

**LEGAL NOTICE BY ORDER OF THE  
SUPERIOR COURT OF THE STATE OF  
CALIFORNIA, FOR THE COUNTY OF  
LOS ANGELES**

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

***Kierre J. Townsend v.  
G2 Secure Staff, L.L.C. et al.***

Superior Court of the State of California, County of  
Los Angeles, Case No. 18STCV04429

*This notice is a summary. The full notice can be  
found online at [www.TownsendvG2SecureStaff.com](http://www.TownsendvG2SecureStaff.com).*

A settlement has been reached in the lawsuit  
referenced above which is pending in the Los  
Angeles County Superior Court (“Court”).

*Townsend v G2 Secure Staff*  
c/o JND Legal Administration  
PO Box 91344  
Seattle, WA 98111

Postal Service: Please do not  
mark barcode

**Who Is Included?** You are part of this Settlement as a Class Member if, from November 9, 2016 through February 3, 2020, you applied to be employed by G2 Secure Staff, L.L.C. and were the subject of a background check(s) that was procured or caused to be procured by G2 Secure Staff, L.L.C. If you were sent this Notice, it is because G2's records indicate that you are a Class Member.

**Summary of the Settlement:** Plaintiff in this case alleged that G2 used non-compliant background disclosure forms – claims which G2 denies. The Court has not made any determinations as to the merits of Plaintiff's claims, but preliminarily approved a \$759,000 Gross Settlement Amount (which also includes sums for settlement administration, Class Counsel's court-approved attorneys' fees and costs, and a court-approved Service Payment to Plaintiff). As a Settlement Class Member, you will receive a Settlement Payment and will be releasing all Released Claims, unless you timely submit an Opt-Out Request to the Settlement Administrator.

**Do I Have A Lawyer?** Yes. The Court has appointed Setareh Law Group as Class Counsel to represent the interests of you and other Class Members. You may hire your own attorney to advise you, but you will be responsible for paying that attorney's fees.

**What Should I Do?** You should get more information by visiting the website provided and make a decision about what you want to do. As a Class Member, you have three options: (1) Do nothing. Each Class Member will receive a share of the Net Settlement Amount unless they exclude themselves from the Class by timely submitting an Opt-Out Request to the Settlement Administrator. If you do not submit an Opt-Out Request and do not object to the Settlement, then you are not required to take any action. You may simply wait until the Court grants final approval of the Settlement at the Final Approval Hearing, and you will be mailed your Settlement Payment thereafter. In exchange for the Settlement Payment, you will be releasing all Released Claims in the Settlement, including any Fair Credit Reporting Act (FCRA) and related state law claims related to the allegedly non-compliant pre-authorization forms, including any adverse action claims; (2) You can submit an Opt-Out Request and be excluded from the Settlement. If you choose to be excluded from the Settlement, you will not receive any Settlement Payment, and you will not be bound by any judgment or other final disposition of the action. Your Opt-Out Request must be postmarked on or before **May 2, 2020**; (3) You can object to the Settlement if you do not submit an Opt-Out Request by sending your signed objection to the Settlement Administrator, including your name, address, telephone number, the case name and number, and the reasons why you believe the Settlement should not be approved. All objections must be postmarked no later than before **May 2, 2020**. You may also appear at the Final Approval Hearing. If the Court rejects your objection and finally approves the Settlement, you will still be bound by the terms of the Settlement including the Released Claims, and you will be mailed a Settlement Payment.

**Final Approval Hearing:** The Los Angeles County Superior Court, located at 312 N. Spring St., Los Angeles, CA 90012, in Department 10, will conduct a hearing on whether to finally approve the Settlement and, if so, will determine what attorneys' fees and costs should be awarded to Class Counsel and whether a Service Payment should be awarded to the Class Representative. The hearing is presently scheduled for July 7, 2020 at 11:00 a.m., but the date and time may be changed without further notice to you.

For more information, contact the Settlement Administrator at 1-888-964-0606, write to Townsend v G2 Secure Staff, c/o JND Legal Administration, PO Box 91344, Seattle, WA 98111, or visit [www.TownsendvG2SecureStaff.com](http://www.TownsendvG2SecureStaff.com).