

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO**

*Quint, et al. v. Vail Resorts, Inc.*

*Civil Action No. 20-cv-03569-DDD-NRN*

**NOTICE OF COLLECTIVE ACTION LAWSUIT FOR  
VAIL RESORTS SNOW SPORT INSTRUCTORS**

**PLEASE READ THIS NOTICE CAREFULLY**  
**THIS NOTICE COULD AFFECT YOUR LEGAL RIGHTS**

**If you are a current or former Vail Resorts, Inc. (“Vail Resorts”) Snow Sports Instructor employed at a Vail Resorts location within the United States at any time after December 2, 2017, the above-captioned collective action lawsuit may affect you.**

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

- Named Plaintiffs in the action—three Vail Resorts hourly employees (two ski instructors; one lift ticket scanner)—allege that Vail Resorts violated the Fair Labor Standards Act (the “FLSA”) by improperly failing to pay Snow Sports Instructors for “off-the-clock” work including, but not limited to: (i) work performed while traveling between employee parking lots, locker rooms, and worksites; (ii) time spent putting on and taking off (“donning and doffing”) uniforms and equipment; and (iii) training time. The Plaintiffs also allege that they and other similarly situated Vail Resorts Snow Sports Instructors were not reimbursed for snow sport equipment and costs for work-related cell phone use during the period from December 2, 2017, through the 2025-2026 season. Plaintiffs allege that, as a result, Vail Resorts failed to pay Snow Sports Instructors their regular or overtime rates of pay per hour.
- Vail Resorts denies that it did anything wrong or violated any laws in this case and denies all the Named Plaintiffs’ allegations. Vail Resorts believes it has paid and continues to pay all Snow Sports Instructors in full compliance with the law.
- The Court has not determined whether Vail Resorts did anything illegal. There is no money available now, and no guarantee that the action will be successful or anyone will recover any money in this case. However, your legal rights may be affected by your response to this notice.

**YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT**

To view JND’s privacy policy, please visit <https://www.jndla.com/privacy-policy>

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| <p><b>DO NOTHING</b></p>                                | <p><b>Do not join the lawsuit</b></p> <p>If you do not wish to be part of the lawsuit, you do not need to do anything. If you do not join the lawsuit, you will not be bound by the result. If you do nothing and money or benefits are awarded for the FLSA claims, you will not be entitled to any portion of the FLSA award.</p> <p>If you do nothing, you also retain the ability to sue Vail Resorts separately over the same or related claims made in this action, to the extent permitted by law.</p> |
| <p><b>ASK TO BE INCLUDED IN THE FLSA COLLECTIVE</b></p> | <p><b>Join the lawsuit</b></p> <p>By signing and returning the attached Consent Form, you join the FLSA collective action as a party to this lawsuit.</p> <p>You will also be bound by the result, whether favorable or unfavorable, to the Plaintiffs.</p>   |

**BASIC INFORMATION**

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

You are a potential Class Member in a Class and Collective Action filed against Vail Resorts. Vail Resorts’ records show that you are a current or former Snow Sports Instructor during the period from December 2, 2017, through the 2025-2026 season. This Notice explains that you are permitted to join in this lawsuit as a Plaintiff if you wish. A trial may be held on the claims being asserted against Vail Resorts and whether Plaintiffs are owed any money, and, if you join, you may be required to testify at trial and/or appear for a deposition. Judge Daniel D. Domenico of the United States District Court for the District of Colorado is overseeing this collective action.

**2. What is this lawsuit about?**

This lawsuit concerns the Named Plaintiffs’ allegations that Vail Resorts failed to pay Snow Sports Instructors for “off-the-clock” work during the period from December 2, 2017 through the 2025-2026 season including, but not limited to, work performed while traveling between employee parking lots, locker rooms and worksites, time spent putting on and taking off (“donning and doffing”) uniforms and equipment and training time, and whether Vail Resorts failed to reimburse hourly employees for the cost of their snow sport equipment and work-related use of their cell phones and other equipment.

Vail Resorts strongly denies that it did anything wrong and is vigorously defending against the claims. Vail Resorts expressly denies that the Named Plaintiffs were paid incorrectly or are entitled to any additional money. Vail Resorts asserts it paid Named Plaintiffs and all Snow Sports Instructors for all time worked as required by law.

**3. Has the Court decided who is right?**

No. No Court or jury has decided whether Plaintiffs or Vail Resorts is correct. By issuing this Notice, the Court is not suggesting the Plaintiffs will either win or lose this lawsuit.

**4. What is a collective action?**

In a collective action lawsuit, one or more people called “Named Plaintiffs” sue on behalf of other people who they believe have similar claims to their own in a single lawsuit. The people together are a “Collective” or “Collective Members.” The Snow Sports Instructors who sued - and all the Collective Members like them - are called the Plaintiffs. The company they sued is called the Defendant.

**5. Why am I receiving this Notice?**

The Court has ordered notice of this lawsuit be sent to a large number of people, many of whom may be similarly situated to the Plaintiffs. Your receipt of this Notice does not mean that you are part of the Collective or that you should join the lawsuit; rather, the Notice is intended to allow you to decide whether or not to join the lawsuit.

**6. Is there any money available now?**

No money or benefits are available now because the Court or a jury has not yet decided whether Plaintiffs’ claims are meritorious, and the two sides have not settled the case. There is no guarantee that money or benefits ever will be obtained.

**7. What happens after this Notice is sent?**

After all Notices are sent, individuals who received the Notice may choose to join the lawsuit as explained below. Then, the Court will decide whether the individuals who chose to join the lawsuit are similarly situated to the Named Plaintiffs and should remain in the case. After that, as long as the case isn’t resolved by a settlement or a motion for summary judgment, the Court will hold a trial. You may be required to appear for a deposition and/or trial testimony if you choose to join the lawsuit. During the trial, a jury or the judge will hear all the evidence and reach a decision about who is right. If the case settles or if any claims are decided as a matter of summary judgment by the Court, there will be no trial.

**WHO IS IN THE COLLECTIVE?**

**8. Am I part of this collective action?**

No, you are not currently part of this lawsuit, and will not be part of this lawsuit, unless (i) you previously filed a consent form, or (ii) file a completed consent form in accordance with the directions in paragraph 10 below.

**9. Which current and former Snow Sports Instructors are included?**

If you were, or currently are, a Vail Resorts Snow Sports Instructor who worked for Vail Resorts after December 2, 2017, you are eligible to participate in the lawsuit.

**YOUR RIGHTS AND OPTIONS**

**You have to decide whether to join the collective action and you have to decide this now.**

**10. How do I ask the Court to include me in the collective action?**

To ask to be included in this collective action, you may complete the Consent Form like the one attached and mail it to:

Vail Resorts Instructor Wage Litigation  
c/o JND Legal Administration  
P.O. Box 91343  
Seattle WA, 98111

The form also can be e-mailed to [info@vailresortsinstructorwagelitigation.com](mailto:info@vailresortsinstructorwagelitigation.com). This form must be returned by **April 15, 2026**. You may also complete the form online at [www.vailresortsinstructorwagelitigation.com](http://www.vailresortsinstructorwagelitigation.com).

If you want to join this lawsuit, it is extremely important that you read, sign and promptly return the Consent to Join form. If you do not wish to join the lawsuit, simply do nothing.

**11. Do I have a lawyer in this case?**

Edward P. Dietrich of Edward P. Dietrich, APC, and Joseph Sellers, Brian Corman, and Alisa Tiwari of Cohen Milstein Sellers & Toll PLLC currently represent the Plaintiffs in this lawsuit and will represent any other Snow Sports Instructor who choose to join this lawsuit. You do not need to hire your own lawyer if you join the lawsuit, but you have the right to hire your own lawyer at your own expense and/or represent yourself if you join this lawsuit.

**12. How will the lawyers be paid?**

If the lawyers get money for the Plaintiffs and other similarly situated Plaintiffs in this case, they may ask the Court for fees/expenses. You won't have to pay these fees/expenses. Fees/expenses may be deducted from any money obtained for the Collective and/or paid separately by Vail Resorts.

**GETTING MORE INFORMATION**

**13. Are more details available?**

If you have any questions, you may contact:

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c/o JND Legal Administration  
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Seattle, WA 98111

Email: [info@vailresortsinstructorwagelitigation.com](mailto:info@vailresortsinstructorwagelitigation.com)  
Phone: 855-680-2842  
Website: [www.VailResortsInstructorWageLitigation.com](http://www.VailResortsInstructorWageLitigation.com)

For more information, please visit the Important Documents page of the case's website for a complete copy of the Complaint and other Court documentation.

You may have received a similar notice that you are represented in a case against Vail Resorts in California. This is a different case and counsel in each case can only answer questions about their own case.

PLEASE DO NOT CONTACT THE COURT CLERK REGARDING THIS MATTER

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The Honorable Daniel D. Domenico  
The United States District Court for the District of Colorado