

STATE OF NORTH CAROLINA
FORSYTH COUNTY

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
22 CVS 929
22 CVS 683

VANDA THOMAS; STACY WHARTON;)
KAREN PRUDENCIO; ARCOLA LEWIS)
d/b/a PREMIER ONE SALON; and)
SHERMAN and KELLEY TRANSOU;)
TARRYTON T. CARSON, d/b/a ZAEL'S)
FLORIST; IL&T FINANCIAL)
CONSULTING, INC.; NU DIMENSIONS)
HAIR STUDIO, INC.; and)
INTERNATIONAL MACHINERY SALES,)
INC.;)
Individually and on Behalf of All Others)
Similarly Situated)
Plaintiffs,)
v.)
WINSTON WEAVER CO., INC.,)
Defendant.)

JOINT PRE-HEARING STATEMENT

COME NOW the parties, pursuant to the Court's Order of March 30, 2026, and submit this pre-hearing statement to identify and describe all documents and other evidence they intend to offer at the final fairness hearing scheduled for May 20, 2026.

- I. Documents to be Offered at the Fairness Hearing
 - a. Offerings by general reference.

The parties will offer by reference all proceedings in this case and particularly all pleadings, motions, affidavits, exhibits, orders regarding class consolidation and certification, the required notice of class action, the affidavits of mailing and publication thereof, and the proofs of claims filed, or that will be filed prior to the

hearing, in compliance with the orders of the Court. Plaintiffs contend that the entire record in this case demonstrates the legal issues which had to be resolved to achieve a settlement and the factual issues that have been contested, which the Court may find helpful to consider in its decision.

b. Specific offerings regarding fairness of the settlement terms.

Plaintiffs will offer into evidence by reference the following pleadings and Orders of the Court regarding fairness of the proposed settlement:

1. Joint Motion for Preliminary Approval of Business Class Settlement and Award of Attorneys' Fees, Costs, and Expenses.
Exhibit 1 – Preliminary Partial Settlement Agreement for the Business Class (“BSA”).
2. Memorandum in Support of Joint Motion for Preliminary Approval of Business Class Settlement, Award of Attorneys' Fees and Expenses, and Recommendation.
Appendix A – Contents of BSA.
Appendix B – Affidavit of Epiq Proposed Settlement Administrator;
Form of Notice.
3. The Court's Order of March 30, 2026, Approving Preliminary Settlement Agreement, Attorneys' Fees and Expenses, Settlement Administrator and Other Related Matters.
4. Joint Motion for Final Approval of Business Class Settlement and Award of Attorneys' Fees, Costs, and Expenses, including attached exhibits, to be filed prior to the hearing.

5. Declarations of Business Class Representatives, to be filed before the fairness hearing.

Tarryton T. Carson, d/b/a Zael's Florist
IL&T Financial Consulting, Inc.
Nu Dimensions Hair Studio, Inc.
International Machinery Sales, Inc.

6. Affidavit of Cameron R. Azari, Regarding Commencement of Settlement Notice Plan.

II. Witnesses Whom Plaintiffs May Call at the Fairness Hearing

Tarryton T. Carson of Zael's Florist

Representative from IL&T Financial Consulting, Inc.

Representative from Nu Dimensions Hair Studio, Inc.

Nicolas Sear of International Machinery Sales, Inc.

III. Stipulations

- a. Defendant Winston Weaver does not oppose the Court's consideration of Plaintiffs' request for attorneys' fees, costs and expenses, and service awards as provided in the Business Class settlement agreement, provided that any such awards are determined by the Court in accordance with applicable law and do not modify the terms of the settlement or impose obligations on Winston Weaver beyond those expressly set forth in the Business Class settlement agreement and the final approval order.
- b. Winston Weaver's non-opposition regarding any evidentiary submissions for the limited purpose of the final approval hearing is without prejudice to, and shall not waive, any evidentiary or other objections in any subsequent phase of this litigation or in any other proceeding. The parties' stipulations for the final

approval hearing shall be construed solely to facilitate the Court's fairness determination and shall not be deemed admissions for any other purpose.

Respectfully submitted this 30th day of April 2026.



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CERTIFICATE OF SERVICE

This is to certify that the undersigned has this date served the foregoing Joint Pre-Hearing Statement on the Court's electronic docketing system. By previous Case Management Order, Liaison Counsel are authorized and designated to receive filing electronically from the Court on behalf of all defendants. Therefore, the undersigned upon information and belief certifies that all counsel of record as noted below, will receive a copy of these papers through the Court's electronic notice system:

This the 30th day of April 2026.

ADDRESSED TO:
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