

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**SYNASIA SANDERS and
JACQUELINE HINE, individually
and on behalf of all others similarly
situated,**

Plaintiffs,

v.

**OS RESTAURANT SERVICES,
LLC, OUTBACK STEAKHOUSE
INTERNATIONAL, L.P.,
OUTBACK STEAKHOUSE OF
FLORIDA, LLC AND BONEFISH
GRILL, LLC,**

Defendants.

CASE NO. 1:21-CV-04778-SEG

JURY TRIAL DEMANDED

**STIPULATION FOR CONDITIONAL CERTIFICATION
AND NOTICE TO CLASS MEMBERS**

Plaintiffs Synasia Sanders and Jacqueline Hine, on behalf of themselves and on behalf of all others similarly situated, (“Plaintiffs”) and Defendants OS Restaurant Services, LLC, Outback Steakhouse International, LLP, Outback Steakhouse of Florida, LLC, and Bonefish Grill, LLC (“Defendants”) hereby file this Stipulation for Conditional Certification and Notice to Class Members and request Court approval of such stipulation by signing below in the space provided.

I.

It is hereby agreed that the Parties will consent to this Court conditionally

certifying this matter as a collective action under the FLSA, 29 U.S.C. § 216(b) for the following classes. The Parties agree that Defendants' consent to conditional certification does not, and will not, prejudice Defendants' right to later argue that Plaintiffs, and any opt-ins to the action, are not "similarly situated" under applicable law and to file a motion asserting that the class conditionally certified should be decertified. Instead, the Parties only agree to conditional certification for purposes of facilitating a potential prompt, and efficient, resolution of this matter and do not, by consenting to conditional certification, admit that Plaintiffs, or any opt-ins, are "similarly situated." Nor does consenting to conditional certification limit, waive, or otherwise effect any defense Defendants may have to Plaintiffs' claims.

The Class Members shall consist of the following:

Outback Steakhouse Class:

All current and former bartenders and servers who worked at Outback Steakhouse for at least one week during the three-year period prior to the filing of this action to the present.

Bonefish Grill Class:

All current and former bartenders and servers employees who worked at Bonefish Grills for at least one week during the three-year period prior to the filing of this action to the present.

The Parties stipulate that Don Foty of Hodges & Foty, LLP, Anthony Lazzaro of the Lazzaro Law Firm, and A. Lee Parks of Parks, Chesin & Walbert, P.C. shall

serve as class counsel and that Synasia Sanders and Jacqueline Hine shall serve as the class representatives.

The Parties stipulate that within **twenty-one (21) days** of the Court approving this stipulation by signing below, Defendants shall provide to Plaintiff's Counsel the names, last known home addresses, and dates of birth for all Class Members as defined above. Defendants shall provide such information in a computer-readable format, such as a Microsoft Excel Spreadsheet.

The Parties stipulate that Plaintiffs' counsel shall transmit the agreed Notice of Rights and Consent Form via first class mail and electronic mail no later than 30 days of receiving the list from Defendants. Plaintiffs shall distribute the Notice and Consent Form attached hereto as Exhibit "A." The Class Members shall be allowed to execute either a hard copy of the consent form or an electronic copy of the Consent Form by DocuSign. The Parties agree that the putative opt-in plaintiffs will have sixty (60) days from the date of the mailing to file consents with the Court.

SIGNED on September 1, 2022.


JUDGE PRESIDING