

**IN THE SUPERIOR COURT FOR THE STATE OF CALIFORNIA  
COUNTY OF LOS ANGELES**

In the matter of *Melissa Margulies, an individual, on behalf of themselves and all others similarly  
situated, and the general public,*

v.

*Legends Football League, LLC, Lingerie Football League, LLC, Mitchell Mortaza*  
(collectively “Defendants”),

Case No. BC550244

**NOTICE OF CLASS ACTION AND CLASS CERTIFICATION**

TO: All persons who worked as football players for Defendants in California at any time from June 27, 2010 until the entry of final judgment.

**Background Information**

On July 26, 2016, the Superior Court of the State of California, County of Los Angeles, the Honorable Lisa Hart-Cole, presiding, certified the lawsuit *Margulies v. Legends Football League, LLC, et al.*, Case No. BC550244, as a class action. This means that the Class Representative Melissa Margulies, through Class Counsel, can pursue the certified claims on behalf of all class members. The Class Representative generally alleges that she and other football players were wrongly classified as being independent contractors. The lawsuit has been certified as a class action with respect to the following claims asserted in the lawsuit: (1) Willful Misclassification of an Employee (Cal. Labor Code section 226.8); (2) Failure to Pay Compensation for All Hours Worked and Minimum Wage Violations (Cal. Labor Code sections 216, 1194, 1194.2, and 1197); (3) Failure to Pay Overtime Compensation (Cal. Labor Code section 1194); (4) Waiting Time Penalties (Cal. Labor Code section 203); (5) Failure to Pay All Wages By the Appropriate Pay Period (Cal. Labor Code section 204); (6) Failure to Provide Accurate Itemized Statements (Cal. Labor Code section 226); (7) Failure to Reimburse or Indemnify Expenses or Losses Incurred As a Result of Performing Work Duties (Cal. Labor Code section 2802); and (8) Unfair Business Practices (California Business and Professions Code section 17200, et seq.).

**Why Have I Received this Notice?**

You have received this notice because you are a member of the certified class.

**What Class Has Been Certified?**

The Honorable Lisa Hart-Cole has certified the Following Class:

All persons who worked as football players for Defendants in California at any time from June 27, 2010 until the entry of final judgment.

**What Happens Next?**

The Defendants have failed to appear in this action to date. A default hearing will occur in this matter based on the claims outlined above. The Court has not yet set a hearing for the entry of a default judgment. The default hearing will determine the amount of damages the Defendants are liable for on the claims that have been certified as class claims. You do not need to appear in court or otherwise participate in this default hearing to be a class member or to be eligible for monetary recovery. You will have the opportunity to present information showing that they are entitled to recover damages if you so choose.

### **Your Right to Opt Out of this Lawsuit**

You have the right to opt out of this case. If you choose to opt out, you will not be eligible for the monetary recovery, if such a recovery becomes available to the class members for the claims in this case. If you opt out, you also will be entitled to pursue your own court action, if you wish, subject to the applicable statute of limitations. You will not be rewarded or punished in any way based on your decision whether or not to remain a class member or opt out of this class action case.

To opt out of the claims in this case, you must send the attached opt-out form to the neutral Third-Party Claims Administrator, Simpluris, Inc., stating that you have read and understand this notice, and that you do not wish to be a member of the Plaintiff class for the claims in this class action lawsuit. Send your request to the following address: Simpluris, Inc., PO Box 26170, Santa Ana, CA 92799. A pre-paid, self-addressed stamped envelope has been included for your convenience. To be effective, your request must be postmarked no later than **October 27, 2016 (45 days from mailing and/or first publication)**.

### **If You Wish to Remain in the Class**

You do not need to do anything to remain in the class for purposes of the claims in this case and reserve your right to make a claim for damages at a later stage. If you do nothing, you automatically will become a member of the class. Any judgment in the case, whether favorable or not, will automatically include all members of the class. If you remain a member of the class in this lawsuit, but do not wish to be represented by the attorneys appointed by the Court to represent the class, you may retain another attorney to represent you or represent yourself.

### **Who Are Class Counsel?**

The Court approved the law firm of Alexander Krakow + Glick LLP as class counsel. If you have any questions regarding the case or the topics of this notice, or you want to communicate with lawyers whom the Court has appointed to serve as lawyers for the class, you can contact class counsel at:

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