

U.S. DISTRICT COURT, DISTRICT OF IDAHO  
NOTICE OF CLASS ACTION SETTLEMENT

**IF YOU HAVE BEEN AN HOURLY, NON-EXEMPT  
EMPLOYEE OF COMMUNITY CONNECTIONS  
INCORPORATED AT ANY TIME FROM MARCH 8, 2018  
THROUGH OCTOBER 31, 2018, A PUTATIVE CLASS  
ACTION SETTLEMENT MAY AFFECT YOUR RIGHTS.**

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

- Dorinda Thompson, individually and as Class Representative on behalf of other former and current employees ("Plaintiffs"), has sued Community Connections Incorporated ("CCI"), claiming CCI miscalculated overtime pay in violation of the Fair Labor Standards Act, and made wrongful deductions from paychecks in violation of Idaho State law. CCI denies these allegations and asserts that it fully complied with state and federal law.
- While the Court has not decided that CCI did, or did not do, anything wrong, or that this lawsuit should be certified as a class action, the parties have settled the matter, and the court has given its preliminary approval of the settlement.

**WHAT THIS NOTICE CONTAINS**

**BASIC INFORMATION**

1. Why did I get this notice?
2. What is the lawsuit about?
3. What is a class action and who is involved?
4. Has the Court decided who is right?
5. Is there any money available now?

**WHO IS IN THE PUTATIVE CLASS**

6. Am I part of this putative class?
7. Are any individuals who worked at CCI not included in the putative class?
8. I am still not sure if I am included.

**YOUR RIGHTS AND OPTIONS**

9. Is there anything I need to do?
10. Will my decision affect my employment at CCI?
11. Is there a way for me to object to the terms of the settlement agreement?

**SETTLEMENT INFORMATION**

12. How much money did the parties settle for?
13. What is my share of the settlement money?
14. When can I expect payment?

**THE LAWYERS REPRESENTING YOU**

15. Do I have a lawyer in this case?
16. Should I get my own lawyer?
17. How will the lawyers be paid?

**FOR MORE INFORMATION**

## BASIC INFORMATION

### 1. Why did I get this notice?

This notice is to inform you that there has been a proposed Settlement of this putative collective action and class action lawsuit against Community Connections Incorporated ("CCI") If you were employed by CCI in the State of Idaho as an hourly, non-exempt employee at any time from March 8, 2018 until October 31, 2018 (the "Putative Class Period"), you are a member of the proposed settlement class in this lawsuit (the "Plaintiffs") and your rights will be affected as set forth in the proposed settlement described in this Notice (the "Settlement").

On July 7, 2020, the Court preliminarily approved the Settlement. You are receiving this Notice because CCI's records show you were employed by CCI at some time during the Putative Class Period. Unless you choose to object to the Settlement as set forth in Paragraph 11, you will be bound by the terms of the Settlement, if it is approved by the Court, and by any order entered by the Court dismissing this class action lawsuit.

### 2. What is the lawsuit about?

On May 10, 2019, a lawsuit was filed by Ms. Dorinda Thompson ("Named Plaintiff") in Kootenai County District Court, State of Idaho, titled DORINDA J. THOMPSON, on behalf of herself and all others similarly situated, Plaintiff, vs. COMMUNITY CONNECTIONS INCORPORATED, Defendant; on August 2, 2019, the case was removed to U.S. District Court, District of Idaho, Case No. 2:19-cv-00300 (the "Action"). The Named Plaintiff generally alleges CCI failed to accurately calculate overtime wages, and took unlawful deductions from wages. CCI denies these allegations.

Counsel for Named Plaintiff and the Putative Class Plaintiffs ("Class Counsel") and Counsel for CCI have extensively investigated, analyzed and evaluated the facts and circumstances surrounding the allegations. Both sets of Counsel believe it would prevail at trial, but recognize that extended litigation would incur substantial additional costs and expenses, and delay any potential recovery to the Putative Class. Counsel for both parties has also taken into account the uncertainty and risk of the outcome of further litigation.

Thus, the Parties reached a mutually agreeable settlement considering all the factors described above.

### 3. What is a class action and who is involved?

The Court has not yet decided if this lawsuit should be a collective action and/or class action. However, the parties have settled the lawsuit as though it were a collective/class action.

In a collective/class action, one or more people called "Class Representatives" (in this case Dorinda Thompson) sue on behalf of other people who they say have similar claims. The people together are a "Class" or "Class Members". The people who have sued and all the Class Members are called the "Plaintiffs". The company they sued (in this case, CCI) is called the Defendant. One court resolves the issues for everyone in the Class.

### 4. Has the Court decided who is right?

No. The Court has not decided whether the Class Representative or CCI is correct. By issuing this notice, the Court is not suggesting that either the Class Representative or CCI is correct. Instead, the Court is simply notifying you, as a Putative Class Member, that the lawsuit exists and that the parties have reached a preliminary settlement.

### 5. Is there any money available now?

Yes. The Parties have settled the claims, and the settlement money available to the Putative Class Members is explained below in Sections 9, 12 and 13.

## WHO IS IN THE PUTATIVE CLASS

### 6. Am I part of this putative class?

The parties have agreed that all potential putative class members are prior and current hourly, non-exempt employees of CCI at any time from March 8, 2018 through October 31, 2018. You have a right to object to the Settlement as explained below in Section 11. If the Court finally approves the Settlement and enters a Final Judgement, you will be sent a settlement check. By cashing the check when it is sent, you will be choosing to be a part of the class.

### 7. Are any individuals who worked at CCI not included in the putative class?

Yes. Salaried exempt management employees are not part of the putative class.

**8. I am still not sure if I am included.**

If you are still unsure whether you are included, you may call or write to the lawyers in this case, at:

Kammi Mencke Smith  
Winston & Cashatt  
601 W. Riverside, Suite 1900  
Spokane WA, 99201  
509-838-6131

**YOUR RIGHTS AND OPTIONS**

**9. Is there anything I need to do?**

No. In October 2019, you were sent a check from CCI with an accompanying letter. The check was identified as being for wages, employment benefits, payroll deductions, and compensation. CCI's records show that you either (1) didn't cash the check, or (2) didn't receive the check because it was returned as undeliverable. During settlement negotiations, it was determined by the parties that the amount of your check was adequate compensation to you for the claims of miscalculated overtime and/or unlawful deductions that are the subject of this lawsuit.

Therefore, this Notice is to inform you that the parties have reached as settlement in the lawsuit. Once the Court finally approves the settlement, you will be resent your settlement check. That check will be valid for 60 calendar days. By cashing or negotiating that settlement check, you will be chosen to be a part of the lawsuit, and held to all the terms of this Settlement Agreement. By choosing to be a part of this lawsuit, you will not be able to sue, or continue to sue CCI as part of any other lawsuit concerning the same legal claims that are the subject of this lawsuit. You will also be legally bound by all of the Orders the Court issues and judgments the Court makes in this Action, including approval of the proposed Settlement and Final Judgment of the Court dismissing the Action with prejudice. For a complete description of the release, please see the full copy of the Stipulation and Settlement Agreement of Collective and Class Action Claims ("Settlement Agreement" Section 2), available for your review at [winstoncashatt.com](http://winstoncashatt.com).

**10. Will my decision affect my employment at CCI?**

No. The law prohibits retaliation of any kind for participation in this Action.

**11. Is there a way for me to object to the terms of the settlement agreement?**

Yes. A hearing (the "Settlement Hearing") will be held before the Honorable Bill R. Wilson on August 7, 2020 at 9:00 a.m. at the U.S District Court, District of Idaho located in Kootenai County Idaho, to determine whether the proposed Settlement of the Action is fair, adequate and reasonable and should be approved by the Court and whether the Action should be dismissed on the merits with prejudice if the Settlement is approved. The hearing may be adjourned by the Court from time to time without further notice.

Any Putative Class Member may appear in person or through their own counsel at the Settlement Hearing and be heard as to why the proposed Settlement should not be approved or why a Final Judgment dismissing the Action against CCI with prejudice should or should not be entered. Anyone wishing to object to the terms of the Settlement must file with the Court their written objections and written notice of intention to appear at the Settlement Hearing together with copies provided to the following attorneys, on or before August 4, 2020, or postmarked no later than July 31, 2020 if serving by mail:

Kammi Mencke Smith  
WINSTON & CASHATT  
601 W. Riverside Ave.,  
Suite 1900  
Spokane, WA 99201

Peter C. Erbland  
LAKE CITY LAW GROUP,  
PLLC  
435 W. Hanley Ave.,  
Suite 101  
Coeur d'Alene, ID 83815

Any member of the Settlement Class who does not make and serve his or her written objections in the manner provided above shall be deemed to have waived such objections and shall be foreclosed from making any objections (by appeal or otherwise) to the proposed Settlement.

You are not required to attend this Hearing unless you plan to object to the Settlement and want your objection to be considered. Any Putative Class Member who is satisfied with the proposed Settlement need not appear at the Settlement Hearing.

**SETTLEMENT INFORMATION**

**12. How much money did the parties settle for?**

The specific and complete terms of the proposed Settlement are described in the Stipulation and Settlement Agreement of Class Action Claims ("Settlement Agreement"), a full copy is available for your review at [winstoncashatt.com](http://winstoncashatt.com).

The total proposed monetary value of the Settlement is \$70,954.10 (the "Settlement Fund"). The Settlement Fund is made up of three parts: (1) a "Payout Fund" to Putative Class Members in the amount of \$5,954.10; (2) an Incentive Award of \$7,000.00 to the Named Plaintiff for her time and efforts acting as the Class representatives from the inception of the Action; and (3) a Fees Award to Class Counsel for fees and costs associated with the Action and administration of the settlement funds.

**13. What is my share of the settlement money?**

If you worked at CCI between March 8, 2018 and October 31, 2018, CCI determined the amount of your check when they audited their payroll records. Additionally, you will be provided an additional amount for any trouble related to the unpaid wages. These checks will be issued as payroll checks, and CCI will pay the employer side taxes associated with the payment, and the wages will be reflected on your 2020 W-2 Form.

**14. When can I expect payment?**

If the Settlement is finally approved at the Settlement Hearing to be held before the Honorable Bill R. Wilson on August 7, 2020, at 9:0 a.m. and the settlement becomes effective if no appeal is made, then processing of payment of the Payout Fund can be expected to begin on or about September 8, 2020. Payment shall be sent via US Mail.

**THE LAWYERS REPRESENTING YOU**

**15. Do I have a lawyer in this case?**

Yes. The law firm of Winston & Cashatt, Lawyers represents the class members in this Action. Winston & Cashatt is referred to as "Class Counsel" and has experience in handling similar cases against other employers. There is one attorney at Winston & Cashatt assigned to his matter: Kammi Mencke Smith.

**16. Should I get my own lawyer?**

You do not need to hire your own lawyer because Class Counsel is working for all Members of the Putative Class; however, if you want your own lawyer, you will be responsible for paying that lawyer. If you hire a lawyer to represent you, that layer may appear in court and speak for you.

**17. How will the lawyers be paid?**

From the start of this lawsuit in May 2019, Winston & Cashatt (Class Counsel) has not received any payment for its services in the case, nor have they been reimbursed for any out of pocket costs and expenses. As part of the preliminary approval of the Settlement, the Court is being advised that Class Counsel will be requesting attorneys' fees and costs in an amount of \$58,000 (the "Fees Award"), an amount believed by Class Counsel and the Named Plaintiff, to be fair and reasonable for the past and future work performed, considering the time expended, the complexity of the case, and the issues raised and litigated to date. The Fees Award shall be paid by CCI and shall come from the Settlement fund but will **not** come out of the Payout Fund. As part of the Settlement, you will not be required to pay Class Counsel anything for their representation of you in the Action. CCI has agreed not to oppose Class Counsel's request for attorney fees and costs.

**FOR MORE INFORMATION**

The foregoing is only a summary of the lawsuit and the proposed Settlement, and is not comprehensive. For a more detailed statement of the lawsuit and the proposed Settlement, you may write to Class Counsel, visit Class Counsel's website at [winstoncashatt.com](http://winstoncashatt.com) or refer to the pleadings, the Stipulation and Settlement Agreement of Class Action Claims, and other papers filed in the Action.

All inquiries can be directed to Class Counsel:

Kammi Mencke Smith  
WINSTON & CASHATT  
601 W. Riverside Ave., Suite 1900  
Spokane, WA 99201  
Tel: (509) 838-6131

**PLEASE DO NOT CONTACT THE CLERK OF THE COURT, THE JUDGE, CCI, OR CCI'S ATTORNEY WITH INQUIRIES.**