT INFORMATION AND EMPLOYMENT, PERSONNEL, AND
PAYROLL RECORDS**

A lawsuit has been filed in the Superior Court for the State of California, County of San Diego, by a former employee entitled *Morton v. Associated Microbreweries, Ltd. et al.* ***This is not a lawsuit against you, and you are not being sued. This notice is designed to give you an opportunity to object to the disclosure of your personal contact information as well as your employment, personnel, and payroll records.***

The former employee, Trevor Morton or “Plaintiff,” filed the lawsuit on behalf of the State of California seeking civil penalties only from Associated Microbreweries, Ltd. and Associated Microbreweries, Inc. for its possible Labor Code violations with regards to its current and former non-exempt employees who work or worked for one of the following legal entities in the State of California at any time from January 10, 2019 through the present date:

ASSOCIATED MICROBREWERIES, LTD;
ASSOCIATED MICROBREWERIES, INC.
(d/b/a Karl Strauss Brewing Co.)

The lawsuit alleges that Associated Microbreweries, Ltd. and/or Associated Microbreweries, Inc. failed to pay all wages owed, failed to pay overtime at the proper legal rate, implemented unlawful tip pooling policies, failed to provide meal and rest periods or pay one additional hour of pay for non-compliant meal and rest periods, failed to pay all wages on time, failed to reimburse employees for the costs associated with online training modules, provided wage statements that did not accurately provide all information required by Labor Code section 226, and failed to maintain accurate payroll records. Plaintiff seeks, on behalf of the State of California, civil penalties under California law. ***This is not a class action or a claim for unpaid wages.*** Rather, it is a claim about whether Associated Microbreweries violated the law and is liable to the State of California for civil penalties under the Labor Code Private Attorneys General Act of 2004.

Associated Microbreweries denies Plaintiff’s allegations and any liability. The Court has not made any determination as to the merits of Plaintiff’s claims.

To assist Plaintiff in his investigation of the lawsuit's allegations, the attorneys for Plaintiff would like Associated Microbreweries to provide them with your first and last name, address, telephone number, and personal email address ("Contact Information"). They would also like Associated Microbreweries to provide them your employment, personnel, and payroll records. Associated Microbreweries has not yet disclosed your Contact Information or employment, personnel, and payroll records to Plaintiff's attorneys and has objected on grounds of your privacy and other bases in law. The parties have agreed that this Notice be sent to you to allow you to decide if you object to Plaintiff's attorneys obtaining your Contact Information, employment, personnel, and payroll records as part of their investigation into the claims.

You have two options:

- (1) **If you OBJECT** to Associated Microbreweries, Ltd. and Associated Microbreweries, Inc. disclosing your Contact Information, employment, personnel, and payroll records to Plaintiff's attorneys, you must return the enclosed postage-prepaid postcard. **The postcard must be postmarked no later than June 18, 2021.**
- (2) **If you do NOT object** to Associated Microbreweries, Ltd. and Associated Microbreweries, Inc. disclosing your Contact Information, employment, personnel, and payroll records to Plaintiff's attorneys, you do not need to do anything in response to this Notice.

If you do not respond within twenty-one (21) calendar days, your Contact Information, employment, personnel, and payroll records will be provided to Plaintiff's attorneys.

Plaintiff's attorneys are as follows:

Nicholas J. Ferraro, Esq.
Lauren N. Vega, Esq.
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Defendants' attorneys are as follows:

Marisa Janine-Page, Esq.
CALDARELLI HEJMANOWSKI PAGE & LEER LLP
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**** You have NO obligation to talk to either Plaintiff's or Defendants' attorneys, but you have the right to do so if you wish.**

PLEASE DO NOT CONTACT THE COURT REGARDING THIS NOTICE