

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

ERIN GOFF, et al. v. COUNTY OF RIVERSIDE

Case No. 5:23-cv-01643-SSS-SP

IMPORTANT NOTIFICATION TO POTENTIAL COLLECTIVE ACTION MEMBERS

THIS NOTICE AND ITS CONTENTS HAVE BEEN AUTHORIZED BY THE UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF CALIFORNIA. THE COURT HAS TAKEN NO POSITION IN THIS CASE REGARDING THE MERITS OF PLAINTIFF'S CLAIMS OR DEFENDANT'S DEFENSES.

Please read carefully. Your legal rights may be affected.

You are receiving this notice in connection with the legal action filed by Erin Goff, a former County of Riverside ("County") employee, on behalf of herself and other current and former non-exempt employees of the County who worked during the period of March 1, 2021, through the present.

This Notice is being sent to you by Order and under supervision of the United States District Court for the Central District of California. The purpose of this notice is: (1) to inform you of the existence of a collective action lawsuit filed against the County of Riverside; (2) to advise you of how your rights may be affected by this lawsuit; and (3) to instruct you on the procedure for participating in this lawsuit. You have been sent this notice because employment records indicate that you may be "similarly situated" to the named Plaintiff.

THE LAWSUIT

The lawsuit is entitled *Erin Goff v. County of Riverside*, Case No. 5:23-cv-01643-SSS-SP and is currently pending in the United States District Court for the Central District of California. The lawsuit was filed on August 15, 2023, and alleges a claim for failure to pay all overtime wages owed under the Fair Labor Standards Act ("FLSA"). The Court has not determined any fault by the County at this time. The County denies liability and is defending against Plaintiff's claims.

Plaintiff's claims in this action are limited to a two (2) or potentially three (3) year statute of limitations. The County disputes any FLSA liability here and further contends that any liability would only extend to two years rather than three. If you choose to join this lawsuit, you may be able to recover damages only for overtime hours worked within this time period.

The specified dispatcher positions, identified by job title and job code, are as follows: Animal Services Dispatcher (73496); D.A. Public Safety Dispatcher (13918); Fire Comm Dispatcher I (13918); Fire Comm Dispatcher II (13807); Sheriff Communications Supv (13809); Sheriff's 911 Comm Officer I (13796); Sheriff's 911 Comm Officer II (13797); Sheriff's 911 Comm Officer II A (13826); Sheriff's 911 Comm Officer II B (13827); Sheriff's Comm Supv A (D) (13794); Sheriff's Comm Supv B (D) (13795); Sr Fire Comm Dispatcher (13808); Sr Sheriff's 911 Co A (D) (13799); Sr Sheriff's 911 Co B (D) (13800); and Sr Sheriff's 911 Comm Officer (13798).

YOUR RIGHT TO PARTICIPATE

Under the FLSA, similarly situated employees may join the existing lawsuit. If you: (1) are a non-exempt (hourly) employee who worked for the County of Riverside, serving in specified "dispatcher" classification, at any time since March 1, 2021; (2) received (a) differentials (i.e., shift or training differentials), (b) cash-in-lieu of benefits (i.e., cash back or in lieu of health benefits), and/or (c) other non-discretionary forms of pay such as incentives within the same workweek as overtime pay at any point during the time period of March 1, 2021, to the present, you may join this lawsuit.

You *must* opt-in to participate. If you opt-in, you will be bound by any judgment of the Court and/or will be eligible to receive a portion of any settlement. You may fill out, sign, and return the Consent to Join form attached to this Notice on the second page, which will be mailed to a third-party administrator in this lawsuit at the following address:

Goff v. County of Riverside
c/o CPT Group, Inc.
PO Box 19504
Irvine, CA 92623
Email: RiversideFLSATolling@cptgroup.com
Fax: (949) 419-3446

You may also elect to do nothing, in which case, you will not join the action and will not be bound by or benefit from any judgment or settlement reached in this matter. If you do not submit a FLSA opt-in form promptly, prior to the mediation estimated to be set in the next five to six months, you will be deemed not to have joined the action. Federal law (the FLSA) requires that any claims for overtime compensation must be filed, if at all, in a state or federal court within two (2) years (or within three (3) years if the violation was willful as defined by law). Any claims for overtime pay under federal law that are not filed within these limits are likely to be denied as untimely.

If you choose to join this lawsuit, you will be bound by any judgment or settlement, whether it is favorable or unfavorable. While this lawsuit is proceeding, you may be required to respond under oath to written questions, testify in deposition, and/or testify in court.

Plaintiff's attorneys have taken this case on a contingency fee. They shall advance all reasonable litigation costs, and you will not be obligated to reimburse Attorneys for any costs advanced if no recovery is obtained. The attorneys may be entitled to receive attorney fees and costs from the County of Riverside should there be a recovery or judgment in favor of the Plaintiff. If there is a recovery, Plaintiff's attorneys will apply to receive an award of separate attorney fees, or a percentage of any common fund judgment or settlement obtained in favor of Plaintiff, but not both.

NO RETALIATION PERMITTED

Under federal law, it is illegal for the County of Riverside to retaliate against you for joining this lawsuit.

QUESTIONS REGARDING THIS NOTICE

This is a Court-approved notice. Please do not contact the Court. Any questions may be directed to the County or to counsel for Plaintiff Goff at Ferraro Vega Employment Lawyers.