

NOTICE OF WARN CLASS ACTION

PLEASE READ THIS NOTICE CAREFULLY, IT MAY AFFECT YOUR RIGHTS

WHAT IS THIS NOTICE ABOUT?

A court has taken the first step in approving a class action lawsuit. The lawsuit, *Williams, et al v. Go Frac, LLC*, involves back wages and benefits you may be owed as a result of Defendant Go Frac, LLC's ("Go Frac") alleged failure to provide you with 60 days' notice prior to your employment loss. Go Frac has denied any wrongdoing, and the Court has not yet made a decision on whether money is owed to anyone.

In a class action lawsuit, one or more persons (class representatives) sue on behalf of themselves and any other individual who may have similar claims. The Court has determined that similar claims exist, and that everyone who has experienced an employment loss similar to the class representative is now a class member in this case.

This Notice a summary only, and is sent to you so that you will know how best to make informed decisions about your rights. For further information, please visit www.WARNgofrac.com, or call (866) 242-0255.

WHAT IS THE WARN ACT CLAIM?

On or about January 12, 2015, Go Frac began laying off nearly all of its employees. On February 11, 2015, the Plaintiffs filed a complaint in federal district court, currently pending in the Marshall Division of the Eastern District of Texas seeking compensation under the Worker Adjustment and Retraining Notification Act (the "WARN Act"). The WARN Act is a federal statute that requires employers under certain circumstances to give their workers 60 days' notice before a mass layoff or a plant closing. In situations where an employer fails to do so, they may be required to pay 60 days' back wages, benefits, and certain expenses.

In this case, the Plaintiffs contend that Go Frac should have provided notice, and because Go Frac did not, they and the class members are entitled to compensation. Go Frac's defense is that the employment terminations were the result of business circumstances that were not reasonably foreseeable when notice would have been required.

ARE YOU A CLASS MEMBER?

The Court has certified this case as a class action, and has defined the class as all affected employees as defined by 29 U.S.C. § 2101(a)(5) of Go Frac who worked for Go Frac in either (a) Texas and surrounding areas or (b) Ohio and surrounding areas, who experienced an employment loss within a 30 day period of January 12, 2015, and who have not filed a timely request to opt-out of the class.

WHAT CAN YOU DO AT THIS TIME?

1. REMAIN A CLASS MEMBER:

If you wish to remain a class member, you do not need to do anything at this time, and you will be represented by the class representative and class counsel. If you do nothing, and are found to be in the definition of the class, you will be a class member and be bound by any judgment (favorable or unfavorable) or court-approved settlement in the case. Before court approval, if you are found to be a class member, you will receive notice of any proposed settlement and will be given the chance to *OBJECT* to it. You may also enter an appearance in this lawsuit through counsel of your own choice if you so desire. If you do so, you will bear the cost of such counsel's fees.

2. EXCLUDE YOURSELF:

If you DO NOT wish to participate in this action, and wish to be EXCLUDED, you will not be bound by any judgment or share in any recovery of the class members. To exclude yourself, check the box on the attached form labeled "EXCLUSION FORM" and follow the directions on that form to return it to class counsel. If you wish to pursue your own claim, you must retain separate counsel. The form must be *received* by **[60 days AFTER MAILING]**.

WHO IS CLASS COUNSEL AND LEAD PLAINTIFF?

The class is represented by Allen R. Vaught, of Baron & Budd, P.C., 3102 Oak Lawn Avenue, Suite 1100; Dallas, Texas 75219, (866) 242-0255. The Court has also appointed Plaintiffs Wildrick Williams and Kelvin King as the Class Representatives (Texas class); and Theodore Hinson as Class Representative (Ohio class).