

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

LYNNE COATES, on behalf of herself and
all others similarly situated and aggrieved,

Plaintiff,
vs.

FARMERS GROUP, INC., FARMERS
INSURANCE EXCHANGE, and FARMERS
INSURANCE COMPANY, INC.,

Defendants.

CASE NO. 5:15-CV-01913-LHK

**IMPORTANT NOTICE OF GENDER
DISCRIMINATION LAWSUIT;
NOTICE OF CONDITIONAL
CERTIFICATION OF NATIONWIDE
EQUAL PAY ACT
COLLECTIVE ACTION**

TO: All women employed by Farmers Group, Inc., Farmers Insurance Exchange, or Farmers Insurance Company, Inc. (“Farmers”) in Claims Litigation at any time since June 8, 2012, in one or more of the following positions: attorney, workers compensation attorney, associate trial attorney, trial attorney, senior trial attorney, senior workers compensation attorney, specialty trial attorney, supervising attorney, supervising workers compensation attorney, HEAT attorney, or managing attorney (“Class Definition”). The Class excludes individuals working in Farmers Legal Business Administration (formerly known as “Claims Legal Services Management”).

The Court has ordered that this Notice be sent to you to explain what the lawsuit is about so that you can decide whether to opt in (join the lawsuit). The Court has not decided on the merits of the case.

I. INTRODUCTION

You have received this Notice because Farmers’ records indicate that you may be eligible to join a collective action lawsuit involving 29 U.S.C. § 201 *et seq.* (“Equal Pay Act”), entitled *Coates v. Farmers Group, Inc., et al.*, No. C 15-001913 LHK (the “Lawsuit”). The Lawsuit is pending in the U.S. District Court for the Northern District of California.

II. DESCRIPTION OF LAWSUIT

On April 29, 2015, a lawsuit was filed against Farmers. The Lawsuit alleges, in part, that Farmers paid female Claims Litigation attorneys less than comparable male attorneys in violation of the Equal Pay Act. Farmers contests all claims that have been asserted and denies any wrongdoing or liability.

On December 9, 2015, the Court conditionally certified the Equal Pay Act claims to proceed as a “collective action” on behalf of women fitting the description above. This Notice has been issued in order to determine the identity of those persons who wish to be involved in the Lawsuit.

III. YOUR RIGHT TO PARTICIPATE AND THE DEADLINE TO DO SO

If you fit the Class Definition, you may assert an Equal Pay Act claim by completing and returning the enclosed “Consent to Join” form via email, facsimile, or mail to the below address no later than March 28, 2016:

Lori E. Andrus, Esq.
Andrus Anderson LLP
155 Montgomery Street, Suite 900
San Francisco, CA 94104
Tel.: (415) 986-1400
Fax: (415) 986-1474
lori@andrusanderson.com

**TO PARTICIPATE IN THE LAWSUIT AND ASSERT A CLAIM
UNDER THE EQUAL PAY ACT, YOU MUST SIGN, DATE AND
MAIL, FAX, OR E-MAIL THE ENCLOSED “CONSENT TO
JOIN” FORM NO LATER THAN MARCH 28, 2016.**

You may obtain additional copies of the consent to join form by visiting Plaintiffs’ Counsel’s website at <http://andrusanderson.com/?p=2337>.

IV. NO RETALIATION IS PERMITTED

Federal law prohibits Farmers from discriminating or retaliating against you for joining this Lawsuit.

V. EFFECT OF JOINING THIS LAWSUIT

If you choose to opt-in by returning the Consent to Join form, you will be asserting a claim for unequal pay under the EPA against Farmers. If you opt-in, you will be bound by the judgment or settlement, whether it is favorable or unfavorable, and, if Plaintiffs succeed on their claims, you may receive backpay along with associated damages owed to you by Farmers. Further, if you opt-in, you designate the collective action representatives as your agents to make binding decisions on your behalf concerning the Lawsuit. If you consent to join this Lawsuit, you may be required to provide information. If you do not wish to join this Lawsuit, simply take no action.

VI. PLAINTIFFS' COUNSEL

If you choose to opt-in and agree to be represented by the named Plaintiff(s), your counsel in this case will be:

Lori E. Andrus, Esq. Andrus Anderson LLP 155 Montgomery Street, Suite 900 San Francisco, CA 94104 Tel.: (415) 986-1400 Fax: (415) 986-1474 lori@andrusanderson.com	Lori J. Costanzo, Esq. COSTANZO LAW FIRM 111 North Market Street, #910 San Jose, CA 95113 Tel.: (408) 993-8493 Fax: (408) 993-8496 lori@costanzo-law.com
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Plaintiffs' Counsel will not charge you directly for their work in this case. If the Plaintiffs recover money, Plaintiffs' Counsel will be paid whatever attorneys' fees the Court orders. Those fees may be subtracted from the recovery obtained from Farmers, or they may be paid separately by Farmers, or they may be a combination of the two. If Plaintiffs recover no money from Farmers, Plaintiffs' Counsel will not be paid for their work on this case.

Alternatively, you may join this Lawsuit and retain counsel of your own choosing and at your own expense. If you wish to retain your own counsel, your attorney must file your Consent to Join form with the Court no later than March 28, 2016 and enter an appearance.

VII. IF YOU CHOOSE NOT TO JOIN THIS LAWSUIT

If you do not wish to join the collective action, you will not be affected by the judgment rendered (whether favorable or unfavorable) or settlement reached in this case. Further, you will be free to file your own lawsuit in any federal district court where such a lawsuit may properly be brought.

VIII. NO OPINION EXPRESSED AS TO MERITS OF LAWSUIT

This notice is for the sole purpose of providing you with information concerning your right to join this Lawsuit. Although this notice and its contents have been authorized by the Court, the Court takes no position regarding the merits of the claims in the Lawsuit.

Please do not contact the Court or the Court clerk with questions about this Lawsuit.