

**UNITED STATES DISTRICT COURT FOR  
THE WESTERN DISTRICT OF MICHIGAN**

**IMANI PITTMAN**, individually, and on  
behalf of others similarly situated,

Plaintiff,

vs.

**RETIREMENT LIVING MANAGEMENT,  
LLC and RETIREMENT LIVING  
MANAGEMENT OF STANDALE, LLC  
d/b/a GREEN ACRES OF STANDALE,**

Defendant.

Case No.: 1:25-cv-00335-JMB-MV

Hon.: Jane M. Beckering

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**STIPULATED ORDER FOR COURT-AUTHORIZED NOTICE**

Plaintiff Imani Pittman, individually and on behalf of all others similarly situated and Defendants Retirement Living Management, LLC and Retirement Living Management of Standale, LLC d/b/a Green Acres of Standale (collectively, the “Parties”), stipulate and agree as follows:

1. On March 27, 2025, Plaintiff filed a Collective Action Complaint asserting claims for violations of the Fair Labor Standards Act (“FLSA”) 29 U.S.C. §§ 201, *et seq.* (Dkt. 1).
2. On April 28, 2025, Plaintiff filed a First Amended Collective Action Complaint asserting claims for violations of the FLSA. (Dkt. 6).
3. On June 20, 2025, Defendants filed their Answer to Plaintiff’s Amended Complaint. (Dkt. 15).
4. On July 2, 2025, the Court issued its Case Management Order, which ordered the Parties to jointly choose a mediator for facilitative mediation from the list of court certified mediators. (Dkt. 18).

5. On July 24, 2025, the Court issued a Notice appointing Michael L. Russell as Mediator for this matter. (Dkt. 24).

6. The Parties have been actively engaged in discussing early resolution of this dispute. To that end, the Parties now stipulate to sending Court-authorized notice via U.S. Mail and email. The Parties also intend to retain a notice administrator who will host a case-specific website containing a long-form notice and other relevant case documents.

7. The various forms of notice are attached, as follows: **Exhibit A**, The Postcard Notice (via U.S. Mail); **Exhibit B**, The Long-Form Notice (for the website); and **Exhibit C**, The Email Notice.

THEREFORE, upon the stipulated agreement of the Parties, the Court Orders as follows:

1. The Collective members to receive Court-authorized notice pursuant to 29 U.S.C. § 216(b) shall consist of:

***All current and former hourly employees who worked for Retirement Living Management LLC in any of its United States facilities at any time since [three years from the date that the Court enters the Order].***

2. The Court further approves the following procedures and deadlines with respect to notice to the Collective:
  - i. On or before 14 days after the entry of this order, the Defendants shall identify and produce to the administrator and Plaintiffs' counsel a list of the names, dates of employment, and available last known addresses and email addresses of all the proposed Collective members in a computer-readable format.
  - ii. Within 21 days from the date of service by Defendants of the list identified in the preceding paragraph, the administrator shall (a) mail via first-class U.S. Mail the approved Postcard Notice and Plaintiff Consent Form to the Collective members (**Exh. A**); (b) post the Long-Form Notice to the case website (**Exh. B**); and (c) email the approved E-mail Notice to the Collective (**Exh. C**).
  - iii. Any member of the FLSA Collective shall have 45 days from the date of the sending of the Notice to return a copy of the Plaintiff

Consent Form to the third-party administrator, who will forward received Plaintiff Consent Forms to Plaintiffs' Counsel for filing. Plaintiff Consents may be returned via mail, email, text, e-signature, or facsimile. All Plaintiff Consent Forms that are received by mail must be postmarked or otherwise verifiably submitted within 45 days from the date of sending the Notice.

- iv. Plaintiffs' counsel will electronically file all returned Plaintiff Consent Forms as soon as practicable.
  - v. Neither Plaintiffs nor Plaintiffs' counsel may use any other form or method of communication, including but not limited to social media advertising, to attempt to notify putative members of the Collective about this lawsuit.
3. Within 60 days of the conclusion of the opt-in period, the parties shall attend a mediation with the previously appointed mediator, Michael L. Russell.
  4. No later than 28 days after the conclusion of the opt-in period, and for the purposes of mediation only, Defendants will produce to Plaintiffs' counsel available timecard and payroll information for the individuals for whom Plaintiffs' counsel filed an executed Consent Form. Any information exchanged for the mediation shall be for purposes of the mediation only.
  5. Within 14 days after the mediation, the parties will jointly submit a report to the Court indicating whether the case has settled. If the case does not settle, the Court will enter an order scheduling a Status Conference.

**IT IS SO ORDERED.**

Date: October 9, 2025

/s/ Jane M. Beckering  
JANE M. BECKERING  
United States District Judge

Date: October 8, 2025

/s/ Jesse L. Young

Jesse L. Young (P72614)

**SOMMERS SCHWARTZ, P.C.**

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Kalamazoo, Michigan 49007

(269) 250-7500

[jyoung@sommerspc.com](mailto:jyoung@sommerspc.com)

Jason J. Thompson (P47184)

Ethan C. Goemann (GA #326816)

**SOMMERS SCHWARTZ, P.C.**

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Southfield, Michigan 48076

(248) 355-0300

[jthompson@sommerspc.com](mailto:jthompson@sommerspc.com)

[egoemann@sommerspc.com](mailto:egoemann@sommerspc.com)

*Attorneys for Plaintiff and the  
Proposed Collective*

Respectfully submitted,

/s/ Matthew M. O'Rourke (with consent)

Matthew M. O'Rourke (P79019)

Brett A. Swearingen (P85790)

Sydney A. Shaw (P88157)

**MILLER JOHNSON**

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*Attorneys for Defendant*

# EXHIBIT A

*Imani Pittman v. Retirement Living Management LLC  
and Retirement Living Management of Standale, LLC  
d/b/a Green Acres of Standale  
C/O ATTICUS ADMINISTRATION  
PO BOX 64053  
ST PAUL MN 55164*

COURT-AUTHORIZED NOTICE

This notice is sent to inform you about *Imani Pittman v. Retirement Living Management LLC and Retirement Living Management of Standale, LLC d/b/a Green Acres of Standale*, Case No. 1:25-cv-655, a lawsuit in which you may be eligible to make a claim for damages under the Fair Labor Standards Act (“FLSA”), to advise you of how your rights may be affected by this lawsuit, and to notify you of the procedure for joining this lawsuit, if you are eligible and so choose.

Complete and return the enclosed Consent Form by **DATE** to join the lawsuit.



<<envelopebarcode>>

Claimant ID: <<claimant ID>>  
<<first name>> <<last name>>  
<<Address 1>> <<address 2>>  
<<City>> <<State>> <<zip>>

**Why am I getting this Notice?** The U.S. District Court for the Western District of Michigan authorized this notice to: All current and former hourly employees who worked for Retirement Living Management LLC in any of its United States facilities at any time since [date] are receiving this notice. If you received this notice and fit the description above, you are eligible to join this lawsuit.

**What is this Lawsuit about?** Plaintiff Imani Pittman (“Plaintiff”) filed this action against Defendants Retirement Living Management, LLC and Retirement Living Management of Standale, LLC d/b/a Green Acres of Standale (“Defendants”) and alleges that Defendants failed to pay their hourly employees overtime wages for all work performed in excess of forty (40) hours per week. More specifically, Plaintiff alleges that Defendants willfully violated the FLSA by failing to calculate the regular rate of pay for its hourly employees, and maintaining an unlawful time-rounding policy. Plaintiff alleges that she and all other hourly employees are entitled to unpaid overtime wages for the past three years, liquidated (double) damages, plus attorneys’ fees and costs. Defendants dispute Plaintiff’s allegations. They maintain that they properly paid their hourly employees for all of the time that they reported that they worked and deny that they willfully violated the FLSA.

**No Opinion Expressed As to Merits Of Lawsuit.** This Notice is meant only to provide eligible individuals information about their right to join this lawsuit if they wish. This litigation is in the early pretrial stage and no determinations of liability have been made. Although the Court authorized this Notice to be sent, the Court takes no direct or indirect position regarding any claims or defenses and there is no assurance that the Court will grant any relief in this case. The Court has not yet made any decision regarding the merits of the parties’ claims or defenses.

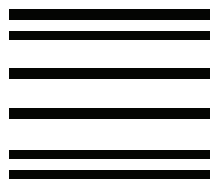
**Effect of Joining This Lawsuit.** It is entirely your own decision whether to join this lawsuit. There is no cost to you to participate, but there is no guarantee of any recovery either. If you choose to join, you will be a party to this litigation. This means that you may be required to respond under oath to written questions, to produce documents, to have your deposition taken, and/or to testify in court at a hearing or at trial. You and Defendant will be bound by any ruling, judgment, or settlement, whether favorable or unfavorable.

**Your Legal Representation If You Join.** If you join the lawsuit, the attorneys retained to represent the Plaintiff and the Collective group are: Jesse L. Young, Esq. and Ethan C. Goemann, Esq., Sommers Schwartz, P.C., One Towne Square, 17th Floor, Southfield, Michigan 48076, jyoung@sommerspc.com, egoemann@sommerspc.com. If you choose to join this lawsuit, the attorneys listed above will represent you unless you obtain your own attorney to file your own separate case. You have the option to retain an attorney of your own choice to represent you.

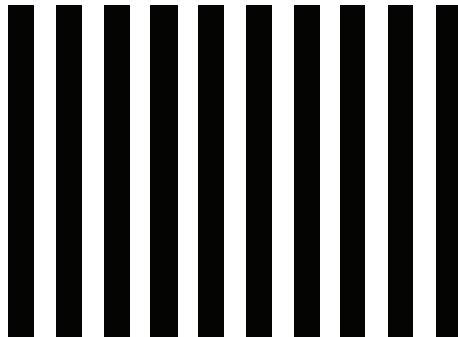
**How do I get more information?** Go to [www.XXX.com](http://www.XXX.com) or call toll-free +1 800-XXX-XXXX.

<<envelopebarcode>><<claimantid>>





NO POSTAGE  
NECESSARY  
IF MAILED  
IN THE  
UNITED STATES



**BUSINESS REPLY MAIL**  
FIRST-CLASS MAIL PERMIT NO.161 SAINT PAUL, MN

POSTAGE WILL BE PAID BY ADDRESSEE

ATTICUS ADMINISTRATION  
PO BOX 64053  
SAINT PAUL MN 55164-9811



# EXHIBIT B

**NOTICE OF RIGHT TO JOIN LAWSUIT**  
**THIS IS NOT A LAWSUIT AGAINST YOU**  
**READ THIS NOTICE CAREFULLY – YOUR LEGAL RIGHTS MAY BE AFFECTED**

TO: *All current and former hourly employees who worked for Retirement Living Management, LLC in any of its United States facilities at any time since [date].*

RE: LAWSUIT FOR UNPAID WAGES UNDER THE FAIR LABOR STANDARDS ACT

**1. INTRODUCTION**

This Notice is to inform you about a lawsuit in which you may be eligible to make a claim for damages under the Fair Labor Standards Act (“FLSA”), 29 U.S.C. § 201, *et seq.*, to advise you of how your rights may be affected by this lawsuit, and to notify you of the procedure for joining this lawsuit, if you are eligible and so choose.

**2. DESCRIPTION OF THE LAWSUIT**

Plaintiff Imani Pittman (“Plaintiff”) filed this action against Defendants Retirement Living Management, LLC and Retirement Living Management of Standale, LLC d/b/a Green Acres of Standale (“Defendants”) and alleges that Defendants failed to pay their hourly employees overtime wages for all work performed in excess of forty (40) hours per week. More specifically, Plaintiff alleges that Defendants willfully violated the FLSA by failing to calculate the regular rate of pay for its hourly employees, and by maintaining an unlawful time-rounding policy.

Plaintiff alleges that she and all other hourly employees are entitled to unpaid overtime wages for the past three years, liquidated (double) damages, plus attorneys’ fees and costs associated with bringing this lawsuit.

Defendants dispute Plaintiff’s allegations. They maintain that they properly paid their hourly employees for all of the time that they reported that they worked and deny that they willfully violated the FLSA.

**3. PERSONS ELIGIBLE TO JOIN THE LAWSUIT**

If you worked for Retirement Living Management, LLC or Retirement Living Management of Standale, LLC d/b/a Green Acres of Standale as an hourly employee at any time since [date], you are eligible to join this lawsuit.

**4. NO OPINION EXPRESSED AS TO MERITS OF LAWSUIT**

This Notice is meant only to provide eligible individuals information about their right to join this lawsuit if they wish. This litigation is in the early pretrial stage and no determinations of liability have been made.

Although the Court authorized this notice to be posted, **the Court takes no direct or indirect position regarding any claims or defenses** and there is no assurance that the Court will grant or deny any relief in this case. The Court has not yet made any decision regarding the merits of the parties' claims or defenses.

**5. YOUR RIGHT TO PARTICIPATE IN THIS LAWSUIT**

If you meet the definition for the Collective group identified in Section 3, you are eligible to participate in this lawsuit.

There is no cost to you to participate, but there is no guarantee of any recovery either. If a violation of the FLSA is proven, you may be eligible to recover damages as allowed by law.

**It is entirely your own decision whether to join this lawsuit.**

**6. EFFECT OF JOINING THIS LAWSUIT**

If you choose to join this lawsuit, you will be a party to this litigation. That means that you and the Defendants will be bound by any ruling, settlement, or judgment on any claim you may have under the FLSA, whether favorable or unfavorable. That also means, if Plaintiff wins or settles, you may be eligible to share in any monetary award; if Plaintiff loses, no money will be awarded, and you will not be able to file another lawsuit regarding the specific matters raised in this lawsuit.

While this lawsuit is proceeding, there is a possibility that you could be required to respond under oath to written questions, to have your deposition taken under oath, to produce documents, and/or to testify in court at a trial or hearing at the U.S. District Courthouse in Grand Rapids, Michigan.

By joining this lawsuit, you are designating the attorneys identified in Section 7 to represent your interest. In addition, you agree that the named Plaintiff may make decisions on your behalf regarding this lawsuit, including the manner and method of conducting the suit. If you elect to voluntarily join this lawsuit, you are designating the named Plaintiff as your agent to make decisions on your behalf in this lawsuit and agreeing that the decisions and agreements made by the named Plaintiff will be binding on you.

The Fair Labor Standards Act contains a limitations period of at least two years and potentially up to three years for the filing of a claim for unpaid overtime wages, after which the claim is forever barred. The statute of limitations on your claim for unpaid overtime wages will not stop running unless and until you elect to submit the enclosed consent form and that form is filed with the Court. If you decide not to submit a consent form in this Lawsuit, you may consult with your own attorney as to how the statute of limitations applies to any potential claim.

**7. NO LEGAL EFFECT IN NOT JOINING THIS LAWSUIT**

If you choose not to join this lawsuit, you will not be affected or bound by any judgment, favorable or unfavorable, on any claims brought under the FLSA alleged in this lawsuit. You will retain all rights, if any, that you may have under the FLSA.

**YOUR LEGAL REPRESENTATION IF YOU JOIN**

If you join the lawsuit, the attorneys retained to represent the Plaintiff and the Collective group are:

Jesse L. Young, Esq.  
Sommers Schwartz, P.C.  
141 E. Michigan Avenue, Suite 600  
Kalamazoo, Michigan 49007  
jyoung@sommerspc.com

Ethan C. Goemann, Esq.  
Sommers Schwartz, P.C.  
One Towne Square, 17th Floor  
Southfield, Michigan 48076  
egoemann@sommerspc.com

If you choose to join this lawsuit, the attorneys listed above will represent you unless you obtain your own attorney to file your own separate case. You are not required to pay attorneys' fees or court costs at this time. If Plaintiff prevails, Plaintiff's counsel will seek an order requiring Defendant to pay their reasonable attorneys' fees and expenses.

You have the option to retain an attorney of your own choice to represent you.

**8. HOW TO JOIN THIS LAWSUIT**

If you wish to join this lawsuit, you must complete, sign, and mail, fax, or email the enclosed Consent Form in the envelope provided to:

Notice Administrator name<sup>1</sup>  
Notice Administrator e-mail  
Notice Administrator phone or fax number

Your signed Consent Form must be completed and postmarked by [45 days from mailing], 2025, for you to be eligible to participate in this lawsuit.

You may also submit the Consent to Join Form by clicking the link below:

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<sup>1</sup> Name and contact information for Notice Administrator will be completed after Notice Administrator is retained.

[INSERT LINK]

Plaintiff's counsel will file your completed Consent Form with the Court upon receipt. Until the Consent Form is filed with the Court, the statute of limitations ordinarily continues to run, and you will not be entitled to any unpaid wages for the days during which you delay sending in your Consent Form.

**9. DEADLINE**

Your completed Consent Form must be postmarked or otherwise submitted by [45 days from mailing], 2025 in order to be eligible to participate in the lawsuit. If you have already submitted a Consent Form for this case prior to receiving this Notice, then you do not need to submit another one at this time.

**10. NO RETALIATION PERMITTED**

The FLSA prohibits employers from discriminating or retaliating against any person for filing a lawsuit, a claim for compensation, assisting or testifying in a lawsuit under the FLSA, or participating in a proceeding or exercising rights under the FLSA.

**11. FURTHER INFORMATION**

For further information about this lawsuit, you may contact Plaintiff's counsel by mail at the address listed above.

**PLEASE DO NOT CONTACT THE COURT REGARDING THIS LAWSUIT**

**CONSENT TO JOIN**

I work or worked for Retirement Living Management in any of its United States facilities as an hourly employee and worked uncompensated overtime.

I choose to participate in the above-captioned lawsuit to recover unpaid overtime wages for off-the-clock work under the federal Fair Labor Standards Act (“FLSA”), 29 U.S.C. § 216(b), and other relief under the law.

I choose to be represented by the named Plaintiff, and Sommers Schwartz, P.C. (“Plaintiff’s Counsel”). I agree to be bound by their decisions in the litigation and by any adjudication of this action by a court, whether it is favorable or unfavorable. I understand that reasonable costs expended by Plaintiff’s Counsel on my behalf will be deducted from any settlement or judgment amount on a pro-rata basis among all other plaintiffs. I understand that Plaintiff’s Counsel will petition the Court to award them attorneys’ fees from any judgment.

Print Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

# EXHIBIT C

Hello,

You are receiving this email because Retirement Living Management, LLC's records show that you work or worked for it as an hourly employee at some point from [date] to the present. A lawsuit is pending against Retirement Living Management, LLC and Retirement Living Management of Standale, LLC d/b/a Green Acres of Standale alleging that hourly employees were not paid overtime wages as required by law. Specifically, Plaintiff Imani Pittman ("Plaintiff") alleges that Retirement Living Management, LLC violated the Fair Labor Standards Act by failing to calculate the regular rate of pay for its hourly employees, and by maintaining an unlawful time-rounding policy. Plaintiff alleges that she and all other hourly employees are entitled to unpaid overtime wages for the past three years, liquidated (double) damages, plus attorneys' fees and costs associated with bringing this lawsuit.

Defendants dispute Plaintiff's allegations. They maintain that they properly paid their hourly employees for all of the time that they reported that they worked and deny that they willfully violated the FLSA.

Please note that the Court has not ruled on the merits of the lawsuit and there is no assurance that it will grant or deny any relief in this case.

The purpose of this email is to notify you of your right to join this case. If you are a ***current or former hourly employee who worked for Retirement Living Management, LLC in any of its United States facilities at any time since [date], 2022***, you may choose to join this suit (that is, you may "opt in"), no later than ***XXXX, 2025***. To opt in, you must submit a Consent Form, which is included with this email and has also been mailed to you with a pre-paid return postcard to your last known address maintained by Retirement Living Management, LLC.

You may also visit the case-specific website at ***XXXX.com*** to find additional information about the case, including the documents that will allow you to electronically sign and submit a Consent Form.

If you want further information about this lawsuit, or have questions about the procedure or deadline for filing a Consent Form, please contact the attorney appointed by the court to serve as counsel for the employees:

Jesse L. Young, Esq.  
Sommers Schwartz, P.C.  
141 E. Michigan Avenue, Suite 600  
Kalamazoo, Michigan 49007  
[jyoung@sommerspc.com](mailto:jyoung@sommerspc.com)

Ethan C. Goemann, Esq.  
Sommers Schwartz, P.C.  
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Southfield, Michigan 48076  
[egoemann@sommerspc.com](mailto:egoemann@sommerspc.com)