

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

SARAH PATTON, ERICA KITTS, and)	
MARILEE HARRISON, individually and)	
on behalf of all similarly-situated persons,)	
)	
Plaintiffs,)	Civil Action No.: 3:15-cv-01013
)	
v.)	
)	
SERVICESTOURCE DELAWARE, INC.)	
d/b/a SERVICESTOURCE)	
INTERNATIONAL, INC.)	
)	
Defendant.)	

RULE 23 NOTICE

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE

A Federal Court authorized this notice. This is not a solicitation from a lawyer.

NOTICE OF CLASS ACTION SETTLEMENT AND SETTLEMENT HEARING

You are receiving this Notice because you were employed by ServiceSource International, Inc. (“ServiceSource”) as a Sales Account Representative, Senior Sales Representative, Strategic Representative, Renewal Sales Representative, Renewal Sales Specialist, Strategic Sales Specialist, Customer Success Associate, Customer Success Representative, Customer Success Specialist, Sales Associate, Sales Representative, or Channel Engagement Specialist in Nashville, Tennessee during the applicable statutes of limitations.

You are part of a group of employees (a “Class”) who has settled a lawsuit with ServiceSource. This lawsuit claims that ServiceSource failed to properly pay for all hours worked. The Parties have agreed to resolve this matter to avoid the disruption and expense of further litigation.

Based on the number of weeks you worked for ServiceSource between September 21, 2009 through October 17, 2018, we estimate your portion of the settlement, before payroll tax withholding, will be no less than «Rule_23_Payment».

A proposed Settlement has been reached in this Lawsuit that affects your rights. The purpose of this Notice is to inform you of the settlement terms and your rights and options in connection with the Settlement. If the Court approves the Settlement, all claims in this Lawsuit will be resolved.

YOUR LEGAL RIGHTS AND OPTIONS	
ACCEPT YOUR PORTION OF THE SETTLEMENT	If you wish to receive your portion of the settlement, you are not required to take any action. You will simply receive a settlement check following the hearing for final approval.
OPT-OUT OF OR OBJECT TO THE SETTLEMENT	Opt-out of the settlement and get no money from it or object to it. If you do not want to participate in the Settlement, complete and mail the Opt Out Form attached hereto to RG/2 Claims Administration LLC or if you believe the Court should not approve the Settlement you may state your objection by mailing a letter to the Parties' attorneys and the Court, before July 5, 2019, explaining your objection.

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Why did I get this Notice?

You were employed by ServiceSource as a Sales Account Representative, Senior Sales Representative, Strategic Representative, Renewal Sales Representative, Renewal Sales Specialist, Strategic Sales Specialist, Customer Success Associate, Customer Success Representative, Customer Success Specialist, Sales Associate, Sales Representative, or Channel Engagement Specialist in Nashville, Tennessee during the applicable statutes of limitations. On May 31, 2019, the Court preliminarily approved a Settlement and ordered that this Notice be sent to you and other employees in the Class. This Notice explains what you can get from the Settlement and what rights it affects.

Federal Law prohibits ServiceSource from retaliating against you for participation or non-participation in the Settlement. You must still comply with all applicable work rules and policies and are still responsible for performing your job duties.

If you are receiving this Notice, you are entitled to receive money under the Settlement.

What is this Lawsuit about?

This Lawsuit alleges that, in violation of Tennessee law, ServiceSource failed to properly pay certain employees for hours worked. The Lawsuit asks for damages from ServiceSource for the alleged unpaid wages and other applicable penalties, and attorneys' fees, and expenses.

ServiceSource has and continues to deny any allegations of improper pay practices but has agreed to resolve this matter to avoid the disruption and expense associated with further litigation. ServiceSource denies any liability or wrongdoing of any kind.

Magistrate Judge Chip Frensley of the United States District Court for the Middle District of Tennessee is overseeing this lawsuit. The lawsuit is known as *Sarah Patton, et al. v. ServiceSource Delaware, Inc. d/b/a ServiceSource International, Inc.*, Case No. 3:15-cv-01013.

What are the Settlement terms?

The Settlement Agreement requires that ServiceSource create a \$217,730.28 settlement fund from which employees included in the Class will receive a settlement check following the final hearing. Each Employee's share of the settlement was calculated using a formula that will take into account the number of weeks in which each employee worked for ServiceSource in a relevant position during the statutes of limitations. ServiceSource's records demonstrate that you worked in a position covered by the settlement agreement for «Rule_23_Weeks» weeks during the time period from September 21, 2009 through October 17, 2018.

If you are a member of the Supplemental FLSA Settlement Class, then any weeks you worked during your FLSA Recovery Period are not recoverable here. However, you are eligible to receive compensation in this Rule 23 case for any weeks you worked for ServiceSource between September 21, 2009 until the beginning of your FLSA Recovery Period.

You do not need to do anything to receive your share of the settlement.

If you wish to participate in the settlement, you do not need to take any action. Unless you opt-out or object to the settlement (as outlined below), you will simply receive a settlement check sometime after the final hearing.

How long do I have to cash my check?

Your settlement check will have a date on it. The settlement checks will be valid for one hundred eighty (180) days following the date on the check, unless the check is returned due to a bad address, in which case, the check will be reissued. You will have 180 days from the reissue date to cash your check.

If you lose your check or it is damaged in the mail, contact the Claims Administrator. You may be able to have it reissued, provided you ask within the 180 day time period.

If you do not cash your check within 180 days of the date it was issued, your money will not be paid by ServiceSource, but you will still be bound by the terms of the settlement, including but not limited to the release of claims.

Will I owe any taxes?

The amount you receive will be wage income subject to normal payroll tax withholding and W-2 reporting. These deductions will be taken out of your settlement check.

Do I have to pay any attorneys or other costs?

No. Your settlement share, and the applicable funds for employees, will not be increased or reduced by the amounts, if any, awarded to the attorneys in the Lawsuit.

As part of the Settlement, the Court appointed Dickinson Wright, PLLC as the attorneys for the Class in this case (“Class Counsel”). To date, Class Counsel has been litigating this Lawsuit without being paid, while advancing the costs and expenses of litigation on behalf of the Class.

Under the Settlement, Class Counsel may request that the Court award them up to \$43,500 for attorneys’ fees, costs and expenses incurred in litigating this Lawsuit on behalf of the Class. ServiceSource will pay Class Counsel’s fees, costs and expenses in the amount awarded by the Court, but in no event will that amount be greater than \$43,500.

When is the final approval hearing?

The Final Approval Hearing will be held on July 17, 2019 at 1:30 p.m. in Courtroom 783 at the U.S. District Court for the Middle District of Tennessee, Estes Kefauver Federal Building & Courthouse, 801 Broadway, Nashville, Tennessee 37203. At that hearing, the Court will determine if the Settlement is fair, reasonable, adequate, and in the best interests of the group of ServiceSource employees defined in the beginning of this Notice. The Court may postpone the hearing or change its location without further notice to you.

You are not required to attend the Final Approval Hearing, although you may do so. If you are satisfied with the Settlement there is no need for you to appear.

What if I want to opt-out of or have objections to the Settlement?

You can opt-out of the settlement and get no money from it or object to it.

If you do not want to participate in the Settlement, complete and mail the attached Opt Out Form to:

Patton v. ServiceSource
RG/2 Claims Administration LLC
P.O. Box 59479
Philadelphia, PA 19102-9479;

If you have objections to the settlement, you must state them in writing and mail them, on or before July 5, 2019, to:

Court at Clerk of the Court for the Middle District of Tennessee
801 Broadway
Nashville, Tennessee 37203

Martin D. Holmes
Joshua L. Burgener
Dickinson Wright PLLC
424 Church Street, Suite 800
Nashville, TN 37219; and

Craig A. Cowart
JACKSON LEWIS P.C.
999 Shady Grove Road, Suite 110
Memphis, TN 38120

All objections must state the name and number of the Lawsuit, which is *Sarah Patton, et al. v. ServiceSource Delaware, Inc. d/b/a ServiceSource International, Inc.*, Case No. 3:15-cv-01013. If you do not follow the procedures for objecting described above, you will be deemed to have waived any objection to the Settlement and will have released the claims covered by the Settlement.

If you send a statement in writing of your objection, you may also come to the Court for the Approval Hearing to have your objections heard by the Court orally. Any attorney who will be representing anyone at the Final Approval Hearing must file a notice of appearance with the Court on or before 7 days before the Hearing.

Where do I find more information?

This Notice is only a summary of the Case and a portion of the terms of the Settlement. For a more detailed statement of the Case or Settlement, you may refer to the court filings, the Settlement Agreement, and the other papers filed in the Case, which you can view at www.servicesourcesettlement.com or inspected at the Office of the Clerk of the Middle District of Tennessee, Estes Kefauver Federal Building & Courthouse, 801 Broadway, Nashville, Tennessee 37203 during regular business hours of each court day. You also may obtain a copy of the Settlement Agreement or further information regarding the Settlement from the Claims Administrator at:

Patton v. ServiceSource
RG/2 Claims Administration LLC
P.O. Box 59479
Philadelphia, PA 19102-9479
info@rg2claims.com
ph: +1 866 742 4955
ph: +1 215 979 1620

Who do I contact if I have further questions?

All questions or inquiries regarding this Notice or Settlement, including the amounts estimated to be payable to you if the Settlement is approved, should be directed to the Claims Administrator.

If you have a question for the Class Administrator, you can contact:

Patton v. ServiceSource
RG/2 Claims Administration LLC
P.O. Box 59479
Philadelphia, PA 19102-9479
info@rg2claims.com
ph: +1 866 742 4955
ph: +1 215 979 1620

If you have a question for Plaintiffs' counsel, you can contact:

Martin D. Holmes (mdholmes@dickinsonwright.com) or Joshua L. Burgener (jburgener@dickinsonwright.com) by email or by calling 615-244-6538

PLEASE DO NOT CONTACT THE COURT, THE JUDGE, SERVICESOURCE, OR SERVICESOURCE'S COUNSEL WITH ANY INQUIRIES.

«BarCode» SSC «MailCode»
«FirstName» «LastName»
«Street» «Street2»
«City», «State» «Zip»