

NOTICE OF LAWSUIT AND SETTLEMENT OF WAGE CLAIMS RELATED TO KRONOS OUTAGE FOR EMPLOYEES OF ARDENT HEALTH ENTITIES

TIME-SENSITIVE, COURT-AUTHORIZED NOTICE

*** This is not an advertisement from a lawyer. ***

This Notice explains your legal rights and options regarding a lawsuit and settlement with Ardent for employee wage claims regarding the Kronos Outage beginning in December 2021

1. What is this about?

A lawsuit was filed against AHS Management, Inc. and BSA Health System Management, LLC (“Ardent”) for unpaid overtime under a federal law, the Fair Labor Standards Act (FLSA), 29 U.S.C. § 201 *et seq.* The case is *Hill v. AHS Management Company, Inc. et al.*, No. 3:23-cv-01045, in the United States District Court for the Middle District of Tennessee.

The lawsuit involves certain non-exempt employees who worked for Ardent entities during the time period from December 11, 2021, to February 17, 2022, and whose pay may have been affected by the Kronos system outage, which affected pay periods between November 28, 2021, and February 25, 2022.

The lawsuit was filed by Vanessa Hill, a former employee of an Ardent entity, who believes that she and other employees were not paid properly and/or on time after Kronos Private Cloud, which Ardent used for certain timekeeping and payroll functions, experienced an outage (“Kronos Outage”). The lawsuit claims that Ardent did not timely or accurately pay employees for all hours worked in the pay periods between November 28, 2021, and February 25, 2022, due to the Kronos Outage.

The Court has not determined that Ardent is liable or did anything wrong. Instead, the employees and Ardent reached a settlement to resolve the case without further litigation. The Court overseeing the lawsuit has approved that settlement. As a result, certain non-exempt employees who worked for Ardent during the Kronos Outage may join the lawsuit and receive a payment in connection with the settlement.

2. Why am I getting this notice?

You have been identified from Ardent’s records as an employee who worked for a relevant Ardent entity during the Kronos Outage and who is eligible to recover money from the settlement. To be eligible to join the lawsuit and participate in this settlement, you must have been employed by an Ardent entity as a non-exempt employee during the time period from December 11, 2021 to February 17, 2022, in a job where you tracked working time using Kronos Private Cloud (or would have tracked working time using Kronos Private Cloud but for the Kronos Outage).

To recover money as part of the settlement, you must join the lawsuit by signing and returning the attached Consent to Join Form. If you do not join the lawsuit, you will not receive any money.

3. What is my share of the settlement

Your settlement payment is a proportional amount representing potentially late or unpaid wages, based on the amount in the settlement fund. It is calculated on a formula that considers the number of hours that you worked for Ardent during the Kronos Outage.

Your settlement payment will be split between two checks, which together will equal your full settlement amount. One check will be the wage portion of the settlement, which will be subject to applicable tax withholdings and for which you will receive an IRS Form W-2. The other check will be the liquidated damages portion of the settlement, which will not be subject to withholdings and for which you will receive

an IRS Form 1099. 25% of your full settlement amount will be allocated to the wage portion, and the other 75% will be allocated to the liquidated damages portion.

The total estimated amount you will receive if you choose to join this lawsuit and participate in the settlement is \$[AMOUNT].

4. How do I get the payment offered?

To join the lawsuit and settlement: SIGN AND RETURN THE CONSENT FORM	If you choose to join the lawsuit and be included in the settlement, you must sign and return the attached Consent Form.	Deadline: December 18, 2026
To stay out of the lawsuit and settlement: DO NOTHING	If you do not want to join the lawsuit and participate in this settlement, then you should <u>not</u> sign or return the attached Consent Form. By doing nothing, you will retain your rights and not release any claims, but you give up the possibility of getting money from the settlement of this lawsuit. If you were overpaid, you may also be required to repay Ardent for any overpayment made to you that has not already been repaid.	No deadline.

5. What happens if I sign and return the enclosed Consent Form?

If you sign and return the Consent Form, you agree to the following:

You will be acknowledging that you (i) are joining this lawsuit, (ii) you are represented by PARMET LAW PC and MORGAN & MORGAN, P.A. (together, the “Collective Attorneys”), (iii) you will be bound by the terms of the attorney-client agreement signed by Vanessa Hill, and (iv) you will be bound by the terms of the Settlement Agreement signed by Vanessa Hill. You will **not** have to pay the Collective Attorneys any money directly. Ardent is paying attorneys’ fees and costs as part of the settlement as a percentage of the overall recovery. In addition, the Court has approved a service award to Vanessa Hill, the former employee who filed the lawsuit, which will also be paid from the settlement fund.

By signing and returning the Consent Form you will be opting-in to the lawsuit and joining the settlement. You understand that by doing so, you are waiving and releasing all wage and hour claims against Ardent related to the Kronos Outage, including but not limited to those for unpaid wages, late payment of wages, and overtime, including penalties under federal, state and local law, during the period beginning November 28, 2021 and ending on August 17, 2026, related to the Kronos Outage.

6. What does the Court think?

While the Court approved this settlement, the Court did not determine that Ardent (or anyone else) did anything wrong or is liable. The Court did not determine you are owed any money. Instead, this is a settlement payment reached as a compromise between the parties to avoid further litigation.

Do not contact the Court regarding this settlement. The Court must remain neutral in this matter and cannot give you advice.

7. What does Ardent think?

Ardent does not agree it did anything wrong or that it is liable in this case. Ardent also claims you were paid correctly and fairly for your hours worked. Ardent also does not agree that a collective action (group lawsuit) is appropriate. Ardent does agree, however, that this settlement is a fair resolution to this lawsuit. No adverse employment action will be taken against you because you choose to join or not join this lawsuit and settlement.

8. How long do I have to make a decision?

The deadline to join the lawsuit and settlement is 60 days after this notice was sent, which is December 18, 2026.

9. I still have questions. Where can I get more information?

This Notice is only a summary. If you would like, you can obtain certain documents related to the case. However, the deadline for signing and returning your Consent Form will not be extended. Please contact the Settlement Administrator for any questions about the settlement:

ILYM Group, Inc.
P.O. Box 2031
Tustin, CA 92781
Telephone: (844) 221-4471
Email: ahs@ilymcases.com

If you have any questions about the collective action or your legal rights, you should contact the lead attorneys for the group of Ardent employees:

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