

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH

**Notice of Overtime Pay Lawsuit
Against R1 RCM Holdco, Inc. on Behalf of
Customer Service Representatives**

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

TO: All hourly-paid, non-exempt employees employed by Defendant as remote employees who used Defendant's electronic timekeeping system to record hours worked and/or work performed ("Associates") from February 2, 2021 to the present.

DATE: January 30, 2025

RE: Fair Labor Standards Act ("FLSA") lawsuit against R1 RCM Holdco, Inc. ("R1"). *Crouse v. R1 RCM Holdco, Inc.*, Case No. 2:24-cv-00088-DBB-JCB, pending in the United States District Court for the District of Utah.

1. This Notice describes a lawsuit that you are allowed to join.

The purpose of this Notice is to inform you of the existence of a collective action lawsuit against R1. You are receiving this Notice because records indicate you were an hourly-paid, non-exempt employee employed by R1 as a remote employee who used R1's electronic timekeeping system to record hours worked and/or work performed from February 2, 2021 to the present. Therefore, the Court has authorized that this Notice be sent to you, to explain what the lawsuit is about, so that you can decide whether to opt in (join the lawsuit).

Please note that the Court has not ruled on the merits of the lawsuit. The Court has only ruled that it is important that you be notified of the existence of the lawsuit so that you can determine (a) how to protect your rights and (b) whether you wish to join it.

2. The lawsuit seeks to recover overtime pay for call center workers, including Customer Service Representatives ("CSRs") who work or have worked for R1 RCM.

Plaintiff, Linda Crouse ("Plaintiff"), brought this action under the Fair Labor Standards Act ("FLSA") on behalf of herself and all Associates who worked for R1 during the past three years. Specifically, Plaintiff alleges that R1 violated the FLSA by requiring Associates to routinely perform certain pre-shift activities off-the-clock without pay. These activities include turning on or warming up their computers, booting up the computers, signing into Windows and logging into the time keeping system before they were able to clock in to the timekeeping system; and troubleshooting technical problems with the computers, networks, programs/applications, and/or phone prior to clocking in. Plaintiff contends that R1's training and policies prohibited Associates from including these pre-shift activities in their compensable time. Plaintiff therefore alleges that she and other CSRs were forced to perform all the above referenced tasks off the clock.

Plaintiff alleges that she and all employees similarly situated are entitled to recover unpaid overtime pay, liquidated damages (equal to the unpaid overtime pay) and interest, attorneys' fees, and costs associated with bringing this lawsuit.

R1 contests all claims that have been asserted and denies any wrongdoing or liability.

3. How you can exercise your right to join this lawsuit.

If you are an Associate as defined on page 1, you may choose to join this suit (that is, you may "opt in"). To opt in, you must submit a "Consent to Join" form. The Consent to Join form is enclosed with this Notice. You may use the enclosed envelope to mail your form, or you may fax it or e-mail it to the claims administrator (whose information is available in Section 7, below), or you may submit your form online by scanning the below QR code. The deadline is **March 17, 2025**. Forms must be postmarked by that date to be valid. Late forms will not be accepted.



4. The consequences of joining this lawsuit.

If you file a Consent to Join form by following the instructions, you will be bound by the judgment (the final result of the lawsuit), whether favorable or unfavorable (that is, whether the Plaintiffs win the case against R1 or not).

Plaintiffs' attorneys will **not** charge you directly for their work in this case. If there is no recovery (*i.e.*, if Plaintiffs recover no money from R1), you will not have to pay the attorneys for any of their work. If there is a recovery, Plaintiffs' attorneys will receive whatever attorneys' fees the Court orders. Those fees may be subtracted from the recovery obtained from R1, be paid separately by R1, or they may be a combination of the two.

If you join this lawsuit, you are choosing to be represented by Plaintiffs' counsel and the Named Plaintiff who brought this case to make decisions and agreements on your behalf concerning the lawsuit. These decisions and agreements will then be binding on you.

5. The consequences of not joining this lawsuit.

If you choose not to join this lawsuit, you will not be affected by any judgment in this lawsuit on this FLSA claim, whether favorable or unfavorable. If you choose not to join this lawsuit, you may file your own lawsuit and select the attorney of your choice. However, if you do not join this lawsuit, you will not be able to receive any money recovered in this lawsuit.

6. No retaliation permitted.

Federal law prohibits R1 from retaliating against you in any way (for example, firing you, giving you unfair reviews, cutting your pay, failing to promote you, etc.) for exercising your rights under the FLSA (for

example, by joining this lawsuit or by providing evidence in support of the Plaintiffs' claims).

7. Your legal representation if you join.

If you choose to join this lawsuit, you will be represented by the Named Plaintiffs through their attorneys. They are:

SOMMERS SCHWARTZ, P.C.
Matthew L. Turner
Paulina R. Kennedy
One Towne Square, Suite 1700
Southfield, Michigan 48076
Telephone: 1-800-418-5175
Fax: 248-936-2147
Email: FLSA@sommerspc.com

Crouse v R1 RCM
c/o Atticus Administration
PO Box 64053
St. Paul, MN 55164
Email: R1RCMOvertimePayLawsuit@AtticusAdmin.com
Telephone: 1-800-418-5175
Website: www.R1RCMOvertimePayLawsuit.com

If you want further information about this lawsuit, or have questions about the procedure or deadline for filing a "Consent to Join," please contact Plaintiffs' Counsel.

8. This Notice has been authorized by the Court.

This Notice and its contents have been authorized by the United States District Court for the District of Utah, the Honorable David B. Barlow presiding. The Court has taken no position regarding the merits of Plaintiffs' claims or of R1 RCM's defenses.

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

LINDA CROUSE, individually
and on behalf of all others
similarly situated,

Plaintiffs,

v.

R1 RCM HOLDSCO, INC., a
Delaware Corporation,

Defendant.

Case No. 2:24-CV-00088-JCB

Hon. David B. Barlow

Magistrate Judge: Jared C. Bennett

CONSENT TO JOIN

1. Pursuant to the Fair Labor Standards Act, 29 U.S.C. §216(b), I hereby consent to join and act as a plaintiff in this lawsuit.

2. I worked for Defendant R1 RCM Holdco, Inc. as an hourly, remote employee and I agree to be bound by any adjudication or court rulings in this lawsuit, whether favorable or unfavorable. I understand that reasonable costs expended by Plaintiff's counsel on my behalf will be deducted from any settlement or judgment amount on a pro-rata basis among all other plaintiffs. I understand that Plaintiff's counsel will petition the Court for an award of attorney's fees from any settlement or judgment.

3. I hereby designate the Sommers Schwartz, P.C. and Melmed Law Group P.C. law firms to represent me in this lawsuit.

Signature: _____

Print Name: _____

Date Signed: _____

Contact Information

The information requested on this page is for internal attorney use and will not be shared with your employer or filed with the court.

Name(s): _____
(Please list all names you use or are known by)

Street Address and Mailing Address (if different): _____

City, State & Zip Code (to receive mail): _____

Telephone: _____ Cell Phone: _____

Personal Email Address(es): _____

Alternative Point of Contact Name & Relationship: _____

Alternative Point of Contact Number: _____

Job Title(s): _____ Supervisor(s): _____

Primary Work Location: _____ Last Hourly Rate: _____

Employment Start Date: _____ Employment End Date: _____

Additional Terms & Information

Section 216(b) of the Fair Labor Standards Act, 29 U.S.C. §216(b), encourages employees to band together to enforce their rights to minimum wages and overtime pay.

It is illegal for an employer to retaliate against an individual for exercising his or her rights (such as by participating in this lawsuit, or by submitting this document, or talking to attorneys about his or her rights to full compensation for work performed).

Unless you retain other legal counsel, at your own expense, you will be represented in this class / collective action lawsuit by the Sommers Schwartz, P.C. and Melmed Law Group P.C. ("class counsel"). No prepayment of legal fees or costs is required. If the class or collective action is later de-certified, class counsel will inform you of your options; and class counsel may ask you to enter into a separate written retainer agreement at that time.

By joining this lawsuit, you agree to stay in contact with class counsel throughout the pendency of the lawsuit and to provide timely assistance to the attorneys and their staff, including preserving and providing documents and discovery responses, returning phone calls and emails, and testifying at depositions and trial. Please advise class counsel immediately of any change of address or employment; any bankruptcy filing; or any criminal conviction.

Attorneys shall be entitled to no fee unless awarded/approved by the court. In addition, any costs advanced by class counsel may be deducted from any amount you receive on a pro rata basis with all other plaintiffs.

Whether you have a claim or are entitled to damages cannot be determined until we review your information and employment history. Class counsel makes no guarantees or representations about the probable outcome of this lawsuit.

If you ever have questions or need to talk to class counsel, we can be contacted as follows:

Paulina R. Kennedy, Esq.
One Towne Square, 17th Floor
Southfield, MI 48076
(248) 355-0300
pkennedy@sommerspc.com