

**United States District Court  
for the Western District of Texas  
San Antonio Division**

**If you worked for Trinidad Drilling, LP as an hourly-paid oilfield worker at any time since March 18, 2013 you may be able to join a collective action lawsuit seeking back overtime wages and other damages.**

***This is not a solicitation from a lawyer.***

An oilfield worker former employee of Trinidad Drilling, LP (“Trinidad”) alleges that he was not paid all overtime wages owed because Trinidad had a practice or policy of not including compensation for oil-based mud pay, a type of shift differential in calculating his hourly overtime rates of pay. Additionally, this worker alleges that he was not paid all overtime wages owed because Trinidad did not include non-discretionary safety incentive bonuses in calculating his hourly overtime rates of pay.

The Court conditionally certified this case as a collective action, which is a type of class action, on behalf of all current and former oilfield employees who worked for Trinidad at any time from March 18, 2013 to now.

**1. Why did I get this notice?**

This Notice is to tell you about a collective action lawsuit against Trinidad that may affect your potential rights to back overtime wages and other damages under federal law. The name of the lawsuit is *Ryan Walker and Moises Cenicerros, on behalf of themselves and all others similarly situated v. Trinidad Drilling, LP*, Civil Action No. 5:15-cv-00169-RP pending in the United States District Court for the Western District of Texas, San Antonio Division.

You have legal rights and options that you may exercise. Therefore, the Court has authorized that this notice be sent to you to explain what the lawsuit is about so that you can decide whether to opt-in (join the lawsuit).

**2. What is the overtime wage lawsuit about?**

Ryan Walker and Moises Cenicerros (the “Plaintiffs”) filed this lawsuit against Trinidad on behalf of themselves and certain other past and current oilfield worker employees who worked for Trinidad.

The Plaintiffs allege that Trinidad did not include compensation for oil-based mud pay, a type of shift differential in calculating his hourly overtime rates of pay.

For more information, call toll-free 1 (866) 495-1255 or [www.trinidadovertimelawsuit.com](http://www.trinidadovertimelawsuit.com)

Additionally, the Plaintiffs allege that they were not paid all overtime wages owed because Trinidad did not include incentive bonuses, such as pay for completing wells on or ahead of schedule, in calculating his hourly overtime rates of pay.

As a result, the Plaintiffs believe that Trinidad owes back overtime pay, liquidated damages (equal to back overtime pay), legal fees and costs for failing to pay all overtime pay owed.

Trinidad denies Plaintiff's allegations and contends that all overtime wages owed were properly paid to its employees.

The Court has not decided who is right or wrong in this lawsuit.

### **3. How do I join (opt-into) the overtime lawsuit?**

If you fit the definition at the top of this notice, you may join this lawsuit as a class plaintiff and be represented by the named lead Plaintiffs in this lawsuit. You can join by mailing, faxing, or emailing the enclosed "**Consent to Join**" form to the Plaintiffs' attorneys before the deadline.

**Your form must be received (or, if mailed, postmarked) on or before: JUNE 22, 2016.**

If you want to join, send in the form sooner rather than later because the maximum period you may be able to seek overtime under the FLSA is three years before the date that form is filed. Filing the form earlier means that the time period covered for you in the case will start earlier.

### **4. What happens if I join the overtime lawsuit?**

If you submit the "Consent to Join" form: You will be represented by the Plaintiffs and their lawyers, who will make decisions and agreements on your behalf concerning the lawsuit. If the Plaintiffs recover money from the Defendant, you may be able to receive a share. However, you cannot bring a separate lawsuit seeking overtime pay, even if the Plaintiffs do not recover money.

The Plaintiffs' attorneys will not charge you directly for their work. If the Plaintiffs recover money, the Plaintiff's attorneys will be paid whatever fees the Court approves. Those fees may be subtracted from the recovery, if any, obtained from Defendant, or they may be paid separately by Defendant, or they may be a combination of the two. If the Plaintiffs recover no money or relief from Defendant, their lawyers will not be paid for their work on this case.

### **5. What happens if I do nothing?**

If you do nothing (i.e., do not submit the "Consent to Join" form): You will not be a part of the lawsuit. You will not be affected by any judgment in this lawsuit or be represented by the Plaintiffs' lawyers. If money is recovered, you will not receive a share.

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## **6. What happens next?**

You and the other Class Members have until **JUNE 22, 2016** to opt into the lawsuit. After that date, you will not be allowed to opt-into this lawsuit.

## **7. Can Employers retaliate against me if I join this lawsuit?**

No. Federal law prohibits employers, including future potential employers, from retaliating against you in any way for participating in good faith in an overtime wage claim. For example, they cannot make threats against you, fire you, give you an unfair review, cut your pay, fail to promote you, or refuse to hire you for exercising your rights under the FLSA in good faith.

## **8. Who will represent me if I join the lawsuit?**

If you choose to join this suit, you will be represented by the Plaintiffs through their attorneys:

**Allen R. Vaught**  
**Baron & Budd, P.C.**  
3102 Oak Lawn Avenue, Suite 1100  
Dallas, TX 75219  
Telephone: (866) 495-1255  
Fax: (214) 520-1181  
E-Mail: [mclarkson@baronbudd.com](mailto:mclarkson@baronbudd.com)

and

**Jeremi K. Young**  
**The Young Law Firm, P.C.**  
1001 S. Harrison, Suite 200  
Amarillo, Texas 79101  
Telephone: (806) 331-1800  
Fax: (806) 398-9095  
E-mail: [stephanie@youngfirm.com](mailto:stephanie@youngfirm.com)

## **9. How do I get more information?**

If you have questions, feel free to contact the attorneys listed in Paragraph 8 above, visit [www.trinidadovertimelawsuit.com](http://www.trinidadovertimelawsuit.com), or call 1 (866) 495-1255.

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