UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION
CASE NO: 24-cv-80787-Matthewman
THIS IS A CONSENT CASE

MIA WILLIAMS, BRITTANY CALVERT and ALISA LEGGETT, on their own behalf and on behalf of those similarly situated,

Plaintiffs,

v.

RETREAT BEHAVIORAL HEALTH, LLC, a Florida Limited Liability Corporation, NR FLORIDA ASSOCIATES, LLC, a Florida Limited Liability Corporation, NR PENNSYLVANIA ASSOCIATES, LLC, a Pennsylvania Limited Liability Corporation, JAMES YOUNG, in his capacity as Receiver of NR Pennsylvania Associates, LLC, NR CONNECTICUT, LLC, a Connecticut Limited Liability Corporation, DRPS MANAGEMENT, LLC, a Florida Limited Liability Corporation, COAL LAKE WORTH, LLC, a Florida Limited Liability Company, COAL CAPITAL HOLDINGS (FLORIDA), LLC, a Florida Limited Liability Corporation, COAL CONNECTICUT, LLC, a Connecticut Limited Liability Corporation COAL NEW HAVEN LLC, a Connecticut Limited Liability Corporation, COAL CAPITAL EPHRATA, LLC, a Pennsylvania Limited Liability Corporation, COAL CAPITAL GROUP, LLC, a New York Limited Liability Corporation, CLW HOLDINGS, LLC, a Florida Limited Liability Company, HFGC FLORIDA, LLC, a Florida Limited Liability Company, CHRISSY GARIANO, ALEXANDER HOINSKY, DAVID SILBERSTEIN, ESTATE OF PETER SCHORR, and ESTATE OF SCOTT KOROGODSKY,

Defendants.

NOTICE TO CLASS OF (I) PROPOSED SETTLEMENT OF CLASS ACTION CONCERNING WARN ACT CLAIMS; (II) DATE OF COURT HEARING FOR FINAL APPROVAL OF PROPOSED WARN ACT SETTLEMENT; AND (III) RIGHT TO OBJECT TO THE SETTLEMENT AND TO APPEAR AT COURT HEARING

PLEASE READ THIS NOTICE CAREFULLY.
YOU HAVE RIGHTS RELATING TO A PENDING LAWSUIT.
YOU MAY BENEFIT FROM READING THIS NOTICE.
THIS IS NOT A LAWSUIT AGAINST YOU.

TO: All persons who were laid off from employment at one of the Retreat Behavioral Health facilities in Pennsylvania as a result of the closing of the facilities on or about June 26, 2024 and/or performed work between June 3, 2024 until the Retreat Behavioral Health facilities' closing on or about June 26, 2024, but who were not paid all wages for work performed in violation of Pennsylvania law.

INTRODUCTION

There is currently pending in the United States District Court for the Southern District of Florida (the "District Court") the above-captioned proceeding (the "Class and Collective Action") brought under the Worker Adjustment and Retraining Notification (the "WARN Act"), the Fair Labor Standards Act ("the FLSA"), and Pennsylvania state wage laws. A class and collective action has been certified by the District Court.

Plaintiffs Mia Williams, Britany Calvert and Alisa Leggett (the "Plaintiffs") have reached a settlement agreement with two of the Defendants: the Estate of Peter Schorr (the "Schorr Estate") and Coal New Haven, LLC ("Coal New Haven").

This Notice constitutes notice to the Class of (a) the proposed Settlement with the Schorr Estate and Coal New Haven; (b) a description of the proposed Settlement; (c) the date of the District Court hearing for final approval of the Settlement; and (d) the right of each member of the Class to object to the Settlement, and to appear at the hearing at which the District Court will consider the final approval of the Settlement.

THE TERMS OF THE SETTLEMENT AGREEMENT

The Schorr Estate, which is currently being administered in a separate probate proceeding (the "Probate Court"), has agreed to request that the Probate Court enter a Consent Judgment in the total amount of Nine Hundred Twenty-Five Thousand Dollars ($925,000.00) to resolve the FLSA and unpaid wages claim brought against the Estate. This amount will have to be approved by the Probate Court and any actual monetary relief will be based on the amount of assets available to be distributed at the conclusion of the probate administration. It is likely that there will be less than the full amount of the Consent Judgment available. The settlement between the Plaintiffs and the Schorr Estate will become effective only after approval by the District Court and the Probate Court. The settlement will allow a consent judgment to be entered, and such consent judgment will be subject to being placed in line with other creditors of equal priority in the Schorr Estate, and is specifically subject to sections 733.705 and 733.707, Fla. Stat. There is no guarantee that the Schorr Estate will have sufficient assets to satisfy all or any portion of the consent judgment, and the Schorr Estate has made no representations, warranties or affirmations that there will be sufficient assets in the Estate of Peter Schorr to satisfy all or part of the Consent Judgment.

Coal New Haven has filed for bankruptcy in the Eastern District of New York (the "Bankruptcy Court). Accordingly, the above-captioned litigation has been stayed as to Coal New Haven. As part of the bankruptcy proceedings, Coal New Haven has agreed to allow a settlement claim of $100,000.00 to resolve the WARN Act, FLSA, and unpaid wages claims brought against Coal New Haven. The settlement between the Plaintiffs and Coal New Haven will become effective only after approval by the District Court and the Bankruptcy Court.

Any distributions from the Probate Court and Bankruptcy Court will be made to a qualified settlement fund to be established by Class Counsel in conformity with Internal Revenue Code §468B (the "<u>Qualified Settlement Fund</u>"). Class Members will receive a pro rata portion of the combined payments made to the Qualified Settlement Fund based on each individual's total damages as calculated using the payroll records from 2024. The fees and costs of the settlement administration shall be paid from the combined total of the payments to the Qualified Settlement Fund. Class Counsel is entitled to attorneys' fees in the amount of one third of the combined total of the Qualified Settlement Fund and Court approved expenses incurred in ligitating this matter and administering the Qualified Settlement Fund.

CLASS COUNSEL'S RECOMMENDATION AND YOUR PROJECTED RECOVERY

Class Counsel recommends the Settlement, believing that it is fair, reasonable and adequate to the Class. The Schorr Estate and the Coal New Haven bankruptcy have limited assets available for distribution and Class Counsel believes this is the best opportunity to recover from these two Defendants.

The amount of your portion of the combined total will depend on the amount ultimately available to be paid from the Qualified Settlement Fund. Your share of the fund will also depend upon what your compensation was during the period immediately prior to your termination. Once payments are made to the Qualified Settlement Fund, you will receive a pro rata portion of your total damages as calculated using the payroll records from 2024. Class Counsel expects to make an interim payment when the Coal New Haven settlement funds followed by a later payment when and if the Schorr Estate settlement funds are available.

RELEASE OF CLAIMS AND EFFECT OF APPROVAL OF SETTLEMENT AGREEMENT

Upon approval by the District Court and Probate Court, Plaintiffs, Class, and Collective Members individually and on their own behalf and on behalf of each of their respective descendants, dependents, heirs, executors, administrators, assigns and successors, covenants not to sue, and releases, absolves and discharge the Estate of Peter Schorr, the Personal Representative of the Estate of Peter Schorr, all beneficiaries of the Estate of Peter Schorr from any and all claims, demands, liens, agreements, contracts, covenants, actions, suits, causes of action, obligations, debts, expenses, attorneys' fees, costs, damages, judgments, orders and liabilities that were or could have been raised arising out of their employment and relating to wages or other compensation.

Upon approval by the District Court and the Bankruptcy Court, Plaintiffs, Class, and Collective Members individually and on their own behalf and on behalf of each of their respective descendants, dependents, heirs, executors, administrators, assigns and successors, covenants not to sue, and releases, absolves and discharge Coal New Haven, LLC from any and all claims, demands, liens, agreements, contracts, covenants, actions, suits, causes of action, obligations, debts, expenses, attorneys' fees, costs, damages, judgments, orders and liabilities that were or could have been raised arising out of their employment and relating to wages, other compensation, or the failure to provide notice of termination.

HOW TO OBJECT OR OPT-OUT

If you are satisfied with the proposed Settlement, you need to do nothing and you will receive your pro rata share of any distributions made from the Qualified Settlement Fund.

If, on the other hand, you believe that the proposed Settlement is unfair or inadequate or believe that Class Counsel's Fees or Class Counsel's Expenses should not be approved, you may object by mailing, via certified mail return receipt requested, a written statement bearing the caption of this action (shown on the first page of this Notice) with the basis for your objection, to the Clerk of the United States District Court for the Southern District of Florida, 701 Clematis Street, West Palm Beach, Florida 33401and also by certified mail return receipt requested, to: Ryan Barack, Kwall Barack Nadeau PLLC, 304 S. Belcher Rd., Clearwater, FL 33765. Objections must be mailed so as to be received no later than **June 15, 2026**, and must include your name, address, and telephone number, together with a statement of whether you wish to be heard personally or by counsel at the final hearing.

You may also appear in person or by counsel at the final hearing described below.

FINAL HEARING TO APPROVE SETTLEMENT AND ATTORNEYS' FEES AND COSTS

The hearing for final consideration and approval of the Settlements, including Class Counsel's Fees and Class Counsel's Expenses, is scheduled to take place on **July 7, 2026** at **1:30pm** (Eastern), before the Honorable Judge Matthewman, Paul G. Rogers Federal Building and U.S. Courthouse, 701 Clematis Street Room 331, West Palm Beach, Florida 33401.

EFFECT ON OTHER DEFENDANTS

This settlement would only resolve the claims between the Class and the Estate of Peter Schorr and Coal New Haven, LLC. It has no effect on the litigation as to any other Defendants.

However, there is additional information to share with you regarding the other Defendants.

The Court granted a voluntary dismissal of Defendants Alexander Hoinsky, James Young, and Christy Gariano. Alexander Hoinsky passed away during the pendency of this litigation. James Young only acted as a receiver following the actions in this lawsuit. Christy Gariano submitted financial records showing she did not have significant assets and would not be able to satisfy a judgment. Class Counsel and Class Representatives moved to dismiss these defendants after careful review of all information.

At a jury trial held in February 2026, the jury found in favor of Defendants CLW Holdings, LLC; Coal Capital Holdings (Florida), LLC; Coal Connecticut, LLC; Coal Capital Ephrata, LLC; Coal Capital Group, LLC; Coal Lake Worth, LLC; HFGC Florida, LLC; and David Silberstein. The Court then entered a judgment in favor of those Defendants and against the Class.

The claims against the other Defendants will continue to be litigated. The Court has granted a default judgment against the remaining Defendants: NR Florida Associates, LLC, NR

Pennsylvania Associates, LLC, NR Connecticut Associates, LLC, Retreat Behavioral Health, LLC, and DRPS Management, LLC.

OTHER INFORMATION

Any questions from members of the Class concerning this Notice or the WARN Action should be directed to Ryan Barack at the address shown above. More information, including a copy of the Settlement Agreement and the moving papers filed with the District Court in support of the Settlement Agreement can be found at https://www.employeerights.com/current-class-actions/retreat-behavioral-health/.

While the District Court has approved the sending of this Notice, it has not taken any position as to the respective claims or defenses asserted by the parties.

PLEASE DO NOT WRITE TO OR CALL THE COURT CONCERNING THIS MATTER