

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

LMAR LAY, Individually and for Others
Similarly Situated,

Plaintiff,

v.

BETACOM HOLDINGS, INC., a
Washington for-profit corporation, and
BETACOM INCORPORATED, a Florida
for-profit corporation

Defendant.

Case No. 2:24-cv-001195-RSM

**IMPORTANT NOTICE: UNPAID OVERTIME SETTLEMENT
WITH BETACOM**

TO: <<EmployeeName>>

RE: Your Right to Available Settlement Funds for Alleged Unpaid Overtime Pay from Betacom

1. DEADLINE TO RETURN OPT-IN CLAIM FORM: DECEMBER 17, 2025

WHY AM I GETTING THIS NOTICE?

You are getting this notice because a case against Betacom Holdings, Inc., and Betacom Incorporated (together, “Betacom”), has settled for a maximum of \$1,200,000.00. This collective action case was filed on behalf of individuals who worked as employees of Betacom and were alleged to work through their meal periods for Betacom, and/or were alleged to receive certain payments that were not considered in the regular rate of pay for purposes of overtime compensation, from August 6, 2021 through August 8, 2025. The case alleged that Plaintiff and certain Betacom employees, including you, were not paid all overtime to which you were entitled under applicable wage laws.

Betacom has denied, and continues to deny, these allegations. Betacom maintains that at all times, you have been properly compensated and paid all overtime to which you are entitled under federal and state wage laws.

THIS NOTICE IS TO INFORM YOU THAT YOU ARE ENTITLED TO RECEIVE MONEY FROM A SETTLEMENT IN THIS CASE, AS DESCRIBED BELOW, IN THE SUM OF <<\$ESTAMOUNT>>. TO RECEIVE YOUR SHARE OF THE SETTLEMENT, YOU MUST RETURN THE ACCOMPANYING OPT-IN CLAIM FORM WITHIN THE SPECIFIED TIME PERIOD.

YOUR SHARE OF THE SETTLEMENT.

Your settlement share amount is stated above. The settlement payment was calculated by multiplying the number of alleged overtime weeks you worked during the relevant time period by a per workweek share determined from your rates of pay, based on the total settlement fund available to the class, and allocated on a *pro rata* basis across the class.

1. WHAT ARE MY OPTIONS?

If you want to join this settlement for alleged unpaid overtime wages, you may read, sign, and return the attached Opt-In Claim Form by **December 17, 2025**. You may return your Opt-in Claim Form by filling out the attached form and returning it by mail, online submission, email, or fax to:

Lay v. Betacom Holdings, Inc.
c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606
Fax: 949-419-3446
Telephone: 1-888-400-1825
Email: LayBetacomHoldingsSettlement@cptgroup.com
Website: www.LayBetacomHoldingsSettlement.com

If you participate in this settlement, you will release Betacom, and all related entities and persons, from all federal, state and local and common law wage and hour actions, causes of actions, demands, damages, attorneys' fees, costs, loss of wages, interest, including but not limited to those that arose or are in any way related to improper classification, failure to pay wages, failure to pay for meal/rest breaks, failure to pay overtime and/or premium rates, failure to provide timely and accurate wage notices, failure to provide timely and accurate wage statements, or otherwise relate to scheduling, payment of wages and/or overtime, and failure to timely pay wages, and any other relief permitted to be recovered on, related to, or in any way growing out of any claims in the Lawsuit regarding events that occurred or are alleged to have occurred from August 6, 2021 through August 8, 2025.

If you do not wish to participate in this lawsuit, then no action on your part is required. Please be advised: Under the operative statute of limitations periods, workers may only be able to recover up to the past three years of back wages, and eligible workers who do not return an Opt-In Claim Form may lose their rights to recover for alleged overtime for work performed in the past for Betacom.

2. WHAT IF I HAVE OTHER QUESTIONS?

This notice is only a summary. If you have additional questions, please contact Class Counsel:

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