FIRST JUDICIAL DISTRICT OF PENNSYLVANIA
COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY

If you are a current or former employee of BAYADA Home Health Care, Inc., who worked in the Commonwealth of Pennsylvania from August 3, 2013, through September 10, 2024, as an hourly paid Home Health Care Nurse (including Registered Nurses ("RNs") and Licensed Practical Nurses ("LPNs")), you could receive a payment as detailed below.

YOUR LEGAL RIGHTS WILL BE AFFECTED WHETHER OR NOT YOU ACT, SO PLEASE READ THIS NOTICE CAREFULLY.

The Court of Common Pleas of Philadelphia County authorized this Notice.
This is not a solicitation from a lawyer.

This Notice advises you of the settlement (the "Settlement") of a lawsuit filed against BAYADA Home Health Care, Inc. ("Defendant"), and your rights and options relative to the Settlement. In the lawsuit, Plaintiffs, Latisha Reed and Nadine Pierre (collectively, "Plaintiffs," and with Defendant, the "Parties"), allege that Defendant violated the Pennsylvania Minimum Wage Act of 1968, *as amended*, 43 Pa. C.S. §§ 333.101 – 333.115, and the Pennsylvania Wage Payment and Collection Law, *as amended*, 43 P.S. §§ 260.1 – 260.45. Defendant denies the allegations and denies that it engaged in any improper conduct.

The Court will hold a Fairness Hearing before the Honorable Michael E. Erdos, on August 19, 2025, at 10:00 a.m. via Zoom, to decide whether to approve the Settlement. If approved by the Court, the $13,500,000.00 Settlement Amount, plus interest as it accrues, minus attorneys' fees, taxes, expenses and costs, Administration Costs, and Class Representative Enhancements, will be distributed between Class Members.

Your rights and options, and the deadline for you to object if you are opposed to the Settlement, are explained in this Notice. The Court in charge of this case must decide whether to approve the Settlement. Payments will be made only after the Court approves the Settlement and any appeals are resolved. Please be patient.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
DO NOTHING	You will receive a payment from this Settlement. You will waive any right to be a part of any other lawsuit against the Defendant or any other Released Party about the legal claims in this case.
EXCLUDE YOURSELF FROM THE SETTLEMENT	You will **not** receive a payment from this Settlement. You may exclude yourself (*i.e.*, opt out) from the Settlement. If you exclude yourself from the Settlement, you will not be bound by any decision in this lawsuit relating to the Settlement or entitled to any benefits attributable to the Settlement. If you exclude yourself, you keep any rights to sue the Defendant. **Requests for Exclusion must be postmarked by July 22, 2025**. *See* Question 14.
OBJECT TO THE SETTLEMENT	You may object to any part, or all of the Settlement if you want to stay in the Class, and want to tell the Court why you do not like the Settlement. *See* Question 16. You will still be a member of the Class. **Objections must be postmarked by July 22, 2025.**
GET MORE INFORMATION	If you would like to receive more information about the proposed Settlement, you can (1) send questions to the Claims Administrator or lawyers identified in this Notice, (2) visit www.strategicclaims.net/bayadaPA, and/or (3) attend the hearing at which the Court will evaluate the proposed Settlement.

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BASIC INFORMATION CONCERNING THE SETTLEMENT

1. Why did I get Notice?

You received this Notice because you have a right to know about all of your options under the proposed settlement of a class action lawsuit in which you are potentially a Class Member before the Court decides whether to approve the Settlement.

Records indicate that you are or may be a current and former employee of BAYADA Home Health Care, Inc., who worked in the Commonwealth of Pennsylvania from August 3, 2013 through September 10, 2024 (the "Class Period") as hourly paid Home Health Care Nurse (including Registered Nurses ("RNs") and Licensed Practical Nurses ("LPNs")).[1] Note that you may have received Notice in error; simply receiving Notice does not mean that you definitively are a member of the Class. You may confirm that you are a member of the Class by reviewing the criteria set forth in Question 5 below. You may also call, email, or write to the Claims Administrator or lawyers in this lawsuit using the telephone numbers or addresses listed in Question 6 below.

This Notice summarizes the lawsuit, the Settlement, your legal rights and options, what benefits are available, who is eligible to receive them, and how to get them.

2. What is this lawsuit about?

On August 3, 2016, Plaintiffs filed an action against Defendant, alleging that Defendant violated Pennsylvania wage and hour laws. The lawsuit is known as *Reed, et al. v. BAYADA Home Health Care, Inc.*, Case No. 160800491, 2016 August Term (Court of Common Pleas, Philadelphia County). Judge Michael E. Erdos of the Court of Common Pleas for Philadelphia County (the "Court") is overseeing this action and the Settlement.

Plaintiffs allege that the Home Health Care Nurses performed work for which they were not paid wages, including for time spent completing verbal shift reports to the oncoming caregiver, and in completing Honesty and Confidentiality, Infection Prevention and required BAYADA University trainings. Defendant has denied and continues to deny these allegations.

Through eight years of litigation, the Parties have exchanged significant document productions, briefed and argued several significant issues (including Class certification, Class decertification, and summary judgment motions), engaged in two separate private mediations with experienced mediators, and prepared the case for trial.

The case was scheduled for trial on September 9, 2024. The Parties picked a jury on September 6, 2024. Thereafter, the Parties met with the trial court judge regarding settlement and on September 9, 2024, argued the pending pretrial motions. Thereafter, following additional negotiations among the Parties and the trial court judge, the Parties reached a settlement.

Defendant has denied and continues to deny any wrongdoing or liability and will continue to vigorously defend the lawsuit if the proposed Settlement is not approved.

There has been no determination by the Court or a jury that Defendant has engaged in any wrongdoing or that Defendant's conduct caused harm to the Class. This Notice is not an expression of any opinion by the Court as to the legal claims against Defendant or its defenses.

[1] Capitalized terms not otherwise defined in this Notice shall have the same meaning as in the Settlement Agreement, which is available at www.strategicclaims.net/bayadaPA.

3. What is a class action lawsuit?

In a class action lawsuit, one or more people called "class representatives" sue for themselves and on behalf of other people who they allege have similar claims. One court resolves all the issues for all class members in a single lawsuit, except for those class members who exclude themselves (i.e., opt out) from the class. Plaintiffs are the proposed class representatives in this lawsuit and are sometimes referred to in this Notice as the "Class Representatives" or as "Plaintiffs."

A copy of the Court's Opinion certifying the Class and a copy of the Court's preliminary approval Order certifying the Class may be found at www.strategicclaims.net/bayadaPA.

4. Why is there a settlement?

The Parties have agreed to the Settlement after extensive negotiations. By agreeing to a settlement, the Parties avoid the costs and risks of further litigation, and Plaintiffs and the other Class Members will receive compensation. Class Counsel have conducted an extensive review of the evidence in the case and the potential risks and benefits of continued litigation. Plaintiffs and Class Counsel agree that the Settlement is in the best interest of the Settlement Class. The Court has not made any finding that Defendant has engaged in any wrongdoing or violated any laws and regulations.

5. Am I part of the Class?

You are a member of the Class if you are a: current or former employee of BAYADA Home Health Care, Inc., who worked in the Commonwealth of Pennsylvania from August 3, 2013 through September 10, 2024, as an hourly paid Home Health Care Nurse (including RNs and LPNs).

Persons who submit a timely and valid Request for Exclusion, before July 22, 2025, as described in Question 14 below, are excluded from the Class.

Also, persons who submitted a Request for Exclusion in connection with the Notice of Class Action sent on May 12, 2022, by Court Order dated April 13, 2022, after the certification of the Class are excluded from the Settlement Class. A list of those persons is available from the Claims Administrator.

6. Who will administer the Settlement?

Strategic Claims Services will administer the Settlement (the "Settlement Administrator" or "Claims Administrator"). You may contact the Settlement Administrator by: (a) sending a letter to BAYADA Settlement Administrator, c/o Strategic Claims Services, 600 North Jackson Street, Suite 205, Media, PA 19063; (b) sending an email to info@strategicclaims.net; (c) visiting the Settlement website at www.strategicclaims.net/bayadaPA; or (d) calling toll-free at (866) 274-4004.

THE SETTLEMENT BENEFITS – WHAT THE SETTLEMENT PROVIDES

7. What does the Settlement provide?

Defendant has agreed to pay a total of $13,500,000.00 ("Settlement Amount") into a Settlement Account for this action. Class Counsel intends to ask the Court to approve attorneys' fees of up to thirty-five percent of the

Settlement Amount, reimbursement for litigation expenses actually incurred, and Class Representative Enhancements of $30,000.00 each for the Plaintiffs.

The total amount available for distribution to Class Members (referred to as the "Class Payment Fund") will be calculated by subtracting the following approved expenses from the Settlement Amount: Class Counsel Attorneys' Fees and Costs, Class Representative Enhancements, Administrative Costs, and certain taxes and tax-related costs.

8. How may I benefit from the Settlement?

You may be eligible to receive a portion of the Class Payment Fund. The specific amount paid to each Class Member will be based on wage data provided by Defendant. At this time, it is unknown what exact amount each Class Member will receive.

Each Class Member shall receive a Settlement Payment calculated as a *pro rata* share of the total Class Payment Fund based on the number of shifts worked during the Class Period. To determine each Settlement Class Member's *pro rata* share of the settlement, the Claims Administrator shall multiply the number of shifts worked by the eligible Settlement Class Member by a fraction, for which (a) the numerator is the Class Payment Fund and (b) the denominator is the sum total of all shifts by all Settlement Class Members.

As explained below, if you qualify for a Settlement Payment, you do not need to take any action to receive it. Settlement Class Members will receive their Settlement Payment through the method they have chosen on the Settlement website. If no method is selected, Settlement Payments will be issued by check and mailed.

The Court must approve the Settlement, and any appeals of that approval must be resolved, before any money can be distributed to Class Members. The Claims Administrator also will need to determine distribution amounts. This process can take several months. Please be patient.

9. Must I submit a claim for a Settlement Payment?

If you are eligible for a Settlement Payment, you do **not** need to submit a claim to receive payment under the Settlement. You will receive any Settlement Payment for which you are eligible automatically via the method you have chosen on the Settlement website. If no method is selected, your Settlement Payment will be issued by check and mailed to you.

10. What are the Named Plaintiffs receiving from the Settlement?

Class Counsel intends to ask the Court to award Class Representative Enhancements of $30,000.00 to each of the two Class Representatives in recognition of the work and effort they expended on behalf of the Class.

THE SETTLEMENT BENEFITS – WHAT YOU GIVE UP

11. What do I give up by participating in the Settlement?

Each Class Member gives Defendant a "release." A release means you are waiving your right to sue Defendant or to receive any benefits from any other lawsuit against Defendant if that lawsuit asserts similar claims or is related in any way to the practices being addressed and resolved in this lawsuit.

For additional details about the scope of the release, or to view the full text of the release, please review the Settlement Agreement, available at www.strategicclaims.net/bayadaPA, or contact Class Counsel (*see* Answer to Question 12).

THE LAWYERS REPRESENTING YOU

12. Do I have a lawyer in this case?

Yes. The Court has appointed the lawyers to represent you and the other Class Members. These lawyers are called Class Counsel. Class Counsel are experienced in handling similar lawsuits against other companies. Class Counsel includes:

James C. Shah
Natalie Finkelman Bennett
Miller Shah LLP
1845 Walnut Street, Suite 806
Philadelphia, PA 19103
nfinkelman@millershah.com

You will not be charged for the services of these lawyers. If you wish to be represented by a different lawyer in this case, you may hire one at your own expense.

13. How will the lawyers (Class Counsel) be paid?

Class Counsel will ask the Court for an award of attorneys' fees not to exceed thirty-five percent of the Settlement Amount (an amount no greater than $4,725,000.00) and for reimbursement of litigation expenses actually incurred in connection with this litigation in an amount not to exceed $500,000.00. Class Counsel will also ask the Court to award Class Representative Enhancements in the amount of $30,000.00 paid to each Named Plaintiff for their efforts to date on behalf of the Class.

If the Court grants Class Counsel's requests, these amounts will be paid out of the Settlement Amount. You will not have to pay these fees, costs, or expenses out of your own pocket.

OPTING OUT OF THE SETTLEMENT

14. If I do not want to be part of the Settlement, can I exclude myself from the Settlement Class?

Yes. You may exclude yourself (i.e., "opt out") from the Settlement Class, but you must submit a Request for Exclusion to the Settlement Administrator postmarked on or before July 22, 2025.

To submit a Request for Exclusion, you must write and mail via U.S. Mail, postage prepaid, to the Settlement Administrator at the following address, a letter that states:

> "I request to be excluded from the settlement in *Reed, et al. v. BAYADA Home Health Care, Inc.*, Case No. 160800491, 2016 August Term (Court of Common Pleas, Philadelphia County). I affirm that I worked for BAYADA Home Health Care, Inc., in the Commonwealth of Pennsylvania as a Home Health Care Nurse for at least one day from August 3, 2013 to September 10, 2024."

Your Request for Exclusion letter must also include your full name, employee number (if known), address, and telephone number. You must personally sign and date the letter.

Your letter requesting exclusion must be postmarked no later than July 22, 2025. It must be mailed to:

BAYADA Settlement Administrator
c/o Strategic Claims Services
600 North Jackson Street, Suite 205
Media, PA 19063

This will be the only opportunity you will have to exclude yourself from the Settlement to which you will otherwise be bound.

If you opt out from the Settlement, you will **not** receive a Settlement Payment and you will **not** be legally bound by any outcomes in the lawsuit between Plaintiffs and the Defendant regarding that Settlement. This means you may be able to sue (or continue to sue) Defendant in the future over the legal issues involved in this lawsuit.

If you decide to exclude yourself from the Settlement so that you can initiate or continue your own lawsuit against Defendant, it is important to consult your own lawyer as soon as possible. Keep in mind that your legal claims are subject to a statute of limitations, which means your legal claims may expire if you do not take timely action.

OBJECTING TO THE SETTLEMENT

15. What does it mean to object?

Objecting simply means informing the Court that you have concerns regarding some aspect of the Settlement. Objecting will not affect your right to receive the benefits of the Settlement if it is approved by the Court.

Please note that you cannot ask the Court to create a different Settlement; the Court can only approve or reject the proposed Settlement. If the Court rejects the Settlement, no Settlement Payments will be issued, and the lawsuit against BAYADA will continue.

16. What is the procedure for objecting to the Settlement?

You can request that the Court deny approval of the Settlement and/or any part of the Settlement. You cannot ask the Court to order a different settlement; the Court can only approve or reject the proposed Settlement. If the Court denies approval, no Settlement Payments will be issued, and the lawsuit will continue. If this is your desired outcome, you must formally object.

Any objection to the proposed Settlement or any part thereof and/or request to speak in person at the Fairness Hearing must be submitted in writing in accordance with the requirements in the Preliminary Approval Order. If you file a timely written objection, you may, but are not required to, appear at the Fairness Hearing, either in person or through your own attorney. If you choose to be represented by your own attorney, you are responsible for hiring and paying that attorney.

All written objections and supporting papers must: (a) clearly identify the case name and number as *Reed, et al. v. BAYADA Home Health Care, Inc.*, Case No. 160800491, 2016 August Term (Court of Common Pleas, Philadelphia County); (b) be submitted via mail, postage prepaid, to the Settlement Administrator at BAYADA Settlement

Administrator, c/o Strategic Claims Services, 600 North Jackson Street, Suite 205, Media, PA 19063; and (c) be postmarked on or before July 22, 2025.

Your objection must also include: (1) your full name, current address, and current telephone number, and, if represented by counsel, any of your counsel's names and contact information including your counsels' address and telephone number; (2) dates of your employment with BAYADA in the Commonwealth of Pennsylvania as a Home Health Care Nurse (including RNs and LPNs); (3) a statement whether you intend to appear at the Final Approval Hearing, either in person or through counsel; (4) a statement of the objection and the grounds supporting the objection; (5) copies of any papers, briefs, or other documents upon which the objection is based; (6) the name and case number of all objections to class action settlements in any court made by you or on your behalf in the past five years; and (7) your signature.

ANY CLASS MEMBER WHO DOES NOT OBJECT IN THE MANNER DESCRIBED ABOVE SHALL BE DEEMED TO HAVE WAIVED ANY OBJECTION AND SHALL NOT HAVE ANY RIGHT TO OBJECT TO THE FAIRNESS OR ADEQUACY OF THE SETTLEMENT.

17. What is the difference between objecting and asking to be excluded?

Objecting is simply telling the Court that you do not like some aspect of the Settlement. You can object to the Settlement only if you do not exclude yourself from the Settlement. If you object to the Settlement, you are still a Class Member.

Excluding yourself is telling the Court that you do not want to be a part of the Settlement. If you exclude yourself from the Settlement, you will **not** receive a Settlement Payment. You also will have no basis to object to the Settlement, and you will not be able to appear at the Fairness Hearing, discussed below, because it no longer affects you.

THE COURT'S FAIRNESS HEARING

18. When/where will the Court decide whether to approve the Settlement?

On August 19, 2025, at 10:00 a.m. via Zoom https://www.courts.phila.gov/remote-hearings/, the Court will hold a Fairness Hearing to determine whether the proposed Settlement is fair, reasonable, and adequate and whether it should be approved.

The Fairness Hearing may be continued from time to time by the Court without further notice and may be held via teleconference or videoconference. Please check the website or contact Class Counsel if you wish to confirm that the hearing time or Zoom link has not been changed.

19. Do I have to attend the Fairness Hearing?

No; however, you are welcome to attend at your own expense. If you file an objection to the Settlement, you do **not** have to appear in Court to talk about it. As long as your objection is filed or postmarked by July 22, 2025, and you comply with the requirements in the Answer to Question 16 above, the Court will consider your objection. You may also send your own lawyer at your expense to attend the Fairness Hearing.

20. May I speak at the Fairness Hearing?

You may ask the Court for permission to speak at the hearing. Anyone wishing to appear must state in their written objection their intention to appear at the Fairness Hearing, at their own expense.

IF YOU DO NOTHING

21. What happens if I do nothing at all?

IF YOU DO NOTHING AND THE COURT APPROVES OF THE SETTLEMENT, YOU WILL BE BOUND BY THE JUDGMENT AND SETTLEMENT AGREEMENT, INCLUDING THE RELEASE OF CLAIMS. If you qualify for a Settlement Payment, you do not need to take any action to receive the payment.

This notice summarizes the proposed settlement. For the precise terms and conditions of the Settlement, please see the Settlement Agreement, which is available at www.strategicclaims.net/bayadaPA, or by contacting Class Counsel (*see* Answer to Question 12 for contact information) or the Settlement Administrator (*see* Answer to Question 6 for contact information), or by accessing the Court docket in this case, for a fee, through the Court's electronic system at https://fjdefile.phila.gov/.

PLEASE DO NOT CALL THE COURT OR THE COURT CLERK'S OFFICE TO INQUIRE ABOUT THIS SETTLEMENT OR THE CLAIM PROCESS.

DATED: May 23, 2025.

THIS NOTICE HAS BEEN SENT TO YOU BY ORDER OF THE COURT OF COMMON PLEAS OF PHILADELPHIA FIRST JUDICIAL DISTRICT OF PENNSYLVANIA

BAYADA Settlement Administrator
c/o Strategic Claims Services
600 North Jackson Street, Suite 205
Media, PA 19063

IMPORTANT LEGAL NOTICE – PLEASE FORWARD

Mail ID
Name
Address
City, State Zip