

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

TRISHA WREN and CYNTHIA PIPER, et al.,  
individually and on behalf of others similarly situated,

Plaintiffs,

vs.

RGIS Inventory Specialists, LLC, RGIS, LLC, and  
Does 1-25 Inclusive,

Defendants.

Case No. 3:06-cv-05778 JCS

**NOTICE OF WAGE AND HOUR CLASS ACTION  
AND OF CLASS CERTIFICATION**

TO: All current and former RGIS hourly Auditors, Assistant Team Leaders, Team Leaders, or Associate/Assistant Area Managers employed by RGIS in **California** at any time during the period January 1, 2005 to the present, in **Washington** at any time during the period September 20, 2003 to the present, in **Oregon** at any time during the period September 20, 2000 to the present, or in **Illinois** at any time during the period January 4, 2004 to the present.

*Para información en español, por favor visite [www.rgisovertime.com](http://www.rgisovertime.com) o hable al 1-877-361-2539.*

**Background Information**

On February 6, 2009, the United States District Court for the Northern District of California, Honorable Joseph C. Spero presiding, certified the lawsuit *Wren, et al., v. RGIS Inventory Specialists*, Civil Action No. 3:06-CV-05778-JCS as a class action. This means that the Class Representatives, through Class Counsel, can pursue the certified claims on behalf of all class members. There have been no rulings on the merits of the underlying claims, no findings of fault, and no damages awarded. The case is still proceeding in court.

**Why Have I Received This Notice?**

You have received this notice because, according to RGIS' payroll records, you are a member of one of the certified classes.

**What Classes Have Been Certified?**

The Honorable Joseph C. Spero certified the following classes:

- 1) **California Class:** This class consists of all hourly Auditors, Assistant Team Leaders, Team Leaders and Associate/Assistant Area Managers employed by RGIS in California on or after January 1, 2005. The Court certified the following claims for the California Class:
  - a. Claims concerning RGIS' alleged failure to pay class members for time spent donning (putting on) equipment and related waiting time from the time that equipment is made available for donning;
  - b. Claims alleging that RGIS' practice of paying only for travel on company-provided transportation after the first hour of travel to an inventory site and after the first hour of travel returning from an inventory site violates applicable state law; and
  - c. Claims concerning RGIS' alleged failure to provide properly itemized wage statements as required by California law.

- 2) **Oregon Class:** This class consists of all hourly Auditors, Assistant Team Leaders, Team Leaders and Associate/Assistant Area Managers employed by RGIS in Oregon on or after September 20, 2000. The Court certified the following claim for the Oregon Class:
  - a. Claims concerning RGIS' alleged failure to pay class members for time spent donning (putting on) equipment and related waiting time from the time that equipment is made available for donning.
- 3) **Washington Class:** This class consists of all hourly Auditors, Assistant Team Leaders, Team Leaders and Associate/Assistant Area Managers employed by RGIS in Washington on or after September 20, 2003. The Court certified the following claim for the Washington Class:
  - a. Claims concerning RGIS' alleged failure to pay class members for time spent donning (putting on) equipment and related waiting time from the time that equipment is made available for donning.
- 4) **Illinois Class:** This class consists of all hourly Auditors, Assistant Team Leaders, Team Leaders and Associate/Assistant Area Managers employed by RGIS in Illinois on or after January 4, 2004. The Court certified the following claim for the Illinois Class:
  - a. Claims concerning RGIS' alleged failure to pay class members for time spent donning (putting on) equipment and related waiting time from the time that equipment is made available for donning.

#### **What Happens Next?**

A trial is scheduled to begin in the District Court for the Northern District of California on February 1, 2010. The trial will determine whether RGIS is liable on the claims that have been certified as class claims. You do not need to appear in court or otherwise participate in this trial to be a class member or to be eligible for a monetary recovery should the Plaintiffs prevail on their claims. If RGIS is found liable after trial, members of the class will have the opportunity to present information showing that they are entitled to recover damages.

#### **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 class members for the state 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 state law claims in this case, you must send a written request to the Court 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 state claims in this class action lawsuit. Send your request to the following address: Wren, et al., v. RGIS Inventory Specialists, PO Box 166, Minneapolis, MN 55440-0166. To be effective, your request must be postmarked no later than **October 6, 2009**.

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

You do not need to do anything to remain in the class for purposes of the state law claims in this case and reserve your right to make a claim for money damages at a later stage if the Plaintiffs succeed on their claim that RGIS has violated California, Oregon, Washington, and Illinois law. If you do nothing, you automatically will become a member of the class for the state law claims in this case. Any judgment in the case on the state law claims, 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 firms of Schneider Wallace Cottrell Brayton Konecky LLP, Bailey Pinney PC, Grady Schneider, and Goldstein, Demchak, Baller, Borgen & Dardarian to serve as class counsel. If you have any questions regarding the case or the topics of this notice, or you want to communicate with the lawyers whom the Court has appointed to serve as lawyers for the class, you can contact class counsel at:

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Dated: 7/31/09

  
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HON. JOSEPH C. SPERO  
United States Magistrate Judge

**PLEASE DO NOT CONTACT THE COURT WITH QUESTIONS ABOUT THIS NOTICE.**

WREN, ET AL., V. RGIS INVENTORY SPECIALISTS  
PO BOX 166  
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