

**CPT Group, Inc.**  
**EMPLOYMENT LITIGATION**

**Myrna Perez v. Penn Industries, Inc.**  
**Los Angeles Superior Court Case No. BC 388981**

Dear Former or Current Employees of Penn Industries, Inc.:

**THIS NOTICE RELATES TO YOUR PRIVACY RIGHTS AND THE DISCLOSURE OF YOUR PERSONAL INFORMATION.**

**THE PLAINTIFF ALLEGES PUTATIVE CLASS CLAIMS FOR DISABILITY DISCRIMINATION AND HAS REQUESTED THE FOLLOWING IN CONNECTION WITH THOSE CLAIMS: (1) YOUR CONTACT INFORMATION, AND (2) DOCUMENTS CONTAINED IN YOUR EMPLOYEE PERSONNEL FILE RELATED TO YOUR REQUEST FOR A MEDICAL LEAVE OF ABSENCE DURING YOUR EMPLOYMENT WITH PENN INDUSTRIES, INC. (“PERSONNEL FILE DOCUMENTS”).<sup>1</sup> PLAINTIFF HAS REQUESTED THIS INFORMATION TO ASSIST WITH THE ALLEGED CLASS CLAIMS.**

**THE COURT HAS ORDERED THAT UNLESS YOU OBJECT IN WRITING ON OR BEFORE **30 DAYS AFTER MAILING OF LETTER**], YOUR CONTACT INFORMATION AND PERSONNEL FILE DOCUMENTS WILL BE DISCLOSED TO PLAINTIFF’S COUNSEL SUBJECT TO A CONFIDENTIALITY ORDER.**

Specifically, Myrna Perez (“Plaintiff”), a former employee of Penn Industries, Inc. (“Penn Industries” or “Defendant”), has filed a lawsuit against Penn Industries. The lawsuit is pending in the Superior Court of the State of California for the County of Los Angeles.

The lawsuit **alleges** that Defendant implemented a discriminatory policy and practice which required employees who took a protected medical leave of absence to return to work within 12 weeks, or their employment would be terminated. Plaintiff seeks to bring this lawsuit as a class action on behalf of all of Defendant’s current and/or former California employees.

No determination has been made regarding the factual or legal merits of Plaintiff’s claims, including whether this is a proper class action. However, the Court has ordered that, **unless you choose to opt-out by signing and mailing in the enclosed, pre-addressed, postage-paid, postcard**, Defendant must disclose to Plaintiff the names, home addresses and home phone numbers of persons who might be included in the class - including yourself.

The court has also ordered that, **unless you choose to opt-out by signing and mailing in the enclosed, pre-addressed, postage-paid, postcard**, Defendant must disclose all Personnel File Documents related to your request for a medical leave of absence (as defined above).

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<sup>1</sup> **PLEASE TAKE NOTE:** The court has ordered that your identity, except the last four digits of your social security number, will remain on all Personnel File Documents disclosed to plaintiff in this case. Unless you object by opting out, these documents will be released to Plaintiff, subject to a protective order requiring confidentiality.

You have two possible choices:

- **OPTION ONE**: If you DO NOT want your contact information and/or your Personnel File Documents to be disclosed to Plaintiff's counsel, you must sign the enclosed form and mail it no later than **[30 days after date of letter]**.
- **OPTION TWO**: If you wish for your contact information (home address and home telephone number) and Personnel File Documents to be disclosed to Plaintiff's counsel, you do not need to do anything.

If you are contacted by Plaintiff's or Defendant's attorneys, you have no obligation to speak to them or to any other person about the case. You will not be rewarded or penalized in any way based on your decision to allow or not to allow your information to be released; however, if you object to providing your information it may impede the ability to pursue the claims on behalf of the class.

For your information, Plaintiff and the alleged putative class are, represented by:

I. Benjamin Blady, Esq.  
Blady Weinreb Law Group, LLP  
6310 San Vicente Boulevard, Suite 400  
Los Angeles, California 90048  
Tel.: (323) 933-1352  
Fax: (323) 933-1353  
Email: bblady@bwlawgroup.com

and Defendant is represented by:

Lyne A. Richardson, Esq.  
Sally S. Frontman, Esq.  
Ford & Harrison, LLP  
350 South Grand Avenue, Suite 2300  
Los Angeles, California 90071  
Tel.: (213) 237-2450  
Fax: (213) 237-2401  
Email: lrichardson@fordharrison.com  
sfrontman@fordharrison.com

Please note that if you object to disclosure of your contact information and Personnel File Documents, Plaintiff may seek an order from the court compelling disclosure of the information. You may contact attorneys for either or both sides with any questions or concerns that you may have. Do not contact the Court.

Sincerely Yours,

**CPT Group, Inc.**  
**16630 Aston**  
**Irvine, Ca 92606**