

IMPORTANT: NOTICE OF LAWSUIT

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

To: All current and former non-emergency medical transportation drivers (NEMT) who provided transportation services under the contract(s) between Medical Transportation Management, Inc. (MTM) and the District of Columbia at any time from October 2, 2014 through the present.

INTRODUCTION

This notice contains important information about your rights under federal law (the Fair Labor Standards Act) based on your current or former transportation work for MTM.

A group of drivers filed a lawsuit against MTM claiming that they were not paid the required minimum and overtime wages for their work under contract(s) between MTM and the District of Columbia. **You may be eligible to participate in this lawsuit.**

This Notice describes the lawsuit and what you need to do to participate in the case. This Notice is not a reflection of the strength of the case. There is no guarantee you and other employees will win this lawsuit.

DESCRIPTION OF THE LAWSUIT

On July 13, 2017, Plaintiffs Isaac Harris, Darnell Frye, and Leo Franklin filed a lawsuit against MTM in federal court in the District of Columbia. The name and case number of this suit is *Isaac Harris et al. v. Medical Transportation Management, Inc.*, Case No. 1:17-cv-01371-APM.

Plaintiffs claim that MTM failed to pay them at least the minimum wage for all hours they actually worked and failed to pay them an overtime rate of one-and-a-half times their regular rate for all hours worked over 40 in a work week. The lawsuit seeks the payment of these unpaid overtime and minimum wages, plus liquidated damages, reasonable attorneys' fees, and court costs. MTM denies that it is an employer of the Plaintiffs and denies that it is liable for and unpaid wages, damages, fees, or costs in the case.

WHO CAN JOIN THE LAWSUIT

You may be eligible to join this lawsuit if you provided NEMT services as a driver under MTM's contract(s) with the District of Columbia, even if you worked directly for a transportation provider or another entity, and if you were not paid minimum or overtime wages any time between July 13, 2014 and the present. Your immigration status has no bearing on this lawsuit or on your right to recover wages owed to you.

HOW TO PARTICIPATE

If you fit the definition above, you may join (or "opt in" to) this lawsuit by **completing, signing, and mailing the enclosed Consent Form** to the Plaintiffs' lawyers at the following address:

Harris v. MTM
c/o Settlement Services, Inc.
P.O. Box 1568
Tallahassee, FL 32302-1568

Please sign and mail the form as soon as possible. **This form must be returned by December 18, 2018.** If you do not return the Consent Form in time, you may not be able to participate, and you may lose your right to any compensation for damages that you suffered. The clock continues to run on your individual claim

until your consent form is filed with the Court; your claim cannot include any time worked that is more than 3 years before the date your opt-in form is filed.

EFFECT OF JOINING THIS LAWSUIT

If you join this lawsuit, you will be bound by the Court's judgment on all issues decided in this case, even if those decisions are not favorable to you. By joining this lawsuit, you designate the Plaintiffs—Isaac Harris, Darnell Frye, and Leo Franklin—to make decisions on your behalf concerning the case, how the litigation is conducted, any agreements with Plaintiffs' counsel about fees and costs, and all other matters in this lawsuit. You agree to be bound by the decisions and agreements that the Plaintiffs make. In the alternative, you may choose retain your own counsel, at your own expense.

While this lawsuit is pending, you may be required to respond to written questions or testify under oath. You will receive the assistance of Plaintiffs' attorneys (or another attorney of your choosing, at your expense) for these tasks. You do not need to directly pay the Plaintiffs' attorneys. If Plaintiffs recover unpaid wages and/or damages, Plaintiffs' attorneys will be paid either by MTM or from a portion of the recovery.

NO LEGAL EFFECT OF NOT JOINING SUIT

If you choose not to join this lawsuit, you need not do anything. If you do not join, you will not be affected by any judgment or settlement in this lawsuit, whether favorable or not. However, if you do not timely file any claims you may have, your claims could expire.

NO RETALIATION PERMITTED

Federal law prohibits retaliation or discrimination against individuals for exercising their rights to participate in a lawsuit of this nature. MTM is prohibited from retaliating against anyone for participating in this lawsuit. If you believe that you are being targeted or treated unfairly because of joining this lawsuit, please call Christopher Scherman at 202-408-4600.

FOR MORE INFORMATION

If you have any questions, please contact SETTLEMENT SERVICES, INC. (866-385-6216) or the lawyers representing plaintiffs in this case:

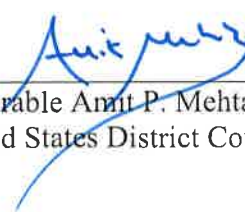
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This notice and its contents have been authorized by the U.S. District Court for the District of Columbia. The Court takes no position on the merits of the parties' claims or defenses.

Dated: September 10, 2018



Honorable Amit P. Mehta
United States District Court Judge