

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

**If you worked as a driver providing non-emergency medical transportation (NEMT) services in the District of Columbia under contracts between Medical Transportation Management (MTM) and the District of Columbia, you may have a claim for unpaid wages for time worked.**

*A court authorized this notice. This is not a solicitation from a lawyer.*

If you were a driver who provided NEMT services in the District of Columbia under contracts between MTM and the District of Columbia from **July 13, 2014 to March 15, 2024**, you have been part of a class action lawsuit alleging that drivers providing NEMT services were not paid all earnings for time they worked. This suit is in federal court in the District of Columbia. The name and case number of this suit is *Isaac Harris et al v. Medical Transportation Management, Inc.*, Case No. 1:17-cv-01371-APM.

The Plaintiffs' claims in this case are only against MTM, not the companies who directly employed the drivers; however, MTM may be entitled to recover from those companies any amounts that are deemed owed in the event that it is found liable. The lawsuit alleges that, under D.C. law, MTM is a general contractor to the companies who employ the drivers with respect to such NEMT services and thus legally responsible for any failure by a company for which the drivers worked to pay them wages required by law for such services. It also alleges that MTM is the joint employer of the drivers for purposes of federal and D.C. wage laws. MTM denies these allegations.

The Court has ruled that MTM is a general contractor, for purposes of D.C. wage laws, of the company or companies for which you drove NEMT trips in Washington, D.C. under contracts between MTM and the District of Columbia. This means that MTM is responsible if your employer failed to pay you any wages you were owed under D.C. law for time worked as a driver providing NEMT services in the District of Columbia under contracts between MTM and the District of Columbia from **July 13, 2014 to March 15, 2024**. The Court also ruled that MTM was not a joint employer. This means that MTM is not responsible for any wages you were owed under federal law.

In the next part of the case, **each driver interested in pursuing a claim against MTM for unpaid wages must inform Plaintiffs' Attorneys identified below of their interest to stay on individually** in this action no later than **August 23, 2025**.

In the next part of the case, the Court will decide if the three Named Plaintiffs and any other drivers who are granted leave to intervene in this action are owed any unpaid wages for time worked as a driver providing NEMT services in the District of Columbia under contracts between MTM and the District of Columbia from July 13, 2014 to March 15, 2024.

**If you are interested in the case or want more information about any claim you may have, please contact the law firm listed below.** Your response will permit you to consult with attorneys, who can help you determine whether you have a claim, what to do to stay in the case, and what could happen if you stay or choose not to stay in the lawsuit.

**YOU ONLY HAVE UNTIL AUGUST 23, 2025 TO NOTIFY THE LAW FIRM LISTED BELOW IF YOU WISH TO MAKE A CLAIM FOR UNPAID WAGES.**

#### **SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT**

<b>CONTACT PLAINTIFFS' LAWYERS (see below)</b>  <b>REMAIN A PART OF THE CASE</b>	<ul style="list-style-type: none"><li>• <b>If you were a driver</b> who provided NEMT services in D.C. under contracts between MTM and D.C. at any time from <b>July 13, 2014 through March 15, 2024</b>, you may be eligible to move for leave to intervene in the case to pursue individual relief. <b>YOU MUST CONTACT PLAINTIFFS' LAWYERS TO SEEK TO INTERVENE IN THE LITIGATION. If you are not sure, we can also help you learn about whether you have a claim.</b></li><li>• The Court will decide your personal claim against MTM for any wages owed to you by your employer under DC law.</li><li>• If you choose to participate, you may obtain a monetary award that may come from a trial or settlement of this lawsuit. The Court could also decide that you are not or were not owed unpaid wages.</li></ul>
<b>DO NOTHING</b>  <b>EXCLUDE YOURSELF FROM THE LAWSUIT BY AUGUST 23, 2025</b>	<ul style="list-style-type: none"><li>• If you do not want to participate in the lawsuit, you do not have to do anything. You will be automatically excluded.</li><li>• Your right to pursue a claim against MTM on your own behalf under DC law will expire August 23, 2025. After that, you will be barred from pursuing that claim against MTM.</li><li>• If you do not join the lawsuit or pursue claims against MTM, you give up the right to any unpaid wages from MTM for this time period.</li></ul>

## **YOUR RIGHTS AND OPTIONS**

If you are interested in pursuing an individual claim you may have against MTM or want more information about this case, **you must contact the attorneys representing the Plaintiffs and Class**. As a member of the “issue” class, you have been represented by the law firms of Cohen Milstein Sellers & Toll PLLC and Public Citizen Litigation Group. They are experienced in handling similar cases. More information about each law firm and their lawyers’ experience is available at: [www.cohenmilstein.com](http://www.cohenmilstein.com) and [www.citizen.org](http://www.citizen.org). You do not have to pay anything to lawyers from these firms to stay in the case.

If you decide to seek to intervene in this lawsuit to pursue your own claim or want to discuss your claim, please reach out by phone call, e-mail, mail, or fax. Send to the following address(es) below:

COHEN MILSTEIN SELLERS & TOLL PLLC

ATTN: Christopher Scherman

1100 New York Ave., NW, Suite 800

Washington, DC 20005

Telephone: 202-408-3604

Fax: 202-408-4699

Email: [MTMDriversCase@cohenmilstein.com](mailto:MTMDriversCase@cohenmilstein.com)

**Your notice that you want to participate in this lawsuit MUST be either postmarked (mail), date stamped (email or fax) or provided to Plaintiffs’ Attorneys (phone) by AUGUST 23, 2025.**

**If you do not want to participate in the lawsuit:** you do not need to take any further action if you do not want to remain in the lawsuit.