

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT
NEW HAVEN DIVISION**

Nadeyah Jones, individually, and on behalf of others similarly situated,)	Case No. 3:23-cv-1071-VAB
)	
)	Hon. Victor A. Bolden
Plaintiff,)	
)	Mag. Robert A. Richardson
vs.)	
)	
CareCentrix, Inc.,)	
)	
Defendant.)	

NOTICE OF RIGHT TO JOIN LAWSUIT

THIS IS NOT A LAWSUIT AGAINST YOU.

READ THIS NOTICE CAREFULLY – YOUR LEGAL RIGHTS MAY BE AFFECTED.

TO: All current and former Patient Advocates who were employed by CareCentrix, Inc. (“CareCentrix”) at any time in the past three years.

RE: Lawsuit for alleged unpaid wages under the Fair Labor Standards Act

1. INTRODUCTION

This Notice is to inform you about a lawsuit in which you may be eligible to make a claim for damages under the Fair Labor Standards Act (“FLSA”), 29 U.S.C. § 201, *et seq.*, to advise you how your rights may be affected by this lawsuit, and to instruct you on the procedure for participating in this lawsuit, if you are eligible and so choose.

2. DESCRIPTION OF THE LAWSUIT

Plaintiff Nadeyah Jones (“Plaintiff”) brought this action against CareCentrix on behalf of herself and all other current and former Patient Advocates who worked for CareCentrix at any time in the past three years. Plaintiff alleges that CareCentrix failed to pay its Patient Advocates premium overtime wages for all work performed in excess of forty (40) hours per week. More specifically, Plaintiff alleges that CareCentrix willfully violated the FLSA by knowingly failing to compensate its Patient Advocates for work tasks completed before and after their scheduled shifts when they were not clocked in to CareCentrix’s timekeeping system.

Plaintiff alleges that she and all other Patient Advocates are entitled to unpaid overtime wages, liquidated (double) damages equal to the amount of the overtime back wages for the past three years, plus attorneys’ fees and costs associated with bringing this lawsuit.

CareCentrix denies Plaintiff’s allegations and denies that its Patient Advocates are entitled to the relief and damages that Plaintiff requests.

3. PERSONS ELIGIBLE TO RECEIVE THIS NOTICE

The U.S. District Court for the District of Connecticut authorized the distribution of this Notice to:

All current and former Patient Advocates who were employed by CareCentrix at any time in the past three years.

If you received this Notice and fit the description above, you may be eligible to join this lawsuit.

4. NO OPINION EXPRESSED AS TO THE MERITS OF THE LAWSUIT

This Notice is meant only to provide eligible individuals information about their right to join this lawsuit if they wish. This litigation is in the early pretrial stage and no determinations of liability have been made.

Although this Notice and its contents were authorized by the Court, **the Court takes no position regarding any claims or defenses**, and there is no assurance that the Court will grant any relief to the Plaintiff in this case. The Court has not yet made any decision regarding the merits of the parties' claims or defenses.

5. YOUR RIGHT TO PARTICIPATE IN THIS LAWSUIT

If you meet the definition of the Collective group identified in Section 3, you may be eligible to participate in this lawsuit.

There is no cost to you to participate, but there is no guarantee of recovery either. If a violation of the FLSA is proven, you will be eligible to recover damages as allowed by law.

It is entirely your own decision whether to join this lawsuit.

6. EFFECT OF JOINING THIS LAWSUIT

If you choose to join this lawsuit, you will be bound by any Settlement or judgment on any claim you may have under the FLSA, whether favorable or unfavorable. That means that, if Plaintiff wins, you may be eligible to share in any monetary award; if Plaintiff loses, no money will be awarded, and you will not be able to file another lawsuit regarding the matters raised in this lawsuit.

While this lawsuit is proceeding, you may be required to respond under oath to written questions, to have your deposition taken under oath, to produce documents, and/or to testify in Court at a trial or hearing at the U.S. District Court in Hartford, Connecticut. If you join this lawsuit, you must preserve any and all documents relating to your employment with CareCentrix which are currently in your possession.

By joining this lawsuit, you are designating the attorneys identified in Section 7 to represent your interest, unless you retain another attorney of your choice. In addition, you agree that the Named Plaintiff may make decisions on your behalf regarding this lawsuit, including the manner and method of conducting the suit. If you elect to voluntarily join this lawsuit, you are designating the Named Plaintiff as your agent to make decisions on your behalf in this lawsuit and agreeing that the decisions and agreements made by the Named Plaintiff will be binding on you. Further, you will be bound by the judgment of the Court on all issues in this lawsuit, whether favorable or unfavorable.

The Fair Labor Standards Act contains a limitations period of at least two years and potentially up to three years for the filing of a claim for unpaid overtime wages, after which the claim is forever barred. The statute of limitations on your claim for unpaid overtime wages will not stop running unless you elect to submit a Consent to Join Form and that form is filed with the Court. If you decide not to file a Consent to Join in this lawsuit, you should consult with your own attorney as to how the statute of limitations would apply to your claim.

7. NO LEGAL EFFECT IN NOT JOINING THIS LAWSUIT

If you choose not to join this lawsuit, you will not be affected or bound by any judgment, favorable or unfavorable, on any claims brought under the FLSA alleged in this lawsuit. You will retain all rights, if any, that you may have under the FLSA and may file your own lawsuit or complaint with the U.S. Department of Labor, subject to the limitations set by law.

YOUR LEGAL REPRESENTATION IF YOU JOIN

If you join this lawsuit, the attorneys retained to represent the Plaintiff and those Similarly Situated are:

Kevin J. Stoops, Esq.
Alana A. Karbal, Esq.
Sommers Schwartz, P.C.
One Towne Square, 17th Floor
Southfield, Michigan 48076
kstoops@sommerspc.com
akarbal@sommerspc.com
Telephone: 248-746-4033

Jeffrey S. Morneau
CONNOR & MORNEAU, LLP
273 State Street #2
Springfield, MA 01103
Telephone: 413-455-1730
jmorneau@cmolawyers.com

If you choose to join this lawsuit, the attorneys listed above will represent you unless you obtain your own attorney to file your own case. You are not required to pay attorneys' fees or court costs at this time. If Plaintiff prevails, Plaintiff's counsel will seek an order requiring Defendant to pay their reasonable attorneys' fees and expenses. The Court must approve any award of attorneys' fees and/or costs.

You have the option to retain an attorney of your own choice to represent you.

8. HOW TO JOIN THIS LAWSUIT

If you wish to join this lawsuit, you must complete, sign, and return the Consent to Join Form by scanning the QR code below and submitting the Consent to Join Form online, or signing and returning the Consent to Join Form in the envelope provided, or submitting via email, fax, or mail to:

Jones v CareCentrix, Inc.
c/o Atticus Administration
PO Box 64053
Saint Paul, MN 55164
Email: CareCentrixOvertimePayLawsuit@atticusadmin.com
Fax: 1-888-326-6411
www.CareCentrixOvertimePayLawsuit.com



If you wish to join this lawsuit, your signed Consent to Join Form must be completed and submitted online, emailed, faxed, or postmarked by **January 6, 2025**, for you to be eligible to participate in this lawsuit. Plaintiff's counsel will file your completed Consent to Join Form with the Court upon receipt. Until the Consent to Join Form is filed with the Court, the statute of limitations ordinarily continues to run, and you will not be entitled to receive compensation for the days during which you delay sending in your Consent to Join Form.

9. DEADLINE

If you wish to join this lawsuit, your completed Consent to Join Form must be submitted online, emailed, faxed, or postmarked by **January 6, 2025**, in order to be eligible to participate in the lawsuit. If you have already submitted a Consent to Join Form for this case, prior to receiving this Notice, then you do not need to submit another one at this time.

10. NO RETALIATION PERMITTED

The FLSA prohibits employers from discriminating or retaliating against any person for filing a lawsuit, a claim for compensation, assisting or testifying in a lawsuit under the FLSA, or participating in a proceeding or exercising rights under the FLSA.

11. FURTHER INFORMATION

For further information about this lawsuit, you may contact Plaintiff's counsel by telephone, email, or mail at the phone numbers and addresses listed above.

PLEASE DO NOT CONTACT THE COURT REGARDING THIS LAWSUIT.