

Letter Regarding Arbitration Agreement & Pending Putative Class Action Lawsuit

To: New Employee

From: Human Resources

Welcome to Car Wash Enterprises! As part of your onboarding materials, you are being provided with a **Mutual Arbitration Agreement and Class Action Waiver** (the “Agreement”). This letter is intended to give you important background information before you review and sign the Agreement, which is required before your employment begins.

In General

The Agreement explains how most employment-related issues will be resolved if they arise. The Agreement requires most employment-related disputes — including claims about wages, meal periods, rest breaks, overtime, paid sick leave, and others — to be resolved through individual arbitration instead of through a lawsuit in court. This means that a neutral arbitrator will decide the outcome of any covered dispute on an individual basis between you and Car Wash Enterprises.

The Agreement itself contains the full terms. You are encouraged to read it carefully.

Pending Putative Class Action Lawsuit

There is currently a pending putative class action lawsuit filed in King County Superior Court: *William Wilson, et al. v. Car Wash Enterprises, Inc.*, Case No. 25-2-27291-5 SEA. The lawsuit alleges various wage-and-hour violations under Washington law, including (1) failure to provide rest periods; (2) failure to provide meal periods; (3) failure to pay overtime wages; (4) payment of wages less than entitled; (5) failure to accrue and allow use of paid sick leave; (6) unlawful deductions and rebates; (7) failure to pay all wages due at termination; (8) willful refusal to pay wages; and (9) failure to pay all compensation owed.

In addition to claims on his own behalf, Plaintiff William Wilson seeks to represent a class of current and former employees—which may include you based on Wilson’s allegations. Regarding damages, the lawsuit seeks (1) compensatory damages; (2) exemplary damages; (3) twice the amount of unpaid compensation; (4) pre-judgment and post-judgment interest; and (5) attorneys’ fees and costs.

Car Wash Enterprises disputes the allegations in the lawsuit, is defending the case, and denies any wrongdoing. The Court has not yet determined whether the claims have any merit or whether they may proceed on an individual or class wide basis.

On April 3, 2026, the Court ordered the lawsuit stayed (i.e. put on hold) and compelled Mr. Wilson's claims to arbitration.

IMPORTANT - How This May Affect You

Signing the Agreement means that you will generally not be able to participate in any class action or collective action lawsuit in court regarding any covered claims. Any dispute between you and Car Wash Enterprises would be resolved in individual arbitration, according to the terms of the Agreement. This includes the pending putative class action lawsuit described above.

Questions

If you have questions about the arbitration process or this notice, you may contact Human Resources at hr@brownbear.com

You may also wish to consult with an attorney of your choosing before signing. This notice is provided for informational purposes only and the Company cannot provide legal advice regarding the pending lawsuit or this Agreement.