

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

THIS NOTICE ADVISES CURRENT AND FORMER EMPLOYEES OF TARANTELLA RISTORANTE, FEMMINA ITALIAN GRILLE, AND/OR CHIANTI RISTORANTE ITALIANO WHO WORKED AS TIPPED SERVERS BETWEEN AUGUST 9, 2012 TO THE PRESENT OF A PROPOSED CLASS ACTION SETTLEMENT CONCERNING TIPS THEY RECEIVED AND HOW TO SUBMIT A CLAIM FOR BENEFITS UNDER THAT SETTLEMENT

**THIS NOTICE MAY AFFECT YOUR LEGAL RIGHTS.
PLEASE READ IT CAREFULLY.**

Anthony Neidle, et al. vs. ACME Trading Expeditions, LLC et al.,
Superior Court of New Jersey, Camden County Docket Number CAM-L-3026-18

THIS NOTICE ONLY PROVIDES LIMITED INFORMATION ABOUT THIS SETTLEMENT, AS WELL AS HOW TO OBTAIN ADDITIONAL INFORMATION AND HOW TO OBTAIN AND SUBMIT A CLAIM FORM

Plaintiffs brought this class action on behalf of Plaintiffs and a class of current and former tipped servers employed by Defendants, who own and operate three (3) local restaurants, Tarantella Ristorante, Femmina Italian Grille and Chianti Ristorante Italiano, alleging a policy of withholding and diverting gratuities owned by the class in violation of the New Jersey Wage Payment Law, N.J.S.A. 34:11-4.1, et seq. ("NJWPL") during the six (6) years immediately preceding the filing of this Complaint. Defendants deny Plaintiffs' allegations and have asserted numerous defenses to Plaintiffs' claims. Defendants do not admit liability to any of the claims of Plaintiffs or any member of the Settlement Class. Plaintiffs and Defendants agree that this Agreement and the Settlement reflected herein is a compromise and settlement of disputed claims.

The Settlement provides eligible Class Members with the opportunity to receive up to \$100.00 for each month they were employed as tipped servers at one of the three above referenced restaurants between August 9, 2012 and the present, up to a maximum of \$7,200.00 for 72 months service. Depending on the number of valid Class Claims the amount of money a Class Member may be increased or decreased on a pro rata basis. To receive this cash distribution, you must timely complete and submit a Proof of Claim form and forward it to the Claims Administrator by either fax or email no later than July 6, 2020, or by mail postmarked no later than July 6, 2020. You may obtain more complete information about the Settlement, a Claim Form, and deadlines by visiting the Settlement Website at www.acmetradingsettlement.com, telephoning (844) 611-2642, or writing the Claims Administrator at Acme Trading Settlement Claim Administrator, 1650 Arch Street, Suite 2210, Philadelphia, PA 19103.

If you do not wish to be a part of this Settlement, you may exclude yourself. If you exclude yourself, you will not be part of the Settlement and will not receive a distribution under the Settlement. If you do not exclude yourself, you will be bound by the Settlement and all Orders of the court. As a result, you will no longer be able to sue or continue to sue the Defendants about the claims covered by the Settlement. To request exclusion, you must mail your request in writing, postmarked no later than May 12, 2020, to the Claims Administrator at Acme Trading Settlement Claims Administrator, Attn. Class Action Settlement Exclusion, P.O. Box 58220, Philadelphia, PA 19102. The New Jersey Superior Court, Camden County, will conduct a hearing on whether to approve the Settlement on June 12, 2020, at 9:00 a.m. in Courtroom 34. If approved, the Court will also determine what amount of fees and expenses should be awarded to class counsel and the class representatives.

If you do not exclude yourself from this action, you or your own lawyer may ask to appear and speak at the hearing at your own cost. You may also object to the Settlement in advance of the hearing by mailing a written objection, postmarked no later than May 12, 2020, to the Claims Administrator at Acme Trading Settlement Claim Administrator, Attn. Class Action Settlement Objection, P.O. Box 58220, Philadelphia, PA 19102.

PLEASE DO NOT TELEPHONE THE COURT. FOR MORE INFORMATION OR TO OBTAIN A CLAIM FORM, PLEASE VISIT THE SETTLEMENT WEBSITE AT:

www.acmetradingsettlement.com