

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI**

**THIS IS A COURT-AUTHORIZED NOTICE AND IS NOT A SOLICITATION
FROM A LAWYER.**

Nurses (“Plaintiffs”) have sued Corizon Health, Inc. and Corizon, LLC (“Corizon” or “Defendants”) alleging they violated the law by failing to pay nurses for time spent performing pre- and post- shift activities. You are eligible to join this lawsuit if you are, or were, employed by Defendants as an hourly, non-exempt nurse and worked more than forty (40) hours in a workweek (*i.e.*, from Sunday at midnight through Saturday at 11:59pm) on an hourly, or non-exempt basis between October 15, 2016 through the present, and if you performed pre- and post- shift activity for which you were not paid because your time clock was not near (*i.e.*, within 25 feet) of the facility’s entrance/exit. Pre- and post- shift activity means any, and all, activities performed after entering a correctional institution before clocking in (other than walking in), and any, and all, activities performed after clocking out before exiting the correctional institution (other than walking out).

The Court has not decided whether Corizon did anything wrong. There is no money available now, and no guarantee there will be. However, your legal rights may be affected, and you have a choice to make now:

YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT	
ASK TO BE INCLUDED	<p>Join this lawsuit. Await the outcome.</p> <p>If you choose to be included in this lawsuit, you keep the possibility of getting money or benefits that may come from a trial or a settlement. But, you give up any rights to separately sue Corizon about the same legal claims in this lawsuit.</p> <p>To be included in this lawsuit, you must: complete, sign, and return the Consent to Join form by May 6, 2021. You can sign and return by Docusign or other electronic signature method.</p>
DO NOTHING	<p>Do not join this lawsuit. Get no benefits from it.</p> <p>By doing nothing now, you give up the possibility of getting any money or benefits from a trial or a settlement of this lawsuit. For now, you keep any rights to sue Corizon separately about the claims made in this lawsuit.</p>

Your legal rights and options under federal law are explained in this notice. Currently, Plaintiffs are represented by Burger Law and Williams Dirks, Dameron (“Plaintiffs’ Counsel”). However, you may have other legal rights and options. You are free to contact the law firm to discuss your rights, you may be represented by an attorney of your choosing, or you may choose to participate in this action without representation.

BASIC INFORMATION

1. Why did I get this notice?

Corizon's records show you currently work, or previously worked, in a position at issue in this lawsuit. The Court has, upon Plaintiffs' Motion, and by agreement of the parties, conditionally certified a collective action lawsuit that may affect you. You have legal rights and options you may exercise at this time in this lawsuit, which is titled *Fritz, et al. v. Corizon, Inc. et al.*, Case No. 6:19-CV-3365-SRB, pending in the United States District Court for the Western District of Missouri.

2. What is a collective action and who is involved?

In a collective action lawsuit, one or more people bring suit and ask the Court to permit other people who have similar claims to join the lawsuit as parties. If the Court decides the lawsuit may continue as a collective action, the Court will resolve the issue for everyone who joins the case.

THE CLAIMS IN THE LAWSUIT

3. What is this lawsuit about?

Plaintiffs contend Corizon violated the federal Fair Labor Standards Act ("FLSA") by failing to pay its hourly nurses overtime for time spent performing pre- and post- shift activities. Plaintiffs are seeking overtime wages for all hours worked over 40 in a single workweek. Plaintiffs also allege claims under Missouri state law. This notice only involves the federal FLSA claims. You can read Plaintiffs' complaint at <https://burgerlaw.com/correctionsnurse/>.

4. What are the Plaintiffs asking for?

Under the FLSA, Plaintiffs seek to recover damages from Corizon for overtime wages, plus reasonable attorneys' fees, and the costs of the lawsuit. Plaintiffs are also seeking liquidated damages, which may double the amount of back wages owed.

5. What is the position of Corizon?

Corizon denies Plaintiffs' FLSA allegations. Corizon contends nurses were paid all wages they were owed under the FLSA and the alleged pre-shift and post-shift activities were not time worked by Plaintiffs and other nurses.

6. Has the Court decided who is right?

The Court has not decided if Corizon did anything wrong. By issuing this notice, the Court is not suggesting the Plaintiffs will win or lose the case.

YOUR RIGHTS AND OPTIONS

7. What happens if I join this lawsuit?

If you choose to join this lawsuit, you will be bound by any ruling or judgment made by the Court, whether favorable or unfavorable. When joining this lawsuit, you may choose to hire a different lawyer of your own choosing at your own expense, or decide to proceed *pro se* (i.e., on your own without an attorney).

If you join the lawsuit, you may have to answer written questions or testify under oath.

If judgment is rendered in favor of Corizon, the Court may tax certain statutory costs against the unsuccessful plaintiffs, but, if they are assessed, the attorneys for the collective action plaintiffs have agreed to pay such costs.

8. How do I ask the Court to include me in this case?

Attached is a form called a “Consent to Join.” If you choose to join this lawsuit, you must sign and promptly submit the Consent to Join Form by May 6, 2021 or file a similar statement with the Court indicating your intention to join the lawsuit. If you choose to submit the attached consent to join form, note you will be represented by Burger Law and Williams Dirks, Dameron, and you will be making certain designations; you can sign and return it by Docusign or other electronic signature method.

If you have any questions about the Consent to Join Form, you can visit <https://burgerlaw.com/correctionsnurse/> or contact an attorney representing Plaintiffs at the information below:

Fritz v. Corizon c/o CPT Group, Inc. (Notice Administrator)
50 Corporate Park
Irvine, CA 92606
Telephone: 1-(888) 413-2833
Email: correctionsnurse@cptgroup.com

If a signed Consent to Join is not submitted, or a similar statement indicating your intention

to join the lawsuit, is not filed with the Court by May 6, 2021, you may be prohibited from participating in this lawsuit.

9. Can Corizon retaliate against me if I join the lawsuit?

No. It is a violation of federal law for Corizon to fire, discipline, punish, intimidate, threaten, refuse to hire, blacklist, or in any manner discriminate, or retaliate, against you for joining this case.

THE LAWYERS REPRESENTING YOU

10. Do I have a lawyer in this case?

If you choose to join this lawsuit, you may be represented by Burger Law and Williams Dirks, Dameron. This law firm is experienced in handling similar cases against other employers. For more information about the law firm, please call (866) 599-2222. However, you may hire a different lawyer of your own choosing at your own expense, or you may decide to proceed *pro se* (*i.e.*, on your own without an attorney), in a separate lawsuit.

11. Will I have to pay the lawyers and how will the lawyers be paid?

If you are represented by Burger Law and Williams Dirks, Dameron, and they recover money for you, they may ask the Court to award them their fees and expenses, and you won't have to pay these fees and expenses. If the Court grants the attorneys' request, the fees and expenses may be deducted from any money obtained for the persons they represent. If you hire a different lawyer, you should consult with your counsel about how he or she may be paid.

GETTING MORE INFORMATION

12. Are more details available?

Visit the website <https://burgerlaw.com/correctionsnurse/> to get more information regarding this lawsuit. You may ask questions or get more details by emailing correctionsnurse@cptgroup.com calling 1-(888) 413-2833 or by writing to: Fritz v. Corizon c/o CPT Group, Inc., 50 Corporate Park, Irvine, CA 92606.