If you are a California resident who paid money to join One Source Talent, a class action may affect your rights.

A court authorized this Notice. This is not a solicitation from a lawyer.

- The settlement resolves a lawsuit over whether One Source Talent operated legally in the State of California between April 2010 and May 31, 2015.
- You could receive 3 free months of membership (\$120 value) in One Source Talent PLUS a share of a \$611,000 fund. But see paragraph 7 for more details.
- Court appointed lawyers will ask the Court to award legal fees and court costs.
- The two sides disagree whether One Source Talent operated legally.
- Your legal rights will be affected whether you act or not. Read this Notice carefully. You have a choice to make now:

YOUR LEGAL RIGHTS AND OPTIONS	
Do Nothing	 You will: Stay in the lawsuit Receive 3 months of free membership but do not receive any money (but see paragraph 7) Give up certain rights
Make a Claim	 You will: Stay in the lawsuit Receive 3 months of free membership <u>and</u> receive some money (but see paragraph 7) Give up certain rights
Exclude Yourself	 You will: Get out of this lawsuit Receive no money or free membership Keep any rights to sue individually
Object to the Settlement	 You will: Stay in the lawsuit You will still receive the free membership and, if you submit a claim, you will also receive some money Be allowed to file court papers and appear before the Judge explaining why you do not like the settlement

- Your rights and options are explained in this Notice. To exclude yourself you must act before **March 10, 2016** and to object you must act by **May 23, 2016**
- The Court must still decide whether to approve this settlement. The free membership will commence and payments will be made if the Court approves the settlement and any appeals are resolved. Please be patient.

• Any questions? Read the rest of this Notice and visit <u>www.lakeshorelaw.org/onesourcetalent.html</u>.

WHAT THIS NOTICE CONTAINS

BASIC INFORMATION
WHO IS IN THE SETTLEMENT
 THE SETTLEMENT BENEFITS
EXCLUDING YOURSELF FROM THE SETTLEMENT
THE LAWYERS REPRESENTING YOU PAGE 6 15. Do I have a lawyer in this case? 16. Should I get my own lawyer? 17. How will the lawyers and Plaintiff be paid?
OBJECTING TO THE SETTLEMENT
THE COURT'S FAIRNESS HEARING PAGE 8 20. When and where will the Court decide whether to approve the settlement? 21. Do I have to come to the hearing? 22. May I speak at the hearing?
GETTING MORE INFORMATION

BASIC INFORMATION

1. WHY DID I GET THIS NOTICE?

The records of One Source Talent show that you paid for membership for one or more months between April 14, 2010 and May 31, 2015 and listed a California residential address.

The Court sent you this Notice because you have a right to know about a proposed settlement of a class action lawsuit and about your options, before the Court decides whether to approve the settlement. If the Court approves it and after objections and appeals are resolved, you will receive certain compensation. You can receive updates about the progress of the settlement from the website listed at the bottom of this Notice.

This package explains the lawsuit, the settlement, your legal rights, what benefits are available, who is eligible for them, and how to get them.

The Court in charge of the case is the United States District Court for the Central District of California. The case is known as Keen v. Coral Reef Productions, Inc., Case No. 8:14-cv-00814-JVS-JCG. The person who sued is the Plaintiff and the various companies and individuals being sued are the Defendants.

2. WHAT IS THIS LAWSUIT ABOUT?

The lawsuit contends that the various Defendants operated the One Source Talent website, which is a "talent listing service." Since January 2010, California law requires a talent listing service to post a \$50,000 bond with the State, use certain contract language in membership agreements and maintain certain written records concerning the authenticity of job listings on its website. One Source Talent allegedly violated all of these requirements and should have to refund all of the membership fees paid by California members.

The Defendants deny they did anything wrong, but chose to settle for economic reasons.

3. WHAT IS A CLASS ACTION AND WHO IS INVOLVED?

In a class action lawsuit, one or more people called "Class Representatives" (in this case Ms. Keen) sue on behalf of other people who have similar claims. The people together are a "Class" or "Class Members." One court resolves the issues for all Class Members, except those who exclude themselves. United States District Court Judge James V. Selna is in charge of this case.

4. WHY IS THERE A SETTLEMENT?

The Court did not decide in favor of Plaintiff or Defendants. Instead, both sides agreed

to a settlement. That way, they avoid the cost of a trial, and the people affected will get compensation. The Class Representative and the attorneys think the settlement is best for everyone who may have been harmed.

WHO IS IN THE SETTLEMENT

5. AM I PART OF THIS CLASS?

Judge Selna decided that every California resident who purchased membership with One Source Talent between April 14, 2010 and May 31, 2015 is a Class Member.

6. DO I NEED PROOF IN ORDER TO GET COMPENSATION?

This is not required to be a member of the Class as Defendants' records contain that information. However, if you believe you <u>should</u> be a Class Member, but have not received this Notice, you should contact Class Counsel at the address listed in paragraph 18 below and present proof that you are a Class Member. Remember, this lawsuit only applies to paid members during the specified time frame who listed a California address when they paid money to One Source Talent.

THE SETTLEMENT BENEFITS

7. WHAT DOES THE SETTLEMENT PROVIDE?

The settlement provides four forms of relief to Class Members.

First, One Source Talent has already agreed to comply with all of the regulations of California law. One Source Talent has already posted a bond and states that it uses the required contract forms and maintains the required records.

Second, most Class Members will receive THREE free months of membership. The normal cost of this service is \$40 per month or about \$120 in total.

Third, certain Class Members previously requested a refund before May 31, 2015 and were denied. Those persons are designated as members of the REFUND CLASS and will receive a \$500 cash refund instead of free membership. These Class Members do not need to submit a Claim Form.

Fourth, each Class Member who is not eligible to receive the above described refund, will still be eligible to submit a Claim Form and receive a share of the \$611,000 fund. You must follow the instructions below carefully to "Submit a Claim for Money."

Remember, unless you are a member of the REFUND CLASS, if you do not submit a Claim Form you will forfeit your share of the monetary portion of the settlement.

8. HOW DO I GET MY FREE MEMBERSHIP?

This will be provided to you automatically if you are a current One Source Talent member about 90 days after the Fairness Hearing (see below) if the settlement is approved. If you are not a current member, you will be notified by email at that time with instructions how to activate the free membership. You will not be required to give your credit card information and there is no deadline on when you activate the membership. It will expire automatically 90 days after it is activated.

9. HOW DO I SUBMIT A CLAIM FOR MONEY?

If you are receiving this Class Notice by mail, there should also be a Claim Form enclosed in the envelope. You should fill out and submit that form by mail to Keen v. One Source Talent Settlement Administrator, 16630 Aston, Irvine, CA 92606.

If you do not have a Claim Form, then you can submit an online version of the Claim Form at the website <u>www.onesourcetalentsettlement.com</u>. You can also call (888) 474-6564 to request a blank Claim Form be mailed to you.

There is a deadline. You must submit your Claim Form either by mail or online no later than **April 25, 2016**. <u>If you miss this deadline you will not be paid</u>.

10. WHAT AM I GIVING UP TO ACCEPT THE SETTLEMENT?

Unless you exclude yourself, you are staying in the Class and that means you cannot start a lawsuit, continue a lawsuit or join a lawsuit raising similar claims against Defendants. It also means you are "releasing" all of the Defendants (and related companies and persons) from any legal claims you might have relating to your One Source Talent membership. This includes but is not limited to claims that the One Source Talent service was illegal, that you did not get good value for your membership fee, or that you were not happy with the service.

This release does not include any claims based on membership before April 2010 or after May 31, 2015. It also does not include any claims that you suffered personal injury or bodily injury from your membership.

11. WHAT IF I DO NOTHING AT ALL?

You will be automatically included in this settlement. You will be barred from participating in a similar lawsuit for the same thing, and will release your claims as described below, even if you never use your 3 months of free membership. Also, if you are member of the REFUND CLASS you will still get the \$500 cash refund, but if you are not a member of that group, then you will not receive any money if you do not submit a Claim Form.

EXCLUDING YOURSELF FROM THE SETTLEMENT

12. HOW DO I EXCLUDE MYSELF FROM THE SETTLEMENT?

If you don't want the compensation from this settlement, but you want keep the right to sue or continue to sue One Source Talent on your own, about the legal issues in this case, then you must take steps to get out. This is called excluding yourself—or is sometimes referred to as opting out of the settlement Class. If you exclude yourself, you will not be legally bound by the Court's judgments in this class action, nor will you receive any compensation.

To ask to be excluded, you must send an "Exclusion Request" in the form of a letter sent by mail, stating that you want to be excluded from the Keen v. One Source Talent class action. You must include your name and address, telephone number, state you wish to exclude yourself from the One Source Talent settlement, and sign the letter. You must mail your Exclusion Request to Keen v. One Source Talent Settlement Administrator, Keen v. One Source Talent Settlement Administrator, 16630 Aston, Irvine, CA 92606.

The Exclusion Request must be postmarked by **March 10, 2016** or it will not be valid and you will be included in the settlement.

13. IF I DO NOT EXCLUDE MYSELF, CAN I STILL SUE ONE SOURCE TALENT LATER FOR THE SAME THINGS?

No. But you would be able to sue for things that happened before April 14, 2010 or after May 31, 2015.

14. IF I EXCLUDE MYSELF, CAN I STILL GET THE FREE MEMBERSHIP OR CASH PAYMENT?

No.

THE LAWYERS REPRESENTING YOU

15. DO I HAVE A LAWYER IN THIS CASE?

Yes. The Court decided that the law firms of Lakeshore Law Center and The Spencer Law Firm are qualified to represent you and all Class Members. Together, the law firms are called "Class Counsel." They are experienced in handling similar consumer rights cases. More information about these law firms, their practices and their experiences is available at <u>www.lakeshorelaw.org</u> and <u>www.spencerlaw.net</u>.

16. SHOULD I GET MY OWN LAWYER?

You do not need to hire your own lawyer because Class Counsel is working on your behalf. But, if you want your own lawyer, you will have to pay that lawyer.

17. HOW WILL THE LAWYERS AND PLAINTIFF BE PAID?

Class Counsel will ask the Court for attorneys' fees of up to \$300,000 and reimbursement for expenses of up to \$10,500. In addition, Class Representative, Briana Keen, will ask for an incentive award of up to \$10,000 for her services on behalf of the Class in successfully prosecuting this lawsuit. The Court may award less than these amounts. These payments will not come out of the compensation to be paid to Class Members. One Source Talent has agreed not to oppose these fees and expenses, or incentive award.

OBJECTING TO THE SETTLEMENT

18. HOW DO I TELL THE COURT I DO NOT LIKE THE SETTLEMENT?

If you are a Class Member, you can object to the settlement if you do not like any part of it. You can give reasons why you think the Court should not approve it. The Court will consider your views. However, if the Court rejects your objection, you will still be bound by the terms of the Settlement.

To object, you must file a Written Objection or a Notice of Intention to appear at the Fairness Hearing, currently set for 1:30 p.m. on June 6, 2016 with the Clerk of the United States District Court, Central District of California, 411 West Fourth Street, Department 10C, Santa Ana, CA 92701.

The Written Objection or Notice of Intention to Appear must be filed by **May 23**, **2016** or it will not be valid.

You must also send copies of the objection or Notice by United States Mail by the above deadline to:

Plaintiff's Attorneys and Class Counsel: JEFFREY WILENS LAKESHORE LAW CENTER 18340 Yorba Linda Blvd. Suite 107-610 Yorba Linda, CA 92886 Telephone: 714-854-7205 Facsimile: 714-854-7206 Email: jeff@lakeshorelaw.org Defendants' Attorneys: CHARLES JUNG NASSIRI & JUNG LLP 1055 West 7th Street, Suite 2800 Los Angeles, CA 90017 Telephone: 213-626-6200 Facsimile: 213-284-3900 Email: <u>charles@njfirm.com</u>

Any written objections or notice of intent to appear shall state each specific reason in support of your objection and any legal support for each objection.

19. WHAT IS THE DIFFERENCE BETWEEN OBJECTING AND EXCLUDING MYSELF?

Objecting is simply telling the Court that you don't like something about the settlement. You can object only if you stay in the Class. Excluding yourself is telling the Court that you don't want to be part of the Class. If you exclude yourself, you have no basis to object because the case no longer affects you.

THE COURT'S FAIRNESS HEARING

20. WHEN AND WHERE WILL THE COURT DECIDE WHETHER TO APPROVE THE SETTLEMENT?

The Court will hold a Fairness Hearing at 1:30 p.m. on June 6, 2016 in Department 10C of the United States District Court, 411 West Fourth Street, Santa Ana, California. At this hearing the Court will consider whether the settlement is fair, reasonable, and adequate. If there are objections, the Court will consider them. Judge Selna will listen to people who have asked to speak at the hearing. The Court may also decide how much to pay Class Counsel and the Plaintiff. After the hearing, the Court will decide whether to approve the settlement. We do not know how long these decisions will take.

21. DO I HAVE TO COME TO THE FAIRNESS HEARING?

No. Class Counsel will answer questions Judge Selna may have. But, you are welcome to come at your own expense. If you send an objection, you don't have to come to Court to talk about it. As long as you filed and mailed your written objection on time, the Court will consider it. You may also pay your own lawyer to attend, but it's not necessary.

22. MAY I SPEAK AT THE HEARING?

If you have previously filed your Notice of Intention to Appear, you may be permitted to speak at the Fairness Hearing. If you have excluded yourself, you will not be permitted to address the Court.

GETTING MORE INFORMATION

23. ARE MORE DETAILS AVAILABLE?

Visit the website <u>www.lakeshorelaw.org/onesourcetalent.html</u> where you will find the Court's Order Certifying the Class, the Complaint, as well as a sample Exclusion Request. You may also write to, email or call the Class Counsel Jeffrey Wilens at the contact information listed under item 18 of this Notice. Your communications with the Class Counsel listed above regarding this action will be confidential.

The pleadings and other records in this litigation may be examined online using the PACER website at <u>https://www.pacer.gov/</u>. Any person can create an account and then use the account to access the docket for this lawsuit and view all court filings. Please follow the instructions at <u>https://www.pacer.gov/psc/hfaq.html</u>.

DO NOT CONTACT THE JUDGE OR THE COURT TO DISCUSS THE LAWSUIT.

BY ORDER OF THE COURT:

Dated: January 25, 2016

by James V. Selna Judge of the District Court