

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

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DANIELLE AILTS CAMPEAU,  
Individually and on behalf of all  
other similarly situated individuals,

Plaintiff,

v.

NEUROSCIENCE, INC., and  
PHARMASAN LABS, INC.,

Defendants.

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ORDER

14-cv-324-jdp

This Order supersedes and replaces the court's earlier order regarding the parties' joint proposed notice. Dkt. 50.

On January 15, 2015, the court granted plaintiff Danielle Ailts Campeau's motion for conditional class certification. Dkt. 48. But defendants NeuroScience, Inc. and Pharmasan Labs, Inc. objected to portions of plaintiff's notice to proposed class members, so the court directed the parties to meet and confer, and to incorporate defendants' objections into a revised notice. The parties filed their revised notice, Dkt. 49, which the court approves with a few minor changes. The approved notice is attached to this Order.

Defendants requested that the court issue a protective order before they disclosed the names and mailing addresses of their employees. Dkt. 35, at 30. Defendants have not specified what restrictions they would want. To avoid delay, the court will impose the only reasonable restriction that comes to mind, which is that plaintiff's counsel may use the names and addresses provided by defendants only to distribute the attached notice to putative class members. This order does not prevent plaintiff's counsel from contacting defendants' employees that he learns of through other means, and it does not prevent him from following up on information provided in response to the attached notice, all within the bounds of his ethical



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**TO: ALL CURRENT AND FORMER FEMALE EMPLOYEES WHO WORK(ED)  
FOR NEUROSCIENCE, INC. AND PHARMASAN LABS, INC. FROM  
JANUARY 27, 2012, TO PRESENT**

**RE: EQUAL PAY ACT WAGE ACTION FILED AGAINST NEUROSCIENCE,  
INC. AND PHARMASAN LABS, INC.**

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**INTRODUCTION**

A wage discrimination lawsuit has been filed against NeuroScience, Inc. and Pharmasan Labs, Inc. on behalf of **all current and former female employees who worked for the companies at any time during the three years prior to the date on this Notice who believe they were not paid equally compared to similarly situated male employees.**

If you have received this notice, you may be eligible to make a claim for equal pay.

## **YOUR RIGHT TO PARTICIPATE IN THE LAWSUIT**

The United States District Court for the Western District of Wisconsin has conditionally approved a class of employees who may have potential claims against the Defendants. This notice has been distributed to:

**all current and former female employees who worked for NeuroScience, Inc. and Pharmasan Labs, Inc. at any time during the past three years.**

If you fit the definition above and do not believe you were paid fairly on account of your gender, you may be eligible to participate in the lawsuit.

**The Court has not yet made any decision in this case about the merits of the Plaintiff's claims or the Defendants' defenses.** The Plaintiff in the lawsuit alleges that the Defendants failed to pay her and other female employees equally when compared to male employees. The Defendants deny all of the Plaintiff's allegations.

You have the right to obtain separate counsel, to bring your own separate action, or not to sue at all. You may join the lawsuit by mailing, emailing, or faxing the enclosed Plaintiff Consent Form to the Plaintiff's Counsel for filing with the Court:

**Joshua A. Newville  
MADIA LAW LLC  
345 Union Plaza  
333 Washington Ave. N.  
Minneapolis, MN 55401  
Email: [joshuanewville@madialaw.com](mailto:joshuanewville@madialaw.com)  
Fax: 612.235.3357**

The Plaintiff Consent Form must be postmarked on or before April 13, 2015, in order for you to participate. If you choose to join this case by filing a Plaintiff Consent Form, your interests will be represented by the Plaintiff's Counsel.

**NO RETALIATION PERMITTED**

The law prohibits retaliation against employees for exercising their rights to join lawsuits such as this. Therefore, Defendants are prohibited from discharging you or retaliating against you in any other manner because you choose to participate in this lawsuit.

**THIS NOTICE AND ITS CONTENT HAVE BEEN AUTHORIZED BY THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WISCONSIN, HOWEVER, THE COURT HAS TAKEN NO POSITION ON THE MERITS OF THE CLAIMS ALLEGED IN THIS CASE.**

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**CONSENT TO BECOME PARTY PLAINTIFF**

Equal Pay Act, 29 U.S.C. § 206

1. By signing this document, I consent to make a claim under the Equal Pay Act to recover wages and other sums due to me from NeuroScience, Inc. and Pharmasan Labs, Inc. (“Defendants”).
2. Within the past three years, one or both Defendants employed me. I have personal knowledge and/or a good faith belief that, as an employee of Defendant(s), I was paid less than similarly situated male employees and/or male employees with less education, experience, and responsibility.
3. By joining this lawsuit, I authorize and designate the Class Representative to make all decisions on my behalf concerning the method and manner of conducting the case, including settlement, the payment of attorneys’ fees and court costs, and all other matters pertaining to the lawsuit.
4. For purpose of this lawsuit, I choose to be represented by Joshua A. Newville of Madia Law LLC and other attorneys with whom he may associate. I acknowledge that the Class Representative has entered into a fee agreement with the attorney handling this case, that I may obtain a copy of the retainer agreement by requesting a copy from the attorney, and that I am legally bound by the terms of the retainer agreement.
5. I understand that I may withdraw my consent to proceed with my claims at any time by notifying the attorney handling the matter.

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

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

Print name: \_\_\_\_\_

**RETURN THIS FORM TO:**

**Joshua A. Newville  
MADIA LAW LLC  
345 Union Plaza  
333 Washington Ave. N.  
Minneapolis, MN 55401**

**Email: [joshuanewville@madialaw.com](mailto:joshuanewville@madialaw.com)**

**Fax: 612.235.3357**

**More Information Regarding the Consent to Become Party Plaintiff Form**

**YOUR CONTACT INFORMATION WILL NOT BE FILED OR DISCLOSED  
PUBLICLY**

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

Street Address: \_\_\_\_\_

City, State, Zip: \_\_\_\_\_

Phone Number(s): \_\_\_\_\_

Email Address(es): \_\_\_\_\_

Position of employment with Defendants: \_\_\_\_\_

Dates of employment with Defendants: \_\_\_\_\_

**Additional Information:**

- This lawsuit seeks to pursue damages for unequal pay of females compared to male employees of Defendants during relevant time period.
- Defendants cannot retaliate against you for joining this lawsuit. Federal law prohibits Defendants or its agents from discharging or in any manner discriminating against you because you elect to join this action by filling out and returning the “Consent to Become a Party Plaintiff” form or otherwise exercising your rights under the Equal Pay Act.
- If you have any questions, please contact Joshua A. Newville of Madia Law LLC, at [joshuanewville@madialaw.com](mailto:joshuanewville@madialaw.com) or 612.349.2743.