

NOTICE OF CLASS ACTION SETTLEMENT

If you worked for REACH Air Medical Services, LLC or CALSTAR Air Medical Services LLC in California as a Flight Paramedic, Flight Nurse, and/or Pilot, you may be entitled to a payment from a class action lawsuit settlement.

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

- You have received this Notice because records from REACH indicate that you were employed in the State of California as a Flight Paramedic, Flight Nurse, and/or Pilot (“Flight Crewmembers”) between August 21, 2016 and May 4, 2023.
- Nine current or former REACH employees filed lawsuits against REACH alleging that REACH failed to pay daily overtime and minimum wages to Flight Nurses and Flight Paramedics and failed to provide off-duty meal and rest periods for all Flight Crewmembers, including Pilots, as well as other claims. REACH denies these allegations and no Court has ruled in favor of any party. The parties have entered into a settlement agreement to resolve the lawsuit without further litigation and expense. This settlement resolves the cases called *Renj, et al. v. Reach Medical Holdings, LLC, et al.*, Case No. RG20072101 and *Mason v. REACH Air Medical Services, LLC*, Case No. 34-2021-00308894.
- You can learn more at: www.ReachFlightCrewSettlement.com.

Your legal rights may be affected by this settlement, and you have a choice to make:

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT:	
RECEIVE A SETTLEMENT CHECK	If you do nothing, you will remain a part of this case, release claims (listed below) against REACH, and be sent a settlement check.
EXCLUDE YOURSELF	If you do not want to participate in the settlement and want to retain your right to sue REACH for unpaid wages and related wage and hour claims, you must submit a written Opt-out Letter to the Settlement Administrator. If you submit an Opt-out Letter, you will not receive a settlement payment and may not object to the settlement.
OBJECT	You may write to the Court about why you object to the settlement. More information about objecting is set forth in Section 15 below.

- These rights and options – **and the deadlines to exercise them** – are explained in greater detail in this Notice.
- The Court still has to decide whether to approve the settlement. Settlement payments will be made if the Court approves the Settlement and after any appeals are resolved. Please be patient.

BASIC INFORMATION

1. Why did I get this notice?

You have a right to know about the proposed class settlement, and about all of your options, before the Court decides whether to approve the Settlement. This Notice explains the lawsuit, your legal rights, and what benefits are available.

The Honorable Frank Roesch, Judge of the Alameda County Superior Court for the State of California, is overseeing the *Reni* action and this Settlement.

For more information about the Settlement, please see the Settlement Agreement available at www.ReachFlightCrewSettlement.com, by contacting class counsel at reachotlawsuit@gbdhlegal.com, or by emailing the Settlement Administrator at ReachFlightCrewSettlement@atticusadmin.com.

2. Am I covered by this Settlement?

REACH's records show that you were employed in the state of California by REACH as a <<Flight Nurse/Flight Paramedic/Pilot>> for the following time period between August 21, 2016 and May 4, 2023: <<Employment Years>> and that you worked <<X Work Weeks>> during that period.

If this information is incorrect, you should contact the Settlement Administrator at PO Box 64053, St. Paul, MN 55164, ReachFlightCrewSettlement@atticusadmin.com, 1-888-900-8779 to submit a dispute and any documents you have to support the disputed information by July 31, 2023. You must do so timely to have your dispute considered.

3. What is this lawsuit about?

This case is about whether REACH failed to pay proper overtime wages, provide off-duty meal and rest periods, provide accurate wage statements, and other related claims. REACH denies these allegations. The Court has not made any ruling in favor of either party.

4. Why is this a class action?

In a class action, one or more people called "class representatives" bring claims on behalf of other people who have similar claims. The people are called "class members" and together are the "class." The individuals who initiated this class action are called the "Plaintiffs." In a class action, the Plaintiffs ask the court to resolve the issues for every member of the class.

5. Why is there a settlement?

The Court did not decide in favor of Plaintiffs or REACH. Both sides believe they will prevail in the litigation, but there was no decision in favor of either party. Instead, the parties have agreed to resolve this matter to avoid the expense and risks of more litigation. Plaintiffs and Class Counsel think the Settlement is in the best interests of all Class Members.

THE SETTLEMENT BENEFITS – WHAT YOU GET

6. What does the Settlement provide?

REACH has agreed to pay at least \$15,000,000.00 (the "Gross Settlement Fund"), plus the employer share of payroll taxes on amounts considered wages. The Gross Settlement Fund will be used to pay: (1) Participating Class Members and Aggrieved Employees (as defined below); (2) attorneys' fees of up to one-third of the Gross Settlement Fund, plus reimbursement of actual litigation expenses and costs of up

to \$60,000.00; (3) Service Awards of \$15,000.00 for each of six Named Plaintiffs who were deposed during litigation and \$10,000.00 for each of three Named Plaintiffs who were not deposed; (4) \$375,000.00 to the California Labor and Workforce Development Agency; and (5) the Settlement Administrator's fees and costs of up to \$30,000.00.

As part of the Settlement, REACH has also agreed to change some of its policies and practices, including to: pay daily overtime to medical crewmembers, revise written policies to reference Proposition 11 (related to meal and rest breaks) and allow Flight Crewmembers to record missed meal and/or rest breaks, pay on-call hours at the applicable minimum wage, revise the Standard Operating Procedures to instruct Flight Crewmembers to record all hours worked (including pass down duties), include preceptor and the non-overtime premium portion of call-in shift pay in the regular rate of pay, and include a California address for REACH Air Medical Services, LLC on Flight Crewmembers' wage statements. In implementing the overtime changes, REACH has agreed to set hourly rates to target an increase in Class Members' aggregate compensation over 2022 compensation.

7. How will my settlement payment be calculated?

The Administrator will calculate how many "Settlement Points" each Class Member is entitled to based on the number of Work Weeks worked during the Class Period, weighted by year and job position. The formula, which has been preliminarily approved by the Court, weighs Work Weeks worked earlier in the Class Period more heavily than more recent years to account for interest (a Work Week worked in 2016 is worth 1.7 the amount of a Work Week worked in 2023, a Work Week in 2017 is worth 1.6, a Work Week in 2018 is worth 1.5, a Work Week in 2019 is worth 1.4, a Work Week in 2020 is worth 1.3, a Work Week in 2021 is worth 1.2, and a Work Week in 2022 is worth 1.1); and which job position you were in (Medical Crewmembers receive a multiplier of 5.0 on their Settlement Points and Pilots receive a 1.0 multiplier, reflecting the different claims of each group). The Administrator will determine how much each Settlement Point is worth based on the net settlement fund to calculate individual awards.

The Settlement Agreement contains the exact allocation formula. You may obtain a copy of the Settlement Agreement at www.ReachFlightCrewSettlement.com.

Based on REACH's records of your dates worked in a job position during the Class Period (see Question #2), your *estimated* payment as a Class Member is <<\$award>>. The actual amount of any payment may vary.

The Settlement Administrator used information from REACH's records to calculate your payment. If the dates or job position listed in section 2 are incorrect, you may contact the Settlement Administrator at PO Box 64053, St. Paul, MN 55164, ReachFlightCrewSettlement@atticusadmin.com, 1-888-900-8779 to submit a dispute and any documents you have to support the disputed information by July 31, 2023. The Settlement Administrator will evaluate the information you provide and will make the final decision as to any dispute.

Half of your settlement payment is subject to payroll deductions for applicable taxes and withholdings like any other paycheck, for which you will receive a Form W-2, and half of your settlement payment is not subject to deductions and will be reported on a Form 1099. Neither Class Counsel nor REACH's counsel can advise you regarding the tax consequences of the Settlement. You may wish to consult with your own personal tax advisor in connection with the Settlement.

Settlement checks that are not cashed within 180 days of issuance will be null and void.

8. Aggrieved Employee Additional Payment

The lawsuit also includes a California Private Attorneys General Act (“PAGA”) claim brought on behalf of the State of California that sought civil penalties from REACH for the overtime and other violations that Plaintiffs alleged.

As part of the settlement of the PAGA claim, REACH agreed to pay \$500,000.00, which will be distributed according to PAGA’s requirement that 75% (or \$375,000.00) be distributed to the California Labor Workforce Development Agency and the remaining 25% (or \$125,000.00) will be paid to Aggrieved Employees.

If you worked for REACH as a Flight Paramedic, Flight Nurse, and/or Pilot in California at any time between August 7, 2019 through May 4, 2023, you are an “Aggrieved Employee.” If the Court approves the PAGA Settlement, Aggrieved Employees will release the Released PAGA Claims.

Your individual PAGA settlement payment will be determined by your proportional share of the \$125,000 based on the number of Work Weeks you worked between August 7, 2019, and May 4, 2023 and your position as either a Medical Crewmember (*i.e.* Flight Paramedic or Flight Nurse) or Pilot.

If you are eligible for a PAGA award, that award will be treated as penalties not subject to deductions and reported on a Form 1099.

HOW YOU GET A PAYMENT

9. How do I get my payment?

If you want to receive a settlement payment, you do not need to take any action. It is your responsibility to update your mailing address with the Settlement Administrator to make sure they have your current address.

10. When will I get my settlement payment?

The Court is scheduled to hold a hearing on September 21, 2023 at 3:30 p.m. to determine whether to give final approval to the Settlement. This date may change without further notice to Class Members. Please check www.ReachFlightCrewSettlement.com to confirm that the date has not changed. If the Court grants final approval, settlement checks are anticipated to be mailed up to three months after the Court issues the final approval order. If an appeal is filed as a result of an objection to the Settlement, then checks will be delayed. Please be patient and update the Settlement Administrator if your mailing address changes.

11. What am I giving up by releasing my claims?

If you want to receive a settlement payment, you will release the Released California Claims. This means that you cannot sue, continue to sue, or be part of any other legal action against REACH or its related entities asserting the Released California Claims. Released California Claims means any and all claims, rights, demands, liabilities, and causes of action of any kind, whether known or unknown including any violation of common law, California law, local law, and/or federal law which was or could have been raised in the Action based on the facts alleged in the complaints, including but not limited to claims based on California Labor Code sections 201, 202, 203, 204-204b, 210, 221, 222, 223, 225.5, 226, 226.2, 226.3, 226.7, 256, 510, 512, 551, 558, 1174, 1182.12, 1194, 1194.2, 1197, 1197.1, and 1198 California Code of Regulations, Title 8 Sections 11000 and 11090, the applicable Industrial Welfare Commission (IWC) Wage Orders, Business & Professions Code sections 17200 *et seq.*, and any related damages, penalties, restitution, equitable relief, disgorgement, interest or attorneys’ fees that arose on or before the end of the Class Period.

In addition, if you worked for REACH in California as a Flight Crewmember between August 7, 2019 and May 4, 2023, you also will release the Released PAGA Claims. Released PAGA Claims means any claims relating to civil penalties under California Labor Code section 2698 *et. seq.* for violations listed and based on the facts alleged in Plaintiffs' August 7, 2020, August 21, 2020, and April 13, 2021 letters to the California Labor & Workforce Development Agency, including violations of California Labor Code sections, 201, 202, 203, 204-204b, 210, 221, 222, 223, 225.5, 226, 226.2, 226.3, 226.7, 256, 510, 512, 551, 552, 558, 1714, 1714.5, 1182.12, 1194, 1194.2, 1197, 1197.1, 1198, that accrued during your employment on or after August 7, 2019 through May 4, 2023. You may not exclude yourself from this Release of PAGA Claims.

EXCLUDING YOURSELF FROM THE SETTLEMENT

12. How do I opt out of the Settlement?

If you want to opt out, you will not receive payment and cannot object. You must submit a written Opt-out Letter to the Settlement Administrator, that: (i) states your name, address, email address, phone number, and last four digits of your social security number; (ii) includes a statement indicating your intent to exclude yourself from the Settlement, such as "I WISH TO BE EXCLUDED FROM THE SETTLEMENT CLASS. I UNDERSTAND THAT IF I ASK TO BE EXCLUDED FROM THE SETTLEMENT CLASS, I WILL NOT RECEIVE ANY MONEY FROM THE SETTLEMENT OF THIS LAWSUIT"; and (iii) includes your signature. The Opt-out Letter must be sent by certified mail on or before **July 31, 2023**.

If you submit an Opt-out Letter, you might still receive a PAGA Award. You will retain the right to bring your own legal action against REACH for California Labor Code claims, excluding PAGA. You should be aware that your claims are subject to a statute of limitations, which means that they will expire on a certain date.

THE LAWYERS REPRESENTING YOU

13. Do I have a lawyer in this case?

The Court has decided that the lawyers at Goldstein, Borgen, Dardarian & Ho are qualified to represent you and all Class Members. These lawyers are called "Class Counsel." You do not need to hire your own attorney. If you do not opt out of the Class and want to be represented by your own lawyer, you may hire one at your own expense.

14. How will the lawyers be paid?

To date, Class Counsel have not been paid any money for their work or out-of-pocket expenses in this case. To pay for their time and risk in bringing this case without guarantee of payment unless they were successful, Class Counsel will request up to one-third of the Gross Settlement Fund plus reimbursement for their out-of-pocket expenses.

OBJECTING TO THE SETTLEMENT

You can tell the Court that you do not agree with the Settlement or some part of it.

15. How do I tell the Court that I disapprove of the settlement?

If you have not submitted an Opt-out Letter, you can ask the Court to deny approval of the Settlement by filing an objection. You can't ask the Court to order a different settlement; the Court can only approve or reject the Settlement. If the Court does not approve the Settlement, no settlement payments will be sent out and the lawsuit will continue. If that is what you want to happen, you must object.

Any objection to the proposed Settlement must be in writing or made orally to the Court at the Final Approval Hearing. To object in writing, a Class Member must submit by mail to the Settlement Administrator PO Box 64053, St. Paul, MN 55164, no later than July 31, 2023 a signed, original document, titled "Class Member Objection." If you submit a written objection you may, but are not required to, appear in person or through your own attorney. If you appear through your own attorney, you are responsible for hiring and paying that attorney.

You may also object by appearing in person or remotely at the Final Approval Hearing. If you are making a remote appearance, you may do so by contacting Class Counsel (contact information at the end of this Notice) and the Clerk of the Court at Dept17@alameda.courts.ca.gov for instructions on appearing remotely at no personal expense to you.

16. What's the difference between objecting and opting out?

Objecting tells the Court that you do not like something about the Settlement and asks the Court not to approve the Settlement.

Opting out (also known as excluding yourself) tells the Court that you do not want to be part of the Class. If you exclude yourself, you cannot object because the case no longer affects you.

If you submit both an objection and an Opt-out Letter, the Settlement Administrator will attempt to contact you to determine whether you intended to object or exclude yourself. If the Settlement Administrator cannot reach you, it will be presumed that you intended to exclude yourself, and your objection will not be considered.

THE COURT'S FINAL APPROVAL/FAIRNESS HEARING

17. When and where will the Court decide whether to approve the Settlement?

The Court will hold the Fairness (or Final Approval) Hearing on September 21, 2023 at 3:30 p.m. in Dept. 17. This date may change without further notice to Class Members. Please check www.ReachFlightCrewSettlement.com to confirm that the date has not changed.

At the hearing, the Court will determine whether the Settlement is fair, adequate, and reasonable and will consider any properly submitted objections. Please contact Class Counsel using the contact information provided in Section 20 below if you have any questions about the date and time of the Fairness Hearing.

18. Do I have to come to the fairness hearing?

No. Class Counsel will attend to answer questions the Court may have. You are welcome to attend at your own expense. If you send an objection, you do not have to attend. As long as you have not excluded yourself and have mailed your written objection on time, the Court will consider it. You may also pay your own lawyer to attend, but it is not necessary.

GETTING MORE INFORMATION

19. Are there more details about the Settlement?

This Notice summarizes the proposed Settlement. More details are in the Settlement Agreement. You can get a copy of the Settlement Agreement at www.ReachFlightCrewSettlement.com.

20. How do I get more information?

If you have other questions about the Settlement or want more information, you can contact the Settlement Administrator PO Box 64053, St. Paul, MN 55164, 1-888-900-8779 and email address ReachFlightCrewSettlement@atticusadmin.com or Class Counsel at:

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