

DESMOND, MARCELLO & AMSTER
6060 Center Drive, Suite 825
Los Angeles, California 90045

Re: Jeanine Phillips v. ProCare One Nurses, LLC, et al.

To Whom It May Concern:

This letter is to inform you of a lawsuit that has been filed in the Orange County Superior Court that may or may not affect you. The lawsuit, Jeanine Phillips v. ProCare Nurses, LLC and Obstetrical Nurses, Inc., Case No. 030000425 was filed on September 19, 2003.

The plaintiff in the lawsuit is Jeanine Phillips, who is seeking to bring this lawsuit on behalf of herself and to represent a proposed class of California hourly nurse employees who worked for Obstetrical Nurses, Inc. in California from September 19, 1999 through December 31, 2000. Ms. Phillips alleges that several of Obstetrical Nurses, Inc.'s pay practices for nurses violated California law. Obstetrical Nurses, Inc. denies Ms. Phillips' allegations and believes that its pay practices complied with California law.

The Law Office of Joseph Antonelli and the Law Offices of Kevin T. Barnes represent the plaintiff. Jeffrey Wertheimer of the Law Firm of Rutan & Tucker, LLP represents Obstetrical Nurses, Inc. The parties are currently litigating whether this case should proceed as a class action or as an individual action. The attorneys would like to speak with you to investigate the claims set forth in the lawsuit. The areas of inquiry the attorneys seek information include the following:

- Were you paid overtime when you worked for Obstetrical from September 19, 1999 to December 31, 2000?
- Did you get paid a lower hourly rate when you worked a 12-hour shift as compared to when you worked an 8-hour shift?
- Were your paystubs understandable?
- Were you permitted to take 10-minute breaks for every 4-hours worked in a day?
- Were you permitted to take a 30-minute meal break where you performed no work when you worked at least 5-hours in a day?
- Did you take a second 30-minute meal period where you performed no work when you worked at least 10-hours in a day?

- Holiday pay, various hospital pay, shift differential issues.

In addition, if you believe you have information that may be relevant to the claims in this action or have questions regarding this action, you may want to bring such matters to the attention of plaintiff's counsel or defendant's counsel. Regardless of whether you choose to come forward or remain silent, there will be no adverse consequences.

**Defendant Obstetrical Nurses, Inc.
is represented by:**

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Sincerely,

Desmond, Marcello & Amster