

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

BENJAMIN BROWN, et al.

Plaintiffs,

-against-

JOHN MAHDESSIAN, individually, and MADAME
PAULETTE LIC, LLC, MADAME PAULETTE
VALET SERVICES, INC., MME PAULETTE DRY
CLEANERS OF 65TH ST. INC., all d/b/a MADAME
PAULETTE, and related or affiliated entities,

Defendants.

Index No.: 154606/2017

NOTICE OF CLASS ACTION LAWSUIT

TO: All individuals employed by John Mahdessian, Madame Paulette LIC, LLC, Madame Paulette Valet Services, Inc., and/or MME Paulette Dry Cleaners Of 65th St. Inc., who performed work related to their garment and interior cleaning and restoration business between May 2011 and the present, including but not limited to production staff, cleaners, pressers, drivers, maintenance workers, spotters, customer service workers, tailors, interior cleaners, baggers, and boxers. The defined class shall not include any owners, corporate officers, or directors, (the "Class").

The purpose of this Notice is to advise you that a lawsuit has been filed against John Mahdessian, Madame Paulette LIC, LLC, Madame Paulette Valet Services, Inc., and MME Paulette Dry Cleaners Of 65th St. Inc. ("Madame Paulette Defendants") alleging claims under New York law and to advise you of the legal rights you may have with respect to this lawsuit.

Plaintiff Benjamin Brown filed a lawsuit in state court under New York law alleging that Madame Paulette Defendants did not pay him and other workers all overtime compensation owed, minimum wages for all hours worked, and made deductions from their pay for lunch breaks and/or parking tickets.

The Court has allowed this action to proceed as a class action lawsuit and has authorized publication of this Notice to advise you about the status of this lawsuit. The Court has not decided whether the claims in the lawsuit are valid or have any merit.

Madame Paulette Defendants deny that Plaintiffs' claims have any merit and have asserted various defenses against Plaintiffs' claims. Madame Paulette Defendants vigorously deny any wrongdoing or liability.

The foregoing description is general and does not purport to cover all of the parties' claims, contentions, denials and defenses in the action. For a more detailed statement of the matters involved in each action, you are referred to the pleadings and other papers filed in this action, all of which may be inspected at the Supreme Court of the State of New York, New York County Court House, 60 Centre Street, New York, New York, during normal business hours.

The law firm of Virginia & Ambinder, LLP has been appointed by the Court to represent you in this action. If you believe that you have a claim for unpaid wages for the work that you performed for John Mahdessian, Madame Paulette LIC, LLC, Madame Paulette Valet Services, Inc., and MME Paulette Dry Cleaners Of 65th St. Inc., you may schedule an appointment to meet with a representative of Virginia & Ambinder, LLP.

Jack Newhouse, Esq. and Alanna Sakovits of Virginia & Ambinder, LLP, 40 Broad Street, 7th Floor, New York, New York 10004, are counsel to the class in this action. Further information about this Notice and answers to other questions concerning this lawsuit may be obtained by contacting Alanna Sakovits, Esq., telephone number (212) 943-9080, facsimile number (212) 943-9082, www.vandallp.com or by email at asakovits@vandallp.com.

If you wish to participate in this action, it is suggested that you make an appointment to meet with a representative of Virginia & Ambinder, LLP. Please be prepared to provide approximate dates of employment, wages you were paid, and hours you worked each week. You have the right to consult with an attorney of your own choosing and to initiate your own action if you do not wish to participate in this class action lawsuit. If you wish to opt-out and be excluded from the Class, you must notify Class Counsel in writing by mail or facsimile sent to Alanna Sakovits, Esq., of Virginia & Ambinder, LLP, 40 Broad Street, 7th Floor, New York, New York 10004. If you decide not to participate in this lawsuit, you may not be eligible to receive any benefits in the event that a settlement or judgment is obtained.

All communications and discussions with Virginia & Ambinder, LLP are confidential and will not be disclosed without your consent.

You have a right to participate in this action even if you are an undocumented alien or if you were paid in cash.

**PLEASE DO NOT CONTACT THE CLERK OF THE COURT
WITH QUESTIONS INVOLVING THIS LAWSUIT.**