

**NOTICE OF PENDENCY OF CLASS ACTION SETTLEMENT  
AND FINAL APPROVAL HEARING**

***CORY STOKES V. CSE HOLDINGS, INC., CLEANSOURCE, INC., ET AL.***  
**SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN FRANCISCO**  
**(CASE NO. CGC-13-530640)**

**IF YOU WORKED FOR CSE HOLDINGS, INC., OR  
CLEANSOURCE, INC. AS AN ACCOUNT  
MANAGER, YOU COULD GET A PAYMENT FROM A  
CLASS ACTION SETTLEMENT.**

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

- If approved, a proposed Settlement will provide up to \$725,000 to resolve a class action lawsuit filed against CSE Holdings, Inc., and CleanSource, Inc. (“CleanSource” or “Defendants”) involving claims under California’s labor laws for the alleged failure of Defendants to reimburse account managers for the cost of driving their personal cars and using their personal telephones for work, for Defendants allegedly taking deductions from commissions earned by account managers, among other allegations, on behalf of all current and former account managers who worked for Defendants in California from August 15, 2008 to October 31, 2010 (the “Class Period”).
- The Settlement is a compromise. The two sides disagree on how much money, if any, might have been awarded if the lawsuit went to trial. The Court did not find that Defendants violated the law. Defendants deny that they did anything wrong and maintain they complied at all times with applicable laws, rules, and regulations.
- There is no money available now, and no guarantee there will be. Your legal rights are affected whether you act or don't act. **Read this notice carefully. NO RETALIATION: Defendants will not fire, punish, retaliate, or otherwise discriminate against any employee because he or she chooses to participate in this Settlement, chooses not to participate, or objects to the Settlement.**

**YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT**

<b>DO NOTHING</b>	<b>Stay in this lawsuit. Await the outcome. Give up certain rights.</b> By doing nothing, you keep the possibility of getting money or benefits that may come from the Settlement. But, you give up any rights to sue Defendants separately about the same legal claims in this lawsuit.
<b>ASK TO BE EXCLUDED</b>	<b>Get out of this lawsuit. Get no benefits from it. Keep your rights.</b> If you ask to be excluded and money or benefits are later awarded, you won't share in those. But, you keep any rights to sue Defendants separately, at your own expense, about the same legal claims in this lawsuit.

**Questions? Call 844-271-4783**

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- This Notice explains your options - **and the deadlines that you must meet.**
- The Court in charge of this case still must decide whether to grant final approval of the Settlement. Payments will be made if the Court approves the Settlement and after any appeals are resolved. **Please be patient.**
- **Any questions? Read on or call the Settlement Administrator, Heffler Claims Group, at (844) 271-4783.**

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## BASIC INFORMATION

### 1. Why did I get this notice package?

Defendants' records show that you previously worked for Defendants as an account manager in California during the Class Period.

The Court authorized this Notice because you have a right to know about the proposed Settlement of this class action lawsuit, and about all of your options, before the Court decides whether to approve the Settlement. This Notice explains the lawsuit, the Settlement, your legal rights, what benefits are available, who is eligible for them, and how to get them.

### 2. What is this lawsuit about?

The San Francisco County Superior Court is in charge of the case. The lawsuit is known as *Cory Stokes v. CSE Holdings, Inc., CleanSource, Inc., et al.*, Case No. CGC-13-530640. The lawsuit alleges that Defendants failed to reimburse account managers for the costs incurred to drive their personal cars and use their personal telephones for work, took deductions from commissions earned, and committed other violations of California law.

On September 23, 2014, at 9:30 a.m., in Department 302 of the Superior Court of California, County of San Francisco, the Court held a hearing where it provisionally approved the terms of the proposed Settlement, found that this case can fairly be settled on a class basis, approved this Notice, and scheduled a hearing where the Court will consider whether to grant "final approval" of the proposed Settlement. Further information about that hearing is set forth in Question 21, below.

### 3. What is a class action and who is involved?

In a class action lawsuit, a person called a "Class Representative" (in this case Cory Stokes) sues on behalf of other people who have similar claims. The people together are a "Class" or "Class Members." The individual who sues is called the Plaintiff. The companies he sues (in this case CleanSource/CSE) are called the Defendants. One court resolves the issues for everyone in the Class—except for those people who exclude themselves from the Class, as described in Question 12 below.

## WHO IS IN THE CLASS SETTLEMENT?

### 4. How do I know if I am part of the Settlement?

The Court decided that all current and former Account Managers of Defendants in California from August 15, 2008 to October 31, 2010 are Class Members.

### 5. Are there exceptions to being included?

Only those employees of Defendants who meet the requirements of Question 4 are a part of the Settlement.

If you exclude yourself from the Settlement pursuant to the instructions in Question 12, you will no longer be included in the Settlement.

**Questions? Call 844-271-4783**

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

If you are still not sure whether you are included, you can get free help by calling or writing to the Settlement Administrator or lawyers in this case using the contact information provided in Questions 15 and 24.

### THE SETTLEMENT BENEFITS - WHAT YOU GET

7. What does the Settlement provide?

Under the proposed Settlement, Defendants agree to pay \$725,000 (the "Maximum Settlement Amount") to resolve Settlement Class Members' claims. The Maximum Settlement Amount includes: (a) expenses and fees of the Settlement Administrator up to \$10,000; (b) an Incentive Award of up to \$25,000 to the Class Representative; (c) attorneys' fees of up to \$181,250 and litigation expenses of up to \$15,000 to Class Counsel; (d) a PAGA payment of up to \$5,000; and, (e) Defendants' share of State and Federal payroll taxes. The Court must approve these payments at the Final Approval Hearing.

8. What am I giving up to get a payment or stay in the Class?

Unless you exclude yourself, you are staying in the Class, and that means that you can't sue, continue to sue, or be part of any other lawsuit against Defendants about the legal issues in *this* case. It also means that all of the Court's orders will apply to you and legally bind you. See Question 12 if you want to find out how to exclude yourself from the Class.

Unless you exclude yourself, you will release all claims, demands, rights, liabilities, and any causes of action, whether known or unknown, arising from the alleged failure of Defendants during the Class Period to pay reimbursement for the use of personal cars and telephones for work, taking deductions from commissions earned, and failure to provide accurate itemized pay statements in violation of the California Labor Code, applicable Wage Order(s), the California Private Attorneys General Act, and the California Business and Professions Code section 17200 *et seq.*

9. How do I get a payment?

To receive a settlement payment you do not need to take any action. Only fill out the attached Workweeks Form if you do not agree with the work weeks set forth in the form, and send it to the following address:

*Stokes v. CSE Holdings, Inc., CleanSource, Inc., et al.*  
Heffler Claims Group  
1515 Market Street, Suite 1700  
Philadelphia, PA 19102  
844-271-4783

If you send the form by US Mail, it must be postmarked by November 10, 2014. If you send it by any other means, it must be received by November 10, 2014.

You must **keep a current address on file** with the Settlement Administrator to ensure that you receive your  
**Questions? Call 844-271-4783**

settlement payment should the Court order final approval of the Settlement. **If you move and the Settlement Administrator cannot locate a current address for you, you will not receive a payment.**

10. When would I get my payment?

The Settlement Administrator will send Individual Settlement Awards after the Court enters an order granting final approval of the Settlement. If there is an appeal of an order granting final approval of the Settlement, payments will be delayed until all appeals are resolved in favor of the Settlement. Please be patient.

11. How much will my payment be?

The distribution formula in the Settlement is based on the number of weeks you worked for Defendants as an Account Manager during the Class Period (“Qualifying Workweeks”) as compared to the total Qualifying Workweeks of all Class Members for the same period. Your Qualifying Workweeks were determined from Defendants’ records. If you disagree with the number of Qualifying Workweeks set forth in the attached Workweeks Form, you may complete Section B of the Form and submit any records to the Settlement Administrator to support your claim.

The amount of your individual settlement award shown on the Workweeks Form is just an estimate. Your payment may be higher, depending on how many Class Members decide to request exclusion from the settlement.

### **EXCLUDING YOURSELF FROM THE SETTLEMENT**

If you don't want a payment from this Settlement, but you want to keep the right to sue or continue to sue Defendants, at your own expense about the legal issues in this case, then you must take steps to get out. This is called excluding yourself – or is sometimes referred to as opting out of the Settlement.

12. How do I get out of the Settlement?

To exclude yourself from the Settlement, you must send a letter stating that you want to be excluded from the *Stokes v. CleanSource Class Action* settlement and that you understand that by doing so you will not receive any money from the settlement. Be sure to include your name, address, telephone number, and your signature. You must mail your exclusion request postmarked no later than November 10, 2014 to:

*Stokes v. CleanSource Class Action Settlement*  
Heffler Claims Group  
1515 Market Street, Suite 1700  
Philadelphia, PA 19102  
844-271-4783

13. If I don't exclude myself, may I sue Defendants for the same thing later?

No. Unless you exclude yourself, you give up any right to sue Defendants for the claims this Settlement resolves. If you have a pending lawsuit against Defendants, speak to your lawyer in that case immediately. Remember, the exclusion deadline is November 10, 2014.

**Questions? Call 844-271-4783**

If you start your own lawsuit against Defendants after you exclude yourself, you'll have to hire and pay your own lawyer for that lawsuit, and you'll have to prove your claims.

14. If I exclude myself, may I get money from this Settlement?

No. If you exclude yourself, you will not receive any money from this Settlement. But, you may sue, continue to sue, or be part of a different lawsuit against Defendants.

### OBJECTING TO THE SETTLEMENT

15. How do I tell the Court that I don't like the Settlement?

As a Class Member, you may object to the Settlement if you don't like any part of it. You may give reasons why you think the Court should not approve it. The Court will consider your views. To object, you must file your objection or an intent to appear and object to the Settlement with the Court no later than November 10, 2014, stating why you object to the Settlement in *Stokes v. CSE Holdings, Inc., CleanSource, Inc.*, Case No. CGC-13-530640. Be sure to include your name, address, telephone number, your signature, and the reasons you object to the Settlement. You must also mail your objection to these three different places postmarked no later than November 10, 2014:

COURT	CLASS COUNSEL	DEFENSE COUNSEL
Clerk of the Court San Francisco County Superior Court 400 McAllister St. San Francisco, CA 94102	Workman Law Firm, PC Robin G. Workman 177 Post Street, Suite 900 San Francisco, CA 94108	Gordon & Rees LLP Mark Posard 275 Battery St., Suite 2000 San Francisco, CA 94111

16. What is the difference between objecting and excluding?

Objecting is simply telling the Court that you don't like something about the Settlement. You can object only if you stay in the Class. Excluding yourself is telling the Court that you don't want to be part of the Class. If you exclude yourself, you cannot object because the case no longer affects you.

### IF YOU DO NOTHING

17. What happens if I do nothing at all?

By doing nothing you choose to stay in the Class. If you stay in and the Court approves the Settlement, you will receive a portion of the Settlement proceeds. Keep in mind that if you do nothing now, you will not be able to sue, or continue to sue Defendants about the same legal claims that are the subject of this lawsuit. You will also be legally bound by all orders and judgments of the Court in this class action.

## THE LAWYERS REPRESENTING YOU

### 18. Do I have a lawyer in this case?

The Court decided that the Workman Law Firm, PC, 177 Post Street, Suite 900, San Francisco, CA, 94108, 415-782-3660, is qualified to represent you and all Class Members. You will not be charged for these lawyers. The law firm is referred to as "Class Counsel." They are experienced in handling similar cases against other employers. More information about the Workman Law Firm, PC, their practices, and their experience is available at [www.workmanlawpc.com](http://www.workmanlawpc.com). You can also find the most important documents in this case, this notice, the complaint, etc., at this website.

### 19. Should I get my own lawyer?

You do not need to hire your own lawyer because Class Counsel is working for you. But, if you want your own lawyer, you will have to pay that lawyer. For example, you can ask him or her to appear in Court for you if you want someone other than Class Counsel to speak for you.

### 20. How will the lawyers be paid?

Class Counsel will ask the Court to approve payment of attorneys' fees up to \$182,000, and litigation expenses estimated to be up to \$15,000.

## THE COURT'S FAIRNESS HEARING

The Court will hold a Final Approval Hearing to decide whether to approve the Settlement. You may attend and you may ask to speak, although you don't have to.

### 21. When and where will the Court decide whether to approve the Settlement?

The Final Approval Hearing is scheduled to occur on December 15, 2014, 9:30 a.m. in Dept. 302 of the Superior Court of California, County of San Francisco, located at 400 McAllister St., San Francisco, California. The Court may continue or adjourn the final approval hearing without further notice to the Class. At this hearing the Court will consider whether the Settlement is fair, reasonable and adequate. If there are objections, the Court will consider them. The Court will listen to people who have asked to speak at the hearing. The Court may also decide how much to pay Class Counsel. After the hearing, the Court will decide whether to approve the Settlement. We do not know how long these decisions will take.

### 22. Do I have to come to the Final Approval Hearing?

No. Class Counsel will answer any questions the Court may have. But, you are welcome to come at your own expense. If you file an objection, you do not need to come to Court to talk about it. As long as you filed and mailed your written objection or notice of intent to appear on time, the Court will consider your objection or may allow you to speak at the hearing. You may also pay your own lawyer to attend, but it's not necessary.

### 23. May I speak at the Final Approval Hearing?

You may ask the Court for permission to speak at the Final Approval Hearing. To do so, you must send a letter

**Questions? Call 844-271-4783**

saying that it is your "Notice of Intention to Appear in *Stokes v. CSE Holdings, Inc., CleanSource, Inc., et al.*, Case No. CGC-13-530640." Be sure to include your name, address, telephone number, and your signature. Your Notice of Intention to Appear must be postmarked no later than November 10, 2014, and sent to the Clerk of the Court, Class Counsel and Defense Counsel at the addresses provided in Question 15. You cannot speak at the hearing if you excluded yourself.

## GETTING MORE INFORMATION

24. Are more details available?

The Court-appointed Settlement Administrator for this Settlement is as follows:

*Stokes v. CleanSource Class Action*  
Heffler Claims Group  
1515 Market Street, Suite 1700  
Philadelphia, PA 19102  
844-271-4783

If you have questions, you may call the Settlement Administrator toll free at 844-271-4783. Ask about the *Stokes v. CleanSource Class Action*.

You may also contact Class Counsel using the contact information provided in Question 15. **PLEASE DO NOT CALL THE COURT.**

You may also view documents filed in this case, including the complete Settlement Agreement, on the Court's website at:

<http://webaccess.sftc.org/scripts/magic94/Mgrqispi94.dll?APPNAME=web&PRGNAME=casenumbrprompt22>, and enter CGC13530640 at the prompt. You may also review documents in person at the Office of the Clerk at the Superior Court of California, City and County of San Francisco, 400 McAllister Street, San Francisco, California 94102, between the hours of 8:00 a.m. and 4:00 p.m., Monday through Friday, excluding Court holidays.