

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**JENNIFER DUPRE and MELINDA  
WILSON, on Behalf of themselves and on  
Behalf of All Others Similarly Situated,**

**Plaintiffs,**

**V.**

**SLATE HEALTHCARE LLC**

**Defendant**

**CIVIL ACTION NO. 4:22-cv-00264**

**NOTICE OF COLLECTIVE ACTION LAWSUIT**

The purpose of this Notice is to inform you of the existence of a collective action lawsuit filed on behalf of current and former traveling nurses against Slate Healthcare, LLC, and of the steps you must take if you desire to participate in the lawsuit. You are not required to participate in the lawsuit.

**DEADLINE TO FILE CONSENT FORM: NOVEMBER 19, 2023**

**1. What Is This Lawsuit About?**

In January 2022, Jennifer Dupre and Melinda Wilson (“Plaintiffs”) filed this lawsuit against Slate Healthcare, LLC (“Slate”), on behalf of themselves and certain other traveling nurses.

The lawsuit primarily alleges Slate violated the Fair Labor Standards Act (“FLSA”) by failing to pay its workers the proper amount of overtime pay for all hours worked over forty (40) hours in a workweek by failing to include all compensation, including per diem amounts, when calculating workers’ regular rate of pay for purposes of paying overtime. In addition to unpaid overtime, Plaintiffs are seeking liquidated damages equal to their unpaid overtime, attorneys’ fees, and costs.

Slate denies liability.

Although the Court has authorized this notice, the Court has not yet decided who will win the lawsuit.

## **2. Are You Eligible To Join This Lawsuit?**

You are eligible to join this lawsuit if you worked for Slate as a traveling nurse at any point from July 24, 2020 to June 1, 2022, and were paid a regular hourly rate and per diem.

## **3. What Are Your Options?**

If you meet the criteria for this lawsuit, you have a choice to assert your legal rights in this case if you desire to do so. However, you are not required to do so and may choose to take no action without consequence to you.

If you want to become a party to this case, you must read, sign, and return the attached consent form by November 19, 2023 and return it to Plaintiffs' attorney at the following address or email address:

Ryan P. Monsour  
*AMO Trial Lawyers LLC*  
3850 N. Causeway Blvd., Suite 590  
Metairie, LA 70002  
Telephone: 504-356-0110  
Facsimile: 504-356-0112  
E-Mail: rpm@amotriallawyers.com

## **4. Effect of Joining the Lawsuit**

If you join the lawsuit and Plaintiffs win or settle, you may be entitled to a money recovery.

If you join the lawsuit and Plaintiffs lose, you will be entitled to no monetary recovery or other relief and you will be unable to assert a separate claim for allegedly unpaid wages by Slate.

If you join the lawsuit, you might be required to sit for a deposition and participate in other discovery. If the case does not resolve by settlement or dismissal, you may be required to testify at a trial.

You will not be required to pay any legal fees to Plaintiffs' attorneys. If there is a recovery, either through verdict or settlement, Plaintiffs' attorneys will receive a portion of the proceeds in an amount deemed reasonable by the Federal Court. If there is no recovery, Plaintiffs' attorneys will receive nothing.

By joining this lawsuit, you are designating the following attorneys to represent your interests: Gregg Rosenberg, Preston Hayes, and Ryan Monsour. This attorneys' address and phone number is listed in Section 7 below.

By joining this lawsuit you will be bound by the judgment of the Court on all issues in the lawsuit, including the reasonableness of any settlement.

#### **5. Effect of Not Joining the Lawsuit**

You are not required to participate in this lawsuit. If you do not join this lawsuit, you will not be impacted by any judgment or settlement, whether favorable or unfavorable.

#### **6. No Retaliation Permitted.**

If you join this lawsuit, federal a law prohibits Slate from retaliating against you as a result of your participation.

#### **7. How Can You Receive More Information?**

If you have any questions about the collective action, your rights, or the basis on which the attorneys expect to be paid, you may contact them directly at:

Ryan P. Monsour  
*AMO Trial Lawyers LLC*  
3850 N. Causeway Blvd., Suite 590  
Metairie, LA 70002  
Telephone: 504-356-0110  
Facsimile: 504-356-0112  
E-Mail: rpm@amotriallawyers.com

You should *not* contact the Court to discuss this matter.

#### **8. You Have Ninety Days To Join This Lawsuit.**

Your determination of whether or not to take action should be made promptly. Because the law only allows a person to recover up to three (3) years of back wages from the date the Consent form is filed, time is of the essence in submitting this form if you wish to have the opportunity to make a full recovery.

All Consents must be filed no later than November 19, 2023, which is ninety (90) days after this Notice was mailed to you.

### **CONCLUSION**

This Notice and its Contents have been authorized by the United States District Court for the Southern District of Texas, Houston Division, but the Court has taken no position regarding the merits of this lawsuit.

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

I hereby consent to be a party plaintiff in the collective action lawsuit captioned *Jennifer Dupre and Melinda Wilson v. Slate Healthcare LLC*, Case No. 4:22-cv-00264 (S.D. Tx). I wish to preserve and pursue any claim that I may have to the greatest extent possible. Therefore, I expressly consent to the use of this consent form for purposes of making me a party plaintiff in this case for my claims under the Fair Labor Standards Act.

By signing and returning this consent form, I authorize the law firms of AMO Trial Lawyers and Rosenberg & Associates to represent me in this case. I agree to be bound by any adjudication of this action by a court, whether it is favorable or unfavorable.

Date: \_\_\_\_\_

Signature: \_\_\_\_\_

Name: \_\_\_\_\_

Address: \_\_\_\_\_

\_\_\_\_\_

Phone Number: \_\_\_\_\_

E-Mail: \_\_\_\_\_

MAIL, FAX, OR E-MAIL TO:

Ryan P. Monsour  
*AMO Trial Lawyers LLC*  
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