

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

OTABEK DJURAEV, individually and on behalf of all others
similarly situated,

Plaintiffs,

- against -

CITY WAV CORP., CITY WAV TRANSPORTATION GROUP
WORLDWIDE INC., CORPORATE TRANSPORTATION
GROUP, L.T.D., VADIM KULISHEVSKIY, AND ABC
SUBCONTRACTOR CORPORATIONS 1-100,

Defendants.

Index No.: 160139/2025

**NOTICE OF PENDENCY OF CLASS ACTION LAWSUIT
IF YOU WORKED AS A DRIVER FOR CITY WAV CORP.,
CITY WAV TRANSPORTATION WORLDWIDE GROUP INC.,
AND/OR VADIM KULISHEVSKIY IN NEW YORK STATE
AT ANY TIME FROM JULY 29, 2019 TO THE PRESENT,
YOUR RIGHTS MAY BE AFFECTED BY THIS LAWSUIT.**

This is a court-authorized notice. This is not a solicitation from a lawyer.

WHY DID I RECEIVE THIS NOTICE?

Named Plaintiff Otabek Djuraev who worked as a driver for City Wav Corp., City Wav Transportation, and Vadim Kulishevskiy, filed a lawsuit in state court under New York law alleging that City Wav Corp., City Wav Transportation, and Vadim Kulishevskiy, as well as Corporate Transportation Group, LT.D., did not pay him and the other class members wages and they are lawfully owed due to Defendants' policies and practices of:

- (i) failing to pay drivers minimum wages for all hours worked;
- (ii) failing to pay overtime compensation at the rate of one and one-half times their regular rate of pay for all hours worked over 40 in a workweek;
- (iii) failing to pay spread-of-hours compensation (an additional hour of pay at the minimum wage rate) on days when drivers worked shifts exceeding ten hours;
- (iv) making unlawful deductions from drivers' wages, including requiring drivers to pay for their own gas, tolls, and other work-related expenses out of pocket; and
- (v) failing to provide wages on a regular and consistent basis, with drivers instead receiving sporadic and irregular payments of random amounts via cash, Zelle, direct deposit, or check, and in many weeks receiving no pay at all.

Defendants City Wav Corp., City Wav Transportation, and Vadim Kulishevskiy have not appeared or answered in this action. The Court has entered a default against these Defendants. The Court has certified this action as a class action and authorized this Notice to advise you of the status of the lawsuit. The Court has **not** yet certified a class action as to Defendant Corporate Transportation Group, L.T.D.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT

If you wish to be included in this lawsuit, or you do nothing in response to this Notice, you will be a member of the class of persons whose rights will be determined by the lawsuit. As a class member, you will waive your right to proceed individually and you will also waive any right you may have to liquidated damages, a penalty that the court may decide to impose if it finds that Defendants City Wav Corp., City Wav Transportation, and Vadim Kulishevskiy willfully violated the law. As a member of the class, you will also be legally bound by any decision of the Court in this lawsuit. Regardless of whether Plaintiffs win or lose in this lawsuit, you will not be able to sue Defendants City Wav Corp., City Wav Transportation, and Vadim Kulishevskiy in a separate action for the claims alleged in this case.

You will be represented by the law firm Virginia & Ambinder, LLP, the attorneys designated by the Court to represent you (“Class Counsel”). If a settlement or judgment is reached at the conclusion of the case, Class Counsel will make an application to the Court for the recovery of their legal fees and costs, and the Court will have discretion in the amount to award Class Counsel. Their costs and fees will be paid out of any recovery that may be obtained in this lawsuit. You have a right to consult with an attorney about this matter. If you wish to be represented by other counsel, you may retain another attorney, but you may be responsible for paying that attorney.

If you do not wish to participate in this lawsuit, you must send a signed letter stating “I elect to exclude myself from the class in *Djuraev et al. v. City Wav Corp. et al.*, Index No. 160139/2025, pending in the Supreme Court of New York for New York County.” You must also include your name, address, telephone number, and signature. Your request must be mailed by First Class U.S. mail to Michele Moreno, Esq. of Virginia & Ambinder, LLP, located at 40 Broad Street, 7th Floor, New York, New York 10004, or emailed to mmoreno@vandallp.com. You must follow these procedures precisely in order to exclude yourself from this lawsuit. If you decide not to participate, you may not be eligible to receive any benefits in the event that recovery is obtained, but you will retain the right to sue separately and on your behalf for the claims asserted in the lawsuit.

You can obtain further information about Class Counsel by visiting Virginia & Ambinder, LLP’s website www.vandallp.com or contacting Michele Moreno, Esq., 40 Broad Street, 7th Floor, New York, NY 10004, mmoreno@vandallp.com, telephone number (212) 943-9080, fax (212) 943-9082. If you require Russian translation, please ask for Albina Zakharkina.

You have a right to participate in this lawsuit even if you are an undocumented immigrant or you are still working for Defendants.

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

DO NOT CONTACT THE COURT OR THE CLERK'S OFFICE WITH QUESTIONS