

**UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
CLASS ACTION SETTLEMENT NOTICE**

A Federal Court authorized this Notice. It is **not** a solicitation from a lawyer.

1. INTRODUCTION. You are receiving this notice because you were identified as an ITT employee who, on or after April 12, 2009, worked in Kuwait under ITT's GMASS contract. As such, you may be entitled to participate in a class action settlement that has received preliminary approval from the Court. This Notice describes the proposed settlement.

2. BACKGROUND. From February 2005 through May 2010, ITT was under contract with the U.S. government (the GMASS contract) to provide support services to the U.S. Army in Kuwait. ITT hired employees to provide those services. On April 12, 2010, Ricky A. Lee and Paul V. Rigsby (Plaintiffs) filed a complaint in the United States District Court for the Western District of Washington alleging that ITT failed to compensate its GMASS employees for overtime and other benefits as required by their employment contracts. ITT denies these allegations. The Court has not ruled on the merits of Plaintiffs' claims.

This is a class action case. The class includes all ITT employees who performed work under the GMASS contract in Kuwait on or after April 12, 2009. Plaintiffs have been appointed to serve as class representatives.

Plaintiffs have entered into a settlement agreement on behalf of the class. The agreement is with Vectrus Systems Corporation (Vectrus). Vectrus is a successor to ITT.

Plaintiffs and their lawyers (Class Counsel) believe that the proposed settlement is in the best interests of the class because it provides an appropriate recovery now while avoiding the risk, expense and delay of pursuing the case through trial and any further appeals. The settlement agreement is described below.

3. TERMS OF THE PROPOSED SETTLEMENT AGREEMENT. The settlement agreement calls for creation of a \$3,750,000.00 settlement fund. After Court-authorized deductions are made, the remainder of the settlement fund will be allocated among the members of the class, with each class member's percentage share being based on the number of days that the class member worked on the GMASS contract in Kuwait.

For their service as class representatives, Plaintiffs will ask for individual payments of \$20,000 and \$10,000. Class Counsel will ask for approximately \$130,000 in reimbursement of litigation and settlement administration expenses to date, as well as further future expenses to finalize and administer settlement payments. Class Counsel also plan to ask for an award of attorneys' fees in an amount equal to 29 percent of the \$3.75 million settlement fund, plus 29 percent of the amount Class Counsel estimate to be the maximum payroll tax payable by Vectrus (*i.e.*, 29 percent of \$200,000.00). If approved by the Court, these amounts will be deducted from the settlement fund.

You will not owe any money for legal fees under the settlement.

Unless you ask to be excluded, you will be bound by the terms of the proposed settlement if it is given final approval by the Court.

4. PAYMENT PROCESS. If the Court grants final approval to the proposed settlement agreement, Class Counsel will mail an IRS form W-4 to you and the other members of the class. You will be instructed to fill out the W-4 form, sign it, and mail it back to Class Counsel by a specified deadline. If U.S. tax withholding laws do not apply to you, you will be allowed to send in a sworn statement explaining why those laws do not apply to you. To receive a check for your share of the settlement fund, your completed W-4 or sworn statement will have to be postmarked by the deadline.

After the deadline passes, Class Counsel will prepare a list of the class members who returned the W-4 forms or sworn statements and are entitled to receive settlement checks. For each person on the list, Class Counsel will determine his or her share of the settlement fund. Class Counsel will give the list to Vectrus, along with copies of the tax documentation received from the class members. Because the settlement payments reflect unpaid wages, Vectrus will comply with U.S. tax withholding requirements. A check will be prepared for each class member on the list, based on his or her allocated share of the settlement fund, minus the required tax withholdings. Vectrus will pay the employer's share of applicable payroll taxes and will mail out the settlement checks.

5. PROCEDURE FOR FINAL APPROVAL. Although the Court has given preliminary approval to the settlement agreement, the Court will not grant final approval without giving class members an opportunity to be heard. If you do not object to the settlement agreement, you do not need to do anything (except return your completed W-4 form or sworn statement when instructed to do so). You may object to the proposed settlement, if you so desire, by filing a written objection no later than July 6, 2018, with the U.S. District Court for the Western District of Washington at 700 Stewart Street, Seattle, WA 98101. Your objection must include the caption *Ricky A. Lee and Paul V. Rigsby v. ITT Corporation, et al.*, Civil Action No. C10-0618-JCC, along with your full name and current address, and it must state, with particularity, why you object to the proposed settlement agreement. You must also send copies of your objection to Class Counsel and ITT's counsel at the addresses indicated below at Section 6.

The Court will consider giving the settlement agreement final approval at a fairness hearing on Tuesday, October 16, 2018 at 9:00 a.m. PDT, which you may attend if you so desire. If you intend to appear at the fairness hearing, either in person or through counsel, you must include notice of that fact and state the purpose for your appearance in the objection you filed with the Court.

6. LEGAL COUNSEL.

Class Counsel is:

Daniel E. Williams, William H. Thomas
THOMAS, WILLIAMS & PARK, LLP
P.O. Box 1776
Boise, ID 83701
ATTN: ITT Settlement

(208) 345-7800 or 1-877-345-7801

Counsel for ITT/Vectrus is:

Jill D. Bowman, David R. Goodnight
STOEL RIVES, LLP
600 University Street, Suite 3600
Seattle, WA 98101

7. REQUEST FOR EXCLUSION. If you want not to be bound by the settlement agreement, you must make a request to be excluded from the class. A form for this purpose accompanies this Notice. For your request to be given effect, you must mail the completed form to Class Counsel on or before July 6, 2018.

8. FURTHER INFORMATION. Further information about this Notice, the deadline for filing an Objection, or the Settlement Agreement can be obtained by calling Class Counsel at 1-877-345-7801. You may also find further information at <http://www.thomaswilliamsllaw.com/Lee-v-ITT-Class-Action.shtml>. Please do not attempt to contact the Court or ITT's Counsel with questions about the Settlement Agreement.

**THE SETTLEMENT HAS BEEN PRELIMINARILY APPROVED AND
THIS NOTICE AND ITS CONTENTS HAVE BEEN AUTHORIZED BY
THE UNITED STATES DISTRICT COURT, HON. JOHN C. COUGHENOUR,
UNITED STATES DISTRICT JUDGE.**