

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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CLAUDIA GAYLE, Individually, On Behalf  
of All Others Similarly Situated and as Class  
Representative,

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:  
: 07 Civ. 4672 (CPS) (KAM)  
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:

Plaintiff,

:  
: **AFFIDAVIT**  
:  
:

- against -

HARRY'S NURSES REGISTRY, INC., and  
HARRY DC R VILIER a/k/a HARRY  
DORVILIEN,

Defendants.  
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STATE OF NEW YORK )  
 ) ss:  
COUNTY OF BRONX )  
*Cherilyn*

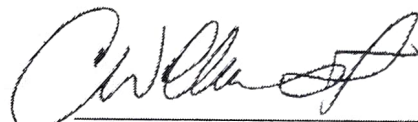
CHERYLANN WILLIAMS-WEST, being duly sworn, deposes and says:

1. I am a registered nurse. I was employed as a nursing supervisor by Harry's Nurses Registry, Inc. ("Harry's"), for approximately one year ending November 2007. During the period of my employment, my job duties and responsibilities included monitoring the patients and the nurses (both licensed practical nurses and registered nurses) placed by Harry's in their homes.

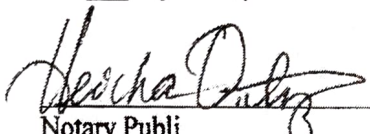
2. Within 90 days of the time that a nurse was placed in service by Harry's, I (or another of the nursing supervisors employed by Harry's) would go into the field, that is, to the home of the patient. While there, I would observe and assess the nurse's skills, for example, hand washing (because many patients breathe through ventilators and are fed through gastric tubes, the nurse's hand washing is of paramount importance). I would also check the book of doctor's orders relating to the patient, to make sure the orders with respect to medication and dosage were up-to-date. Nurses who had been in service for extended periods would receive

supervision of this kind every 6 months. I, or one of my colleagues, would also perform an assessment of this kind within 48 hours of the time that Harry's began to care for a patient.

3. During my employment at Harry's, I was also responsible for documentation, that is, review of assessments performed by nurses in the field. For example, I would work with the nurse by teaching her how to do a proper head-to-toe assessment of the patient, including such things as mental capacity, heart rate, condition of tracheotomy, sound of lungs, with a focus on the condition being treated. I would also talk to the nurses about such things as infection control and legal issues in nursing. On occasion, I would be accompanied on these in-service assessments by vendors of medical equipment (e.g., ventilators) or their technicians so that I could better instruct the nurses on the use of equipment. These monthly assessments typically lasted 4-5 hours. That is, each month, I (or another nursing supervisor) would spend 4-5 hours in the field with each nurse placed in service by Harry's.

  
Cherilyn Williams-West  
Cherilyn

Sworn to before me,  
this 13<sup>th</sup> day of August, 2008

  
Notary Public

