

# Exhibit D

THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY  
*Jose Cartagena and Dharian Sanchez, individually on behalf of themselves and all others similarly situated v. PlanITROI, LLC, No. 2:25-cv-12230-JKS-MAH*

**If you were laid off by PlanITROI, LLC, from its offices in Denville, New Jersey, on or around February 28, 2025, you could get a payment from a class action settlement.**

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

- The settlement relates to Defendant PlanITROI’s alleged failure to give 90 days’ notice and make adequate severance payments before laying off its employees at 100 Ford Road, Denville, NJ 07834, on or around February 28, 2025. If you were laid off by Defendant from its Denville offices on or around that date, you are a Member of the Settlement Class.
- Settlement Class Members who do nothing will automatically receive a check. Payments will be made from the Net Settlement Fund on a prorated basis based on your wages and benefits while working for Defendant. The amount of these payments will be determined by an independent settlement administrator and approved by the court, and not by Defendant.
- **Your legal rights are affected, so please read this notice carefully.**

<b>YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT:</b>	
<b>DO NOTHING</b>	<b>Automatically receive a settlement check once the settlement is finally approved.</b> Give up the right to bring a separate lawsuit about the same issue.
<b>EXCLUDE YOURSELF</b>	<b>Get no benefits from the settlement.</b> Keep the right to bring a separate lawsuit about the same issue at your own expense.
<b>OBJECT</b>	<b>Write to the court about why you don’t like the settlement.</b> If the settlement is approved you will still automatically receive a check and give up the right to bring a separate lawsuit about the same issue.

- These rights and options—**and the deadlines to exercise them**—are explained in this notice.
- Please be patient while the court decides whether to approve the settlement.

**BASIC INFORMATION**

1. Why did I get this notice?

If you received a postcard notice or email relating to this case, then the records of Defendant show that you were laid off from its offices in Denville, New Jersey, on or around February 28, 2025. Because of this, you are a Member of the Settlement Class, and you may be affected by this class action settlement.

The court has approved this notice because you have a right to know about the proposed class action settlement, and about your options, before the court decides whether to approve the settlement. If you do nothing and the court approves the settlement, and after any appeals are resolved, you will receive the benefits of the settlement.

This notice explains the lawsuit, the settlement, your legal rights, what benefits are available, and how those benefits will be calculated.

The court in charge of the case is the United States District Court for the District of New Jersey, and the case is known as *Jose Cartagena and Dharian Sanchez v. PlanITROI, LLC*. The people suing are called the Plaintiffs, and the company being sued is called the Defendant.

2. What is the lawsuit about?

The lawsuit claims that Defendant laid off its employees at its Denville, New Jersey, offices without giving its employees 90 days' notice of the layoffs or making adequate severance payments as required by New Jersey Law. Defendant denies that it did anything wrong.

3. Why is this a class action?

In a class action lawsuit, one or more people called "class representatives" (in this case, Plaintiffs Jose Cartagena and Dharian Sanchez) sue on behalf of themselves and other people who have similar claims. All of these people are members of a "class." This is a class action because the court has preliminarily decided it meets the legal requirements to be a class action solely for the purposes of settlement. Because the case is a class action, one court resolves the issues for everyone in the Settlement Class, except for those people who choose to exclude themselves.

Questions? Email: \_\_\_\_\_ or Call  
**PHONE NUMBER**

4. Why is there a settlement?

The court did not decide in favor of the Plaintiffs or the Defendant. Instead, both sides agreed to a settlement. That way, they avoid the cost of a trial and the risks of either side losing, and they ensure that the people affected by the lawsuit receive compensation. Defendant does not in any way admit any of the allegations in the lawsuit, and denies any and all fault or liability for the claims that have been alleged in this lawsuit. The parties think that the settlement is best for everyone involved under the circumstances. The settlement will not be approved unless the court finds it is “fair, reasonable, and adequate.”

## THE SETTLEMENT CLASS

To see if you will be provided with benefits from this settlement, you first have to decide if you are a Member of the Settlement Class.

5. How do I know if I am part of the settlement?

If you received an email or postcard notice addressed to you, then you are a Member of the Settlement Class. You will be a part of the settlement, and the applicable benefits of the settlement will be provided to you, unless you exclude yourself. If you are not sure whether you have been properly included, you can call the number at the bottom of this notice to check.

## SETTLEMENT BENEFITS: WHAT YOU GET

6. What does the settlement provide?

The Defendant has agreed to pay \$250,000 into a Settlement Fund to settle this case. As discussed separately below, attorneys’ fees, litigation costs, the costs of this notice, the costs of distributing the settlement benefits, other settlement administration costs, and service awards to Plaintiffs for their service to the Settlement Class will also be paid out of the Settlement Fund.

7. What can I get from the settlement?

After deducting court-approved attorneys’ fees and expenses, costs of notice and administration, and service awards, there will be a Net Settlement Fund available for distribution to Class Members. Members of the Settlement Class will be paid from this Fund on a prorated basis, based on the hours they worked and their wages while working for Defendant. The actual amount of any Settlement Class Member’s check will be determined by an independent settlement administrator based on the following formula:

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		1 week’s pay per full year of employment for the Member, + 4 weeks’ pay for the Member, - severance received by the Member		
Each Class Member’s Share	=	÷	×	Net Settlement Fund
		1 week’s pay per full year of employment for all Members, + 4 weeks’ pay for all Members, - severance received by all Members		

8. What do I need to do to receive a payment from the settlement?

You do not need to do anything to receive a payment from the settlement. As long as you do not exclude yourself, you will receive a settlement payment if the settlement is approved and becomes final, and if you are eligible. If your address changes, however, please use the email address or phone number at the bottom of this notice to report the address change so that your payment reaches you.

9. When would I get my payment?

The court will hold a hearing on **DATE OF FINAL APPROVAL HEARING** to decide whether to approve the settlement. You do not need to attend. If the court approves the settlement, there may be a period when appeals can be filed. Once any appeals are resolved or if no appeals are filed, it will be possible to distribute the funds. This may take several months and perhaps more than a year. You do not need to do anything to receive your payment.

10. What am I giving up to get my payment?

Unless you exclude yourself, you are staying in the Settlement Class. That means you can’t sue, continue to sue, or be part of any other lawsuit against Defendant relating to legal claims based on the February 2025 layoffs, except for any claims relating to accrued paid time off. It also means that all of the court’s orders will apply to you. Once the settlement is final, any claims you have or may have relating to the layoffs will be forever waived and released, *i.e.*, given up.

**EXCLUDING YOURSELF FROM THE SETTLEMENT CLASS**

If you don’t want a payment or any other benefits from this settlement, and/or you want to keep the right to sue or continue to sue the Defendant on your own about the legal issues in this case,

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**PHONE NUMBER**

then you must take steps to get out. This is called “excluding” yourself from or “opting out” of the Settlement Class.

11. How do I get out of the settlement?

To exclude yourself from this settlement, you must send a letter by mail saying that you want to opt-out or be excluded from *Jose Cartagena and Dharian Sanchez v. PlanITROI, LLC*. The letter must include your name, address, telephone number, and your signature. You must mail your exclusion request postmarked no later than **DEADLINE TO OPT-OUT** to:

*Jose Cartagena and Dharian Sanchez v. PlanITROI, LLC* Exclusions  
**Settlement Administrator Address 1**  
**Settlement Administrator Address 2**  
**City, State ZIP**

You can’t exclude yourself on the phone or by e-mail or by letter to a different address. If you ask to be excluded, you will not get any settlement payment, and you cannot object to the settlement. You will not be legally bound by anything that happens in this lawsuit. You may be able to sue (or continue to sue) the Defendant in the future.

A request for exclusion must be submitted individually and must be personally signed by the you. **Requests for exclusion cannot be submitted on behalf of multiple individuals,**

12. If I don’t exclude myself, can I sue later for the same thing?

No. Unless you exclude yourself, you give up the right to sue the Defendant for the claims that this settlement resolves. If you have a pending lawsuit, speak to your lawyer in that suit immediately. You must exclude yourself from *this* Class to continue your own lawsuit. Remember that the exclusion deadline is **DEADLINE TO OPT-OUT**.

13. If I exclude myself, can I get money from this settlement?

No. If you exclude yourself, you are not eligible for any money from this settlement.

## THE LAWYERS REPRESENTING YOU

14. Do I have a lawyer in this case?

The Court appointed the law firms of CohenMalad, LLP; Stranch, Jennings & Garvey, PLLC; and Strauss Borrelli, LLP, to represent you and other Members of the Settlement Class. Together, the

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**PHONE NUMBER**

lawyers are called Class Counsel. You will not be charged for these lawyers' services. If you want to be represented by your own lawyer, you may hire one at your own expense.

You may contact Class Counsel at the following addresses:

**CohenMalad, LLP**  
One Indiana Square, Suite 1400  
Indianapolis, IN 46204

**Stranch, Jennings & Garvey, PLLC**  
223 Rosa Parks Avenue, Suite 200  
Nashville, TN 37203

**Strauss Borrelli, LLP**  
613 Williamson Street, Suite 201  
Madison, WI 53703

15. How will the lawyers be paid?

Class Counsel will ask the court for attorneys' fees of up to one third of the Settlement Fund, to be paid from the Settlement Fund, plus reimbursement of expenses, and a service award to the Plaintiffs of up to \$1,000.00 each, to be paid from the Settlement Fund. The amount of the attorneys' fees, expenses, and service awards must be approved by the Court.

### OBJECTING TO THE SETTLEMENT

You can tell the Court that you don't agree with the settlement or some part of it.

16. How do I tell the Court that I don't 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 must state the reasons for your objection and include any evidence, briefs, motions or other materials you intend to offer in support of the objection. The Court will consider your views. To object, you must send a letter saying that you object to *Jose Cartagena and Dharian Sanchez v. PlanITROI, LLC*. You must include your name, address, telephone number, your signature, and the reasons you object to the settlement, along with any evidence or legal argument that supports your objection. You must mail the objection to the following address postmarked no later than **DEADLINE TO OBJECT:**

*Jose Cartagena and Dharian Sanchez v. PlanITROI, LLC* Objections

**Settlement Administrator Address 1**  
**Settlement Administrator Address 2**  
**City, State ZIP**

17. What's the difference between objecting and excluding myself?

**Questions? Email:** \_\_\_\_\_ **or Call**  
**PHONE NUMBER**

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

## THE COURT'S FINAL APPROVAL HEARING

The Court will hold a hearing to decide whether to approve the settlement. You do not need to attend the hearing. However, if you wish, you may attend and you may ask to speak.

18. When and where will the Court decide whether to approve the settlement?

The Court will hold a final approval hearing at **DATE AND TIME** at **LOCATION**, or by telephonic or videoconference, which will be listed on the settlement website. At this hearing, the court will consider whether the settlement is fair, reasonable, and adequate. Objectors to the settlement are allowed to attend the final approval hearing and may ask to speak before the Court. If there are objections, the court will consider them. The court will listen to people who have asked to speak at the hearing and complied with Question 20 of this notice. 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. You are not required to attend this hearing.

19. Do I have to come to the hearing?

No. You are welcome to come at your own expense if you wish, but Class Counsel will answer questions the court may have. If you send an objection, you don't have to come to Court to talk about it. As long as you 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.

20. May I speak at the hearing?

You may ask the Court for permission to speak at the final approval hearing. To do so, you must send a letter titled "Notice of Intent to Appear in *Jose Cartagenova and Dharian Sanchez v. PlanITROI, LLC*." You must include your name, address, telephone number, signature, and any evidence you intend to use at the hearing. Your Notice of Intent must be postmarked no later than **DEADLINE TO OBJECT**, and be sent to the address listed under Question 16 of this notice. If you hire a lawyer to speak for you, they must also comply with the requirements of this paragraph and must file an appearance in accordance with the applicable rules of the court.

## IF YOU DO NOTHING

Questions? Email: \_\_\_\_\_ or Call  
**PHONE NUMBER**

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21. What happens if I do nothing at all?

If you do nothing, you will be a part of this settlement, and you will be sent a payment once it becomes final. In exchange for the payment, you won't be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against the Defendant relating to the February 2025 layoffs, except for any claims relating to accrued paid time off.

## GETTING MORE INFORMATION

22. Are there more details about the settlement?

This notice summarizes the proposed settlement. More details, including the settlement agreement, are available on the settlement website **URL** using **PASSWORD**. You can also call toll free **PHONE NUMBER**. Be sure to state that you are calling about the *Jose Cartagenova and Dharian Sanchez v. PlanITROI, LLC* settlement.

Questions? Email: \_\_\_\_\_ or Call  
**PHONE NUMBER**

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