

NOTICE OF CLASS CERTIFICATION

*A court authorized this notice. This is not a solicitation.
This is not a lawsuit against you and you are not being sued.
However, your legal rights are affected by whether you act or don't act.*

To: All non-exempt field worker employees including, but not limited to, directional drillers and MWD (measurement-while-drilling) field workers who worked in California for Geo Guidance Drilling Services, Inc. from February 20, 2015 to the present.

PLEASE READ THIS NOTICE CAREFULLY. YOUR RIGHTS MAY BE AFFECTED.

1. Why did I get this Notice?

You are receiving this Notice because Geo Guidance Drilling Services, Inc.'s (hereinafter "Geo Guidance") records indicate that you work, or previously worked in California as a non-exempt field worker (for example, a directional driller or MWD) from February 20, 2015 to present. For purposes of this Notice, you are referred to as a "Class Member."

In a class action lawsuit, one or more people called "Class Representatives" (in this case Garrett Ramsey) sue on behalf of other people who are alleged to have similar claims. The people together are referred to as a "Class" or "Class Members." One court resolves the issues for everyone in the class, except for those people who choose to exclude themselves from the Class.

This Notice relates to a lawsuit called *Garrett Ramsey v. Geo Guidance Drilling Services, Inc.*, Case No. BCV-19-100463-DRZ (the "Lawsuit"). The Court has allowed, or "certified," some of the claims in the Lawsuit to proceed to trial as a class action. The Court has not yet decided whether the claims are correct or not. Geo Guidance disputes these claims and denies Mr. Ramsey's assertions.

This Notice contains information about (1) the Court's recent order certifying a Class of non-exempt field workers, (2) the questions certified for class treatment, (3) your rights as a Class member, and (4) your right to "opt out" or exclude yourself from the Lawsuit.

The Court has certified the following class and subclasses with respect to the theories discussed in the Court's certification order:

Field Worker Class – all non-exempt field worker employees including, but not limited to, directional drillers and MWD (measurement-while-drilling) field workers who worked in California during the period from February 20, 2015 to the present.

Meal Period Subclass – all Defendant's non-exempt field worker employees, including, but not limited to, directional drillers and MWD (measurement-while-drilling) field workers, who worked one or more shifts in excess of six (6) hours in California during the period from February 20, 2015 to the present.

Alternative Meal Period Subclass – all Defendant's non-exempt field worker employees, including, but not limited to, directional drillers and MWD (measurement-while-drilling) field workers, who worked one or more shifts in excess of six (6) hours in California without receiving a 30-minute meal period during which they were relieved of all duties, during the period from February 20, 2015 to the present.

Overtime Subclass – all non-exempt field worker employees, including, but not limited to, directional drillers and MWD (measurement-while-drilling) field workers, who worked one or more shifts in excess of eight (8) hours in a day or forty (40) hours in a workweek in California at any time from February 20, 2015 to the present.

Flat-Rate Subclass – all non-exempt field worker employees, including, but not limited to, directional drillers and MWD (measurement-while-drilling) field workers, who worked in California and were paid a fixed day-rate, a guaranteed minimum, or a 24-hour increment, during the period of February 20, 2015 to the present.

Terminated Employee Subclass – all non-exempt field worker employees, including, but not limited to, directional drillers and MWD (measurement-while-drilling) field workers, who worked in California during the period from February 20, 2016 to the present, and who were not properly paid all wages on termination or within 72 hours thereof.

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Wage Statement Subclass – all non-exempt field worker employees, including, but not limited to, directional drillers and MWD (measurement-while-drilling) field workers, who worked in California and received a wage statement during the period from February 20, 2016 to the present.

Reimbursement Subclass – all non-exempt field worker employees, including, but not limited to, directional drillers and MWD (measurement-while-drilling) field workers, who worked in California and incurred business expenses that were not reimbursed during the period of February 20, 2015 to the present.

2. What is this Case about?

Plaintiff Garrett Ramsey, a former employee of Geo Guidance, filed a class action lawsuit on behalf of the class and subclasses in California on February 20, 2019. The Lawsuit alleges that Geo Guidance violated various California labor laws, including: (1) failure to provide mandated meal periods, (2) failure to pay all overtime wages and minimum wages, (3) failure to pay all wages due and owing upon separation of employment, (4) failure to provide accurate wage statements, (5) failure to reimburse all business expenses, (6) unfair business practices and violation of the Fair Labor Standards Act. This Notice is not about the last violation of the Fair Labor Standards Act. Those people including in that portion of the lawsuit will receive a separate letter with instructions.

Specifically, the Lawsuit claims that Geo Guidance violated California law for overtime, minimum wage, meal breaks, accurate wage statements and timely final payment of all wages.

Plaintiff claims that Geo Guidance did not comply with California wage and our law because it paid field workers a day rate regardless of the hours they worked, rather than hourly pay and had no policy to provide third or fourth meal breaks and maintained records of missed and late meal breaks.

Furthermore, Plaintiff claims that, because of the failure to pay all required minimum and overtime wages and meal break premiums, Geo Guidance failed to pay all wages due and owing to its employees upon separation of employment.

Finally, the Lawsuit alleges that Geo Guidance failed to provide accurate itemized wage statements to its employees as required by California law, including a failure to include rates of pay or number of hours worked.

As mentioned above, **the Court has not decided whether Plaintiff or Geo Guidance is correct.** That is not determined until trial, which has not yet been scheduled. Geo Guidance denies all these claims and allegations, and contends that it complied with all applicable laws and paid its field workers all wages and other payments that were owed.

On May 17, 2023, the Court only entered an Order certifying the Class and Subclasses listed above in Section 1. For details on what the Court did certify, please go to www.yoonlaw.com/geoguidance.

3. What are my options?

Since the case has been certified for class treatment and you are a Class Member, you have two options:

(1) **Do Nothing and Remain a Member of the Class.**

If you want to remain a Class Member, you do not need to do anything at this time. Your rights will be represented by Class Counsel, you will be a member of the Class, and you will be bound by the result in the lawsuit. You will not be allowed to bring your own action for the claims alleged in this lawsuit as identified above.

Unless you exclude yourself in the manner immediately below, you may receive money or benefits if the case is settled or judgment is obtained by Plaintiff on behalf of the Class. However, you will also be bound by all orders the Court enters and any judgment reached in this case, even if the results are in Geo Guidance's favor, but you will not owe anything to Geo Guidance if it prevails in the case.

If you also receive a Notice of Opportunity to Join Collective Action under the Fair Labor Standards Act, that is different than this process and you must follow the process in that letter to participate in that portion of the lawsuit.

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(2) Exclude Yourself.

You have the option to exclude yourself as a Class Member, by sending to **Phoenix Settlement Administrators** a “Request for Exclusion from the Class Action” letter/card postmarked no later than **July 29, 2023**, with your name, address, last four digits of your social security number, telephone number, and signature. The Request for Exclusion should state:

“I WISH TO BE EXCLUDED AS A CLASS MEMBER IN THE RAMSEY v. GEO GUIDANCE LAWSUIT. I UNDERSTAND THAT IF I ASK TO BE EXCLUDED, I WILL NOT BE A PART OF THE LAWSUIT.”

Mail the Request for Exclusion directly to **Phoenix Settlement Administrators, P.O. Box 7208, Orange, CA 92863**, postmarked by no later than **July 29, 2023**. If you exclude yourself, you will no longer be a part of the lawsuit and will not receive any money or benefits that may be awarded the Class in the Lawsuit. But you will keep any right you may have to bring your own lawsuit against Geo Guidance concerning the claims alleged in this Lawsuit as identified above. If you decide to exclude yourself, you may wish to consult your own attorney as soon as possible regarding your rights.

4. *Has the Court decided who is right?*

The Court has not set this case for trial. Once the Court sets this case for trial, at trial, the Court will decide whether Plaintiff or Geo Guidance are correct.

5. *What is the Plaintiff asking for?*

Plaintiff seeks to recover unpaid minimum and overtime wages, one hour of pay for each day within which a Class Member was not provided all their meal periods in compliance with California law, statutory penalties of up to 30 days’ pay for all former employees who were not paid these wages, statutory penalties for the wage statement violations and interest. Plaintiff is also asking Defendant to pay all of Plaintiffs’ attorneys’ fees and costs.

6. *Is there any money available now?*

No money or benefits are available now because the Court has not yet decided whether Defendant’s conduct is lawful. There is no guarantee that money or benefits will ever be obtained. If they are, you will be notified.

7. *What happens if I do nothing at this time?*

You do not have to do anything now if you want to remain a Class Member and keep the possibility of getting money or benefits from this lawsuit. By doing nothing, you will remain a member of the Class. If you stay in and Plaintiff obtains money or benefits, either as a result of the trial or a settlement, you will be notified.

Keep in mind that if you do nothing now, regardless of whether Plaintiff wins or loses the trial, you will not be able to separately sue Geo Guidance for the same legal claims that are the subject of this Lawsuit – including: (1) failure to provide mandated meal periods, (2) failure to pay all overtime wages and minimum wages, (3) failure to pay all wages due and owing upon separation of employment, (4) failure to provide accurate wage statements, (5) failure to reimburse all business expenses, and (6) unfair business practices.

You will also be legally bound by all of the Orders the Court issues and judgments the Court makes in this class action.

8. *Why would I ask to be excluded?*

If you exclude yourself, you will not be legally bound by the Court’s judgments in this class action.

If you exclude yourself as a Class Member - which is sometimes called “opting-out” - you won’t get any money or benefits from this Lawsuit even if the Plaintiff obtain them as a result of the trial or form any settlement (that may or may not be reached) with Geo Guidance. However, you may then be able to separately sue or continue to sue Geo Guidance for the legal claims that are the subject of this Lawsuit.

If exclude yourself and bring your own lawsuit against Geo Guidance, you will have to prove your claims on your own. If you want a lawyer for that, you will have to hire your own lawyer. If you exclude yourself you should talk to your own lawyer soon, because your claims may be subject to a statute of limitations.

9. *Do I have a lawyer in this case?*

Yes. The attorneys appointed to represent Plaintiff and the Class Members are below. You may contact them by phone or email with any questions, comments or if you wish to assist in the case.

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10. *Should I get my own lawyer?*

If you choose to remain a Class Member, you do not need to hire your own lawyer because Class Counsel are working on your behalf. But if you want your own lawyer, you will be responsible for hiring 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.

11. *How will the lawyers for the Class Members get paid?*

If Class Counsel gets money or benefits for the Class, they will ask the Court for fees and expenses. You will not have to pay these fees and expenses. If the Court grants Class Counsel's request, the fees and expenses would be either deducted from any money obtained for the Class or paid separately by Defendant.

12. *How and when will the Court decide who is right?*

As long as the case isn't resolved by a settlement or otherwise, Class Counsel will have to prove Plaintiff's claims in this litigation, including at a trial if necessary. There is no guarantee that Plaintiff will win, or that he will get any money for the Class. The trial date is currently unscheduled. When scheduled, it will be in Division J of the Kern County Superior Court, located at 1215 Truxtun Avenue, Bakersfield, California 93301. During the trial, a Jury or the Judge will hear all of the evidence to help them reach a decision about whether the Plaintiff or Geo Guidance are right about the claims in the Lawsuit.

13. *Do I have to come to the trial?*

You do not need to attend the trial, unless called as a witness. You may be called as a witness even if you opt out. Class Counsel will present the case for the Class Members, and Defendant will present its defenses. You are welcome to come at your own expense. If you wish to participate in the trial or be a witness, you should contact Class Counsel.

14. *Will I get money after the trial?*

If the Plaintiff obtains money or benefits as a result of the trial or a settlement and you are a member of the Class, you will be notified about how the funds will be paid. We do not know how long this will take.

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15. Are more details available?

For more information, you may contact Class Counsel. Their contact information is above in Section 9.

You may visit www.yoonlaw.com/geoguidance for copies of the Complaint, the Court's Order Re Motion To Certify Class, and a copy of this Notice.

Complete copies of the pleadings, orders and other documents filed in this litigation may be examined and copied at any time by visiting any Clerk's Office. You may visit the Clerk's Office for the courthouse. Up to date information on the location hours is available at <https://www.kern.courts.ca.gov/general-information/locations-contact-info>. The case is titled Garrett Ramsey v. Geo Guidance Drilling Services, Inc., Case No. BCV-19-100463-DRZ. Electronic access is available at <https://portal.kern.courts.ca.gov/>

PLEASE DO NOT CALL OR WRITE TO THE COURT FOR INFORMATION OR ADVICE

NOTICE APPROVED BY THE KERN COUNTY SUPERIOR COURT