

THIS NOTICE IS SUBJECT TO APPROVAL OF THE COURT
SUPREME COURT OF THE STATE OF NEW YORK COUNTY OF NEW YORK

ALEX SHANKLIN, LOUISA RASKE, MELISSA BAKER, ELENI TZIMAS, MARCELLE ALMONTE, GRECIA PALOMARES, CARINA VRETMAN, MICHELLE GRIFFIN TROTTER, VANESSA PERRON, ROBERTA LITTLE, and TATIANA ESMERALDA SEAY-REYNOLDS

Index No. 653702/201

Individually and as Class Representatives

Plaintiffs,

v.

WILHELMINA MODELS, INC., WILHELMINA INTERNATIONAL LTD., ELITE MODEL MANAGEMENT CORPORATION, CLICK MODEL MANAGEMENT, INC., MC2 MODEL AND TALENT MIAMI LLC, MC2 MODELS MANAGEMENT LLC, NEXT MANAGEMENT, LLC, MAJOR MODEL MANAGEMENT INC.,

Defendants.

NOTICE OF CLASS ACTION LAWSUIT

This Notice has been authorized by a New York State Court.

This Notice affects your rights—please read it carefully.

You are not being sued. This is not a solicitation from a lawyer.

WHAT IS THIS? This Notice is to inform you of a lawsuit that was certified as a Class Action in New York County Supreme Court. The Court has not ruled on who would win the case.

WHAT IS THE LAWSUIT ABOUT? The Plaintiffs sued Defendants Wilhelmina Models, Inc., Wilhelmina International Ltd. (together “Wilhelmina”), and Next Management, LLC (“Next”) on behalf of themselves and other current and former models who had management agreements with the Defendant Modeling Agencies. The lawsuit claims that such models are misclassified as independent contractors and that, accordingly, Wilhelmina and Next are in violation of certain provisions of New York Labor Law. The time period covered by the lawsuit is from October 24, 2007 to the present. This class action seeks to recover money damages for all Class Members, to the extent that such damages are available and awarded by the Court. The Defendants deny the allegations and have asserted a number of defenses to Plaintiffs’ claims, including that the New York Labor Law does not apply to Plaintiffs because models are properly classified as independent contractors.

AM I A CLASS MEMBER? You are a Member of the Class if you entered into a model management contract with Wilhelmina and/or Next and were classified as an independent contractor rather than an employee and attended a casting, go see, meeting, check-in, or test shoot, or performed any other work or service booked by Next or Wilhelmina’s New York Office on or after October 24, 2007; and (i) had deductions taken from your payments by Next or Wilhelmina on or after October 24, 2007, and/or (ii) received or should have received a paycheck or wage statement from Next or Wilhelmina on or after October 24, 2007.

WHAT ARE MY RIGHTS AS A CLASS MEMBER? You may be entitled to share in any monetary recovery (damages) obtained by either the Wilhelmina Class and/or Next Class. As a Class Member, you will be legally bound by the Court’s final decision in this case, either favorable or unfavorable, on the claims being litigated in this case.

HOW DO I REMAIN A MEMBER OF THE CLASS? You do not have to do anything to remain in the Class.

CAN I EXCLUDE MYSELF? Yes. You may exclude yourself from the lawsuit by mailing or emailing the Request To Be Excluded form by **no later than June 20, 2025**.

WHAT ARE MY RIGHTS IF I EXCLUDE MYSELF? If you exclude yourself from either the Wilhelmina Class and/or Next Class, you will not be entitled to share in any recovery that may be obtained for the Class. You will also not be legally bound by the Court’s final decision and are free to pursue your own claims if you decide to. Finally, you will not be entitled to any further notice about this case.

HOW CAN I LEARN MORE? Should you desire further information about the lawsuit, you may inspect the pleadings, all orders entered by the Court, and all other papers filed in the lawsuit at the office of the Clerk of the Court for the Supreme Court of the State of New York, New York County, 60 Centre Street, New York, New York, or by accessing the Court’s online docket at <https://iapps.courts.state.ny.us/nyscef/CaseSearch> and searching for case number 653702/2013. You can also find out more about the lawsuit by calling 1-888-890-8824, emailing info@shanklinmodelslawsuit.com, or by visiting www.Shanklinmodelslawsuit.com.

These rights and options—and the deadlines to exercise them—are explained in full below.

SUMMARY OF THIS LAWSUIT

1. This lawsuit was first filed on October 24, 2013. A Fourth Amended Complaint was filed on July 24, 2024 for purposes of adding a class representative to the Next Class and the Wilhelmina Class.
2. Plaintiffs allege that, although their model management contracts state that they are classified as “independent contractors” by Defendants Wilhelmina and Next, they are treated like employees pursuant to New York law and thus are afforded the protections of New York Labor Law. Plaintiffs allege that as employers Defendants Wilhelmina and Next violated New York Labor Law by deducting certain amounts from the wages of Plaintiffs without Plaintiffs’ consent. Additionally, Plaintiffs allege that as employees they were entitled to accurate wage statements and Defendants Wilhelmina and Next failed to furnish accurate statements of wages to Plaintiffs in violation of New York Labor Law.
3. In their complaint, Plaintiffs seek damages for these violations on behalf of themselves and all other persons similarly situated who also had model management contracts with the Defendants.
4. The Defendants deny the allegations and have asserted a number of defenses, including that New York Labor Law does not apply to Plaintiffs because models are properly classified as independent contractors.
5. On May 8, 2020 the Court granted leave to form a Wilhelmina Class and a Next Class.

The Wilhelmina Class is represented by Ms. Grecia Palomares, Ms. Carina Vretman, Ms. Michelle Griffin Trotter, and Ms. Roberta Little and defined by the Court as:

all persons who entered into model management contracts with Wilhelmina who were classified as independent contractors rather than employees and attended a casting, go see, meeting, check-in, or test shoot, or performed any other work or service booked by Wilhelmina's New York Office on or after October 24, 2007; and (i) had deductions taken from their payments by Wilhelmina on or after October 24, 2007; and/or (ii) received or should have received a paycheck or wage statement from Wilhelmina on or after October 24, 2007

The Next Class is represented by Ms. Vanessa Perron and Ms. Tatiana Esmeralda Seay-Reynolds and defined by the Court as:

all persons who entered into model management contracts with Next who were classified as independent contractors rather than employees and attended a casting, go see, meeting, check-in, or test shoot, or performed any other work or service booked by Next's New York Office on or after October 24, 2007; and (i) had deductions taken from their payments by Next on or after October 24, 2007; and/or (ii) received or should have received a paycheck or wage statement from Next on or after October 24, 2007

6. You have been identified as a member of the Wilhelmina Class and/or the Next Class. If you think you may be a member of this Class, but you did not receive a copy of this notice addressed to you via email, please call 1-888-890-8824 or email info@shanklinmodelslawsuit.com.
7. The Court has not ruled on who would win this case. This Notice is being sent to you for the sole purpose of informing you about the lawsuit and so that you can decide whether or not to remain as a Class member.

OTHER INFORMATION & CLASS COUNSEL

1. This notice is only a summary of this lawsuit. Should you desire further information about the lawsuit, you may inspect the pleadings, all orders entered by the Court, and all other papers filed in the lawsuit at the office of the Clerk of the Court for the Supreme Court of the State of New York, New York County, 60 Centre Street, New York, New York, or by accessing the Court's online docket at <https://iapps.courts.state.ny.us/nyscef/CaseSearch> and searching for case number 653702/2013.
2. You can also find out more about the lawsuit by calling 1-888-890-8824, emailing info@shanklinmodelslawsuit.com, or by visiting www.Shanklinmodelslawsuit.com.
3. The Court has appointed the following attorneys and law firm ("Class Counsel") to represent the class:

Christopher Kercher
Luke Phillips
Laura Santos-Bishop
Kayla Slattery

Adam Wolfson
Diane Cafferata

Quinn Emanuel Urquhart & Sullivan LLP
295 Fifth Avenue, 9th Floor
New York, NY 10016
Tel: 212-849-7000

Quinn Emanuel Urquhart & Sullivan LLP
865 S. Figueroa St. 10th Floor
Los Angeles, CA 90017
Tel: 219-443-3000

YOUR RIGHTS AS A CLASS MEMBER

1. To remain as a member of either the Wilhelmina Class and/or Next Class and participate in the recovery, if any, resulting from this class action, **you do not have to file any document with the Court.** You, or your attorney should you decide to retain one, may file an appearance with the Clerk if you desire. Otherwise, the attorneys for the Wilhelmina Class and Next Class, whose names are listed above, will represent you. *You will not personally have to pay them any attorneys' fees, costs or expenses for their professional services, but if the Classes succeed, the Court may award them fees, costs, and expenses out of, or in addition to, any recovery the Classes obtain in this lawsuit.*
2. As a Class Member, you may be entitled to share in any monetary recovery (damages), if any, obtained by either the Wilhelmina Class and/or Next Class. As a Class Member, you will be legally bound by the Court's final decision, either favorable or unfavorable, in this case on the claims being litigated.

TO EXCLUDE YOURSELF FROM THIS CLASS ACTION

1. You have the right to exclude yourself from the class action. If you exclude yourself from either the Wilhelmina Class and/or Next Class, you will not be entitled to share in any recovery that may be obtained for the Class. You will also not be legally bound by the Court's final decision, either favorable or unfavorable, on the claims being litigated. Finally, you will not be entitled to any further notice about this case.
2. You can exercise your right to exclude yourself by mailing a Request To Be Excluded form to the address below, or by emailing the signed letter to the email listed below. The request must contain the case name and number, and be signed with your name and address printed below your signature. **All requests for exclusion must be mailed or emailed to the address below and postmarked or emailed no later than June 20, 2025:**

Shanklin v. Wilhelmina Administrator
c/o Epiq
PO Box 2896
Portland, OR 97208-2896

Email: info@shanklinmodelslawsuit.com

If the request is postmarked or emailed later than June 20, 2025, the request will be considered untimely and you will not be excluded.

You may also seek the advice and counsel from your own individual attorney, at your own expense, if you desire.

DO NOT CONTACT THE COURT OR DEFENDANTS CONCERNING THIS CASE

SO ORDERED BY THE SUPREME COURT OF THE STATE OF NEW YORK.

BY:

Justice Margaret Pui Yee Chan

Dated: January 29, 2025

[LETTER FORMAT]**Mail To:**

Shanklin v. Wilhelmina Administrator
 c/o Epiq
 PO Box 2896
 Portland, OR 97208-2896

OR

Sign, PDF and Email as attachment to info@shanklinmodelslawsuit.com.

I, _____, request to be excluded from the lawsuit entitled, *Alex Shanklin et. al. v. Wilhelmina Models, Inc. et al*, Supreme Court of the State of New York, County of New York, Index # 653702/2013.

 (Signature)

(Print Name):

(Address):

(Email):

(Phone):