

**If you were an hourly employee at one of the McDonald's restaurants owned and operated by Albert/Carol Mueller T-A McDonald's, Albert and Carol Mueller LTD Partnerships, Albert Mueller, and/or Carol Mueller between November 5, 2010 and July 2013 who were required to and did receive payment of wages for your employment in whole or in part via a JPMorgan Chase Bank, N.A. "Payroll Card"**

**A CLASS ACTION LAWSUIT MAY AFFECT YOUR RIGHTS**

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

- A settlement ("Settlement") has been entered to settle two lawsuits (the "Lawsuits") on behalf of all current and/or former hourly employees of one of the McDonald's restaurants owned and operated by Albert/Carol Mueller T-A McDonald's, Albert and Carol Mueller LTD Partnerships, Albert Mueller, and/or Carol Mueller (together, the "Mueller Defendants") who, between November 5, 2010 and July 2013, were required to and did receive payment of wages for their employment in whole or in part via a JPMorgan Chase Bank, N.A. "Payroll Card."
- The Lawsuits are titled *Siciliano, et al v. Albert and Carol Mueller LTD Partnership, et al*, No. 2013-07010 ("Siciliano Matter") and *King, et al v. Albert and Carol Mueller LTD Partnership, et al*, No. 2014-08688 ("King Matter") (together, with the Siciliano Matter, the "Lawsuits"), both filed in the Court of Common Pleas of Luzerne County, Pennsylvania.
- The Siciliano Matter was filed against the Mueller Defendants and the King Matter was filed against the Mueller Defendants and against JPMorgan Chase & Co. and JPMorgan Chase Bank, N.A. (the "Chase Defendants") (together with the Mueller Defendants, the "Defendants").
- As Class Relief, the Defendants will reimburse all Settlement Class Members any fees they incurred when they used their Payroll Card (to the extent not already reimbursed). In addition, the Mueller Defendants will pay each Settlement Class Member an additional \$100 per person.
- Subject to Court approval, the Defendants will also pay Plaintiffs' counsel the total sum of \$858,505 (consisting of \$808,505 to be paid by the Mueller Defendants and \$50,000 to be paid by the Chase Defendants), for attorneys' fees and legal costs.
- This Notice is a description of important terms of the Class Action Settlement Agreement ("Agreement"), but it does not set forth every term of that Agreement or modify that Agreement. You may obtain a copy of the entire Agreement with more detail at [www.anapolweiss.com](http://www.anapolweiss.com).
- If you are receiving this Notice, it is because you appear to meet the definition of individuals who are entitled to receive benefits from this Settlement. You may exclude yourself from the Settlement (opt-out), or object to it, as set forth in greater detail in the Agreement and below.
- The Court of Common Pleas of Luzerne County, Pennsylvania authorized this Notice. On October 24, 2017, the Court will hold a hearing in Courtroom 3<sup>rd</sup> Floor at 10:00 am, at 200 North River Street, Wilkes-Barre, Luzerne County, Pennsylvania to consider whether to approve this Settlement. The hearing may be adjourned by the Court without further notice.

## YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT

<b>DO NOTHING.</b>	<p><b>Stay in these Lawsuits. Give up certain rights and give up your right to share in benefits.</b></p> <p>If you do nothing and do not send back your Participation Form, you will remain in the Settlement and will be bound by the Judgment as entered by the Court in this case. But, you give up the right to sue the Defendants for claims arising from the same facts alleged in the Lawsuits. And, you cannot get any money or benefits from the Lawsuits.</p>
<b>STAY IN THE LAWSUITS AND SEND IN THE PARTICIPATION FORM.</b>	<p><b>Stay in these Lawsuits. Share in benefits. Give up certain rights.</b></p> <p>By completing the Participation Form and sending it to the proper address by the Participation Deadline, you will be bound by the Judgment entered by the Court, and you will be eligible for the Class Relief described above. But, you give up the right to sue the Defendants for claims arising from the same facts alleged in the Lawsuits.</p>
<b>EXCLUDE YOURSELF</b>	<p><b>Get out of these Lawsuits. Get no benefits from them. Keep your right to file your own lawsuit.</b></p> <p>If you opt-out (ask to be excluded), you cannot get any money or benefits from these lawsuits. But, you will keep any right you have to sue the Defendants for claims arising from the same facts alleged in the Lawsuits, and you will not be bound by any orders or judgments in the Lawsuits.</p>

Your options are explained more fully in this Notice.  
The deadline to exclude yourself from the Settlement is October 16, 2017.

## BASIC INFORMATION

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

In a class action, Class Representatives sue on behalf of a group of other people who have the same or similar claims. The people with similar claims are called the “Class” or “Settlement Class Members.” One court resolves the claims and issues for all Settlement Class Members instead of evaluating each Settlement Class Member’s claim.

You are a Settlement Class Member as defined by the Agreement, if you fit into the definition of the Class below and you do not exclude yourself. You will not be in the Class if you exclude yourself (opt-out) from the Class by following the instructions in this Notice.

### What is this about?

The Lawsuits allege that the Mueller Defendants violated Pennsylvania’s Wage Payment and Collection Law, and that all Defendants violated Pennsylvania’s Unfair Trade Practices and Consumer Protection Law, when the Mueller Defendants paid their employees, in whole or in part, by way of JPMorgan Chase Bank, N.A. payroll debit cards, and did not give their employees any other option for payment. The Lawsuits further allege that Plaintiffs were charged fees by the Chase Defendants or other financial institutions when they used their payroll debit cards, and thus, they did not receive 100% of their earned wages.

On May 14, 2015, the Court determined that the Siciliano Matter met the requirements to go forward as a class action. You can learn more information about why the Court allowed the Siciliano Matter to be certified as a class action in the Court’s May 14, 2015 Opinion granting the Motion for Class Certification, which is available at [www.cefaloandassociates.com](http://www.cefaloandassociates.com). Thereafter, on September 1, 2017 the Court determined that the King Matter met the requirements to go forward as a class action for settlement purposes only.

### **Why did I get this notice?**

You are receiving this Notice because records which the Mueller Defendants provided to the lawyers for the Class indicate that you may be a member of the Settlement Class. Because you may be a member of the Settlement Class, your legal rights may be affected. You should read this Notice carefully.

### **Am I a member of the Litigation Class?**

You are a member of the Settlement Class if you fit into the following Settlement Class definition:

All current and/or former hourly employees of the Mueller Defendants who worked at one of the McDonald's restaurants owned and operated by the Mueller Defendants between November 5, 2010 and July 2013 and who were required to and did receive payment of wages for their employment in whole or in part via a payroll card issued by JPMorgan Chase Bank, N.A. ("Payroll Card").

## **YOUR LEGAL RIGHTS AND OPTIONS**

You must decide whether to stay in the Litigation Class or exclude yourself from the Litigation Class.

### **How do I receive benefits?**

You must complete and return the Participation Form to the Claims Administrator according to the directions on the Participation Form. Any and all benefits will be sent to you directly at the address which you provide on that Participation Form. If the address to which this Notice was sent is no longer your address you should immediately advise the Claims Administrator, Angeion Group, at the address below and on the Participation Form.

### **What happens if I do nothing at all?**

If you do nothing, you will remain in the Settlement Class. You will be legally bound by all orders and judgments of the Court, and you will not be able to sue Defendants, or continue to sue as part of any other lawsuit involving claims arising from the same facts at issue in these cases.

**However, to be eligible to receive benefits from the Settlement, you must complete and return the Participation Form to the Claims Administrator by the Participation Deadline, October 16, 2017 (post-marked by the United States Postal Service or other equivalent carrier).**

### **What happens if I exclude myself?**

If you do not want to stay in the Settlement Class, you must exclude yourself, also known as "opting out." The Court will exclude any Class members who request exclusion.

If you exclude yourself from the Settlement Class, you will not be eligible to receive any money or benefits from the Settlement, but you will keep any right that you may have to sue the Defendants for the claims arising from the same facts alleged in the Lawsuits, and you will not be bound by any orders or judgments in the Lawsuits.

### **How do I ask to be excluded?**

To exclude yourself from the Settlement Class, you must sign, date and return the Opt-Out Form (page 2 of the Participation Form) by October 16, 2017 (post-marked by the United States Postal Service or other equivalent carrier).

If you would like to be excluded from the Litigation Class, mail your Opt-Out Form to the Claims Administrator:

Debit Card Settlement Administration  
c/o Angeion Group, Claims Administrator  
1801 Market Street, Suite 660  
Philadelphia, PA 19103

## **How do I object to the Settlement?**

If you want to be included in the settlement but do not agree to all the terms, you can object. If you object, you must deliver to the Claims Administrator identified above by U.S. Mail so that it is postmarked by October 16, 2017 (post-marked by the United States Postal Service or other equivalent carrier), a written statement setting forth your objection and any supporting brief you wish to file. You may prepare, file, and serve your written objection and any supporting brief on your own or through an attorney retained at your own expense.

## **THE LAWYERS REPRESENTING YOU**

### **Who represents you?**

The Court appointed the law firms of Anapol Weiss and Cefalo & Associates to represent the Settlement Class. These firms are “Class Counsel.” As part of the Settlement, Class Counsel will receive attorneys’ fees and expenses for their work performed on behalf of the Settlement Class. You don’t have to pay these attorneys’ fees and expenses. You may hire your own attorney to appear in Court, but then you will have to pay that attorney at your own expense.

## **QUESTIONS**

If you have questions, call 1-855-465-0349, or write to the Claims Administrator, Angeion Group, at the address listed above.