

**SUPERIOR COURT OF THE STATE OF WASHINGTON
FOR KING COUNTY**

PAUL HAMAKER, individually and as a putative class representative, and JOSEPHINE HAMAKER, individually and as a putative class representative,

Plaintiffs,

vs.

HIGHLINE MEDICAL CENTER, a Washington non-profit corporation, REBECCA A. ROHLKE, individually, on behalf of the marital community and as agent of non-party Hunter Donaldson; JOHN DOE ROHLKE, on behalf of the marital community; RALPH WADSWORTH, individually, on behalf of the marital community, and as agent of non-party Hunter Donaldson, JANE DOE WADSWORTH, on behalf of the marital community; TIM CARDA, individually, on behalf of the marital community, and as agent of non-party Hunter Donaldson, JANE DOE CARDA, on behalf of the marital community; GRACIELA PULIDO, individually, on behalf of the marital community and as agent of non-party Hunter Donaldson, JOHN DOE PULIDO, on behalf of the marital community, KIMBERLY WADSWORTH, individually, on behalf of the marital community and as agent of non-party Hunter Donaldson, and JOHN DOE WADSWORTH, on behalf of the marital community,

Defendants.

No. 16-2-02870-5 KNT

[PROPOSED] NOTICE OF CLASS ACTION LAWSUIT

IMPORTANT LEGAL NOTICE

This Notice may affect your legal rights. Please read carefully.

I. YOUR LEGAL RIGHTS MAY BE AFFECTED BY A CLASS ACTION LAWSUIT

You may be a member of the class listed below in a lawsuit against Highline Medical Center (“Hospital”); Ralph Wadsworth, the owner and manager of Hunter Donaldson, a company that handled medical liens for the Hospital; Tim Carda, another Hunter Donaldson manager; and two Hunter Donaldson

employees, Rebecca Rohlke and Graciela Pulido (collectively referred to with “Hunter Donaldson” unless stated otherwise). If you are a class member, your legal rights are affected by this lawsuit.

A. Summary of Class Membership

The Court has ruled that the following people are members of the class:

For purposes of their claims for monetary relief, a class under CR 23(b)(3) consisting of all individuals who (i) paid money to Hunter Donaldson or the Hospital or (ii) had a portion of their personal injury settlement funds held in trust by their attorneys to pay the Hospital’s medical service lien claim, because of an allegedly defective medical services lien notice notarized by Rebecca Rohlke and recorded with the King County Auditor by Hunter Donaldson on behalf of the Hospital.

B. Purpose of the Notice

The purpose of the Notice is to inform you of:

- The subject matter and status of the lawsuit;
- Your rights and obligations as a result of this lawsuit and what steps you may take in relation to this class action litigation.

C. Summary of Options and Deadlines

As a class member, you may choose to:

- Do nothing in which any legal claims you have against the Defendants for the recovery of money from Defendants as a result of their medical services liens will be determined by any verdict or judgment entered in this action;
- Exclude yourself from the class. To exclude yourself from the class you must mail a statement indicating your desire to exclude yourself from this action by May 9, 2022.
- You also have the right to remain in this action through representation of attorneys other than Class Counsel. You will be responsible for retaining and paying these other attorneys.

II. STATUS OF THE LAWSUIT

The named Plaintiffs filed this case as a proposed class action. The class action lawsuit asserts that the Hospital and Hunter Donaldson recorded medical services liens against class members with the King County Auditor’s Office, which were fraudulently notarized by Rebecca Rohlke, and used those liens to

improperly collect money from class members' personal injury settlements or other monetary recoveries, resulting in payment of money to Defendants or withholding of a portion of class members' monetary recoveries by their personal injury attorneys in trust accounts due to the disputed lien claim. Defendants deny any and all allegations and claims. The named Plaintiffs asked the Court to certify these claims to proceed as a class action so that all class members who are entitled to recover money from the Defendants may do so in this lawsuit.

On November 10, 2021, the King County Superior Court certified the above described case as a class action and designated the Class described above. The Court also appointed the law firm Pfau Cochran Vertetis Amala ("PCVA") and attorney Darrell L. Cochran and Christopher E. Love as attorneys for the class ("Class Counsel"). The Court also appointed Plaintiff Paul Hamaker as class representative.

III. OPTIONS FOR CLASS MEMBERS

A. Option #1: Participate in the Class Lawsuit

In order to participate in the lawsuit, you do not have to respond to this Notice. By participating in the lawsuit, any legal claims you may have against the Defendants regarding their medical services liens will be determined by any judgment entered in this case, whether it is an award of money to the class (to which you may be entitled to a share) or a judgment in favor of the Defendants dismissing the legal claims. The Court has **NOT** ruled on the merits of any of the certified claims or any defenses Defendants may assert.

B. Option # 2: Exclude Yourself from the Class

You may exclude yourself from the class. If you exclude yourself, you are not bound by the determination in this case and cannot share in any money awarded to the class. To exclude yourself, you must submit a statement indicating your desire to exclude yourself to the at the address shown in Section IV below by May 9, 2022.

IV. ADDITIONAL INFORMATION

Any questions you have concerning the matters contained in this notice (and any corrections or changes of name or address) should NOT be directed to the Court but should be directed to Class Counsel at the following address and/or telephone number:

Pfau Cochran Vertetis Amala, PLLC
ATTN: Highline Lien Lawsuit
909 A Street, Suite 700
Tacoma, WA 98402
(253) 777-0799

Requests to be excluded from the class should be mailed to CPT Group, Inc. at the following address:

ATTN: Highline Lien Lawsuit Exclusions
c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606

The pleadings, order certifying the class, and other records in this litigation may be examined and copied at any time during regular office hours at the office of the Clerk, Superior Court of the State of Washington, King County. You may also obtain these documents from Class Counsel at the address listed above.

V. REMINDER AS TO TIME DEADLINE

1. In order to participate in the class, you do not need to respond to this Notice.
2. In order to exclude yourself from the class, mail a written request for exclusion to Class Counsel at the address provided above by May 9, 2022.

PLEASE DO NOT CONTACT THE COURT