

## NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

THIS NOTICE ADVISES YOU OF A PROPOSED CLASS ACTION SETTLEMENT CONCERNING STUDENT-PROVIDED COSMETOLOGY SERVICES YOU MAY HAVE RECEIVED AT AN EMPIRE BEAUTY SCHOOL IN NEW JERSEY. THIS NOTICE PROVIDES A WEBSITE, TELEPHONE NUMBER, AND ADDRESS WHERE YOU CAN OBTAIN INFORMATION IN ORDER TO SUBMIT A CLAIM FORM.

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

*Christa Robey v. EEG, Inc., et al.*

Superior Court of New Jersey, Camden County, Civil Action No. CAM-L-1462-19

### **THIS NOTICE ONLY PROVIDES LIMITED INFORMATION ABOUT THIS SETTLEMENT**

Your rights may be affected by a proposed class action settlement of claims against EEG, Inc. and Frank Schoeneman (collectively “Defendants”). The settlement would resolve a lawsuit in which Plaintiff asserts various claims against Defendants involving the prices charged to customers for student-provided cosmetology services at the clinics operated by Defendants’ Empire Beauty Schools (“the Schools”) in New Jersey. Plaintiff alleges that Defendants violated the law by charging customers more than the reasonable cost of materials used in the performance of such services. Plaintiff brought a lawsuit on her own behalf and **on behalf of all persons who received one or more cosmetology services at one or more of Defendants’ Schools or Clinics in New Jersey between January 13, 2017 and January 13, 2020.** Defendants deny the allegations of the lawsuit in their entirety but have agreed to settle the case to avoid the costs of litigation. You might be a member of the Settlement Class if you received a student-provided cosmetology service at an Empire Beauty School in New Jersey between January 13, 2017 and January 13, 2020.

The Settlement provides that eligible Settlement Class Members may receive up to four \$5 Service Vouchers (with a total value of \$20.00), which may be used to pay for future cosmetology services at any Empire Beauty School in New Jersey. Service Vouchers are not redeemable for cash and may not be used for products or goods. Other terms and conditions apply and are set forth in the Settlement Agreement. To receive vouchers, you must timely complete and submit a Claim Form and forward it to the administrator by either fax or email no later than July 27, 2020, or by mail postmarked no later than July 27, 2020. You may obtain complete information about the Settlement (including the Long Form Notice and Claim Form) and deadlines by visiting the Settlement Website at [www.empirebeautyschoolsettlement.com](http://www.empirebeautyschoolsettlement.com), telephoning (833)-556-6383, or writing to Empire Beauty School Litigation Claims 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 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, or certain entities related to them, about the claims covered by the Settlement. To request exclusion, you must mail your request in writing, postmarked no later than May 23, 2020, to the Empire Beauty School Litigation Claims Administrator, Attn: Exclusion Request, P.O. Box 58220, Philadelphia, PA 19102. The Court, located at Hall of Justice, 101 S. Fifth St. Camden NJ 08001, will conduct a hearing on whether to approve the Settlement on June 12, 2020, and if approved, to determine what amount of fees and costs should be awarded to Class Counsel and the Class Representative. If you do not exclude yourself, you or your own lawyer may ask to appear and speak at the hearing at your own cost. You may object to the Settlement in advance of the hearing by following the procedure set forth in the Long Form Notice. Any objection must be received by May 23, 2020.