

**OFFICIAL COURT NOTICE OF CLASS ACTION SETTLEMENT**

**TO:**     **<Firstname> <Lastname>**  
          **<Address>**  
          **<City> <State> <Zip>**

**Claim ID:** **<ClaimID>**  
**Password:** **<Password>**

You have a right to participate in this settlement if you worked for Euromarket Designs, Inc., which does business as **Crate & Barrel, CB2, Crate & Kids**, and/or **Hudson Grace** (referred to as “Euromarket Designs” in this notice) as an hourly employee in New York between March 6, 2017 and December 31, 2022.

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

- You have received this notice because Euromarket Designs’s records reflect that you worked as an hourly employee in one of Euromarket Designs’s New York retail stores during the period covered by this settlement.
- A former employee alleged that Euromarket Designs failed to pay her and other employees on a weekly basis in violation of New York Labor Law. Euromarket Designs denies these allegations. The Court has not made any ruling on the merits of the claims. The parties have entered into a settlement to avoid further disputes and litigation with the attendant inconvenience and expense.
- Under the allocation formula created by the settlement, you are eligible to receive an estimated payment of approximately **<Payment>**.
- To participate in the settlement, you must mail or submit a properly completed Claim Form so that it is post-marked or received by **September 27, 2024**. If you fail to timely return a Claim Form, you will not receive any money from the settlement.

<b>YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT</b>	
<b>SUBMIT THE CLAIM FORM</b>	If you return a properly completed Claim Form post-marked or otherwise received by <b>September 27, 2024</b> , you will receive a share of the settlement.
<b>DO NOTHING</b>	If you do nothing, you will not receive any money from the settlement, but you will still release your claims and will be unable to sue Euromarket Designs for legal claims under the New York Labor Law for the applicable time period.
<b>OPT OUT</b>	If you wish to exclude yourself (“opt out”) from the settlement and not receive a payment, you must follow the directions outlined in question 10 below.
<b>OBJECT</b>	You may write to the Court about why you believe the settlement is unfair or unreasonable. You must set out the legal and factual arguments to support your objection, and include any supporting documentation. If the Court rejects your objection, you will still be bound by the terms of the settlement. If you object, you may ask to appear before the Court to express your concerns about the fairness of the settlement. Procedures for objecting are described in question 11 below.

## 1. Why did I get this notice?

This notice explains the terms of the settlement, your legal rights, and what benefits are available in the lawsuit *McMillan v. Euromarket Designs, Inc.*, Index No. 601313/2024, a case pending in the Supreme Court of the State of New York, Nassau County. The judge overseeing this case ordered that you be sent this notice because Euromarket Designs' records indicate that you worked as an hourly employee in one of its New York retail stores between March 6, 2017 and December 31, 2022. You are eligible to participate in this class action settlement and have a right to learn about all of your options.

## 2. What is this case about?

This case is about whether Euromarket Designs violated the New York Labor Law by failing to pay hourly workers weekly instead of biweekly. Euromarket Designs denies these claims.

## 3. Why is this a class action?

A class action is a lawsuit where one person called the "Plaintiff" sues on behalf of people who may have similar claims. These other individuals are called Class Members. This settlement covers all Class Members who do not opt out.

## 4. Why is there a settlement?

The Court did not decide in favor of Plaintiff or Defendant. Both sides believe they would have prevailed in litigation. Instead, both sides have agreed to resolve this matter solely to avoid the burden, expense and risks associated with litigation.

## 5. What does the settlement provide?

Euromarket Designs has agreed to pay up to a maximum of \$4,160,000, which will cover settlement awards to Class Members, a payment to Plaintiff's Counsel for attorneys' fees and costs, a payment to Plaintiff for her service to the Class, and the costs of administering the settlement.

## 6. How much will my payment be?

Based on the formula that has been approved by the Court, you are currently estimated to receive approximately **<Payment>**. The allocation formula takes into account the amount of your earnings compared to other Class Members within the applicable period.

Plaintiff's Counsel and Defendant's Counsel do not make any representations concerning the tax consequences of this settlement or participation in it, and you are advised to seek your own personal tax advice prior to acting in response to this notice.

## 7. How can I get my payment?

To get your payment, you must return a completed Claim Form by **September 27, 2024**. You may return the Claim Form through the mail in the pre-stamped return envelope, by email, or by online submission:

Euromarket Designs Settlement Administrator  
c/o CAC Services Group  
6420 Flying Cloud Dr Ste 101  
Eden Prairie, MN 55344  
info@cacsg.com  
www.EuromarketDesignsSettlement.com

**Claim ID: <ClaimID>**

**Password: <Password>**

## **8. When will I get my payment?**

If you return a completed Claim Form to the Settlement Administrator by the deadline, we estimate that you will be sent your settlement check within approximately 21 days of the deadline for submission of claim forms. The deadline for the submission of claim forms may be adjusted to provide additional time for submission for Class Members whose notices are returned as undeliverable and re-mailed. You will then have 120 calendar days from the check mailing date to cash/deposit your check. If you do not cash/deposit your check within that one hundred and twenty (120) calendar day period, the uncashed check will become void and you will not receive a re-issued check, but you will still be bound by the Release.

## **9. What am I giving up to get a payment?**

If you do not opt out of the settlement, you will release any and all wage and hour claims under the New York Labor Law and related claims for penalties, interest, liquidated damages, attorneys' fees, and/or costs, against Euromarket Designs and its past and present owners, employees, officers, investors, attorneys, parents and subsidiaries, that accrued during your employment between March 6, 2017 and December 5, 2023. Additionally, if you submit a Claim Form, you will also release claims under the Fair Labor Standards Act and related claims for penalties, interest, liquidated damages, attorneys' fees, and/or costs, against the same entities.

## **10. How do I opt out of the settlement?**

If you do not want to participate in this and you want to keep the right to sue Euromarket Designs about the issues in this case, then you may need to take steps to remove yourself from the case. This is called excluding yourself from—or opting out of—the settlement. To exclude yourself from the settlement, you must send a letter by First Class U.S. mail or email, stating your intention to opt out of the settlement. Be sure to include your name, address, telephone number, and your signature. Your exclusion request must be postmarked no later than **September 27, 2024**, and must be mailed or emailed to:

Euromarket Designs Settlement Administrator  
c/o CAC Services Group  
6420 Flying Cloud Dr Ste 101  
Eden Prairie, MN 55344  
info@cacsg.com

## **11. How do I object to the settlement?**

You can object to the settlement if you don't like any part of it. To object, you must send a letter via U.S. Mail or email stating that you object to the settlement as well as all reasons for the objection. You must set out the legal and factual arguments to support your objection, and include any supporting documentation. You must state if you wish to appear at a hearing, which the judge

may hold at their discretion. Any reasons you do not include in the statement will not be considered. Be sure to include your name, address, telephone number, and signature. Mail or email the objection to:

Euromarket Designs Settlement Administrator  
c/o CAC Services Group  
6420 Flying Cloud Dr Ste 101  
Eden Prairie, MN 55344  
info@cacsg.com

Your letter must be postmarked no later than **September 27, 2024**.

**12. Do I have a lawyer in this action?**

Yes. You are represented by Molly Brooks, Michael Danna, and Amy Maurer of the law firm of Outten & Golden LLP. You will not be charged separately for these lawyers; their fees are being covered by the settlement fund. You do not need to retain your own attorney.

**13. How will the lawyers be paid?**

The Court has approved payment to Plaintiff's Counsel of one-third of the Settlement Amount for attorneys' fees, plus out-of-pocket costs. These fees compensate Plaintiff's Counsel for investigating the facts and negotiating and finalizing the settlement. The Court has also approved a service award to the Plaintiff of \$10,000 to recognize risks she took and her service to the Class by initiating this lawsuit and settlement.

**14. Are there more details about the settlement?**

You can get a copy of the full Settlement Agreement by sending a request in writing to:

Euromarket Designs Settlement Administrator  
c/o CAC Services Group  
6420 Flying Cloud Dr Ste 101  
Eden Prairie, MN 55344  
info@cacsg.com

**15. How do I get more information?**

If you have other questions about the settlement, you can contact Plaintiff's Counsel:

Molly Brooks, Michael Danna, and Amy Maurer  
Outten & Golden LLP  
685 Third Avenue, 25th Floor  
New York, NY 10017  
(212) 245-1000  
EuromarketDesignsSettlement@outtengolden.com

DATED: July 29, 2024