EXHIBIT B

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF IOWA
CENTRAL DIVISION

CHAD LYONS; and CHRISTIAN TAVERAS, individually and on behalf of others similarly situated, Plaintiffs, vs. IR LABS DE, LLC; and SOURCETEK, INC. Defendants.	)	Case No. 4:24-cv-00002-SHL-SBJ **NOTICE OF COLLECTIVE ACTION LAWSUIT**

TO: [First Name], [Last Name].

Re: Collective action lawsuit regarding claims for alleged unpaid overtime compensation

DEADLINE TO FILE CONSENT FORM: _____, 2025.

1. Why Are You Getting This Notice?

Two former employees filed a lawsuit on behalf of themselves and other current and former employees of IR Labs DE, LLC and SourceTek, Inc. ("Lawsuit"). No Court or Arbitrator has decided the merits of the Lawsuit. Nevertheless, the Parties have agreed to resolve this Lawsuit to avoid the disruption and expense associated with any further action. The resolution that has been reached in this Lawsuit may affect your rights.

On _____, 2025, the Court approved a resolution in this Lawsuit and authorized this Notice to be sent to certain employees whose IR Labs DE, LLC's ("IR Labs") records identified as current or former employees who were classified as nonexempt, recorded overtime, and received commissions or milestone bonus payments ("IR Labs FLSA Settlement Group").

If you are the intended recipient identified above, you received this Notice because you were identified as a member of the IR Labs FLSA Settlement Group and therefore you have the option to (1) do nothing, or (2) submit a Claim Form to receive a payment in exchange for a release of claims against IR Labs and other parties.

The purpose of this Notice is to inform you of the terms, and your rights and options in connection with the resolution.

YOUR LEGAL RIGHTS AND OPTIONS	
DO NOTHING	If you do not wish to be a part of this Lawsuit, you do not need to do anything. If you do nothing, you will not receive a money payment as part of the resolution of this Lawsuit, and you will not release your claims against IR Labs and other parties, as explained below.
SUBMIT THE CLAIM FORM	If you wish to participate in the resolution of this Lawsuit and receive a money payment, as well as agree to release your wage-and-hour claims and be bound by the Confidential Settlement Agreement and Release, you must timely complete and return the attached Claim Form, which must be mailed to_____. The Claim Form is time sensitive and must be received by the Claims Administrator on or before _____, 2025.

The decision to join (or not) is entirely yours.

IR Labs and SourceTek (collectively, "Defendants") will not and cannot retaliate against you for your participation or non-participation in the Lawsuit.

2. What Is This Lawsuit About?

Two former employees filed this lawsuit on behalf of themselves and other current and former employees of Defendants. Plaintiffs allege Defendants failed to pay them and other workers overtime as required by the FLSA. Plaintiffs seek back wages in the form of unpaid overtime, liquidated damages, plus attorneys' fees and costs, for themselves and all similarly situated employees.

Defendants deny that they paid their workers incorrectly. They deny that any current or former employees are entitled to any additional compensation or other relief. Defendants have asserted numerous defenses to Plaintiffs' claims.

The Court has not decided who is right. By authorizing this Notice, the Court is not suggesting that the Plaintiffs will win or lose the case.

3. What are the resolution terms?

The resolution requires that Defendants create a resolution fund to pay eligible members who submit the Claim Form attached to this Notice. Allocations of payments from the resolution fund to members of the IR Labs FLSA Settlement Group will be determined based on the number of weeks worked by each member of the IR Labs Settlement Group during the time period of January 2, 2021, to [DATE OF COURT APPROVAL]. Defendants have agreed to pay Plaintiffs' attorneys fees and costs.

How can I make my claim?

You must fill out and sign the Claim Form that is attached to this notice and return it by mail to

[CLAIMS ADMINISTRATOR AND CONTACT INFO]

The Claim Form must be received by the Claims Administrator on or before _____, 2025.

If you timely submit a Claim Form, a check for your share of the resolution will be sent to you at your most current address available at the time of payment, so it is important that you tell the Claims Administrator if you move or your address has changed.

How long do I have to cash my check?

Your check will have a date on it. The checks will be valid for sixty (60) days.

If you lose your check or it is damaged in the mail, contact the Claims Administrator. You may be able to have it reissued, provided you ask within the 60-day time period.

If you do not cash your check within 60 days of the date it was issued, your money will not be paid.

Will I owe any taxes?

Half of the amount you receive will be wage income and subject to normal payroll tax withholdings and W-2 reporting. These deductions will be taken out of your check. The other half of the payment will be designated as non-wage income and subject to 1099 reporting. If you have questions about the tax consequences of the payment to you, you should consult with an accountant or other tax advisor.

What rights am I giving up by submitting a Claim Form?

You will give up any right to file a wage-and-hour claim for the time period covered by this Lawsuit. If you submit a Claim Form, you agree to fully release and discharge IR Labs and

SourceTek and their direct and indirect parents, affiliates, subsidiaries, divisions, owners, shareholders, partners, joint venturers, professional employment organizations, representatives, predecessors, successors, assigns, clients, and customers, and all of their current and former employees, officers, directors, attorneys, insurers, and agents thereof, both individually and in their business capacities, and their employee benefit plans and programs and their plan administrators and fiduciaries, from any and all state, local, or federal claims, obligations, demands, actions, rights, causes of action and liabilities, whether known or unknown, for alleged unpaid wages, overtime damages, minimum wages, unreimbursed expenses, inadequate meal or rest breaks, inadequate pay statements, penalties (including late payment and waiting-time penalties), premium pay, interest, liquidated or other damages, restitution, and any other compensation and relief under the Fair Labor Standards Act ("FLSA") and any other federal, state, and local wage-related law (including statutory, common law, contractual, and equitable claims) that arise from or relate to your employment or association with IR Labs or SourceTek from January 2, 2021 through the date of the Approval Order.

If you submit a Claim Form, you will further agree to be bound by the other terms of the Confidential Settlement Agreement and Release that was negotiated by Plaintiffs and Defendants and approved by the Court. A copy of that agreement is available on the Court's docket and/or by requesting a copy from Class Counsel.

Do I have to pay any attorneys or other costs?

No. Your share, and the applicable funds will not be increased or reduced by the amounts, if any, awarded to the attorneys in the Lawsuit.

As part of the resolution, the Court appointed William "Jack" Simpson of Simpson, PLLC and Timm Reid of the Reid Law Firm, PLLC as the attorneys for eligible employees in this Lawsuit. ("Class Counsel").

Under the resolution, IR Labs is required to pay Class Counsel in this case.

4. Where do I find more information and who do I contact if I have further questions?

This Notice is only a summary of the Lawsuit. All questions or inquiries regarding this notice and/or resolution should be directed to the Claims Administrator or Class Counsel.

Claims Administrator:

[insert name and contact info]

Class Counsel:

William “Jack” Simpson
Simpson, PLLC
100 South Main Street
Booneville, MS 38829
Telephone: (662)913-7811
Email: jack@simpson-pllc.com

You should **not** contact the Court to discuss this matter.

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF IOWA
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CHAD LYONS; and CHRISTIAN TAVERAS, individually and on behalf of others similarly situated, Plaintiffs, vs. IR LABS DE, LLC; and SOURCETEK, INC. Defendants.	)	Case No. 4:24-cv-00002-SHL-SBJ **CLAIM FORM** **for IR Labs FLSA Settlement Group**

Name
Address
City, State, Zip

If your name or address is different from those shown above, print the corrections on the lines below.

TO RECEIVE MONEY FROM THE RESOLUTION OF THIS LAWSUI, YOU MUST COMPLETE, SIGN, AND SUBMIT THIS FORM TO THE ADDRESS BELOW BY [INSERT DATE].

IF YOU DO NOT PROPERLY SUBMIT IT BY [INSERT DATE], YOUR CLAIM WILL BE REJECTED.

I. INSTRUCTIONS

1. You must complete, sign and return this Claim Form by mail to **the Claim Administrator at [address]** in order to be paid money from this resolution. Your Claim Form must be received on or before the date above, or it will be rejected.

2. If you move, please send your new address to the Claim Administrator at the address shown above. It is your responsibility to keep a current address on file at the address shown above.

3. If you sign and return this Claim Form and it is either received on or before the date above, you will be sent a check for the applicable amounts based on eligible weeks that you worked during the relevant time period as provided in the resolution.

4. Submitting a claim will not impact your employment with Defendants in any way.

Yes, I wish to be a part of this Resolution and this Lawsuit. By signing below, I am releasing IR Labs DE, LLC ("IR Labs") and SourceTek, Inc. ("SourceTek") and their direct and indirect parents, affiliates, subsidiaries, divisions, owners, shareholders, partners, joint venturers, professional employment organizations, representatives, predecessors, successors, assigns, clients, and customers, and all of their current and former employees, officers, directors, attorneys, insurers, and agents thereof, both individually and in their business capacities, and their employee benefit plans and programs and their plan administrators and fiduciaries, from any and all state, local, or federal claims, obligations, demands, actions, rights, causes of action and liabilities, whether known or unknown, for alleged unpaid wages, overtime damages, minimum wages, unreimbursed expenses, inadequate meal or rest breaks, inadequate pay statements, penalties (including late payment and waiting-time penalties), premium pay, interest, liquidated or other damages, restitution, and any other compensation and relief under the Fair Labor Standards Act ("FLSA") and any other federal, state, and local wage-related law (including statutory, common law, contractual, and equitable claims) that arise from or relate to your employment or association with IR Labs or SourceTek from January 2, 2021 through the date of the Approval Order. I further agree to be bound by the Confidential Settlement Agreement and Release that was negotiated by the Parties and approved by the Court.

_____ _____

Sign your name here Date

_____ _____

Print Your Name Here Former Names (if any)

_____ _____

Home Address Email address (optional)

_____

Social Security Number

Unique Employee Identification No. _____ *[to be inserted by Claims Administrator]*