

Novak/Elmaghraby v. Home Depot U.S.A., Inc.,
Consolidated Civil Action No. 04-4100 (PGS)

VERIFIED FACT SHEET FOR OPT-IN PLAINTIFFS

1. Identify by location and store number, If known, every Home Depot store at which you have worked as a Home Depot Merchandising Assistant Store Manager (referred to as a "MASM") since August 25, 2001, including for each such store:

(a) the names of the Store Manager(s) and/or Co-Manager(s) to whom you reported as a MASM;

(b) the dates during which you worked at each such store as a MASM.

2. For each Home Depot store at which you have worked as a MASM since August 25, 2001, identify:

(a) each department to which you were assigned as a MASM;

(b) the dates during which you were assigned to each such department;

(c) the name of each Department Supervisor and/or Department Head who was assigned to each such department for any period(s) of time during which you were assigned to the same department as a MASM.

3. Identify by inclusive dates each week, beginning August 25, 2001 and continuing to the present, during which you claim you worked more than 55 hours as a Home Depot MASM, stating for each such week:

(a) the total hours you claim to have worked that week;

(b) the store(s) at which you worked that week;

(c) identifying all persons with knowledge of the actual hours you worked for that week.

4. Identify each document which you contend supports your claim that you worked more than 55 hours for each week identified in response to No. 3.

5. Identify each employer for which you worked, presently work and/or sought employment with, subsequent to your employment with Home Depot (including periods of self employment), and provide for each employer:

(a) your best memory of the date(s) on which you sought employment;

(b) the dates of employment;

(c) the position title(s) and corresponding job duties and responsibilities;

(d) the salary or rate of pay for each position held;

(e) the employer's address;

(f) the facility or location(s) at which you worked;

(g) except for your present employer, the specific reason(s) for leaving said employment,

6. Identify fully and specifically any civil lawsuit, administrative claim, arbitration, grievance or any other adversarial proceeding ("action"), other than the present one, in which you have been a plaintiff or claimant which involves(ed) any employment related claims (including claims for discrimination, harassment, income, disability or other compensation, and/or that relate to your ability to work), or any bankruptcy proceeding you have commenced, including as to each;

(a) the complete name of the action;

(b) a description of the action;

(c) the identity of all parties to it;

(d) the date it was filed;

(e) the identity of the court or agency before which the action was filed;

(f) its docket number;

(g) the identity of the lawyers for each party; and

(h) the final result or current status of the action.

7. Identify each person, including current or former Home Depot employees, with whom you have communicated regarding your claims or participation in this action, including the name and address of each person identified.

I declare under penalty of perjury that the foregoing is true and correct.

Date signed

Signature

Printed Name