



lawsuit against Defendant. Thus, if you remain a member of the Class, you will be bound by the judgment whether favorable or unfavorable to the Plaintiffs.

**4. How do I join the class action claims for unpaid wages?**

You do not have to do anything to join. You are AUTOMATICALLY included in the class action, which is why you received this Notice. If you want to remain included in the Class, you do not need to do anything. By doing nothing, you will continue to be part of the Class and you will receive additional information regarding the case as it goes on. If you prefer, you may enter an appearance through your own attorney at your own cost.

**5. What should I do if I want to be excluded from the class action claims?**

If you want to be *excluded* from the Class, you must notify attorneys for Plaintiffs of your decision to opt out by electronic mail within **sixty (60) days** of receiving this Notice.<sup>1</sup>

**Miller Shah LLP**  
1845 Walnut Street, Suite 806  
Philadelphia, Pennsylvania 19103  
Telephone: (610) 891-9880  
Facsimile: (866) 300-7367  
Email: [nfinkelman@millershah.com](mailto:nfinkelman@millershah.com)

**Shaffer & Gaier, LLC**  
1628 JFK Blvd. Suite 400  
Philadelphia, Pennsylvania 19103  
Telephone: (215) 751-0100  
Facsimile: (215) 751-0723  
Email: [mshaffer@shaffergaier.com](mailto:mshaffer@shaffergaier.com)

Persons who elect to opt-out of the Class will not be bound by any judgment in the class action and will not be entitled to participate in any recovery, if any recovery occurs in the class action. If you opt-out of the Class, you may pursue other legal remedies apart from the class action that may be available to you. Neither the Parties nor their attorneys make any representations to you regarding what, if any, legal remedies are available to you should you choose to opt-out.

**6. Has the Court ruled on the Plaintiffs' claims?**

No. The Court has not yet ruled on any of Plaintiffs' claims. The fact that this Notice is being mailed to you does not mean that the Court has decided whether any of BAYADA's employees are owed any compensation, or whether Defendant violated any laws.

**7. If I wish to remain in the lawsuit, how will I continue to receive further Notices?**

Unless you elect to be excluded from the Class, you will continue to receive information by electronic mail.

If you plan to change your email address, please send an e-mail with your name, home and cell telephone numbers [info@strategicclaims.net](mailto:info@strategicclaims.net).

**8. Who are the attorneys for Plaintiffs and how will they be paid?**

The attorneys for Plaintiffs are:

Natalie Finkelman Bennet  
James C. Shah  
Miller Shah LLP  
1845 Walnut Street, Suite 806  
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Chicago, Illinois 60606  
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Facsimile: (312) 233-1560  
Email: [rstephan@stephanzouras.com](mailto:rstephan@stephanzouras.com)

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<sup>1</sup> Plaintiffs initially sent this notice to class members on May 12, 2022 and class members who received that notice have until July 11, 2022 to elect to opt out of the Class if they want to exclude themselves from this class action. After the notice was sent BAYADA identified additional class members, including you. You will have sixty days from the date of receiving this Notice to notify attorneys for Plaintiffs of your decision to opt out, if you want to exclude yourself from the Class, as set forth in this Notice.

The attorneys for Plaintiffs may be entitled to receive a payment of attorneys' fees and costs in this lawsuit if there is a recovery or judgment in Plaintiffs' favor. If there is no recovery or judgment in Plaintiffs' favor, you will not be responsible for any attorneys' fees. Any payment of attorneys' fees by Defendant to Plaintiffs' counsel will be subject to Court approval. By joining this lawsuit, you designate Plaintiffs as your agents to make decisions on your behalf concerning the litigation, the method and manner of conducting this litigation, the entering of an agreement with Plaintiffs' counsel concerning attorneys' fees and costs, that you are represented by the above-named attorneys, and all other matters pertaining to this lawsuit. These decisions and agreements made and entered into by the representative Plaintiffs will be binding on you if you do not choose to opt out.

**9. How can I obtain further information about this lawsuit?**

The pleadings and other records of this litigation may be examined and copied any time during the regular office hours in the office of the Clerk at the following address:

The Court of Common Pleas of Philadelphia County, Pennsylvania  
301 Filbert Street, Suite 310 B, Philadelphia, PA 19107

Additionally, if you have questions about this case or need help understanding this Notice, you may review the case website, [www.strategicclaims.net/bayada](http://www.strategicclaims.net/bayada), and contact the lawyers representing the Plaintiffs who brought this lawsuit. You may reach those lawyers by calling (866) 540-5505 or by sending an email to [information@millershah.com](mailto:information@millershah.com) or [mshaffer@shaffergaier.com](mailto:mshaffer@shaffergaier.com)

**\*THIS NOTICE AND ITS CONTENTS HAVE BEEN AUTHORIZED BY THE COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY, PENNSYLVANIA. THE COURT HAS TAKEN NO POSITION IN THIS CASE REGARDING THE MERITS OF PLAINTIFFS' CLAIMS OR DEFENDANT'S DEFENSES.**

**PLEASE DO NOT CALL OR WRITE THE JUDGE ASSIGNED TO THIS MATTER. THE JUDGE CANNOT ANSWER QUESTIONS CONCERNING THIS LAWSUIT OR THIS NOTICE.**

**Bayada Home Health Care Class Action  
c/o Strategic Claims Services  
600 N Jackson Street, Suite 205  
Media, PA 19063**

**IMPORTANT LEGAL NOTICE – PLEASE FORWARD**

**Mail ID  
Name  
Address  
City, State, ZIP**