

If you are a California resident who paid money to join Explore Talent, a class action may affect your rights.

A court authorized this Notice. This is not a solicitation from a lawyer.

- You could receive 3 free months of premium PRO Talent membership (\$150 value) in Explore Talent.
- The settlement resolves a lawsuit over whether Explore Talent operated legally in the State of California between January 2010 and April 1, 2013.
- Court appointed lawyers will ask the Court to award \$205,000 in incentive award to the Plaintiffs and for their legal fees and court costs.
- The two sides disagree whether Explore Talent operated legally and, if it did not, how much money it would have to pay to California members.
- Your legal rights will be affected whether you act or not Read this Notice carefully. You have a choice to make now:

YOUR LEGAL RIGHTS AND OPTIONS	
Do Nothing	You will: <ul style="list-style-type: none">• Stay in the lawsuit• Receive the 3 months' free membership• Give up certain rights
Exclude Yourself	You will: <ul style="list-style-type: none">• Get out of this lawsuit• Obtain no money or benefits from it• Keep any rights to sue individually
Object to the Settlement	You will: <ul style="list-style-type: none">• Stay in the lawsuit.• Be allowed to file court papers and appear before the Judge explaining why you do not like the settlement

- Your rights and options are explained in this Notice. To exclude yourself or object you must act before **April 13, 2017**.
- The Court must still decide whether to approve this settlement. The free membership will commence if the Court approves the settlement and any appeals are resolved. Please be patient.
- Any questions? Read the rest of this Notice and visit www.lakeshorelaw.org/exploretalent.

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BASIC INFORMATION

1. WHY DID I GET THIS NOTICE?

The records of Explore Talent show that you paid for membership for one or more months between January 1, 2010 and April 1, 2013 and listed a California residential address.

The Court sent you this Notice because you have a right to know about a proposed settlement of a class action lawsuit, and about your options, before the Court decides whether to approve the settlement. If the Court approves it and after objections and appeals are resolved, you will receive certain compensation. You can receive updates about the progress of the settlement from the website listed at the bottom of this Notice.

This package explains the lawsuit, the settlement, your legal rights, what benefits are available, who is eligible for them, and how to get them.

The Court in charge of the case is the Superior Court of the County of Alameda, State of California, and the case is known as Winkler v. Media Entertainment Partners, Inc., Case No. RG13667619. The person who sued is the Plaintiff and the various companies and individuals being sued are the Defendants. The remaining Defendants are: Primesites, Inc., Media Entertainment Partners, Inc., David Davis, and Ami Shafir.

2. WHAT IS THIS LAWSUIT ABOUT?

The lawsuit contends that the various Defendants operated the Explore Talent website, which is a “talent listing service.” Since January 2010, California law requires a talent listing service to post a \$50,000 bond with the State, use certain contract language in membership agreements and maintain certain written records concerning the authenticity of job listings on its website. Explore Talent allegedly violated all of these requirements and should have to refund all of the membership fees paid by California members.

The Defendants deny they did anything wrong, but chose to settle for economic reasons.

3. WHAT IS A CLASS ACTION AND WHO IS INVOLVED?

In a class action lawsuit, one or more people called “Class Representatives” (in this case William Breveard and Abdul Dotson) sue on behalf of other people who have similar claims. The people together are a “Class” or “Class Members.” One court resolves the issues for all Class Members, except those who exclude themselves. Alameda County Superior Court Judge Winifred Y. Smith is in charge of this case.

4. WHY IS THIS LAWSUIT A CLASS ACTION?

The Court did not decide in favor of Plaintiffs or Defendants. Instead, both sides agreed

to a settlement. That way, they avoid the cost of a trial, and the people affected will get compensation. The Class Representative and the attorneys think the settlement is best for everyone who may have been harmed.

WHO IS IN THE SETTLEMENT

5. AM I PART OF THIS CLASS?

Judge Smith decided that every California resident who purchased membership with Explore Talent between January 1, 2010 and April 1, 2013 is a Class Member.

6. DO I NEED PROOF IN ORDER TO GET COMPENSATION?

This is not required to be a member of the Class as Defendants' records contain that information. However, if you believe you should be a Class Member, but have not received this Notice, you should contact Class Counsel at the address listed in paragraph 17 below and present proof that you are a Class Member. Remember, this lawsuit only applies to paid members during the specified time frame who listed a California address when they paid money to Explore Talent.

THE SETTLEMENT BENEFITS

7. WHAT DOES THE SETTLEMENT PROVIDE?

The settlement provides two forms of relief to Class Members.

First, the Court will issue an "injunction," a type of court order that requires with respect to California members that Explore Talent comply with all of the regulations of California law. Explore Talent will have to post a bond, use the required contract forms, and maintain the required records.

Secondly, each Class Member will receive THREE free months of PRO Talent membership. The normal cost of his premium service is \$49.95 per month or about \$150 in total.

8. HOW DO I GET MY FREE PRO TALENT MEMBERSHIP?

This will be provided to you automatically if you are a current Explore Talent member about 60 days after the Fairness Hearing (see below) if the settlement is approved. If you are not a current member, you will be notified by email at that time with instructions how to activate the free PRO Talent membership. You will not be required to give your credit card information and there is no deadline on when you activate the membership. It will expire automatically 90 days after it is activated.

9. WHAT AM I GIVING UP TO ACCEPT THE SETTLEMENT?

Unless you exclude yourself, you are staying in the Class and that means you cannot start a lawsuit, continue a lawsuit or join a lawsuit raising similar claims against Defendants. It also means you are “releasing” all of the Defendants (and related companies and persons) from any legal claims you might have relating to your Explore Talent membership. This includes but is not limited to claims that the Explore Talent service was illegal, that you did not get good value for your membership fee, or that you were not happy with the service.

This release does not include any claims based on membership before January 2010 or after April 1, 2013. It also does not include any claims that you suffered personal injury or bodily injury from your membership.

10. WHAT IF I DO NOTHING AT ALL?

You will be automatically included in this settlement. You will be barred from participating in a similar lawsuit for the same thing, and will release your claims as described above, even if you never use your 3 months free PRO Talent membership.

EXCLUDING YOURSELF FROM THE SETTLEMENT

11. HOW DO I EXCLUDE MYSELF FROM THE SETTLEMENT?

If you don’t want the compensation from this settlement, but you want keep the right to sue or continue to sue Explore Talent on your own, about the legal issues in this case, then you must take steps to get out. This is called excluding yourself—or is sometimes referred to as opting out of the settlement Class. If you exclude yourself, you will not be legally bound by the Court’s judgments in this class action, nor will you receive any compensation.

To ask to be excluded, you must send an “Exclusion Request” in the form of a letter sent by mail, stating that you want to be excluded from the Winkler v. Explore Talent class action. You must include your name and address, telephone number, state you wish to exclude yourself from the Explore Talent settlement, and sign the letter. You must mail your Exclusion Request to Dumas & Kim, Mr. James Dumas, Esq., 3435 Wilshire Blvd., Suite 990, Los Angeles, CA 90010. You may also get an Exclusion Request form at the website, <http://www.lakeshorelaw.org/exploretalent>.

The Exclusion Request must be **postmarked by April 13, 2017** or it will not be valid and you will be included in the settlement.

12. IF I DO NOT EXCLUDE MYSELF, CAN I STILL SUE EXPLORE TALENT LATER FOR THE SAME THINGS?

No. But you would be able to sue for things that happened before January 1, 2010 or after April 1, 2013.

13. IF I EXCLUDE MYSELF, CAN I STILL GET THE FREE PRO TALENT MEMBERSHIP?

No.

THE LAWYERS REPRESENTING YOU

14. DO I HAVE A LAWYER IN THIS CASE?

Yes. The Court decided that the law firms of Lakeshore Law Center and The Spencer Law Firm are qualified to represent you and all Class Members. Together, the law firms are called “Class Counsel.” They are experienced in handling similar consumer rights cases. More information about these law firms, their practices and their experiences is available at www.lakeshorelaw.org and www.spencerlaw.net.

15. SHOULD I GET MY OWN LAWYER?

You do not need to hire your own lawyer because Class Counsel is working on your behalf. But, if you want your own lawyer, you will have to pay that lawyer.

16. HOW WILL THE LAWYERS BE PAID?

Class Counsel will ask the Court for attorneys’ fees and expenses up to \$205,000 out of which no more than \$2,000 could be paid to Class Representatives Breveard and Dotson. The Court may award less than these amounts. This payment will not come out of the compensation to be paid to Class Members. Explore Talent has agreed not to oppose these fees and expenses, or incentive award.

OBJECTING TO THE SETTLEMENT

17. HOW DO I TELL THE COURT I DO NOT LIKE THE SETTLEMENT?

If you’re a Class Member, you can object to the settlement if you don’t like any part of it. You can give reasons why you think the Court should not approve it. The Court will consider your views. However, if the Court rejects your objection, you will still be bound by the terms of the Settlement.

To object, you must either appear at the Fairness Hearing (see paragraph 19) or submit an objection in writing by **April 13, 2017**. To submit the objection in writing, you must personally file it with or submit it by United States Mail to the Alameda County Superior

SUPERIOR COURT FOR THE COUNTY OF ALAMEDA

Court, 1225 Fallon Street, Oakland, California 94612.

You must also serve copies of the Objection by United States Mail on:

Plaintiffs' Attorneys and Class Counsel:
JEFFREY WILENS, ESQ.
LAKESHORE LAW CENTER
18340 Yorba Linda Blvd. Suite 107-610
Yorba Linda, CA 92886
Telephone: 714-854-7205
Facsimile: 714-854-7206
Email: jeff@lakeshorelaw.org

Defendants' Attorneys:
JAMES DUMAS
DUMAS & KIM
3435 Wilshire Blvd., Suite 990,
Los Angeles, CA 90010
Telephone: 213-368-5000
Facsimile: 213-368-5009
Email: jdumas@dumas-law.com

Any written objections shall state each specific reason in support of your objection and any legal support for each objection.

18. WHAT IS THE DIFFERENCE BETWEEN OBJECTING AND EXCLUDING MYSELF?

Objecting is simply telling the Court that you don't like something about the settlement. You can object only if you stay in the Class. Excluding yourself is telling the Court that you don't want to be part of the Class. If you exclude yourself, you have no basis to object because the case no longer affects you.

THE COURT'S FAIRNESS HEARING

19. WHEN AND WHERE WILL THE COURT DECIDE WHETHER TO APPROVE THE SETTLEMENT?

The Court will hold a Fairness Hearing at **April 21, 2017 at 11:00 a.m.** in Department 21 of the Alameda County Superior Court, 1221 Oak Street, Oakland, CA 94612. At this hearing the Court will consider whether the settlement is fair, reasonable, and adequate. If there are objections, the Court will consider them. Judge Smith will listen to people who have asked to speak at the hearing. The Court may also decide how much to pay Class Counsel. After the hearing, the Court will decide whether to approve the settlement. We do not know how long these decisions will take.

20. DO I HAVE TO COME TO THE FAIRNESS HEARING?

No. Class Counsel will answer questions Judge Smith may have. But, you are welcome to come at your own expense. If you submit an Objection, you don't have to come to Court to talk about it. As long as you filed or mailed your Written Objection on time, the Court will consider it. You may also pay your own lawyer to attend, but it's not necessary.

SUPERIOR COURT FOR THE COUNTY OF ALAMEDA

21. MAY I SPEAK AT THE HEARING?

If you appear at the Fairness Hearing, you may be permitted to address the Court. If you have excluded yourself, you will not be permitted to address the Court.

GETTING MORE INFORMATION

22. ARE MORE DETAILS AVAILABLE?

Visit the website www.lakeshorelaw.org/exploretalent where you will find the Court's Order Certifying the Class, the Complaint, as well as a sample Exclusion Request. You may also write to, email or call the Class Counsel Jeffrey Wilens at the contact information listed under item 17 of this Notice.

The pleadings and other records in this litigation may be examined online on the Alameda County Superior Court's website, known as "DomainWeb" at <https://publicrecords.alameda.courts.ca.gov/PRS/Home/Disclaimer> and use the case number RG13667619. Images of every document filed in the case may be viewed through the 'Register of Actions.'"

Your communications with the class counsel listed above regarding this action will be confidential.

DO NOT CONTACT THE JUDGE OR THE COURT OR DEFENDANTS' ATTORNEY TO DISCUSS THE LAWSUIT. You may contact Class Counsel.

BY ORDER OF THE COURT:

Dated: February 10, 2017

by Winifred Y. Smith
Judge of the Superior Court