

**LEGAL NOTICE AUTHORIZED AND DIRECTED
BY THE COURT OF COMMON PLEAS FOR CENTRE COUNTY, PA**

TO: ALL CURRENT AND FORMER HOURLY EMPLOYEES OF GLENN O. HAWBAKER, INC. (“GOH”) IN THE COMMONWEALTH OF PENNSYLVANIA DURING THE PERIOD SEPTEMBER 1, 2015 THROUGH DECEMBER 31, 2018.

NOTICE OF PENDENCY OF CLASS ACTION

**PLEASE READ THIS NOTICE CAREFULLY,
IT MAY AFFECT YOUR LEGAL RIGHTS**

This is a notification that you may be a member of a plaintiff class (the “Class”) in a certified class action case against Glenn O. Hawbaker, Inc. (“GOH” or “Defendant”) pending in the Centre County Court of Common Pleas (the “Law-suit”). The title of the case is: *James C. King v. Glenn O. Hawbaker, Inc.*, No. 2021-0957.

1. What the Lawsuit is About

Plaintiff, James C. King, on behalf of himself and all others similarly situated, alleges that GOH engaged in a common pattern, scheme, practice or course of conduct to breach its contracts with Plaintiff and the Class members to pay the prevailing wage as promised in the form of actual wages and fringe benefits on all prevailing-wage projects during the period from September 1, 2015 through December 31, 2018, inclusive (the “Class Period”). Plaintiff further alleges that the common pattern, scheme, practice or course of conduct by GOH during the Class Period violated the Pennsylvania Wage Payment and Collection Law, entitling Plaintiff and Class Members to prejudgment interest and liquidated damages for all wage and fringe benefit shortages during the Class Period and continuing through December 1, 2021. Plaintiff seeks monetary damages on behalf of himself and the Class based on these claims. GOH has denied and continues to deny the allegations made by Plaintiff on behalf of the Class, and has asserted defenses. No final ruling has been made on these claims. The Court has not yet scheduled a trial date.

2. Your Rights as a Class Member

The Class consists of:

All current and former hourly wage employees who worked on prevailing wage contracts at Glenn O. Hawbaker, Inc. in the Commonwealth of Pennsylvania during the period September 1, 2015 through December 31, 2018.

The certified Class Representative is the Plaintiff, James C. King.

Certified Lead Class Counsel:

Michael D. Donovan
Donovan Litigation Group, LLC
1885 Swedesford Road
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(610) 647-6067
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Additional Class Counsel:

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State College, PA 16801
(814) 867-3115

Additional Class Counsel:

Eric Lechtzin
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411 S. State Street
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These attorneys will represent you as part of the class unless you choose to hire your own attorney. You have the right to hire your own attorney.

If you wish to remain in the Class, **YOU DO NOT NEED TO TAKE ANY ACTION**. If you remain in the Class you will be bound by any decision, favorable or unfavorable, in this case.

If you do not wish to remain in the Class, then you must make your request in writing. If you exclude yourself from the Class, you will not participate in any settlement or favorable judgment in the Lawsuit but you also will not be bound by any unfavorable judgment.

Your request to be excluded from the Class must be in writing and must provide your name and address and a statement that you wish to be excluded from the Class in *King v. Glenn O. Hawbaker, Inc.* This statement must be sent by first-class mail, postmarked no later than February 25, 2024 addressed to: Notice Administrator, *King v. Glenn O. Hawbaker, Inc.*, P. O. Box 16, West Point, PA 19486. If you request exclusion on behalf of anyone other than yourself you must describe your legal authority to make this request.

3. Further Court Proceedings

The Court will proceed to decide the merits of Plaintiff’s claims as asserted in the Lawsuit. Either party could prevail on the merits.

4. How To Get More Information

Additional information about the Lawsuit is available at www.GOHwageandhourclassaction.com. Any questions you may have concerning the matters contained in this Notice should be directed to Class Counsel. **DO NOT CALL THE COURT OR THE DEFENDANT.**

This Notice does not fully describe all of the claims and defenses of the parties. The pleadings and other records in this litigation may be viewed at the website above or examined during regular office hours at the Office of the Prothonotary, Centre County Court of Common Pleas, 102 South Allegheny Street, Bellefonte, PA 16823.

5. Can You Participate in this Class Action if You Already Received a Restitution Check from the Office of the Attorney General’s Action?

Yes. Even if you previously received a restitution check from the action by the Pennsylvania Office of the Attorney General against Glenn O. Hawbaker, Inc. in or around December 2021, you may still participate in this Class Action and may be entitled to additional compensation.

BY THE COURT:

Hon. Jonathan D. Grine, President Judge
Centre County Court of Common Pleas

Date: January 11, 2024