

NOTICE TO PUTATIVE CLASS MEMBERS

Chao “Charles” Xu, a former employee of Systems Integration Solutions, Inc. (“SIS”) who performed work on a contract for Apple Inc. (“Apple”) filed a putative class action lawsuit against SIS and Apple alleging that he and other hourly employees who were employed as SIS Consultants in California were not adequately compensated in compliance with California law. Specifically, Mr. Xu alleges that he and other SIS Consultants were entitled to payment for additional hours they worked. Mr. Xu also alleges claims that SIS and Apple did not provide legally-compliant wage statements, did not maintain accurate and complete records of hours worked by Consultants, did not provide the written notice to Consultants required by Cal. Labor Code § 2810.5, and did not timely pay all wages due and owing during employment and upon termination of employment.

Both Apple and SIS deny all of the claims of Mr. Xu, and deny that Mr. Xu or the other members of the putative class are entitled to any of the relief sought in the case. In particular, Defendants contend that their employment practices complied with California law, and SIS Consultants were paid for all time worked, were timely paid wages at termination, and received all required statements and notices. Apple also denies that it is liable to any SIS Consultant for any of the claims asserted in this lawsuit because it never employed any SIS Consultant, and at all times SIS was the sole employer of Mr. Xu and of the other SIS Consultants he seeks to add to this lawsuit. The case has not yet been certified by the Arbitrator as a class action, and Defendants have asserted that the case should not proceed as a class action on the grounds that it lacks merit and otherwise does not meet the standards for a class action.

You are receiving this letter because the records of SIS show that you worked as an SIS Consultant, on an hourly basis, for a client or customer of SIS, at some point since December 17, 2010. As a result, you might potentially participate if a class were certified in this matter. Attorneys for Mr. Xu are investigating the claims in the arbitration and seek to obtain your name, address, email address, and telephone number from SIS so that they can communicate with you to investigate the claims in the arbitration. If they contact you, Mr. Xu’s attorneys may ask you for information regarding the nature of the work you do (or used to do), including: the hours you worked, what you were paid, and whether you were provided the written notice and wage statements required by California law.

The Arbitrator in charge of this case has ordered that this notice be issued to determine if you would object, on privacy grounds, to having your address, email address, and telephone number provided to Mr. Xu’s attorneys. If you do not want this information to be provided to Mr. Xu’s attorneys, please do either of the following by no later than July 5, 2016:

1. Complete and return the enclosed pre-addressed and pre-stamped postcard to: Settlement Services, Inc., P.O. Box 10643, Tallahassee, FL 32302; OR
2. Go to the website www.CalSISConsultant.com, click on “Disclosure of Contact Information” in the sidebar, and follow the online instructions on the “Disclosure of Contact Information” page. **Note that in order to submit online, you will need to provide the following personal identification number that is assigned to you: [PIN].**

The attorneys who represent Mr. Xu are:

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You are under no obligation to provide information to or discuss this matter with Mr. Xu's attorneys or with Apple, SIS or any of Apple or SIS's managers, employees or attorneys. Neither Apple nor SIS will retaliate against you in any way for providing or refusing to provide any information regarding the lawsuit. If you request not to have your contact information provided to Mr. Xu's attorneys, that does not prevent you from participating in any potential settlement or judgment in the Arbitration.