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7

8 UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF WASHINGTON

10 NANCY ZANDT, KELLI O'CONNOR,)
11 HEATHER HOLICK, and STACY)
12 STRONG,)

13 Plaintiffs,)

14 vs.)

15 HORIZON HOSPICE, LLC, HORIZON)
16 HEALTH CARE, LLC, and LOREN)
17 GUSKE,)

18 Defendants)
19
20
21
22

NO. 2:15-cv-00137-TOR

DECLARATION OF MATT
CROTTY

I, Matt Crotty, declare.

DECLARATION: 1

1 1. I am competent to testify and have personal knowledge about what is
2 written in this declaration. I am one of the attorneys representing the Plaintiffs in
3 the above-captioned action.

4 2. Attached hereto as Exhibit A is a true and correct copy of a list of
5 Horizon Health Care, LLC RNCMs, RMCM-WTLs, and Hospice Nurses produced
6 on October 9, 2015 in discovery by Defendants and labeled as 101129.

7 3. Attached hereto as Exhibit B is a true and correct copy of excerpts of
8 Defendants' Employee Handbook, produced by Defendants on October 2, 2015, as
9 part of Defendants' initial disclosures, and labeled as 102001, 102008, 102017-9.
10

11 4. Attached hereto as Exhibit C is a true and correct copy of a Horizon
12 Health Care, LLC's "Time Sheet Training For Nurses", produced by Defendants on
13 October 2, 2015, as part of Defendants' initial disclosures, and labeled as 101009.
14

15 5. Attached hereto as Exhibit D is a true and correct copy of the
16 "Contract/Salary At Will Wage Agreement" documents for Plaintiffs Strong,
17 Holick, and O'Connor, produced by Defendants on October 2, 2015, as part of
18 Defendants' initial disclosures, and labeled as 301014, 501005, and 401012.

19 6. Attached hereto as Exhibit E is a true and correct copy of a September
20 30, 2013, email, produced by Defendants on October 2, 2015, as part of Defendants'
21 initial disclosures, and labeled as 101088.
22

DECLARATION: 2

8. Attached hereto as Exhibit G is a true and correct copy of Defendants’ “Contract/Salary At Will Wage Agreement” for Nancy Zandt, produced by Defendants on October 2, 2015, as part of Defendants’ initial disclosures, and labeled as 201169.

10. Attached hereto as Exhibit I is a true and correct copy of a November 11, 2013, email, produced by Defendants on October 2, 2015, as part of Defendants' initial disclosures, and labeled as 108280.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

DATED this 12th day of October, 2015.

By/s/ Matthew Z. Crotty
Matthew Z. Crotty, WSBA 39284

CERTIFICATE OF SERVICE

I certify that on 10/13, 2015, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to those attorneys of record registered on the CM/ECF system. All other parties, if any, shall be served in accordance with the Federal Rules of Civil Procedure.

CROTTY & SON LAW FIRM, PLLC

By/s/ Matthew Z. Crotty

Matthew Z. Crotty, WSBA 39284
905 W. Riverside Ave. Ste. 409
Spokane, WA 99201
Telephone: (509)850-7011
Email: matt@crottyandson.com

EXHIBIT A

	Employee	Phone	Job Title	Hire Date	Release Date
1	Johnson, Debra J		Clinical Director	01/02/2007	
2	Rice, Heather S		RN - Quality Assur.	06/18/2007	
3	Collins, Darlene L		RN On-call	10/27/2014	
4	Hanson, Audrey K.		RN On-call	12/19/2011	
5	Marden, Mary O.		RN On-call	07/01/2004	01/20/2014
6	Zandt, Nancy K		RN On-call	03/05/2012	11/01/2014
7	Anderson, Karen M		RN Team Lead	11/01/2010	03/26/2015
8	Jones, Janet M		RN Team Lead	06/26/2012	03/28/2014
9	Lucas, Deborah K		RN Team Lead	09/01/2010	06/14/2013
10	Page, Michele L		RN Team Lead	03/01/2012	12/09/2012
11	Phillips, Kathi L		RN Team Lead	08/11/2015	08/28/2015
12	Swanson, LeAnn J		RN Team Lead	02/09/2009	
13	Wharton, Barbara R		RN Team Lead	12/01/2010	
14	Aarnes, Tamara J		RNCM	03/05/2012	04/30/2014
15	Chinn, Amy M		RNCM	07/09/2012	
16	Cosgrove, Maureen S		RNCM	10/29/2012	
17	Cultice, Margaret A		RNCM	02/20/2012	11/22/2013
18	Cunningham, Judy L		RNCM	09/20/2010	
19	Deobald, Kirsten L		RNCM	05/05/2014	05/14/2014
20	Dudenhofer, Karen R		RNCM	04/21/2011	
21	Fisher, Carol A		RNCM	08/28/2012	09/13/2012
22	Hansen, Ray D		RNCM	05/14/2012	
23	Holman, Cindy L		RNCM	10/23/2012	02/02/2013
24	Huskinson, Michelle A		RNCM	12/30/2013	02/23/2015
25	Kitterman, Sheena M		RNCM	06/01/2015	
26	Konek, Jill M		RNCM	08/05/2015	
27	Lail, Jennifer L		RNCM	12/18/2014	06/11/2015
28	Lane, Christian M		RNCM	07/07/2014	
29	McNaughton, Roxann J		RNCM	05/26/2015	06/17/2015
30	Miller, Susan R		RNCM	05/29/2012	07/20/2012
31	Murray, Mariah D.		RNCM	07/08/2004	
32	O'Connor, Kelli S		RNCM	06/17/2013	06/14/2014
33	Porter, Tracy A		RNCM	08/09/2010	02/08/2013
34	Rossolillo, Kasey G		RNCM	03/20/2012	
35	Smith, Jennifer L		RNCM	10/15/2012	08/27/2015
36	Stevens, Marlana D		RNCM	10/15/2012	01/09/2013
37	Strong, Stacy L		RNCM	08/06/2012	03/31/2014
38	VanderMeer, Kathryn L		RNCM	01/03/2012	06/01/2012
39	Wiggs, Carolyn M		RNCM	08/31/2015	
40	Zeik, Heather A		RNCM	07/16/2013	09/06/2013
41	Dean, Amanda L		RNCM - WTL	06/26/2014	08/23/2015
42	Gavin, Emily L		RNCM - WTL	06/29/2015	
43	Holick, Heather L		RNCM - WTL	10/29/2012	
44	Schramm, Karen L		RNCM - WTL	04/02/2015	
45	Craig, Marsha L		RNCM / Educ. RN	03/07/2008	
46	Smith, Lauren L		RNCM / On-call	09/24/2014	01/26/2015
47	Cortner, Alice A		RNCM / On-call	09/23/2013	05/18/2014
48	Enslow, Shannon E		RNCM / On-call	03/01/2010	11/08/2012
49	Kaehler, Kathleen		RNCM / On-call	08/05/2013	10/24/2013
50	Sinclair, Anne M		RNCM / On-call	02/03/2014	04/04/2014
51	Wurz, Elizabeth M		RNCM / On-call	10/03/2011	12/19/2013
52	Atlas, Anne S		RNCM / On-call	11/05/2013	01/06/2014

EXHIBIT B



**NOTICE TO APPLICANTS
AND EMPLOYEES**

Screening tests for illegal
drug use may be required
before hiring and during
your employment here.

**HORIZON
HOSPICE**



123 W Cascade Way
Spokane, WA 99208
Office: 489-4581, fax: 482-0717

WELCOME
Employee
Handbook

Horizon Hospice

SCOPE OF SERVICES	Policy Number 114 Page of
NHPCO Standard(s): EBR 4.2; CES 8.1; IA 4; WE 16.1 Regulatory Citation(s): 42 CFR 418.100(c)	original-6/98 rev 3/00, 9/11 word/policies

POLICY

Horizon Hospice provides comprehensive services to provide end-of-life care to terminally ill patients and their families within its geographical service area and in the setting defined by the patient and family as the patient's place of residence.

PROCEDURES:

1. Horizon Hospice provides four levels of care appropriate to the needs of the Horizon Hospice patient:
 - a. routine home care in the patient's own home or the facility in which he or she resides;
 - b. continuous care when a Horizon Hospice patient is experiencing an acute crisis;
 - c. inpatient respite care in a contracted facility when necessary to provide respite to overwhelmed or otherwise unable caregivers; and
 - d. general inpatient acute care in a contracted facility for the management of pain or symptoms that can not be managed in the patient's home.
2. Horizon Hospice patients and their families receive the services of the Horizon Hospice's IDG which include:
 - a. nursing services;
 - b. medical social services;
 - c. physician services (from the Horizon Hospice Medical Director and/or the patient's attending physician);
 - d. counseling services, (including spiritual counseling, dietary counseling, and bereavement counseling);
 - e. Horizon Hospice aide services;
 - f. other therapies including physical therapy, occupational therapy, and speech-language pathology services, as identified in the patient's plan of care
3. In addition to the services of the IDG, Horizon Hospice provides medical supplies and equipment and drugs that are used for the management of pain and symptom control related to the patient's terminal illness.
4. The scope and frequency of services provided by Horizon Hospice are in accordance with each patient's needs as identified in his or her plan of care.
5. Nursing services, physician services, and drugs and biologicals are routinely available on a 24 hour basis 7 days a week and other services on a 24 hour basis when reasonable and necessary to meet the needs of the patient and family.

Horizon Hospice

PAYROLL GUIDELINES	Policy Number 517d Page 1 of 3
	original 2/98– rev 5/05, 4/12 word/policies

STANDARD WORK PERIOD: The office hours of Horizon Hospice are 8:30 a.m. to 5:00 p.m. Monday through Friday, unless otherwise determined by the Administrator. Professional services are available to patient's 24-hours per day, 7 days per week.

The Horizon Hospice standard work period is 80 hours in a two week period. An employee's work schedule is determined by supervisor and employee and subject to approval by the Administrator. If work hours are changed, the appropriate supervisor will notify each employee affected by the change as much in advance as possible.

REST BREAKS & LUNCH BREAKS: Each employee is entitled to and expected to take a 15 minute break during each continuous paid four hours of work. Lunch breaks cannot be combined with rest breaks. If an employee works less than four hours per day, they are not eligible for a rest break.

Each employee is entitled to and expected to take a minimum of 30 minute and maximum of 60 minute lunch break, unless otherwise approved by the Administrator or designee. All lunch breaks are unpaid.

PAY PERIODS: All Horizon Hospice employees are paid every other Friday. Each pay period will cover 80 hours of work. Any time card that is not completed correctly and turned in with applicable documentation by noon on Monday prior to each pay day may not be paid until the following pay period.

TIME SHEETS: All hourly wage employees are required to keep an accurate record of hours worked. All hourly wage employees are provided with a time sheet which is the basis on which wages are paid. It is the employee's responsibility to record time worked properly. It is the employee's responsibility to sign and turn in the appropriate time sheet to the designated Payroll collection area daily. Improper completion of the time sheet may result in delayed payment of correct earnings.

OVERTIME: The intent of Horizon Hospice is to compensate overtime in accordance with federal and state laws. Every attempt will be made to plan overtime with consideration for employees. Non-exempt employees will be compensated for all authorized work in excess of 40 hours in a one week time period (Saturday at 12:00 am to Friday at 11:59 pm). The compensation for overtime is one and one half times the regular rate of pay. Non-exempt employees also must receive advance authorization to work overtime from the appropriate supervisor which is subject to approval by the Administrator.

Employees may elect to use compensatory (comp) time in lieu of receiving overtime pay by submitting a signed Request for Comp Time (form # 3080) to their immediate supervisor. The form must also be signed by the Clinical Director or Administrator and forwarded to the bookkeeping department. All staff members wishing to elect the use of comp time must obtain permission from their supervisor before working any overtime hours. Comp time is earned on the same basis as overtime pay (one and one half time for non-exempt; hour for hour for exempt).

Only two consecutive days of comp time can be taken at a time. Time off requires the employee's immediate supervisor and Clinical Director or Administrator's approval, via submission of a "Requisition for Days Off (form 3054). A copy of the signed requisition should be forwarded to both the Bookkeeping and Human Resources department. No more than two days can be "banked" or carried over to a succeeding month. Comp time has to be used by the end of the following month (from when earned) or it reverts to regular overtime pay.

COMPENSATION PROGRAM: Salary and other compensation plans for the Administrator will be established by the Governing Body. Salary increases are based on merit and longevity and are dependent upon the ability of Horizon Hospice to increase the pay. Salaries for all employees shall be established by the Administrator. A review of all salaries will be completed yearly as a part of the annual budget proposal and approval process.

MILEAGE REIMBURSEMENT: All employees will be reimbursed for miles driven (performing official Horizon Hospice work) which is approved by the employee's immediate supervisor or the Administrator. The rate of reimbursement will be established by the Administrator subject to approval by the Governing Body.

ON-CALL PAY: If an employee is scheduled to be "on-call" (outside normal work hours), reimbursement will be at the established rate. If you are called for duty, you will be paid your established hourly rate from the time you leave your home until the time you return to your home. On-call employees are required to communicate all patient care each morning, except for weekends which will be reported Monday morning to the Patient Care Coordinator. They are also expected to carry a beeper or cell phone with them and stay within the beeper or cell phone receiving range.

HOLIDAY ON-CALL PAY: An additional payment will be made to nursing staff for holiday on-call to the equivalent of \$200.00 per day. This stipend is paid on each day that the office is closed and on the holiday if the holiday lands on a weekend. The stipend will be split between the number of nurses scheduled to cover a 24 hour period of on-call. Before all holidays occur, NAC's are expected to notify all patients/families/caregivers and relay to them the day(s) that the office will be closed for a holiday. If a patient is living in a facility such as a SNF, ALF or AFH, the NAC shall notify that facility of the upcoming holiday and make arrangements for the facility staff to provide all ADL's for their patient that day. If a patient is living in a residence, all NAC's will notify the patient/family/caregiver of the holiday and ask if they prefer to reschedule the next NAC visit or if they will need an NAC visit on the holiday. In the event a patient residing in a residence requests the NAC visit on the holiday, the NAC will be paid at one and a half (1 ½) times their normal pay rate for working on the holiday.

Horizon Hospice

Page 3 of 3

517d

PAYROLL DEDUCTIONS: Each employee's earnings and payroll deductions are shown on a voucher attached to each paycheck. Deductions are made in accordance with federal and state laws. Any other deductions must be authorized in writing by the employee.

WAGE GARNISHMENTS: A garnishment is legal permission of creditors to collect directly from the employer part of an employee's pay. Although Horizon Hospice does not wish to become involved in an employee's private matters, it is compelled by law to administer the court's orders. If Horizon Hospice is requested to garnish an employee's wages, Horizon Hospice will notify the employee and explain the details of the garnishment and how it affects wages.

EXHIBIT C

Timesheet Training for Nurses

- Visits: Each visit is paid at a flat rate that includes travel time, visit time and documentation
- Patient Deaths and Admissions: During office hours m-f 8:30 to 5pm these are paid at an hourly rate for the visit time, travel time and all documentation and notifications that are brought back to the office to complete.
- ON-Call: All hours after normal office hours are paid at the on-call rate. This includes travel time, visit and phone call times and documentation. If report is given or received during office hours then you will be paid at an hourly rate. If you get or give report after office hours it is paid at an on-call rate. On call status is the only time staff are paid mileage to and from their homes.
- IDT: All updated care plans for patients are paid at 30 minutes each. A new patient care plan is paid at 1 hour. Presentation for each patient during IDT is paid at 10 minutes per patient.
- Inservices: Any nurse meetings, or inservices will be paid at an hourly rate.
- Mileage: Mileage is paid from the first visit or trip to the office to the last patient visit or office trip. We do not pay mileage or travel time from home to the first stop and from the last stop of the day to home.
- Earned Leave - You start accruing your first full month based on hours worked. You can start using it after 3 full months worked. If you take a day off you need to turn in a timesheet that states how many EL hours you wish to use. You should be able to track your earned leave hours on your paystub.
- Always round your time to the nearest 5 minutes.

EXHIBIT D

Monday 8/6/12
@ 9:30

Horizon Hospice

CONTRACT / SALARY AT WILL WAGE AGREEMENT	Policy Number 3016 Page 1
	original-12/98 rev 8/07, 9/11 word/policies

Please Print

Stacy Strong
Name

8/6/12
Date of Hire

RN case manager
Position

[REDACTED]
S.S. #

[REDACTED]
Employee Date of Birth

[REDACTED]
Employee Home Phone

Employee Payroll # _____

Salary Per Month: _____

Per Visit: 48.00

Per Hour: \$29.00

Per Mile (if applicable): .55
(Per IRS Guidelines)

Other (Specify): on call \$30.00

Special Agreements: _____

[Signature]
Employee Signature

8/6/12
Date

[Signature]
Supervisor Signature

8/2/12
Date

[Signature]
Administrator

8/6/12
Date

Office Use Only

Date Entered in Payroll System: _____

☐ Copy made for Personnel file (Original in Payroll file)

301014

Horizon Hospice

CONTRACT / SALARY AT WILL WAGE AGREEMENT	Policy Number 3016 Page 1
	original-12/98 rev 8/07, 9/11 word/policies

Please Print

Name Agatha HolickDate of Hire 10/29/12Position RN

S.S. # _____

Employee Date of Birth [REDACTED]

Employee Home Phone _____

Employee Payroll # _____

Salary Per Month: _____

Per Visit: 48.00Per Hour: 29.00Per Mile (if applicable): 35
(Per IRS Guidelines) 480Other (Specify): 30 on callSpecial Agreements: RN case managerEmployee Signature Agatha HolickDate 10/29/12Supervisor Signature [Signature]Date 10/25/12Administrator John M. JuskeDate 10-31-12

Office Use Only

Date Entered in Payroll System: _____

☐ Copy made for Personnel file (Original in Payroll file)

Horizon Hospice

CONTRACT / SALARY AT WILL WAGE AGREEMENT	Policy Number 3016 Page 1
	original-12/98 rev 8/07, 9/11 word/policies

Please Print

Name Kelli O'ConnorDate of Hire 6/17/13Position RN

S.S. #

Employee Date of Birth

Employee Home Phone [REDACTED]

Employee Payroll #

Salary Per Month:

Per Visit: \$48.00Per Hour: \$29.00Per Mile (if applicable): .56
(Per IRS Guidelines)Other (Specify): on call \$30.00 per hr

Special Agreements:

Employee Signature K O'ConnorDate 6/17/13Supervisor Signature A JohnsonDate 6/12/13Administrator Jan M. JuskDate 6-18-13

Office Use Only

Date Entered in Payroll System:

☐ Copy made for Personnel file (Original in Payroll file)

EXHIBIT E

Debra Johnson

From: Debra Johnson
Sent: Monday, September 30, 2013 9:46 AM
To: Nancy Zandt
Subject: RE: overtime

Oh well that's great then, I thought it was over time so it's ok.

From: Nancy Zandt
Sent: Monday, September 30, 2013 9:03 AM
To: Debra Johnson
Subject: Re: overtime

They have been paying me office time 27 not 45 for each meeting. I will talk to Audrey with regard to this

Sent from my iPhone

On Sep 30, 2013, at 8:56 AM, "Debra Johnson" <DJohnson@horizonhospice.com> wrote:

Nancy you need to work more with Audrey and take 1 hr off each day for the meetings. There is no overtime for meetings. Thank you

Debra

EXHIBIT F

Debra Johnson

From: Stacy Strong
Sent: Wednesday, November 27, 2013 4:11 PM
To: Debra Johnson
Subject: Re: IDG Charting

I understand about pot stirring and, of course that is not my intent. We do need some direct dialog between everyone affected to solve it. I've been having this problem for a year with no relief or progress to improve it. I want this company to be successful and I want everyone to get along but we (nurses) are overloaded with charting without adding double charting. I also realize that you know all of this. Please forgive me for opening the forum this way.

I am going to enjoy the rest of my vacation without checking any more emails. I did it to keep up so I wouldn't be so far behind and found I felt helpless to get the office what was needed.

Stacy

On Nov 27, 2013, at 4:35 PM, "Debra Johnson" <DJohnson@horizonhospice.com> wrote:

Stacy just to let you know I hear your frustration. But when there is an issue you do not need to include the whole office or a good percent of the staff. Not appropriate. This behavior tends to stir the pot. We will talk when you get back.

Debra

From: Stacy Strong
Sent: Wednesday, November 27, 2013 3:28 PM
To: Barb Wharton
Cc: Team Leaders; Nurses; Mike Farmer; Debra Johnson; Heather Rice
Subject: Re: IDG Charting

All of my charting was done and a sync completed on Friday.

I chart and rechart and still get emails asking me to do my work. I stayed up until well after midnight to make sure the office had everything they needed to carry on a week without me. I did not bring my computer on my vacation.

This is a MUMMS problem.

Sorry if I sound frustrated, I'm not irritated with any recipients of this email but I am very frustrated that my work takes a walk into the Universe or wherever. I am also frustrated that to fix their malfunction I am required to report a problem and be available to receive the email and interact with them or they close the ticket by the end of the day and still end up doing all the work again. I complete extra charting on my own time and it affects my home life.

I know I am not the only one suffering from this problem. It is my strong opinion that I chart one time and, if I am required to duplicate my work, I can charge for the time it takes.

Comments welcome. Sorry Barb, not your fault this is coming up now.

Stacy

Never Give Up

On Nov 27, 2013, at 2:23 PM, "Barb Wharton" <BWharton@horizonhospice.com> wrote:

I do not see IDG charting for [REDACTED] 3912. Can you complete this – please? ☺

Thanks
Barb

EXHIBIT G

COPY

Horizon Hospice

CONTRACT / SALARY AT WILL WAGE AGREEMENT	Policy Number 3016 Page 1
	original-12/98 rev 8/07, 9/11 word/policies

Please Print

NANCY ZANDT
Name

3/5/12
Date of Hire

RN
Position

S.S. #

Employee Payroll #

Salary Per Month:

Per Visit:

Per Hour: \$30.00 (hr.)
per night x 8⁰
per day = \$240.00

Per Mile (if applicable):
(Per IRS Guidelines)

Other (Specify): per shift works M-Friday

Special Agreements Salary \$2,400-yrly. -

Nancy K Zander
Employee Signature

4/5/12
Date

J. M. [Signature]
Administrator

4-4-12
Date

Employee Date of Birth

Employee Home Phone

EXHIBIT H

Loren Guske

From: Debra Johnson
Sent: Wednesday, June 03, 2015 3:30 PM
To: Loren Guske
Subject: FW: nancy schedule

Oops sent it to me. I do that sometimes.

From: Debra Johnson
Sent: Wednesday, June 03, 2015 2:33 PM
To: Debra Johnson
Subject: RE: nancy schedule

Sorry Loren that was 13 .5 hours

From: Debra Johnson
Sent: Wednesday, June 03, 2015 10:52 AM
To: Loren Guske
Subject: nancy schedule

Worked with Mary from 2013 to Jan. 22, 2014 5 nights a week then, from Jan 22 thru May 2014 out of the 5 nights 2 nights with Audrey and 3 nights alone. June thru Oct. 5 nights per week by herself. Also during Oct of 2014 we decreased her hours to 13 hours per night instead of 15.
Debra

3/5/12 - 1/22/14 5 nights/wk Mary - phone & Nancy - legs
Marden

1/22/14 - 5/2014 3 nights/wk Solo On-call

2 nights/wk Rotate - legs & Triage w/
~~Audrey~~ Audrey

June 2014 - Oct 2014 5 nights/wk Solo

EXHIBIT I

Rosemary Petersen

From: Kelli O'Connor
Sent: Monday, November 11, 2013 5:34 PM
To: Audrey Hanson
Subject: Re: next Friday (this coming friday)

Oh, okay. I didn't know that. What hours are the full shift? 5:30,? 12 hours.

Sent from my HTC One™ SV

----- Reply message -----

From: "Audrey Hanson" <ahanson@horizonhospice.com>
To: "Kelli O'Connor" <koconnor@horizonhospice.com>
Subject: next Friday (this coming friday)
Date: Mon, Nov 11, 2013 5:03 PM

That's fine with me! As long as you are ok with the pay difference, if someone takes the whole night they get 8 hours of pay, if we split we get paid for the hours we go out.

From: Kelli O'Connor
Sent: Monday, November 11, 2013 1:23 PM
To: Audrey Hanson
Subject: Re: next Friday (this coming friday)

How about if I take call until you are finished with your celebration, like midnight or so, and then you take call the rest of the night? If that doesn't work I'll take the whole shift.

Sent from my HTC One™ SV

----- Reply message -----

From: "Audrey Hanson" <ahanson@horizonhospice.com>
To: "Kelli O'Connor" <koconnor@horizonhospice.com>
Subject: next Friday (this coming friday)
Date: Mon, Nov 11, 2013 2:00 AM

Are you sure you don't mind working next Fri? I had told Debra I would, but then she took me off and said you said you could. I told my niece we might be able to take her out to dinner to celebrate some things she has gotten done in her life, but I don't want to confirm unless I know you don't mind. It is not too late, I told her I would let her know by Tuesday or so.