
*****TIME-SENSITIVE NOTICE*****

*****THIS IS NOT AN ADVERTISEMENT FROM A LAWYER*****

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF IDAHO**

**Shane Chaffer, individually and on behalf
of all others similarly situated,**

Plaintiff,

vs.

Front Line EMS, LLC,

Defendant.

Case No. 1:22-cv-00181-DCN

NOTICE OF OVERTIME LAWSUIT

TO: Current and former Paramedics and EMTs employed by Front Line EMS, LLC during the last three years.

RE: Fair Labor Standards Act (FLSA) lawsuit alleging unpaid overtime wages.

DEADLINE TO RETURN CONSENT FORM: December 23, 2022

1. Why Am I Getting This Notice?

A lawsuit filed in the United States District Court for the District of Idaho (the “Lawsuit”) alleges Front Line EMS, LLC (“Front Line”) violated the law by not paying overtime to Paramedics and EMTs who were allegedly paid a day rate. Front Line’s records indicate you were employed by Front Line and as a Paramedic or EMT at some point since «**3 years before date of Order**» and were compensated based on the pay practice at issue in the lawsuit. Front Line denies that it violated the law and asserts that it paid its Paramedics and EMTs all hourly and overtime wages due in connection with the payments they received from Front Line. The Court has not yet decided whether any violation has occurred or whether you are entitled to any overtime pay. You are receiving this notice to explain how you can participate in this Lawsuit if you choose.

2. What Is This Lawsuit About?

Shane Chaffer (“Plaintiff”) was employed by Front Line at certain times as a Paramedic. He

alleges that he was not properly paid for any overtime hours worked under the FLSA. He also alleges Front Line did not properly pay overtime to other Paramedics and EMTs when they worked over 40 hours in a week.

Plaintiff alleges Front Line owes Paramedics and EMTs who were paid an alleged day rate unpaid overtime for all hours worked in excess of 40 per workweek in the past 3 years, additional liquidated damages equal to the amount of unpaid overtime, attorneys' fees, and costs.

Front Line denies Plaintiff's claims and asserts all of its Paramedics and EMTs have been and continue to be properly paid under the FLSA and all other applicable law. Specifically, Front Line asserts that its Paramedics and EMTs were properly compensated for all overtime hours worked and were paid all hourly and overtime wages in connection with the payments they received from Front Line.

The Court has not yet determined whether Plaintiff or Front Line is right. Accordingly, this notice is for the sole purpose of determining the identity of those persons who wish to be involved in this Lawsuit. By returning a Consent to Join Wage Claim Form, you can make a claim for damages against Front Line.

3. What Are My Options?

Whether or not to join this Lawsuit is up to you. If you want to join this Lawsuit and make a claim for unpaid overtime wages, you must read, sign, and return the attached Consent to Join Wage Claim Form by **December 23, 2022**. You may return your Consent to Join Wage Claim Form by filling out the attached form and returning it by mail, e-mail, or fax to:

Overtime Lawsuit Against Front Line
RICARDO J. PRIETO
SHELLIST LAZARZ SLOBIN LLP
11 Greenway Plaza, Suite 1515
Houston, Texas 77046
Telephone: 713.621.2277 · Fax: 713.621.0993
E-mail: rprieto@eeoc.net

If you do not wish to be a part of the Lawsuit, you do not need to do anything. The decision to join is entirely yours.

Because the FLSA only allows workers to recover up to the past three years of back wages, eligible workers who do not return a Consent to Join Wage Claim Form may lose their rights to make a claim for overtime wages for work performed in the past for Front Line unless they bring a new, separate case.

4. Effect of Making a Claim for Unpaid Overtime Wages.

If you return a Consent to Join Wage Claim form and choose to join this Lawsuit, you will be bound by any judgment, favorable or unfavorable, on any claim you may have under the FLSA. If you win, you may be eligible to share in the monetary award, including overtime wages and liquidated damages. If you lose, no money will be awarded, and you will not be able to file another lawsuit regarding the matters raised in this Lawsuit.

If you choose to join this Lawsuit, you may be required to answer written questions from Front Line under oath, produce documents relating to your claim(s), and testify under oath at an oral deposition and/or at trial with regard to your claim(s) against Front Line.

5. Retaliation and Blackballing Are Prohibited.

The FLSA prohibits anyone from discriminating or retaliating against you if you choose to take part in this Lawsuit, and Front Line has agreed to abide by the law in this regard. Similarly, you will not be discriminated or retaliated against for choosing not to join this Lawsuit.

6. Your Legal Representation If You Join.

If you choose to join this collective action lawsuit, your attorneys will be Ricardo J. Prieto and Melinda Arbuckle of the law firm SHELLIST LAZARZ SLOBIN LLP, and Emily A. MacMaster of the law firm MACMASTER LAW PLLC. Their contact information is listed below.

You will also be represented by Plaintiff Shane Chaffer as the representative plaintiff. Along with Plaintiff's Counsel, Plaintiff will make all decisions regarding the litigation, including all decisions regarding settlement or trial, the terms of settlement and release of claims, and agreements regarding attorneys' fees and costs.

7. How Can You Receive More Information?

If you have any questions about the collective action or your legal rights, you should contact counsel for the class directly at:

Ricardo J. Prieto
Melinda Arbuckle
SHELLIST LAZARZ SLOBIN LLP
11 Greenway Plaza, Suite 1515
Houston, Texas 77046
Phone: 713.621.2277
Fax: 713.621.0993
E-mail: rprieto@eoc.net

Emily A. MacMaster
MACMASTER LAW, PLLC
300 W. Main Street, Suite 202
Boise, Idaho 83702
Phone: 208.608.2235
E-mail: emily@macmasterlaw.com

8. You Have Until December 23, 2022 to Join this Lawsuit.

Your decision about whether to join the Lawsuit should be made promptly. Because the law only allows a person to recover up to 3 years of back wages from the date the Consent to Join Wage Claim Form is filed, time is of the essence in submitting this form if you wish to join this Lawsuit. All consent forms must be received by email or postmarked if sent by mail no later than **December 23, 2022**, which is sixty (60) days after this Notice was mailed to you. A Consent to Join Wage Claim Form is enclosed with a self-addressed stamped envelope.

You should **NOT** contact the Court to discuss this matter. The Court must remain neutral and cannot offer you advice. This lawsuit is pending in the United States District Court for the District of Idaho, before the Honorable David C. Nye, Chief United States District Judge.