

NOTICE OF COLLECTIVE ACTION LAWSUIT

***Bradley, et al. v. Vox Media, Inc., d/b/a SB Nation, No. 1:17-cv-1791-RMC* United States District Court for the District of Columbia**

TO: All current or former Site Managers and Managing Editors who performed work in the United States for Vox Media, Inc. (“Vox Media”) in its SB Nation business division at any time since March 27, 2015.

INTRODUCTION

This Notice is to inform you of a collective action lawsuit alleging violations of the federal Fair Labor Standards Act, 29 U.S.C. § 201 *et seq.* (the “FLSA”), because your rights might be affected by this suit. In addition, you may have the right to participate in this suit and the Notice explains how you may do so.

DESCRIPTION OF THE LAWSUIT

Plaintiffs Cheryl C. Bradley, John M. Wakefield and Maija Liisa Varda (collectively “Plaintiffs”) have filed a collective action lawsuit against Vox Media in the United States District Court for the District of Columbia. In their Amended Complaint, Plaintiffs claim that Vox Media violated the FLSA by failing to pay its Site Managers and Managing Editors (collectively “Site Managers”), as employees entitled to protection under the FLSA, at least the federal minimum wage (currently \$7.25 per hour worked), as well as by failing to provide Site Managers overtime pay for all hours worked over forty (40) in a week.

Vox Media denies the allegations in the Amended Complaint because, among other reasons, Vox Media alleges that Site Managers were “independent contractors” and not “employees” entitled to the protections of the FLSA.

You have received this notice because Vox Media’s records indicate that you are or were a Site Manager who performed work in the United States for Vox Media within its SB Nation business division at any time from March 27, 2015 through present (the “FLSA Class”).

WHO IS ELIGIBLE TO JOIN THIS CASE?

You may be eligible to join this case if you served as a Site Manager in the United States within Vox Media’s SB Nation business division during any week from March 27, 2015 through present.

WHAT HAPPENS IF YOU JOIN THIS CASE?

If you choose to join this case, you may be required, with the help of Plaintiffs’ lawyers, to answer written questions, produce documents related to your work as Site Manager, attend a deposition, and/or testify in court. You will not be responsible for paying any lawyers’ fees. Plaintiffs’ lawyers are being paid on contingency, which means that if Plaintiffs do not receive a recovery in this case, no lawyer fees will be owed. If Plaintiffs obtain a recovery, either by

settlement or judgment, Plaintiffs' lawyers may, pursuant to the FLSA, file a request with the Court to receive part of the recovery as compensation for their services. Any settlement or fee award would require the Court's approval as being fair and reasonable.

If Plaintiffs and the other Site Managers win this case, you may receive compensation for unpaid minimum wages and/or overtime wages. The maximum possible recovery allowed under the FLSA is double (2x) any unpaid minimum wages and overtime. If you elect to join this case, you designate the Plaintiffs as your agent to make decisions for you relating to the litigation, including settlement, lawyer fees and costs, and any other matters relating to this case, regardless of whether a recovery is ultimately achieved.

Thus, if you elect to join this case, Plaintiffs' decisions will be binding on you and your claims. A recovery is not guaranteed and depends on the adjudication of the claims.

You do not need to join this case. It is your choice. If you do not join the case, you preserve the right to file your own separate claim, or not, as you choose.

YOUR RIGHTS TO PARTICIPATE IN THIS CASE

You have the right to join, or not join, this case. If you fall within the definition of the "FLSA Class" above, you may join this case by completing, signing, and returning, the enclosed "Opt-In Consent Form," by mail or email to:

Vox Media Site Manager Wage Litigation

James E. Goodley
Jennings Sigmond, P.C.
1835 Market Street, Suite 2800
Philadelphia, PA 19103
jgoodley@jslex.com

If you have any questions or need any assistance, you may contact the Plaintiffs' attorneys, James E. Goodley of Jennings Sigmond, P.C. at 215-351-0614, by email at: jgoodley@jslex.com or Ginger L. Grimes of Goldstein, Borgen, Dardarian & Ho at 510-287-4356, by email at: ggrimes@gbdhlegal.com

To join this case, please complete, sign and mail or e-mail the enclosed Opt-In Consent Form as soon as possible. Plaintiffs' lawyers must receive your form by June 3, 2019 in order to preserve your right to join this case.

RETALIATION AND DISCRIMINATION PROHIBITED

The FLSA prohibits Vox Media from retaliating or discriminating against you in any way because you elect to join this case. If you suspect you have been retaliated or discriminated against because of your choice to join this case, you may contact Plaintiffs' lawyers to so inform them.

PLEASE TAKE NOTE

Generally there is a two (2) year deadline for filing your claims under the FLSA, or three (3) years if the violation is willful. These statutory limitations periods have been extended by one year based on a tolling order entered earlier in this litigation so that the filing deadlines are now three (3) years, or four (4) years if the violation is willful. Plaintiffs have alleged that Vox Media's violations of the FLSA were willful, while Vox Media denies these allegations. The deadline begins to run from the date(s) in which hours were worked. Therefore, you should return the form as soon as possible to preserve your claims to the maximum possible extent.

Please do not contact the Court about this Notice.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

CHERYL C. BRADLEY, individually and on behalf of all persons similarly situated,	:	Civil Action No.: 1:17-cv-1791
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
	:	
VOX MEDIA, INC., d/b/a SB NATION	:	
	:	
Defendant.	:	

CONSENT TO JOIN COLLECTIVE ACTION LAWSUIT

Pursuant to 29 U.S.C. § 216(b), I consent to become a party plaintiff in the above-captioned Fair Labor Standards Act case, to be represented by Jennings Sigmond, P.C. and Goldstein, Borgen, Dardarian & Ho, and to be bound by judgment of the Court.

I worked as a Site Manager or Managing Editor for SB Nation Website
_____ from on or about _____ (date) to on or about
_____ (date).

Signature: _____

Name: _____

Date of Birth: _____

Address: _____

Phone: _____

e-mail: _____

Return Form To:

**James E. Goodley, Esq.
Jennings Sigmond, P.C.
1835 Market, Suite 2800
Philadelphia, PA 19103
jgoodley@jslex.com
(215) 351-0614**