U.S. District Court for the Eastern District of New York

Philip Calderon et al v. Public Partnerships LLC
Case No. 25-cv-2320 (FB)(LKE)

Class Action Notice

Authorized by the U.S. District Court

Available in other languages at PublicPartnershipsSettlement.com

Are you a personal assistant who was paid through Public Partnerships LLC as the statewide fiscal intermediary for services performed as part of the Consumer Directed Personal Assistant Program (CDPAP) in New York City, Nassau County, Suffolk County, and/or Westchester County between March 1, 2025 and April 30, 2026?

You may be entitled to money.

The United States District Court has preliminarily approved a settlement in the class action lawsuit *Calderon et al v. Public Partnerships LLC.*

To learn more about this Settlement, read this Notice or visit the Settlement Website.

Key things to know:

- If you take no action, you will automatically be a member of the class and may get money from the Settlement. Unless you opt-out, the Court's decision will apply to you, and you will not be able to sue Public Partnerships LLC about the same issues.

- **Among other claims, this Settlement releases any claims against Public Partnerships LLC arising under the Fair Labor Standards Act (FLSA), which is the federal wage and hour law, through June 23, 2026**. If you do not exclude yourself from the Settlement by opting out of the Settlement, and the Court approves the Settlement, you will waive the right to make a claim for any FLSA violations, including any alleged unpaid wages owed under the FLSA and any available liquidated damages, through June 23, 2026.

- You can learn more at: **www.PublicPartnershipsSettlement.com**

Table of Contents

About This Notice

Why did I get a notice by email or text message?

If you received a notice by email or text message, our records identify you as a member of the group of people affected, called the "Class." This Notice is to tell you about the Settlement of a class action lawsuit, ***Calderon et al v. Public Partnerships LLC*.** The proposed Settlement would cover all current and former personal assistants who provided services as part of the Consumer Directed Personal Assistants Program (CDPAP) in New York City, Nassau County, Suffolk County, and/or Westchester County (collectively, "downstate personal assistants"), at any time between March 1, 2025 and April 30, 2026, and who were paid through Public Partnerships LLC as the statewide fiscal intermediary. The Settlement Agreement explains what rights Class members have, and helps Class members make informed decisions about what action to take.

If you received a postcard notice in the mail, it is because we could not reach you by email or text message. You are still part of the Class. You should log into the Settlement Website to update us with your contact information or email or call the Settlement Administrator (PublicPartnershipsSettlement@atticusadmin.com, 1-800-314-2601).

If you think you are a member of the class but did not receive an email, text, or postcard, call the Settlement Administrator at 1-800-314-2601.

What do I do next?

Read this Notice to understand the Settlement and determine if you are a Class member. Then, decide if you want to:

Options	More information about each option
Do Nothing	If you do nothing, you will get a payment. The amount you receive will depend on several factors, including: (1) how many hours you have worked in CDPAP while registered and paid through the fiscal intermediary Public Partnerships LLC between March 1, 2025, and April 30, 2026; (2) whether you were eligible for but not paid the sign-on bonus; (3) the amount of your compensation allocated to MEC benefits; and (4) the amount of your compensation allocated for PTO and how much is remaining in your PTO balance. You will also give up rights resolved by the Settlement. Specifically, you will give up the right to sue Public Partnerships LLC for the claims made in this Action, and all other related wage-and-hour claims through the June 23, 2026. This release includes any

	potential claims under the Fair Labor Standards Act, the New York Labor Law, the New York State Paid Safe and Sick Leave Act, the New York City Paid Safe and Sick Leave Act, the Home Care Worker Wage Parity Act, and for breach of contract. See the section "What am I giving up to stay in the Settlement Class" below. You may also benefit from changed practices. Specifically, as of April 30, 2026, Public Partnerships LLC no longer requires employees to participate in the MEC plan. Further details about the changes that would benefit you are provided in the section "Learning About the Settlement" below.
Opt Out	If you opt out, you will not receive any payment, but you will keep the right to bring any claims you may have against Public Partnerships LLC. See the section "Opting Out" below.
Object	Tell the Court why you don't like the Settlement. You cannot object if you opt out. If you object and the Settlement is approved anyway, you will still get a payment. See the section "Objecting" below.

Read on to understand the specifics of the Settlement and what each choice would mean for you.

Learning About the Lawsuit

What is this lawsuit about?

Four individual plaintiffs, Philip Calderon, Allison Fields, Farshad Pinchasi, and Dana Folgar (the "Plaintiffs" or "Class Representatives") claim that Public Partnerships LLC failed to pay workers all legally owed wages on time and at the correct rate, in violation of the Fair Labor Standards Act and the New York Labor Law.

Plaintiffs also claim that Public Partnerships LLC's benefit offerings did not comply with New York's Home Care Worker Wage Parity Act. The Plaintiffs brought the case on behalf of the Class, as well as themselves.

Where can I learn more?
You can get a complete copy of the proposed settlement and other key documents in this lawsuit at: PublicPartnershipsSettlement.com/Settlement-Documents

The proposed Settlement would cover all current and former personal assistants who were paid through Public Partnerships LLC as the statewide fiscal intermediary for services performed as part of CDPAP in New York

City, Nassau County, Suffolk County, and/or Westchester County (collectively, "downstate personal assistants") at any time between March 1, 2025 and April 30, 2026.

What is the position of Public Partnerships LLC?

Public Partnerships LLC disputes the allegations in the lawsuit and denies any wrongdoing. Public Partnerships LLC has entered this Settlement to avoid the time and expense of ongoing litigation, and to remain fully focused on consumers and caregivers it supports across the country.

Why is there a settlement in this lawsuit?

On May 1, 2026, Plaintiffs and Public Partnerships LLC agreed to settle, which means they have reached an agreement to resolve the lawsuit. Both sides want to avoid the risk and expense of further litigation.

The Settlement is on behalf of the workers who brought the case and all members of the Settlement Class. The Court has not decided this case in favor of either side, nor determined that anyone could recover any certain amount in this litigation.

What is a class action settlement?

A class action settlement is an agreement between the Parties to resolve and end the case. Settlements can provide money to Class members and changes to the practices that the Plaintiffs allege caused harm to Class members.

If approved, the Settlement will stop the lawsuit from being litigated any further. If the case continued to be litigated, there is a possibility that Public Partnerships LLC would win and the workers would receive nothing. There is also the possibility that Public Partnerships LLC would be required to pay more than they have agreed to pay under the Settlement.

Class Counsel, the attorneys at Katz Banks Kumin LLP and The Legal Aid Society representing the Plaintiffs, investigated the facts and applicable law regarding the claims and defenses. The Parties engaged in lengthy and arms' length negotiations to reach this Settlement with the help of a neutral third-party mediator. The Class Representatives and Class Counsel believe that the proposed Settlement is fair, reasonable, and adequate and in the best interests of the Class.

Has the Court determined that Plaintiffs or Public Partnerships LLC have won?

No. This is a settlement. That means the Parties resolved the matter before the Court entered a judgment deeming any party the "winner."

What happens next in this lawsuit?

The Court will hold a fairness hearing to decide whether to approve the Settlement. The final fairness hearing will be held at:

Where: U.S. District Court for the Eastern District of New York
Courtroom 13B, 225 Cadman Plaza East, Brooklyn, NY 11201

When: 11:00 a.m. on November 10, 2026.

The Court has directed the Parties to send you Notice about the proposed Settlement. Because the Settlement of a class action decides the rights of all members of the proposed class, the Court must give final approval to the Settlement before it can take effect. Payments will only be made if the Court approves the Settlement.

You don't have to attend, but you may at your own expense. You have the right to enter an appearance in the case through an attorney if you want. You may also ask the Court for permission to speak and express your opinion about the Settlement. If the Court does not approve the Settlement or the Parties decide to end it, it will be void and the lawsuit will continue. The date of the hearing may change without further notice to members of the class. To learn more and confirm the hearing date, go to **www.PublicPartnershipsSettlement.com**.

Learning About the Settlement

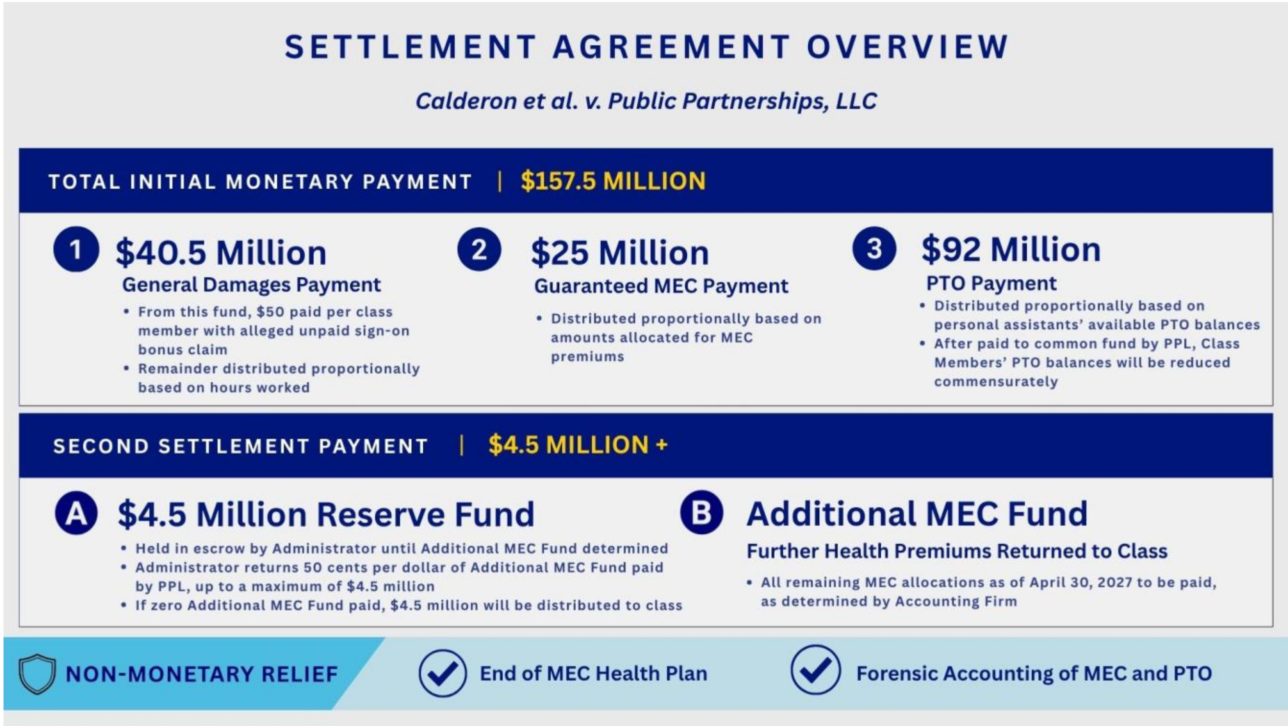
What does the Settlement provide?

The Settlement provides the following, which will be distributed to approximately 200,000 downstate personal assistants:

- $40.5 million in general damages;
- $25 million in Wage Parity compensation previously allocated to the Minimum Essential Coverage (MEC) plan;
- $92 million of accrued paid time off (the PTO balances of Class Members will be reconciled to reflect this distribution);
- A reserve fund of $4.5 million; and
- Any unspent funds allocated to the MEC plan after April 30, 2027.

The class will be paid after Court-approved litigation costs, fees for Class Counsel, costs of settlement administration, and service awards to each Plaintiff who brought this case are paid.

A diagram of all the payments Public Partnerships LLC has agreed to make is below:



In addition, as part of the Settlement, Public Partnerships LLC ended the mandatory MEC plan as of April 30, 2026, and will allow Plaintiffs to conduct accountings with a forensic expert on the MEC Plan and PTO program to ensure all available relief is paid to the Class.

This is just a summary of the benefits that are available through the Settlement. Please refer to the full Settlement Agreement linked here for all details.

How do I know if I am part of the Settlement?

If you received an email, text, or Postcard Notice, the records of Public Partnerships LLC indicate that you are a member of the Settlement Class. The Settlement Class includes all current and former personal assistants who were paid through Public Partnerships LLC as the statewide fiscal intermediary for services performed as part of CDPAP in New York City, Nassau County, Suffolk County, and/or Westchester County (collectively, "downstate personal assistants") at any time between March 1, 2025 and April 30, 2026.

If you did not receive an email, text, or Postcard Notice and believe you are a member of the Settlement Class, email or call the Settlement Administrator (PublicPartnershipsSettlement@atticusadmin.com, 1-800-314-2601).

How much will my payment be?

Your payment amount will depend on several factors:

(1) how many hours you have worked in CDPAP while registered and paid through the fiscal intermediary Public Partnerships LLC between March 1,

2025, and April 30, 2026;

(2) whether you were eligible for but not paid the sign-on bonus;

(3) the amount of your compensation allocated to MEC benefits; and

(4) the amount of your compensation allocated for PTO and how much is remaining in your PTO balance.

Are there taxes and who pays them?

Yes, the settlement funds will be both W2 earnings, from which taxes will be withheld, and 1099 earnings, for which you are responsible for paying taxes. You will be responsible for paying taxes on all Settlement Payments you receive, regardless of whether you receive a 1099 (Federal law only requires these forms to be sent to those receiving more than $2,000 in non-wage damages).

In addition to the settlement amount, Public Partnerships LLC will pay the employer's side of taxes.

Neither Defendants nor Class Counsel are providing you tax advice though this Settlement, so you will be responsible for seeking your own tax and/or accounting advice regarding your tax obligations.

What am I giving up to stay in the Settlement Class?

If the Court approves this Settlement, the Settlement will come into effect 30 days after the approval order is entered, provided that there are no appeals of the Court's decision. When the Settlement comes into effect, all Settlement Class Members who have not timely and properly opted out of the Settlement Class will release Public Partnerships LLC and all "Public Partnerships Releasees" (as defined in the Settlement Agreement) from the following claims:

(1) any and all claims raised on behalf of the Settlement Class or Settlement Collective or that could have been raised on behalf of the Settlement Class or Settlement Collective based on the facts alleged in the First Amended Complaint, and (2) any and all wage-and-hour claims through the Settlement Execution Date (collectively, the "Released Class Claims"). Without limiting the foregoing, the Released Class Claims include all federal, state, and local claims for wages, compensation, paid time off, or paid leave benefits, and related claims for penalties, interest, liquidated damages, attorneys' fees, costs and expenses that the Settlement Class and Settlement Collective may have had as of the Settlement Execution Date, including, but not limited to, all claims under the Fair Labor Standards Act (FLSA), Wage Parity Act (WPA), New York Labor Law (NYLL), New York Labor Law § 195, Earned Safe and Sick Time Act (ESSTA), Paid Sick and Safe Leave

Law (PSSLL), breach of contract, and any related regulations, ordinances or Wage Orders, Employee Retirement Income Security Act (ERISA) claims related to any aspect of the MEC or the MEC-related payments set forth in Section IV, and any other claim asserted in the First Amended Complaint. This release does not include claims based on conduct occurring after June 23, 2026.

This means that Class Members will release all claims asserted in this action, and give up the right to sue Public Partnerships LLC in the future for the same claims and for all wage and hour claims between March 1, 2025, and June 23, 2026, as set forth above.

Importantly, the above release includes claims arising under the FLSA, which is the federal wage and hour law. Plaintiffs believe this is fair because all claims under the FLSA overlap with state law claims asserted under the applicable New York wage laws. **If you do not opt out from the Settlement, and the Court approves the Settlement, you will waive the right to make a claim for any FLSA violations, including any alleged unpaid wages owed under the FLSA and any available liquidated damages, through June 23, 2026.**

As noted above, the release may affect your rights, and may carry obligations, in the future. To view the full terms of this release that are contained in the Settlement Agreement, as well as the Plaintiffs' First Amended Complaint and other related documents, please click here.

Deciding What to Do

How do I weigh my options?

You have three options. You can do nothing and receive settlement money, you can opt out of the Settlement, or you can object to the Settlement. This chart shows the effects of each option:

	Do Nothing	**Opt Out**	**Object**
Can I receive settlement money if I . . .	YES	NO	YES
Am I bound by the terms of this lawsuit if I . . .	YES	NO	YES
Can I pursue my own case if I . . .	NO	YES	NO
Will the class lawyers represent me if I . . .	YES	NO	NO (as to objection)

Receiving a Payment

How will I get my payment?

If Public Partnerships LLC sent your pay by direct deposit when you provided services with Public Partnerships LLC, your Settlement Payment will be made by direct deposit to the last bank account you had on file with Public Partnerships LLC. If you received your pay from Public Partnerships LLC by check, your Settlement Payment will be made by check.

Please contact the Settlement Administrator, Atticus Administration, at 1-800-314-2601 if you wish to confirm your address or payment information.

If you want to receive your payment by check and you have moved since you worked for Public Partnerships LLC, you can also update your mailing address to receive your check by clicking here.

Do I have a lawyer in this lawsuit?

In a class action, the court appoints class representatives and lawyers to work on the case and represent the interests of all the class members. For this Settlement, the Court has appointed the following individuals and lawyers.

Your lawyers: Katz Banks Kumin LLP (Hugh Baran, Emma Walters, and Avi Kumin) and The Legal Aid Society (Richard Blum, Rebekah Cook-Mack, Michael Diller, B. Franco Olshansky, Elizabeth Saylor, Belkys Garcia, and Rebecca Antar) have been appointed as Class Counsel.

These are the lawyers who negotiated this Settlement on your behalf.

If you want to be represented by your own lawyer, you may hire one at your own expense.

Do I have to pay the lawyers in this lawsuit?

Lawyers' fees and costs will be paid from the Settlement Fund. **You will not have to pay the lawyers directly.**

To date, your lawyers have not been paid any money for their work or the expenses that they have paid for the case. To pay for their time and risk in bringing this case without any guarantee of payment unless they were successful, your lawyers will request, as part of the final approval of this Settlement, that the Court approve a payment of up to 15% of the Settlement Fund in attorneys' fees, plus reimbursement of out-of-pocket expenses, as well as the costs of settlement administration.

Lawyers' fees and expenses will only be awarded if approved by the Court as a fair and reasonable amount. You have the right to object to the lawyers' fees even if you think the settlement terms are fair.

Your lawyers will also ask the Court to approve service payments of $15,000 to each of the Class Representatives (Philip Calderon, Allison Fields, Farshad Pinchasi, and Dana Folgar) for the time and effort they contributed to the case. If approved by the Court, the Service Awards will be paid from the Settlement Fund.

Opting Out

What if I don't want to be part of this Settlement?

You can opt out. If you do, you will not receive payment and cannot object to the Settlement. However, you will not be bound or affected by anything that happens in this lawsuit and may be able to file your own case. You cannot exclude yourself from the program changes called for by the proposed Settlement.

How do I opt out?

To opt out of the Settlement, you must complete the opt out form here and mail it so that it is postmarked by September 19, 2026 to the Settlement Administrator at:

Public Partnerships Settlement
c/o Atticus Administration
PO Box 64053
St. Paul, MN 55164
1-800-314-2601

You may also upload the form by logging into the Settlement Website, www.PublicPartnershipsSettlement.com, or by emailing it to the Administrator. If you send an opt-out form this way, you must send it so it is received by September 19, 2026. Be sure to include your name, address, date of birth, telephone number, and signature.

Objecting

What if I disagree with the Settlement?

If you disagree with any part of the Settlement (including the lawyers' fees) but don't want to opt out, you may object. You must give reasons why you think the Court should not approve the Settlement and say whether your objection applies to just you, a part of the Class, or the entire Class. The Court will consider your views. The Court can only approve or deny the Settlement — it cannot change the terms of the Settlement. You may, but don't need to, hire your own lawyer to help you, at your own expense.

To object, you must send a letter to the Administrator that:

(1) is postmarked by September 19, 2026;
(2) includes the case name and number (*Calderon et al v. Public Partnerships LLC*, Case No. 25-cv-2320 (FB)(LKE))
(3) includes your full name, address and telephone number, and email address;
(4) states the reasons for your objection;
(5) says whether you or your lawyer intend to appear at the Final Approval Hearing and your lawyer's name;
(6) your signature.

Mail the letter to:

Public Partnerships Settlement
c/o Atticus Administration
PO Box 64053
St. Paul, MN 55164

Doing Nothing

What are the consequences of doing nothing?

If you do nothing, you will get a payment and other relief and will be bound by the Settlement and its "release" provisions. That means you won't be able to start, continue, or be part of any other lawsuit against Public Partnerships LLC (or any related entities or individuals) about the issues in this case, **including any claims against Public Partnerships LLC under the Fair Labor Standards Act (FLSA) through June 23, 2026.** A full description of the claims and persons who will be released if this Settlement is approved can be found here.

Key Resources

How do I get more information?

This Notice is a summary of the proposed Settlement. The complete settlement with all its terms can be found here. To get a copy of the Settlement Agreement or get answers to your questions:

- call the administrator (1-800-314-2601)

- visit the case website at www.PublicPartnershipsSettlement.com
- access the Court Electronic Records (PACER) system online or by visiting the Clerk's office of the Court (address below).

Resource	Contact Information
Case website	www.PublicPartnershipsSettlement.com
Settlement Administrator	Public Partnerships Settlement c/o Atticus Administration PO Box 64053 St. Paul, MN 55164 1-800-314-2601 PublicPartnershipsSettlement@atticusadmin.com
Your Lawyers	**KATZ BANKS KUMIN LLP** Hugh Baran Emma Walters Avi Kumin 111 Broadway, Suite 1403 New York, NY 10006 (646) 759-4501 PPLSettlementInquiries@katzbanks.com **THE LEGAL AID SOCIETY** Richard Blum Rebekah Cook-Mack Michael Diller B. Franco Olshansky Elizabeth Saylor Belkys Garcia Rebecca Antar 49 Thomas Street, Fifth Floor New York, NY 10013 (212) 440-4300 civ_hq_employment@legal-aid.org
Court (DO NOT CONTACT)	U.S. District Court for the Eastern District of New York 225 Cadman Plaza East Brooklyn, NY 11201