

FILED

2020 AUG 24 AM 9:17

GRAYS HARBOR CO.  
KYNEDOSTER  
COUNTY CLERK

Judge:  
Hearing Date: August 21, 2020  
Hearing Time: 8:30 am  
Case No. 16-2-00022-0

**SUPERIOR COURT OF THE STATE OF WASHINGTON  
FOR GRAYS HARBOR COUNTY**

MARY BRYAN and DEBRA RILEY,  
individually and on behalf of all others  
similarly situated,

Plaintiffs,

vs.

GRAYS HARBOR COMMUNITY  
HOSPITAL, a Washington non-profit  
corporation, GRAYS HARBOR COUNTY  
PUBLIC HOSPITAL DISTRICT NO. 2, a  
Washington municipal 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, and JOHN DOE PULIDO, on  
behalf of the marital community,

Defendants.

16-2-00022-0  
OR 83  
Order  
8758459



No. 16-2-00022-0

~~PROPOSED~~ STIPULATED ORDER  
GRANTING PLAINTIFFS' MOTION  
FOR APPROVAL OF PLAN OF  
NOTICE AND NOTICE TO CLASS  
MEMBERS

**[PROPOSED] STIPULATED ORDER GRANTING  
PLAINTIFFS' MOTION FOR APPROVAL OF PLAN  
OF NOTICE AND NOTICE TO CLASS MEMBERS**

**PFAU COCHRAN  
VERTETIS AMALA**  
ATTORNEYS AT LAW

909 A Street, Suite 700  
Tacoma, WA 98402  
(253) 777-0799 | Fax: (253) 627-0654  
www.pvalaw.com

1  
2  
3       **THIS MATTER** having come before the Court upon Plaintiffs' Motion for Class  
4 Certification, and the Court having considered the following:

- 5           1.       Plaintiffs' Motion for Approval of Notice Plan and Class Notice;
- 6           2.       Defendant Grays Harbor Community Hospital and Grays Harbor Public  
7 Hospital District No. 2's Opposition Plaintiffs' Motion for Approval of Notice Plan and Class  
8 Notice and accompanying declarations, if any; and
- 9           3.       The existing record in the case.

10  
11       For the reasons stated blow, it is **ORDERED, ADJUDGED, and DECREED** that  
12 Plaintiffs' Approval of Notice Plan and Class Notice is hereby **GRANTED**. The Court further  
13 **FINDS and ORDERS** as follows:

- 14           1.       Plaintiffs recommends CPT Group as the Notice Administrator. Plaintiffs shall bear the  
15 cost of utilizing CPT. The Court has reviewed the background qualifications of CPT as the  
16 Notice Administrator and finds it qualified to serve for this case and therefore appoints CPT as  
17 the Notice Administrator.
- 18           2.       The Court finds that the Notice Plan and Class Notice proposed by Class Counsel  
19 provides the best notice practicable under the circumstances to class members.
- 20           3.       Pursuant to the Court's Order Granting Plaintiffs' Motion for Class Certification, CPT  
21 shall cause a copy of the notice to be transmitted by first class mail to all class members and  
22 otherwise effectuate the Notice Plan no later than ten (10) days after the Court's entry of this  
23 Order.  
24  
25  
26

**[PROPOSED] STIPULATED ORDER GRANTING  
PLAINTIFFS' MOTION FOR APPROVAL OF PLAN  
OF NOTICE AND NOTICE TO CLASS MEMBERS**

**PFAU COCHRAN  
VERTETIS AMALA**  
ATTORNEYS AT LAW

909 A Street, Suite 700  
Tacoma, WA 98402  
(253) 777-0799 | Fax: (253) 627-0654  
[www.pvalaw.com](http://www.pvalaw.com)

1 4. Pursuant to the Court's Order Granting Plaintiffs' Motion for Class Certification, Class  
2 members shall have forty-five (45) days from the mailing of the Class Notice within which to  
3 return their exclusion requests advising Class Counsel of their desire to opt-out of the case.

4 6. Pursuant to the Court's Order Granting Plaintiffs' Motion for Class Certification, in the  
5 event any notice is returned undeliverable, CPT shall use reasonable efforts to obtain corrected  
6 addresses. When corrected addresses are obtained, CPT shall cause the approved Notice to be  
7 mailed promptly to the affected individuals, with the exception that the deadline for returning  
8 the exclusion forms shall be forty-five (45) days after the date of the second mailing.

9 7. Within 10 days after the conclusion of the 45-day notice period, Class Counsel shall  
10 provide Defendant Grays Harbor Community Hospital with a list of all class members whose  
11 notice was not returned as undeliverable and who timely submitted exclusion requests.  
12 Subsequently, Class Counsel will provide Defendant Grays Harbor Community Hospital with  
13 the identities of any class members whose notice was returned as undeliverable, who received  
14 a second mailing, and who timely submitted an exclusion request within 10 days of receipt of  
15 such requests.  
16  
17

18 DONE IN OPEN COURT this 24<sup>th</sup> day of August, 2020.

19  
20   
21 \_\_\_\_\_  
22 Judge  
23  
24  
25  
26


**[PROPOSED] STIPULATED ORDER GRANTING  
PLAINTIFFS' MOTION FOR APPROVAL OF PLAN  
OF NOTICE AND NOTICE TO CLASS MEMBERS**

**PFAU COCHRAN  
VERTETIS AMALA**  
ATTORNEYS AT LAW

909 A Street, Suite 700  
Tacoma, WA 98402  
(253) 777-0799 | Fax: (253) 627-0654  
www.pvalaw.com

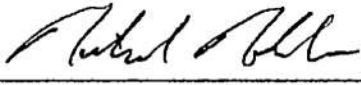
1 Presented By:

2 PFAU COCHRAN VERTETIS AMALA, PLLC

3   
4 By Darrell L. Cochran  
5 Darrell L. Cochran, WSBA No. 22851  
6 Christopher E. Love, WSBA No. 42832  
7 Attorneys for Plaintiffs

8 Stipulated as to Entry:

9 BENNETT BIGELOW & LEEDOM, P.S.

10 By   
11 Michael Madden, WSBA No. 8747  
12 Attorney for Defendant Grays Harbor  
13 Community Hospital /Public Hospital  
14 District No. 2 of Grays Harbor County  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

[PROPOSED] STIPULATED ORDER GRANTING  
PLAINTIFFS' MOTION FOR APPROVAL OF PLAN  
OF NOTICE AND NOTICE TO CLASS MEMBERS

**PFAU COCHRAN  
VERTETIS AMALA**  
ATTORNEYS AT LAW

909 A Street, Suite 700  
Tacoma, WA 98402  
(253) 777-0799 | Fax: (253) 627-0654  
[www.pcalaw.com](http://www.pcalaw.com)