

IMPORTANT NOTICE OF GENDER DISCRIMINATION LAWSUIT
NOTICE OF COURT ORDERED CONDITIONAL CERTIFICATION OF COLLECTIVE
ACTION IN FEDERAL GENDER DISCRIMINATION LAWSUIT AGAINST
CHADBOURNE & PARKE LLP (“CHADBOURNE”), MARC ALPERT, ANDREW
GIACCIA, ABBE LOWELL, LAWRENCE ROSENBERG, HOWARD SEIFE, and PAUL
WEBER

Kerrie Campbell, et al. v. Chadbourne & Parke LLP, et al.
U.S. District Court for the Southern District of New York

TO: ALL WOMEN EMPLOYED AS PARTNERS AT CHADBOURNE FOR AT LEAST
ONE DAY FROM AUGUST 31, 2013 THROUGH THE PRESENT.

I. INTRODUCTION

A gender discrimination lawsuit has been filed against Chadbourne & Parke (“Chadbourne”) under the federal Equal Pay Act in the U.S. District Court for the Southern District of New York (*Kerrie Campbell, et al. v. Chadbourne & Parke LLP, et al.*, 1:16-cv-06832 (JPO)) (the “Lawsuit”).

The Lawsuit seeks to recover compensation Plaintiffs allege Chadbourne wrongfully denied you and other female partners.

The Court hereby issues Notice to you and other female partners at Chadbourne who worked at Chadbourne at any time since August 31, 2013. This Notice informs you of your right to join this Lawsuit if you wish to do so.

II. DESCRIPTION OF LAWSUIT

The Lawsuit alleges that Chadbourne improperly paid female partners less than their male counterparts in violation of the federal Equal Pay Act, which requires equitable pay for male and female employees who are deemed similarly situated under the law.

Chadbourne contests all claims that have been asserted and denies any wrongdoing or liability.

The Court conditionally certified the EPA claims to proceed as a “collective action” on behalf of women fitting the Collective Action description in Section III below. Although this Notice and its contents have been authorized by the U.S. District Court for the Southern District of New York, the Court has not made any determination about the merits of the case, including whether Chadbourne wrongfully denied compensation to you or any other female partners.

III. COMPOSITION OF THE COLLECTIVE ACTION

This notice applies to you if you are a woman who was employed:

- 1) as a partner at Chadbourne;
- 2) for at least one day on or after August 31, 2013 and
- 3) performed services for Chadbourne in the United States during at least one work week on or after August 31, 2013

IV. YOUR RIGHT TO PARTICIPATE IN THE LAWSUIT

If you meet the criteria set forth in Section III above, you may be able to join the Lawsuit by completing and mailing, faxing, or emailing the enclosed “Consent to Join” form (**Attachment A**) to **[INSERT THIRD PARTY ADMINISTRATOR]**:

[INSERT THIRD PARTY ADMINISTRATOR CONTACT INFO]

V. YOUR TIME TO JOIN THIS LAWSUIT IS LIMITED

TO JOIN THIS LAWSUIT, YOU MUST TIMELY SIGN, DATE AND RETURN A “CONSENT TO JOIN” FORM. A COPY OF THE CONSENT TO JOIN FORM MAY ALSO BE FOUND AT **[THIRD PARTY ADMINISTRATOR TO INSERT WEBLINK].**

DEADLINE: THE “CONSENT TO JOIN” FORMS MUST BE POSTMARKED AND/OR RECEIVED BY **[INSERT THE CLAIMS ADMINISTRATOR] NO LATER THAN **[45 DAYS FROM THE DATE NOTICE IS MAILED]**.**

Without sending the “Consent to Join” form, you are not automatically a party to this Lawsuit, nor are you required to become a party.

VI. NO RETALIATION IS PERMITTED

Federal law prohibits anyone from discriminating or retaliating against you for joining or deciding not to join in this Lawsuit.

VII. EFFECT OF JOINING THIS LAWSUIT

If you choose to join the Lawsuit, you will be bound by any judgment by the Court on your claims. If the Court rules in your favor, you may receive payment for damages, including unpaid compensation from Chadbourne.

If you choose to join the Lawsuit, you may also be required to provide information relevant to your claims.

VIII. COUNSEL FOR PLAINTIFFS

If you choose to join this Lawsuit and agree to be represented by the Named Plaintiffs through their attorneys, your counsel in this case will be Sanford Heisler, LLP. Sanford Heisler, LLP will represent you and the Named Plaintiffs on a contingency basis. This means that if you obtain any recovery as part of this lawsuit, attorneys’ fees will be paid from any monies awarded to you and if you do not recover, you will not owe any attorneys’ fees.

Alternatively, you may join this Lawsuit and retain counsel of your own choosing at your own expense. If you wish to retain your own counsel, your attorney must file your “Consent to Join” form with the Court by **[45 days from the date of mailing of this notice]** and enter an appearance. You will need to make your own fee arrangement with other counsel if you choose other counsel to represent you.

IX. YOU CHOOSE NOT TO JOIN THIS LAWSUIT

If you choose not to join the collective action, you do not need to do anything in response to this Notice. If you do not join the collective action, you will not be bound by or affected by any resolution or Court judgment on the EPA claims (whether favorable or unfavorable). Your decision not to join this case will not affect your right to bring any timely claims on your own in the future.

X. QUESTIONS REGARDING THIS NOTICE

If you have questions about this Notice, the Consent to Join form, or the Lawsuit generally, you may contact Plaintiffs' Counsel, [names of attorneys] of Sanford Heisler, LLP, at [number] or [email]@sanfordheisler.com.

Please do NOT contact the Court or the Court clerk with questions about this Lawsuit.

Attachment A

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

**KERRIE CAMPBELL and
JAROSLAWA Z. JOHNSON,
individually, and on behalf of others
similarly situated,**

Plaintiffs,

Civ. No. 1:16-cv-06832 (JPO)

v.

**CHADBOURNE & PARKE LLP,
MARC ALPERT
ANDREW GIACCIA,
ABBE LOWELL,
LAWRENCE ROSENBERG,
HOWARD SEIFE, and
PAUL WEBER**

Defendants.

CONSENT TO JOIN FORM

Consent to sue under the Equal Pay Act

**THIS FORM MUST BE POSTMARKED, FAXED, OR E-MAILED BY [45 DAYS FROM
DATE OF MAILING], OR YOU WILL NOT BE A PART OF THIS LAWSUIT**

I work or worked for Chadbourne in the position of partner and performed services in the United States during at least one workweek since August 31, 2013.

I consent to join the Equal Pay Act collective action entitled *Campbell, et al. v. Chadbourne & Parke LLP, et al.*, 1:16-cv-06832 (JPO), seeking to recover unpaid compensation, liquidated damages, and other relief sought in this action under the federal Equal Pay Act, 29 U.S.C. § 206(d).

I choose to be represented in this matter by the named Plaintiffs and counsel (Sanford Heisler, LLP) in this action.

First Name Middle Name Last Name

Signature Date

Further Information Regarding Consent to Join Form

Print Name: Street
Address:

City, State, and ZIP:

Telephone Number(s):

Home:

Work:

Cell:

E-mail

Address:

Please return to:

INSERT THIRD PARTY ADMINISTRATOR CONTACT INFO