

**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,

Plaintiff,

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.

No. 16-2-00022-0

**[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 Defendants Grays Harbor Community Hospital (“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:

All individuals who, within the applicable period of limitations, paid money to Hunter Donaldson or the Hospital or who 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 filed 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; and

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 Settlement you must mail a statement indicating your desire to exclude yourself from this action by October 19, 2020.
- 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 Grays Harbor County Auditor's Office, which were fraudulently notarized by Rebecca Rohlke or otherwise legally defective, 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 December 8, 2017, the Grays Harbor 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 Plaintiffs Mary Bryan and Debra Riley as class representatives.

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 address shown in Section IV below by October 19, 2020.

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 CPT Group, Inc. at the following address and/or telephone number:

Bryan v. Grays Harbor Community Hospital
c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606
1-(888) 373-2581

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

Bryan v. Grays Harbor Community Hospital
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, Grays Harbor 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 October 19, 2020.

PLEASE DO NOT CONTACT THE COURT

DATED this 3rd day of September, 2020.