

<<MERGED\_Name>>

## NOTICE OF YOUR RIGHT TO PARTICIPATE IN SETTLEMENT

TO: Eligible individuals who a) were engaged by “labor brokers” or sub-contractors; b) to perform construction-related services pursuant to subcontractor agreements with Manganaro Midatlantic LLC; c) during the Class Period of May 15, 2021 to April, of 2025.

DATE: October 31, 2025

On May 15, 2024 litigation was initiated by Carlos Antonio Guzman Torres and Jose Santos Guzman Torres (“Named Plaintiffs”), on behalf of themselves and others, in the United States District Court for the Eastern District of Virginia, against Manganaro Midatlantic LLC and an affiliate (“Defendant” or “MMA”), regarding claims of unpaid overtime and independent contractor misclassification, in a civil action styled civil action styled *Carlos Antonio Guzman Torres and Jose Santos Guzman Torres v. Manganaro Building Group, LLC*, Case No. 3:24-cv-00343. MMA and denies the allegations and asserts, among other defenses, MMA did not employ Plaintiffs or the group of individuals they represented. Plaintiffs and MMA have since reached a resolution, and the Court has approved the terms of the settlement and has approved, for settlement purposes, distribution of this notice to eligible individuals. The Court has not decided whether MMA violated federal or Virginia law, and this notice does not imply in any way the Court’s endorsement of Plaintiffs’ claims.

Pursuant to the Agreement, you are eligible to recover an estimated individualized allocation of <<MERGED\_SettlementAmount>>. If you do not agree with this amount, you have the right to file an objection to the settlement as set out below. The purpose of this notice is to inform you about the settlement and to discuss your rights and options with respect to the lawsuit and the settlement. Unless you choose not to participate in the settlement, you will be bound by the settlement. Please review the enclosed settlement agreement and if you wish to not participate simply inform the Settlement Administrator in writing at the contact listed below, via mail, email, or fax by December 15, 2025:

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)

Each eligible individual has a unique pro rata allocation according to his/her estimated alleged overtime damages coupled with a flat \$25.00, allocated for alleged misclassification damages. **If you do not opt out of the settlement, and the settlement is subsequently approved, you will be agreeing to release MMA from the classwide wage & hour claims raised in the Complaint.**

Alternatively, if you do not opt-out of the settlement, you may object to the settlement if you so desire. By objecting to the settlement, you will be asking the Court not to approve the settlement or the settlement payments. If you wish to object to the settlement, you must file your objection with the Court in the Action by December 15, 2025. Please list the case number (3:24-cv-00343) and your name, address, and the basis of your objection and send it to:

Clerk of Court  
Spottswood W. Robinson III and  
Robert R. Merhige, Jr., Federal Courthouse  
701 East Broad Street  
Richmond, VA 23219

Please also provide a copy of any objections to Class and Defense Counsel at:

<p>Craig Juraj Curwood Zev H. Antell Samantha R. Galina Butler Curwood, PLC 140 Virginia Street, Suite 302 Richmond, Virginia 23219 (804) 648-4848 <a href="mailto:craig@butlercurwood.com">craig@butlercurwood.com</a> <a href="mailto:zev@butlercurwood.com">zev@butlercurwood.com</a> <a href="mailto:samantha@butlercurwood.com">samantha@butlercurwood.com</a></p> <p>Timothy Coffield Coffield PLC Mail Only: 300 East Main St. Ste 100 Charlottesville, VA 22902 434-218-3133 <a href="mailto:tc@coffieldlaw.com">tc@coffieldlaw.com</a></p> <p><i>Class Counsel</i></p>	<p>Adam L. Lounsbury D. Paul Holdsworth Jason Lewis, P.C. 701 East Byrd Street, 17th Floor Richmond, Virginia 23219 Tel.: (804) 649-0404 <a href="mailto:Adam.Lounsbury@jacksonlewis.com">Adam.Lounsbury@jacksonlewis.com</a> <a href="mailto:Paul.Holdsworth@jacksonlewis.com">Paul.Holdsworth@jacksonlewis.com</a></p> <p><i>Counsel for Manganaro Midatlantic, LLC</i></p>
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Those who opt out of the settlement will not be bound by the settlement, will not release any claims, and will not receive any payment from this settlement.

Given the current timetable, we would expect payments to be made to all those who elect to participate in the settlement on or around April 2026.

This settlement is the result of arms-length negotiations between Plaintiff and MMA and their respective attorneys. Both sides agree that this settlement is fair and appropriate under the circumstances.

If you have any questions, please feel free to contact the Settlement Administrator listed above. A full copy of the Settlement Agreement can be reviewed at <https://www.ManganaroMidAtlanticclassaction.com>. Additionally, if your address changes, or is different from the one on the envelope enclosing this notice, please promptly inform the Settlement Administrator listed above.

If you have any questions regarding this Notice and Agreement, you may also contact class counsel:

<p>Craig Juraj Curwood Zev H. Antell Samantha R. Galina Butler Curwood, PLC 140 Virginia Street, Suite 302 Richmond, Virginia 23219 (804) 648-4848 <a href="mailto:craig@butlercurwood.com">craig@butlercurwood.com</a> <a href="mailto:zev@butlercurwood.com">zev@butlercurwood.com</a> <a href="mailto:samantha@butlercurwood.com">samantha@butlercurwood.com</a></p>	<p>Timothy Coffield Coffield PLC Mail Only: 300 East Main St. Ste 100 Charlottesville, VA 22902 434-218-3133 <a href="mailto:tc@coffieldlaw.com">tc@coffieldlaw.com</a></p>
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