

COMMONWEALTH OF MASSACHUSETTS

MIDDLESEX, ss.

SUPERIOR COURT DEPARTMENT
C.A. No. 1981CV01957

MICH KAREN PIERRE LOUIS,
Individually and on behalf of all others
similarly situated,

Plaintiff,

v.

BAYADA HOME HEALTH CARE, INC.,
DAVID BAIADA, and J. MARK BAIADA,

Defendants.

RECEIVED

6/6/2022

**DECLARATION OF MICH KAREN PIERRE LOUIS
IN SUPPORT OF MOTION FOR SETTLEMENT APPROVAL**

Mich Karen Pierre Louis, on oath, hereby declares as follows:

1. I am an adult, I have personal knowledge of the facts stated herein, and I am competent to so testify.

2. I am the Plaintiff and class representative in the above-captioned action

3. During the period from approximately March 23, 2017 through approximately June 28, 2018, I was employed by Bayada Home Health Care, Inc. ("Bayada") as a home health aide, working out of Bayada's office at 2000 Commonwealth Avenue, Newton, Massachusetts 02466.

4. I was employed by Bayada at a rate of \$12.70 per hour, and I was paid weekly, with each pay period running from Monday through the following Sunday.

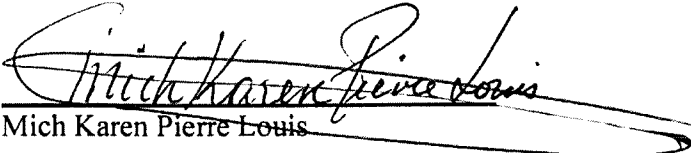
5. For each pay period while I was employed with Bayada, I received a paper earnings statement by mail that described the services I provided for that week and listed my gross earnings, payroll deductions and net earnings for the current pay period and for the year to date.

6. In or around May of 2018, I was reviewing my earnings statement for the most recent pay period and when I added the listed and itemized payroll deductions and deducted that total from my gross earnings, I noticed that the difference I got was higher than the amount of my net earnings (both for the current pay period and for year to date). The amount of my net earnings appeared to be less than it should be, based on the total amount of deductions that were listed on my earnings statement.

7. After discovering this, I was referred to an attorney, David Pastor of Pastor Law Office, LLP, and I communicated with Mr. Pastor in an effort to seek legal advice. After

communicating with Mr. Pastor and complying with certain procedural requirements, I filed a class action complaint against Bayada and others.

I hereby certify that the foregoing is true and correct. Executed on June 7, 2022.

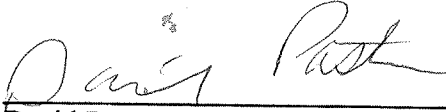

Mich Karen Pierre Louis

CERTIFICATE OF SERVICE

I hereby certify, under penalty of perjury, that on June 6, 2022, I caused copies of the foregoing Declaration of Mich Karen Pierre Louis in Support of Motion for Settlement Approval to be served via email upon counsel for Defendants as follows:

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David Pastor