# **LEGAL NOTICE OF CLASS ACTION SETTLEMENT**

You are receiving this notice because you are a member of a Class in a lawsuit pending in the United States District Court for the District of Oregon titled *Magallon v. Robert Half International, Inc.*, Case No. 6:13-cv-01478-SI (D. Or.) (the "Action"). You were previously sent notice of the case in June 2021, and you are now receiving another notice because the parties have reached a settlement. As such, you are entitled to certain rights and options, which are summarized below. There is more detailed information about the case and settlement following the summary.

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT		
DO NOTHING AND RECEIVE A CHECK	If you do not opt-out of the Settlement, you are entitled to a settlement check in the amount of \$955.95. You do not need to do <b>anything</b> to receive the check.	
ACHECK	If the Court approves the Settlement and it becomes final and effective, a check will be mailed to the address maintained by Robert Half International, Inc., now known as Robert Half, Inc., ("RHI") for you, and you will give up your right to bring your own lawsuit against RHI about claims related to RHI's practices for providing notice to consumers about the results of background checks used for employment purposes.	
	You may update and/or confirm your address with the Settlement Administrator.	
EXCLUDE YOURSELF FROM THE SETTLEMENT	You may exclude yourself from the Settlement if you wish. In so doing, you will receive no benefits from the lawsuit. This is the only option that will retain your right to bring another lawsuit against RHI about the claims described below. You must request exclusion by April 9, 2025. For more information about how to exclude yourself, see Question 10 below.	
OBJECT	You may object to the terms of the Settlement Agreement, including the proposed award of attorneys' fees and costs of \$4,375,719.32, and/or the separate service award to the Plaintiff of \$15,000. For more information about these awards, see Questions 6 and 14 below.	
	Your deadline to object is April 9, 2025. You must do so by writing to the Court (Clerk of Court, U.S. District Court for the District of Oregon, Mark O. Hatfield United States Courthouse, 1000 Southwest Third Avenue, Portland, Oregon 97204). For more information about what to include in an objection, see Questions 15 and 18.	
	If the Court approves the Settlement, you will still receive a settlement check even if you objected.	
GO TO A HEARING	You may speak at the Final Approval Hearing set for May 7, 2025 if you submit an objection that complies with the requirements in the Settlement, as long as you mail in a letter saying that you would like to appear and be heard at the hearing.	

#### ADDITIONAL CASE DETAILS

You are a member of the certified class in lawsuit pending in the United States District Court for the District of Oregon titled *Magallon v. Robert Half International, Inc.*, Case No. 6:13-cv-01478-SI (D. Or.) (the "Action"). In the Action, an individual asserts violations of the Fair Credit Reporting Act ("FCRA") based on the claim that RHI had a practice of taking adverse action against applicants for employment without first providing the applicant a copy of the pertinent background check (also known as a "consumer report") and a written description of their rights under the FCRA, as required by section 1681b(b)(3) of the FCRA. RHI has asserted that it provided all notices and disclosures required by law, and provided candidates a meaningful opportunity to dispute negative information before any decision was made regarding their application or employment. The Court has not decided which side is right. The Court has preliminarily approved the proposed Settlement Agreement (available at <a href="https://www.MagallonSettlement.com">www.MagallonSettlement.com</a>) to which the parties have agreed (the "Settlement"). A hearing is scheduled for May 7, 2025, to decide whether to approve the Settlement and whether to approve Class Counsel's request for attorneys' fees and expenses. If you received a written or email notice about the settlement, it is because the Court determined, based upon RHI's records covering August 22, 2008 through November 30, 2017, that you are a member of the following Class:

All natural persons residing in the United States (including territories and other political subdivisions) who: (i) applied for temporary employment placement through RHI; (ii) about whom RHI obtained a consumer report for employment purposes from the General Information Services, Inc., from August 22, 2008 until November 30, 2017; (iii) the consumer report contained either a "red flag" or a "yellow flag"; and (iv) RHI determined the applicant was "not placeable." The class does not include any person who applied for placement through RHI in June 2012 or later, signed the arbitration agreement acknowledgement form, and did not opt out of the arbitration agreement within 30 days.

**Read this notice carefully.** This notice advises you of the benefits that may be available to you under the proposed Settlement and your rights and options as a Settlement Class Member. You may also review the full Settlement Agreement and the papers filed in support of approval of the Settlement on <a href="https://www.MagallonSettlement.com">www.MagallonSettlement.com</a>. Class Counsel's full request for attorneys' fees, costs, and expenses will be available on the website by January 25, 2025.

These rights and options—and the deadlines to exercise them—are explained in this notice.

The Court still has to decide whether or not to approve the Settlement. If it does, and any appeals are resolved, benefits will be distributed to members of the Settlement Class.

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### **BASIC INFORMATION**

#### 1. Why is there a notice?

A court ordered that this notice be provided because you have a right to know about the proposed Settlement of this class action lawsuit and its effect on you. This notice explains the lawsuit, the Settlement, and your legal rights.

Judge Michael Simon, of the United States District Court for the District of Oregon, is overseeing this case, *Magallon v. Robert Half International*, *Inc.*, Case No. 6:13-cv-01478-SI (D. Or.). The person who sued – Bonnie Magallon – is the Plaintiff. RHI is the Defendant.

### 2. What is this litigation about?

The lawsuit claims that RHI had a practice of taking adverse action against applicants for employment without first providing the applicant a copy of the pertinent background check (also known as a "consumer report") and a written description of their rights under the FCRA, as required by section 1681b(b)(3) of the FCRA.

You can review the complaint in this lawsuit on the website <a href="www.MagallonSettlement.com">www.MagallonSettlement.com</a>. RHI has asserted that it provided all notices and disclosures required by law, and provided candidates a meaningful opportunity to dispute negative information before any decision was made regarding their application or employment. The Court has not decided which side is right.

### 3. Why is this a class action?

In a class action, one or more people called Class Representatives (in this case, Plaintiff) sue on behalf of themselves and other people with similar claims. Together, all the people with similar claims are members of a Class.

#### 4. Why is there a Settlement?

The Court has not decided in favor of either Plaintiff or RHI (together, the "Parties"). Instead, the two sides have agreed to a Settlement. In doing so, the Parties avoid the costs and uncertainty of litigation and a trial, and Settlement Class Members receive the benefits described in this notice. The proposed Settlement does not mean that any law was broken or that RHI did anything wrong. RHI denies all claims in this case. The Class Representative and her lawyers believe the proposed Settlement is in the best interests of Settlement Class Members.

## WHO IS PART OF THE SETTLEMENT?

If you received notice of the Settlement from a notice or email addressed to you, then you are on the list of people that the Court determined, based upon RHI's records covering August 22, 2008 through November 30, 2017, are members of the Class. All Settlement Class Members applied for temporary placement through RHI (or a division of RHI such as "OfficeTeam") and RHI received a background check about them for employment purposes from General Information Services, Inc. between August 2008 and November 2017. The report included a "red flag" or a "yellow flag" because of information contained in the report. The Court decided that RHI determined each class member was "not placeable" because of the background report. The Class does not include anyone who applied to RHI in June 2012 or later, signed the arbitration agreement acknowledgement form, and did not opt out of the arbitration agreement within 30 days.

#### 5. What if I am not sure whether I am included in the Settlement?

If you are not sure whether you are in the Settlement Class, or have any other questions about the Settlement, visit the settlement website at <a href="https://www.MagallonSettlement.com">www.MagallonSettlement.com</a> or call the toll-free number, (833) 215-9289. You may also send questions to the Settlement Administrator at Magallon v. Robert Half International, c/o Settlement Administrator, P.O. Box 16, West Point, PA 19486.

### THE SETTLEMENT BENEFITS

### 6. What does the Settlement provide?

If the Court approves the Settlement and it becomes final, RHI will pay \$955.95 to each Settlement Class Member, \$30,000 to cover the costs of class notice and administration, \$15,000 to Plaintiff Bonnie Magallon as a service award and individual settlement, and attorneys' fees, costs, and litigation expenses as awarded by the Court.

## 7. How much will my payment be?

Each Settlement Class Member will receive a check for \$955.95.

#### 8. When will I receive my payment?

Settlement Class Members do not need to do anything to receive the cash awards under the Settlement. If the Court approves the Settlement and it becomes final, then a check will automatically be sent by mail to the address you maintained with RHI. Please go to <a href="https://www.MagallonSettlement.com">www.MagallonSettlement.com</a> to confirm your mailing address for delivery of your check.

Payments will be sent only after the Court grants final approval to the Settlement and after any appeals are resolved (*see* "The Final Approval Hearing" below). If there are appeals, resolving them can take time. Please be patient.

#### 9. What am I giving up if I participate in the Settlement?

If the Settlement receives Final Approval from the Court, every Settlement Class Member, each on behalf of himself, herself, or itself, and on behalf of his, her, or its respective heirs, executors, assigns, beneficiaries, predecessors, and successors, and any person or entity claiming under them (collectively, "Releasing Parties"), shall automatically be deemed to have fully and irrevocably released and forever discharged RHI and its parents, direct and indirect subsidiaries, agents, insurers, and any company or companies under common control with any of them, and each of their respective predecessors, successors and assigns, past and present officers, directors, managers, employees, agents, servants, accountants, attorneys, advisors, shareholders, members, insurers, representatives, partners, vendors, issuers, or anyone acting on their behalf, but not any consumer reporting agency or third party that provided background information about any Class Member to RHI (collectively, "Releasees"), of any and all legal or equitable claims that were or could have been asserted in the Action relating in any way to RHI's alleged failure to comply with FCRA section 1681b(b)(3) ("Released Claims"). Section XV of the Settlement Agreement describes the legal claims that you give up if you remain in the Settlement. The Settlement Agreement is available at <a href="https://www.MagallonSettlement.com">www.MagallonSettlement.com</a>.

#### EXCLUDING YOURSELF FROM THE SETTLEMENT

If you don't want benefits from the Settlement, and you want to keep the right to sue RHI on your own about the claims in this case or any other Released Claims, then you must take steps to opt out of the Settlement. This is called excluding yourself—or it is sometimes referred to as "opting out" of the Settlement.

#### 10. How do I exclude myself from the Settlement?

To exclude yourself from the Settlement, you must submit a statement with the following information:

- The name of this Action (Magallon v. Robert Half International, Inc., Case No. 6:13-cv-01478-SI (D. Or.));
- Your full name, address, e-mail address, and telephone number;
- The identity of the counsel representing you in this Action, if any;
- A statement that you want to be excluded from the Settlement in this Action;
- Your signature and date of execution.

You must submit your exclusion request no later than **April 9, 2025** to Magallon v. Robert Half International, c/o Settlement Administrator, P.O. Box 16, West Point, PA 19486.

#### 11. If I do not exclude myself, can I sue RHI for the same thing later?

No. If you do not exclude yourself, you will give up the right to sue RHI for the claims that the Settlement resolves. You must exclude yourself from the Settlement Class if you want to pursue your own lawsuit.

#### 12. If I exclude myself, can I still get a payment?

No. You will not receive a payment if you exclude yourself from the Settlement.

#### THE LAWYERS REPRESENTING THE ENTIRE SETTLEMENT CLASS

# 13. Do I have a lawyer in the case?

The Court has appointed counsel to represent you and others in the Settlement Class as "Class Counsel":

John SoumilasRobert S. SolaJames A. FrancisRobert S. Sola, P.C.Lauren KW Brennan1500 SW First Avenue

FRANCIS MAILMAN SOUMILAS, P.C. Suite 800

1600 Market Street, Suite 2510 Portland, OR 97201

Philadelphia, PA 19103

Class Counsel will represent you and others in the Settlement Class. You will not be charged for these counsel. If you want to be represented by your own lawyer, you may hire one at your own expense.

## 14. How will the lawyers be paid?

The Parties have agreed that RHI will pay Class Counsel attorneys' fees, costs and expenses approved by the Court pursuant to the FCRA. Class Counsel will ask the Court to approve an award of attorneys' fees, costs, and litigation expenses. Class Counsel will file their motion seeking attorneys' fees and expenses by January 24, 2025. That motion will be available at <a href="https://www.MagallonSettlement.com">www.MagallonSettlement.com</a> by January 25, 2025. The Court will review Class Counsel's request and determine the amount of fees and expenses to award.

#### **OBJECTING TO THE SETTLEMENT**

You can tell the Court that you do not agree with the Settlement or some part of it.

#### 15. How do I tell the Court if I do not like the Settlement?

If you are a member of the Settlement Class, you can object to any part of the Settlement, the Settlement as a whole, and/or Class Counsel's request for attorneys' fees and expenses. To object, you must either submit your objection on the case docket using the CM/ECF electronic filing system, or submit a letter to the Court at the following address:

Clerk of Court
U.S. DISTRICT COURT FOR THE DISTRICT OF OREGON
Mark O. Hatfield United States Courthouse
1000 Southwest Third Avenue
Portland, Oregon 97204-2944

Your objection must be submitted on or before April 9, 2025, and must include:

- The name of this Action Magallon v. Robert Half International, Inc., Case No. 6:13-cv-01478-SI (D. Or.);
- Your full name, address, e-mail address, and telephone number;
- All grounds for the objection, accompanied by any legal support for the objection known to you or your counsel;
- The identity of all counsel who represent you in this matter, including any former or current counsel who may be entitled
  to compensation for any reason related to the objection to the Settlement or fee application;
- The number of times you have objected to a class action settlement in the past five (5) years, including the caption of each case in which you made such objection;
- If applicable, the number of times your counsel or your counsel's law firm have objected to a class action settlement in the past five (5) years, including the caption of each case in which you made such objection;
- Whether you intend to appear and/or testify, or counsel representing you intends to appear, at the hearing that the Court
  has scheduled to determine whether to grant final approval of the Settlement and Class Counsel's request for attorneys'
  fees (the "Final Approval Hearing");
- The identity of all counsel representing you who will appear at the Final Approval Hearing;
- A list of all persons who you or your counsel will call to testify at the Final Approval Hearing in support of the objection; and
- Your signature (an attorney's signature is not sufficient).

## THE FINAL APPROVAL HEARING

The Court will hold a Final Approval Hearing to decide whether to approve the Settlement and whether to approve Class Counsel's request for attorneys' fees and expenses. You may attend and you may ask to speak, but you don't have to do so.

# 16. When and where will the Court decide whether to approve the Settlement?

The Court has scheduled a Final Approval Hearing on May 7, 2025 at 1:30 p.m. at the Mark O. Hatfield United States Courthouse, 1000 Southwest Third Avenue, Portland, Oregon 97204-2944. The hearing may be virtual or moved to a different date or time without additional notice, so it is a good idea to check <a href="www.MagallonSettlement.com">www.MagallonSettlement.com</a> for updates. At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. The Court will also consider any requests by Class Counsel for attorneys' fees and expenses. If there are objections, the Court will consider them at the hearing. After the hearing, the Court will decide whether to approve the Settlement, the request for attorneys' fees and expenses. We do not know how long these decisions will take.

### 17. Do I have to attend the hearing?

No. Class Counsel will answer any questions the Court may have. But you may attend the hearing at your own expense. If you send an objection, you don't have to come to Court to talk about it. As long as you submit your written objection on time and it complies with the requirements set forth in Question 15 above and in Section X of the Settlement Agreement, the Court will consider it. You may also pay your own lawyer to attend, but it is not necessary.

## 18. May I speak at the hearing?

You may ask the Court for permission to speak at the Final Approval Hearing. To do so, you must submit an objection that complies with the requirements set forth in Question 15 above and send a letter saying that you intend to appear and wish to be heard. Your notice of intention to appear must include the following:

- Your full name, address, and telephone number;
- A statement that this is your "Notice of Intention to Appear" at the Final Approval Hearing for Settlement in *Magallon v. Robert Half International, Inc.*, Case No. 6:13-cv-01478-SI (D. Or.);
- The reasons you wish to be heard;
- Copies of any papers, exhibits, or other evidence or information that is to be presented to the Court at the Final Approval Hearing; and
- Your signature (an attorney's signature is not sufficient).

You must submit your Notice of Intention to Appear so that it is received no later than April 9, 2025, to the address in Question 15 above.

#### IF YOU DO NOTHING

# 19. What happens if I do nothing at all?

If you do nothing, you will receive the benefits to which you are entitled under this Settlement.

### **GETTING MORE INFORMATION**

#### 20. How do I get more information?

This notice summarizes the proposed Settlement. More details are in the Settlement Agreement. You can obtain the complete Settlement Agreement at <a href="www.MagallonSettlement.com">www.MagallonSettlement.com</a>. You also may write with questions to the Settlement Administrator at Magallon v. Robert Half International, c/o Settlement Administrator, P.O. Box 16, West Point, PA 19486, or call the toll-free number, (833) 215-9289. Please do not contact RHI or the Court for information.