

## NOTICE OF COLLECTIVE ACTION SETTLEMENT

<<First Name>> <<Last Name>>  
<<ADDRESS>>  
<<CITY, STATE ZIP>>

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### UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF TENNESSEE

CASE NO. 2:24-CV-84

## **If you worked as a Server or Bartender for The Steel Coop or Sunset Restaurant between December 23, 2021, and April 15, 2025, you may be entitled to a payment from a collective action lawsuit settlement.**

*A U.S. District Court Judge authorized this notice. This is not a solicitation from a lawyer.*

- In December 2024, Lauren Boyer, a former server and bartender (“Plaintiff”) who worked at The Steel Coop and Sunset Restaurant (“Defendants”), brought this lawsuit alleging that Defendants failed to pay applicable minimum wage during periods of time within the past 3 years. Specifically, the Plaintiff alleged that she and other tipped workers did not receive proper notice from Defendants that they would be taking a tip credit against their wages. The Plaintiff sought unpaid wages at the full minimum wage rate. Defendants denied the allegations and argued that at all times its employees were properly paid and received proper tip credit notice.
- In April 2025, the Parties reached an agreement for a settlement on a collective action basis as defined above. You were listed as a putative collective member.
- To avoid the burden, expense, inconvenience, and uncertainty of continued litigation, the parties have concluded that it is in their best interests to resolve and settle the action by entering into a settlement agreement. Accordingly, the Plaintiff and Defendants have agreed to a settlement, the terms of which are set forth in the parties’ Collective Action Settlement Agreement, which has been approved by the Court. Defendants have agreed to pay up to a maximum settlement amount of \$475,000.00 (the “Maximum Settlement Amount”) to be allocated among the participating Collective Members, as well as to pay attorneys’ fees, litigation costs, and the expenses of administering the settlement.
- By signing, dating, and returning the corresponding Claim Form, you agree to be bound by the Settlement Agreement, you consent to become a party plaintiff to this action under the federal Fair Labor Standards Act (“FLSA”), 29 U.S.C. § 216(b), and you agree to fully, finally and forever release, remise, and discharge The Steel Coop, LLC. (including their parents, subsidiaries, affiliates, predecessors, successors and assigns, and each of their respective past and present officers, directors, agents, representatives, attorneys and employees) (the “Released Parties”) from any and all wage and hour claims under Federal and applicable state and local law that accrue from December 23, 2021, through April 15, 2025, including, without limitations, all state and federal claims for unpaid minimum wages, straight time wages, overtime wages, and related claims for penalties, interest, liquidated damages, attorneys’ fees, costs, and expenses. This paragraph shall be construed broadly to include the maximum extent of “wage and hour” claims including any claims related to the amount or timing of any payment of wages. Such release includes but is not limited to state law wage payment and wage assignment statutes.

- This case has settled and you have a right to participate in the settlement. Your individual settlement is based on the number of hours that you worked for Defendants during the relevant time period. You were then allocated your proportionate share of the settlement.
- Under the allocation formula created by the settlement, you are entitled to receive an anticipated settlement payment of which will be reported half on a W-2 and half on a 1099.
- You may contact the Claims Administrator by phone (888) 250-6810 or visit the Settlement Website at TheSteelCoopCollectiveAction.com to obtain the amount of your anticipated settlement payment.
- Your Individual Settlement Payment may be subject to a tax breakdown of 50% W-2 wages, and 50% 1099 non-wage income. No tax advice is being provided and you can consult with a tax advisor if you have questions about the tax treatment of this payment. You are advised to seek your own personal tax advice prior to acting in response to this Notice.
- This amount is based on a formula that takes into account the number of hours you worked at a tip credit rate between December 23, 2021, and April 15, 2025 (the “Relevant Period”). As described more fully below in Section 6 of this Notice, to participate in the settlement and receive a settlement payment, you must return a properly completed Claim Form so that it is received by the Claims Administrator and postmarked no later than **September 26, 2025**. If you fail to timely return a completed Claim Form, you will not receive a settlement payment.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT:	
<b>RETURN THE CLAIM FORM AND RECEIVE A PAYMENT</b>	By timely returning a properly completed Claim Form, you will agree to participate in the FLSA settlement, release your claims, and receive an estimated settlement payment. You will also release any wage and hour claims you may have against the Released Parties for the Relevant Period, including those under the FLSA. To receive a settlement payment, you must submit your Claim Form by email or U.S. Mail such that it is postmarked or otherwise received by September 26, 2025.
<b>DO NOTHING</b>	If you do not return the Claim Form, you will receive no payment. Despite not receiving payment, you will not release your FLSA wage and hour claims against the Released Parties, as set forth in the Settlement Agreement.

- These rights and options, and the deadlines to exercise them, are explained in this notice.

## BASIC INFORMATION

### 1. Why did I get this notice?

Defendants’ records state that you were employed by Defendants as a Server at The Steel Coop and/or Sunset Restaurant between December 23, 2021, and April 15, 2025. The Court ordered that you be sent this notice because you have a right to know about the settlement of this collective action lawsuit. This notice explains the lawsuit, the settlement, your legal rights, and what benefits are available.

The Court approved this settlement in the United States District Court for the Middle District of Tennessee. This lawsuit is known as *Lauren Boyer, on behalf of herself and all others similarly situated, v. The Steel Coop, LLC.*, Case No. 2:24-cv-84.

## 2. What is this lawsuit about?

This lawsuit is about whether Defendant violated the FLSA as a result of alleged improper notice of the use of the tip credit. Specifically, the Plaintiff contends, that Defendant did not provide sufficient notice to tipped employees that they were utilizing the tip credit. Defendant denies that it did anything wrong. Plaintiff also alleges that the Defendant required Servers and Bartenders to spend more than 20% of their workweek performing non-tip producing duties and were paid a sub-minimum wage for this work. Plaintiff further claims that the Defendant periodically required Servers and Bartenders to surrender portions of their tips to the restaurants. Defendant denies all of the allegations.

## 3. Why is there a settlement?

The Court did not decide in favor of either side. Both sides believe they would have prevailed in this case, but there was no decision ruling in favor of either party. Instead, both sides agreed to a settlement. That way, they will all avoid the cost of a trial, the risk of losing, and the delay of litigating the case and of potential appeals, and the people affected will get compensation.

## THE SETTLEMENT BENEFITS – WHAT YOU GET

### 4. What does the settlement provide?

Defendant has agreed to pay up to a total maximum amount of \$475,000.00 as a part of the Collective Settlement Agreement. This amount covers settlement payments to participating Collective Members, Collective Counsel's attorneys' fees and costs, the Named Plaintiff, and the costs of administering the settlement, which is expected to be \$6,392.91.

### 5. How much will my payment be?

Based on the formula that has been preliminarily approved by the Court, you will be entitled to receive a settlement payment of \$<<MERGED\_EstimatedAward>>, which will be reported half on a W-2 and half on a 1099. The allocation formula takes into account the number of hours worked by you during the Relevant Time Period at a tip credit rate. In order to receive a settlement payment, you will need to timely return the Claim Form. The Collective Settlement Agreement contains the exact allocation formula. You can get a copy of the Settlement Agreement by accessing the publicly available documents for *Boyer, et. al. v. The Steel Coop*, Case No. 2:24-cv-84 at [www.pacer.gov](http://www.pacer.gov) at ECF No. 27-1, or by sending a request, in writing, to the Claims Administrator at the address set forth in Section 6 below.

## HOW YOU GET A PAYMENT

### 6. How can I get my payment?

You will receive your payment, you must return a properly completed Claim Form to the Claims Administrator postmarked or otherwise received by email by **September 26, 2025**. You must return your Claim Form by U.S. mail or email, and may send it in the enclosed pre-paid envelope to:

ILYM Group, Inc.  
P.O. Box 2031  
Tustin, CA 92781  
Telephone: (888) 250-6810  
Fax: (888) 845-6185  
Email: [claims@ilymgroup.com](mailto:claims@ilymgroup.com)



If you do not return the Claim form by September 26, 2025, then you will not receive any payment.

## THE LAWYERS REPRESENTING YOU

### 7. Do I have a lawyer in this case?

The Court has decided that Jordan Richards of USA Employment Lawyers – Jordan Richards, PLLC and C. Ryan Morgan of Morgan & Morgan, P.A. are qualified to represent you and all Collective Members. These lawyers are called “Counsel for the Collective.” You will not be charged for these lawyers. You do not need to retain your own attorney in order to participate in the settlement. If you want to be represented by your own lawyer, you may hire one at your own expense. Counsel for the Collective’s contact information is below:

Jordan Richards  
USA Employment Lawyers – Jordan Richards, PLLC  
1800 S.E. 10<sup>th</sup> Avenue, Suite 205  
Ft. Lauderdale, FL 33316  
Ph: (954) 871-0050

C. Ryan Morgan  
Morgan & Morgan, P.A.  
20 N. Orange Ave. 15<sup>th</sup> Floor  
Orlando, Florida 32802-4979  
Ph: (407) 420-1414

### 8. How will the lawyers be paid?

Counsel for the Collective has requested and the Court has approved payment of \$160,862.08 for attorneys’ fees and costs. Those fees compensate Counsel for the Collective for investigating the facts, litigating the case, and negotiating the settlement. The cost of the Claims Administrator and the payment to the Named Plaintiff in the amount of \$10,000.00 have also been deducted from the Maximum Settlement Amount.

### 9. What are the effects of not participating in the settlement?

If you decide not to participate in this settlement, you will not participate or receive any settlement proceeds. If you want to initiate your own individual lawsuit against the Defendants regarding these claims, you should not join this lawsuit. You should be aware that claims asserted under the FLSA, such as those alleged here, are subject to a statute of limitations that may impact your right to recover.

## GETTING MORE INFORMATION

### 10. Are there more details about the settlement?

This notice summarizes the approved settlement. More details are in the Settlement Agreement. If there are any discrepancies between this notice and the Settlement Agreement, the Settlement Agreement will control. You can get a copy of the Settlement Agreement by sending a request, in writing, to the Claims Administrator at the address set forth in Section 6 above.

### 11. How do I get more information?

If you have other questions about the settlement, you can contact the Claims Administrator or Counsel for the Collective.

**THIS NOTICE WAS AUTHORIZED ON JUNE 26, 2025 BY THE HONORABLE JUDGE WAVERLY CRENSHAW, JR. OF THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE**

**PLEASE DO NOT CONTACT THE COURT ABOUT THIS NOTICE**

DATED: July 28, 2025