

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

CASE NO. 05-23087-CIV-ALTONAGA/Turnoff

JACK COOPER PINTO, NICOLA PRAZERES,
OCTAVIO REVELES, individually, and on behalf of all
others similarly situated,

Plaintiffs,

vs.

PRINCESS CRUISE LINES, LTD d/b/a
PRINCESS CRUISES

Defendant.

NOTICE OF PENDENCY OF CLASS ACTION,
PROPOSED SETTLEMENT AND SETTLEMENT HEARING

This Notice provides you with important information in connection with the settlement of a lawsuit concerning Princess Cruise Lines, Ltd. ("Princess"). If you wish to recover money you must act by December 31, 2006. **THIS NOTICE MAY AFFECT YOUR RIGHTS – PLEASE READ IT CAREFULLY AND IN ITS ENTIRETY.**

TO: All former and current, non-POEA seafarer-employees, who since November 28, 2001 have worked or are working for and aboard various foreign flagged vessels owned by Defendant Princess Cruise Lines Ltd., worked overtime hours and have not been or are not being paid wages in full upon their discharge from their respective vessels upon which they are/were employed at the termination of voyages in U.S. ports or harbors. Excluded from the class are (a) Defendant and its corporate officers and directors, and (b) the immediate family members of Defendant's corporate officers and directors. As used herein the term corporate officers and directors does not include someone who works aboard a Princess ship and has the rank or position of ship's officer or department director. ("THE SETTLEMENT CLASS")

A federal court authorized this Notice. This is not a solicitation from a lawyer.

Settlement Benefits: As part of the proposed class action settlement, a \$4.25 million fund is being provided (the "Settlement Fund") in addition to certain non-monetary relief. Plaintiffs estimate that approximately 20,000 employees worked for Princess during the period from November 28, 2001 through the date of this notice (the "Settlement Class Period"). Plaintiffs claim that Princess failed to pay adequate wages during the Settlement Class Period. Princess has denied these claims. In order to resolve the matter, the parties have reached a settlement. The Settlement Fund to be distributed is subject to reduction based on the amount of attorneys' fees and expenses that may be awarded by the Court, as described below.

The actual amount each Settlement Class member shall be entitled to be paid is an amount equal, at least, to (1) the number of months the claimant worked from November 28, 2001, through the date of this notice, divided by (2) the total number of months worked by all Princess class member employees on Princess vessels during that same period, as determined by Princess's position headcounts, multiplied by, (3) \$4,250,000.00 less the total fees and costs finally awarded to plaintiffs' counsel and the settlement class representatives, (4) reduced by 60% if the individual class member was a member of the *Gall et. al. v. Princess* previous class action and did not opt out but did not receive any payment or reduced by 75% if the individual class member filed a claim and received an actual money payment from that lawsuit. To be eligible for payment you must submit a timely and valid proof of claim. A valid proof of claim must show that you worked overtime hours beyond those already contained in your consolidated wage and that you were not fully paid for those excess overtime hours and that you signed off a Princess vessel at the end of your contract or employment in a port or harbor of the United States. The Settlement also requires for Princess to adopt accurate work time records. The settlement also provides for a grievance and arbitration procedure for wage claims as defined in the Settlement Agreement.

Description of Case: Plaintiffs – former Princess employees – allege that Princess failed to pay adequate wages to employees who worked aboard any Princess ship during the Settlement Class Period and specifically that they were required to work excess overtime beyond the overtime hours already contained in their consolidated monthly wage. Plaintiffs brought this litigation to require Princess to pay employees wages, other compensation, and penalty wages of two times the Plaintiffs' daily wages per day since discharge from their vessels and to require Princess to maintain accurate time records for each of the class members. Princess denies that it owes the wages, other compensation, and penalties.

Reasons for Settlement: This Settlement presents a substantial recovery in light of the risk that the Class would not prevail on some or all of their claims. The Settlement avoids the costs and risks associated

with continued litigation – including the danger of no recovery – and provides a considerable benefit to the Settlement Class now.

Attorneys’ Fees and Expenses: Plaintiffs’ counsel has not received any payment for their work investigating the facts, conducting this litigation and negotiating the settlement on behalf of the Settlement Class, nor have they been reimbursed for their out-of-pocket expenditures. Plaintiffs’ counsel has spent considerable time and effort in the prosecution of this litigation on a contingent basis, and have advanced the expenses of the litigation in the expectation that if they were successful in obtaining a recovery for the Class they would be paid from such recovery. If the Court approves the Settlement, Plaintiffs’ counsel will ask the court for attorneys’ fees not to exceed thirty percent (30%) of the Settlement Fund and for fees for each of the three named Plaintiffs of \$7,500. In this type of litigation it is customary for counsel to be awarded a percentage of the common fund recovery as attorneys’ fees. The court will ultimately decide what amount of the attorneys’ fees are awarded to class counsel.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
SUBMIT A CLAIM FORM	The only way to get a payment is to fill out and return the attached “Claim Form”.
EXCLUDE YOURSELF	This is the only option that allows you to participate in another lawsuit against Princess relating to the claims being released in this case. To exclude yourself from the settlement, fill out and return the attached “Opt Out” form or otherwise provide written notice that you intend to opt out. If you so opt out, you will not receive payment from this settlement.
OBJECT	You may write the Court if you object to the Settlement. You may also speak in Court about the fairness of the Settlement if you have timely filed an objection.
DO NOTHING	If you feel you have been properly paid or for any other reason do not wish to participate in this lawsuit against Princess and you do not intend to file your own separate lawsuit against Princess, you can simply do nothing. You will receive no payment from Princess, but you will still be bound by the settlement.

DEADLINES	
SUBMIT CLAIM	December 31, 2006
REQUEST EXCLUSION	December 31, 2006
FILE OBJECTION	December 15, 2006
FAIRNESS HEARING	January 11, 2007

Fairness Hearing: The Court has scheduled a hearing on January 11, 2007 at 9:00 a.m., before the Cecilia Altonaga, United States District Judge at the United States District Court for the Southern District of Florida, at 301 North Miami Avenue, Miami, Florida 33128, to consider whether to grant final approval of the Settlement (the “Fairness Hearing”). The Fairness Hearing may be rescheduled by the Court without further notice. Any Settlement Class Member may appear at the Fairness Hearing to argue that the proposed Settlement should not be approved and/or to oppose the applications for attorneys’ fees and expenses and class representative fees. But in order to be heard at the hearing, you must make any objection in writing, file it with the Court and serve it on the parties to the lawsuit **no later than December 15, 2006**. You do not need to attend the Settlement Hearing if you do not wish to object. Any person who fails to object in the manner and by the date described above shall be deemed to have waived any objections, and shall be barred forever from raising such objections in this or any other action or proceeding.

How To Obtain Additional Information: This is only an abbreviated summary of the proposed settlement and release. In order to receive additional information, please contact:

Claims Administrator	Plaintiffs’ Counsel
PRINCESS CRUISE LINES LTD. Pinto Litigation Claims 24305 Town Center Dr. Santa Clarita, CA 91355 USA	Tucker Ronzetti, Esq., KOZYAK TROPIN & THROCKMORTON, P.A., 2525 Ponce de Leon, 9 th Floor Coral Gables, FL 33134 USA
	Julio Ayala, Esq. Crew Member Advocacy Center 66 W. Flagler St. Suite 300 Miami, FL 33130 USA
	David W. Brill, Esq. Downs, Brill, Whitehead Pointe Bank Building, Ste 304 One Southwest 129th Ave., Pembroke Pines, FL 33027 USA

PLEASE DO NOT CONTACT THE COURT
Accurate claims processing takes a significant amount of time.
If you have any questions, call: 1-800-_____