

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

**Notice of age discrimination lawsuit
against PricewaterhouseCoopers LLP
("PwC") on behalf of Associate Applicants**

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

TO: All individuals who, from October 18, 2013 to March 28, 2019, applied for a full-time Associate, Experienced Associate, or Senior Associate position in PwC's Tax or Assurance lines of service, met the minimum qualifications for the position to which they applied, were age 40 or older at the time of application, and were not hired by March 28, 2019 (collectively, "Associate Applicants").

DATE: July 9, 2019

RE: Age Discrimination in Employment Act ("ADEA") collective action lawsuit against PwC alleging that PwC discriminated against Associate Applicants nationwide by failing to hire them, in favor of younger applicants.

Rabin v. PricewaterhouseCoopers LLP, Case No. 3 Civ. 16-02276 (JST), pending in the United States District Court for the Northern District of California.

1. Why did I get this notice?

The purpose of this notice is to inform you of a collective action lawsuit against PwC in which you may be similarly situated to Steve Rabin and John Chapman, the individuals who brought this case. The Court has ordered that this notice be sent to advise you of how your legal rights may be affected by this lawsuit, and to present your options to you.

The Court has not decided whether PwC did anything wrong. The Court has only ruled that you should be notified of the existence of the lawsuit in order to present your legal rights and options.

2. Am I eligible to join this lawsuit?

You are eligible to join this lawsuit if, from October 18, 2013 to March 28, 2019, you applied for a full-time Associate, Experienced Associate, or Senior Associate position in PwC's Tax or

For more information, please visit <http://www.PwCApPLICANTCase.com>

Assurance lines of service, met the minimum qualifications for the position to which you applied, were age 40 or older at the time you applied, and were not hired as of March 28, 2019.

3. What is this lawsuit about?

The individuals who brought the lawsuit, known as “the Plaintiffs,” allege that PwC discriminated against them and other applicants aged 40 and older when they applied for Associate positions. They claim that PwC has a policy of giving preference to younger workers by, for example, recruiting on college campuses and favoring younger applicants over equally or more qualified applicants aged 40 and older. The Plaintiffs seek front- and back-pay, liquidated damages (in an amount equal to back wages) or interest, attorneys’ fees, and litigation costs for themselves and other applicants aged 40 and older, as well as injunctive and programmatic relief.

PwC denies these allegations and asserts that its hiring policies are lawful, merit-based, and have nothing to do with age. PwC further asserts that it goes to great efforts to hire a diverse workforce and that includes welcoming people of all ages.

4. Has the Court decided who is right?

The Court hasn’t decided whether PwC or the Plaintiffs are correct. By issuing this Notice, the Court is not suggesting who will win this case. To prevail, the Plaintiffs must prove their claims at a trial.

5. Is there any money available now?

No money or benefits are available now, because the Court has not yet decided which side will win the case. There is no guarantee that money or benefits will ever be obtained.

6. How can I join the lawsuit?

If you are eligible to join this lawsuit (as described above in Section 2) and you wish to join this case, you may “opt in” to the lawsuit. **To opt in, you must submit a “Consent to Join” form by September 23, 2019. You can submit the Consent to Join form on the web at <http://www.PwCApPLICANTCase.com>, by email to Info@PwCApPLICANTCase.com, by fax to (855) 423-1501, or by mail to Rabin v. PricewaterhouseCoopers Administrator, P.O. Box 91216, Seattle, WA 98111.**

To be timely, the form must be postmarked or received by September 23, 2019. A Consent to Join form and stamped envelope are enclosed with this notice.

7. What happens if I join the lawsuit?

If you file a “Consent to Join” form, you agree that the Court’s orders will apply to you, whether they are favorable or unfavorable. You also agree that you will be represented by the Plaintiffs

For more information, please visit <http://www.PwCApPLICANTCase.com>

and their counsel (listed below, in Section 11) and authorize them to make decisions on your behalf regarding the lawsuit, including any settlement. These decisions and agreements will then be binding on you.

If you choose to join this lawsuit, you may be required to actively participate in the lawsuit, including by providing information, documents and/or testimony at deposition or at trial.

8. How will the lawyers be paid?

Plaintiffs' attorneys will **not** charge you directly for their work in this case. If there is no recovery (*i.e.*, if the Plaintiffs recover no money from PwC), you will not have to pay the attorneys for any of their work. If there is a recovery, Plaintiffs' attorneys will receive whatever attorneys' fees the Court orders. Those fees may be subtracted from the recovery obtained from PwC, or they may be paid separately by PwC, or they may be a combination of the two.

9. What happens if I do not join the lawsuit?

If you choose not to join this lawsuit, you will not be affected by any judgment in the lawsuit relating to the ADEA claim, whether favorable or unfavorable. However, you will not be able to receive any money recovered in the lawsuit, should there be any recovery. You may pursue your own claim in a separate action, subject to PwC's defenses, and select the attorney of your choice at your own expense.

10. What happens next?

The lawsuit will proceed toward trial, which could take many months or years. If your contact information changes, and you want Plaintiffs' counsel to be able to contact you (*e.g.*, to update you about the case, to send you money from any settlement or judgment (if any), etc.), you may provide your updated contact information to Plaintiffs' counsel (whose information is available at <https://www.PwCAgeCase.com> and in Section 11, below).

11. Your legal representation if you join

If you choose to join this lawsuit (by submitting a "Consent to Join" form), you will be represented by the Plaintiffs through their attorneys. The attorneys are:

Jahan C. Sagafi
Laura Iris Mattes
OUTTEN & GOLDEN LLP
One California Street, 12th Floor
San Francisco, CA 94111
Telephone: (415) 638-8800
Facsimile: (415) 638-8810
E-mail: jsagafi@outtengolden.com
E-mail: imattes@outtengolden.com

Adam T. Klein
Melissa L. Stewart
Daniel Stromberg
OUTTEN & GOLDEN LLP
685 Third Avenue, 25th Floor
New York, NY 10017
Telephone: (212) 245-1000
Facsimile: (646) 509-2060
E-mail: atk@outtengolden.com
E-mail: mstewart@outtengolden.com
E-mail: dstromberg@outtengolden.com

Lucy B. Bansal
OUTTEN & GOLDEN LLP
601 Massachusetts Avenue NW,
Second Floor West
Washington, D.C. 20001
Telephone: (202) 847-4400
Facsimile: (202) 847-4410
E-mail: lbansal@outtengolden.com

Daniel Kohrman
Laurie McCann
Dara Smith
AARP FOUNDATION LITIGATION
601 E. Street, N.W.
Washington, D.C. 20049
Telephone: (202) 434-2060
Facsimile: (202) 434-2082
E-mail: dkohrman@aarp.org
E-mail: lmccann@aarp.org
E-mail: dsmith@aarp.org

Jennifer L. Liu
THE LIU LAW FIRM, P.C.
1170 Market Street, Suite 700
San Francisco, CA 94102
Telephone: (415) 896-4260
Facsimile: (415) 231-0011
E-mail: jliu@liulawpc.com

If you have any questions, please contact Plaintiffs' counsel at PwCAgeCase@outtengolden.com or the contact information above.

If you would like further information about this lawsuit, please visit <http://www.PwCApPLICANTCase.com>, contact Plaintiffs' counsel, or access the Court docket in this case, for a fee, through the Court's Public Access to Court Electronic Records (PACER) system at <https://ecf.cand.uscourts.gov>, or by visiting the office of the Clerk of the Court for the United States District Court for the Northern District of California, at 450 Golden Gate Ave, San Francisco, CA 94102, between 9:00 a.m. and 4:00 p.m., Monday through Friday, excluding Court holidays.

12. This notice has been authorized by the Court.

This notice and its contents have been authorized by the United States District Court for the Northern District of California, San Francisco Division, the Honorable Jon S. Tigar presiding. The Court has taken no position regarding the merits of the Plaintiffs' claims or of PwC's defenses.

For more information, please visit <http://www.PwCApPLICANTCase.com>