

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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SEDDIQ ELAMRANI, on behalf of himself
and all others similarly-situated,

Plaintiff,

-against-

Civil Action No.:
15-cv-2050 (ERK)(MDG)

HENRY LIMOUSINE, LTD. and AVRAHAM MAZOUZ,
in his individual and professional capacities,

Defendants.

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COURT AUTHORIZED NOTICE OF LAWSUIT

If you worked at HENRY LIMOUSINE, LTD., between
April 13, 2012 and the present, as a driver, please read this Notice.

*Important: You are NOT being sued. This Notice is NOT a solicitation from a lawyer.
The Court authorized this Notice.*

- Plaintiff Seddiq Elamrani was previously employed as a driver by Henry Limousine, Ltd. (“Henry”) and Avraham Mazouz, the owner of Henry. Mr. Elamrani brought this lawsuit against these two defendants on behalf of himself and all other current and former similarly situated drivers, employed since April 13, 2012. Three other drivers, formerly employed by Henry, later joined the lawsuit as plaintiffs. Each plaintiff claims that Henry did not pay him for all hours worked, including overtime wages due.

Defendants deny any wrongdoing and/or liability and deny that any employee was underpaid for his or her work.

- The Court has authorized the parties to send out this Notice. The Court has not decided who is right or who is wrong. However, your legal rights may be affected, and you have a choice to make now. This lawsuit is currently in the early pretrial stage. The Court has made no finding on the merits of the claims raised by Plaintiffs, or Defendants’ various defenses.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT	
ASK TO BE INCLUDED	If you choose to be included in this collective action, you must complete the consent form at the end of this Notice. You also may share in any proceeds from a settlement or judgment if those bringing the claims are successful, but you give up any rights to separately sue the Defendants about the same legal claims in this lawsuit.
DO NOTHING	By doing nothing, you will not be included in this lawsuit relating to claims under the Fair Labor Standards Act.

1. Why did I get this notice?

You are getting this notice because Henry's records show that you may have worked as a driver at Henry from September 30, 2012 to the present, and Plaintiffs allege that you are similarly situated to them.

2. What is a collective action and who is involved?

In a collective action lawsuit, one or more persons can bring a lawsuit on behalf of others who have similar claims. The individuals who brought this lawsuit are called the Plaintiffs. The corporate entity and individual that he has sued are called the Defendants. One Court resolves the issues for everyone who decides to join the case.

3. What is this collective action lawsuit about?

Plaintiffs allege that Henry's compensation practices violated federal and state law. Plaintiffs claim that they and other drivers are entitled to unpaid wages, liquidated damages, attorneys' fees, and costs.

Defendants deny any wrongdoing and/or liability and maintain that all of their employees are paid in accordance with federal and state law.

This notice concerns the claims brought under the federal law known as the Fair Labor Standards Act.

4. How do I join this collective action lawsuit?

To participate in this lawsuit, you need to fill out the enclosed form called "Consent to Join" and mail it in the enclosed, postage-paid envelope to Plaintiffs' lawyers. Should the enclosed envelope be lost or misplaced, the Consent to Join form must be sent to:

Borrelli & Associates, P.L.L.C.
Re: Henry Limousine, Ltd. Case
1010 Northern Boulevard, Suite 328
Great Neck, New York 11021
(516) 248-5550

You can also fax the Consent to Join form to (516) 248-6027 or scan and email it to mjb@employmentlawyernewyork.com

The signed Consent to Join form must be postmarked, faxed, or e-mailed by December 8, 2016. If your signed Consent to Join form is not postmarked, faxed, or e-mailed by December 8, 2016, you may not be allowed to participate in the federal law portion of this lawsuit.

You have a right to be represented by your own lawyer, but you will be responsible for making arrangements for payment of fees of the attorney you select. The lawyer you hire must file with the court a Consent to Join this lawsuit by the deadline set and must enter a formal appearance as attorney on your behalf.

Defendants are represented by:

Pike, Tuch & Cohen LLP
1921 Bellmore Avenue
Bellmore, New York 11710
(516) 783-0062

If you decide to join this case, you should not contact the Defendants' lawyer directly yourself.

5. What happens if I join the collective action lawsuit?

You will be bound by any ruling, settlement, or judgment, whether favorable or unfavorable. If there is a favorable resolution, either by settlement or judgment, and you qualify under the law, you may be entitled to some portion of the recovery. If you join this lawsuit and send your Consent to Join to Borrelli & Associates, P.L.L.C., you are designating the Plaintiffs and Borrelli & Associates, P.L.L.C. to make decisions on your behalf concerning the case, including the method and manner of conducting the case, and all other matters pertaining to this Lawsuit. Decisions made and agreements entered into by Plaintiffs relating to the Lawsuit will be binding on you if you join the Lawsuit. If you hire your own attorney, you will be bound by decisions and agreements that your attorney makes on behalf in this Lawsuit.

While this lawsuit is pending, you may be required to submit to a deposition and/or testify at trial and to provide documents or information relating to your employment at Henry, which may include responding to written questions. For this reason, if you join the lawsuit, you should preserve all documents relating to your employment at Henry currently in your possession. Plaintiffs' attorneys, or your own attorney, if you hire one, will assist you.

6. What happens if I do nothing at all?

You will not be included in this lawsuit and you will not be affected by any settlement or judgment rendered in this case, whether favorable or unfavorable. The limitations period on your claims continues to run.

7. Can I participate in this collective action lawsuit regardless of my immigration status?

Yes. You have a right to participate in this Lawsuit regardless of your immigration status.

8. If I join, will there be any impact on my employment?

Federal law prohibits Defendants from discharging or in any other matter retaliating against you because you join this case.

9. Do I have a lawyer in this case?

Plaintiffs are represented by Borrelli & Associates, P.L.L.C. If you choose to join this Lawsuit, Borrelli & Associates, P.L.L.C. will represent you on a contingency fee basis, meaning you will not owe any attorneys' fees unless Plaintiffs are successful and win the case or obtain a settlement.

10. This Notice has been authorized by the Court

The Honorable Marilyn D. Go, United States Magistrate Judge for the U.S. District Court, Eastern District of New York has reviewed the contents of this Notice and approved the sending of this Notice. The Court expresses no opinion on the merits of the Lawsuit and has not yet ruled on whether the Plaintiffs' claims or Defendants' defenses have any merit.

PLEASE DO NOT WRITE OR CALL THE COURT ABOUT THIS NOTICE.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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SEDDIQ ELAMRANI, on behalf of himself
and all others similarly-situated,

Plaintiff,

-against-

Civil Action No.:
15-cv-2050 (ERK)(MDG)

HENRY LIMOUSINE, LTD. and AVRAHAM MAZOUZ,
in his individual and professional capacities,

**CONSENT TO JOIN
COLLECTIVE ACTION**

Defendants.
----- X

IF YOU RECEIVED THIS FORM AND WANT TO JOIN THIS LAWSUIT, PLEASE COMPLETE THESE TWO STEPS:

1. COMPLETE AND SIGN THIS CONSENT TO JOIN LAWSUIT FORM; AND
2. USE THE ENCLOSED ENVELOPE TO RETURN THIS FORM TO THE ADDRESS BELOW NOT LATER THAN December 8, 2016.

Borrelli & Associates, P.L.L.C.
Re: Henry Limousine, Ltd. Case
1010 Northern Boulevard, Suite 328
Great Neck, NY 11021

YOU CAN ALSO FAX THE CONSENT TO JOIN FORM TO (516) 248-6027,
OR SCAN AND EMAIL IT TO: mjb@employmentlawyernewyork.com

I consent to join the collective action and authorize Plaintiff Seddiq Elamrani and Borrelli and Associates, P.L.L.C. to act on my behalf in all matters relating to this action, including any settlement of my claims. I agree to notify Borelli & Associates, P.L.L.C. of any changes in my contact information listed below.

SIGNATURE

PRINT NAME

Address

City, State, Zip Code

Telephone Number

Email Address

Start Date

End Date