

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
WESTERN DIVISION

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
APR 17 2018
JAMES W. MCCORMACK, CLERK
By: *[Signature]*
PLAINTIFF *[Signature]* DEPT. CLERK

**HANNAH ALLEN, Individually and on
Behalf of All Others Similarly Situated**

vs.

No. 4:18-cv-262-JM

VINO'S, INC. and CHRIS NEW

DEFENDANT

ORIGINAL COMPLAINT—COLLECTIVE ACTION

COMES NOW Plaintiff Hannah Allen ("Plaintiff"), individually and on behalf of all others similarly situated, by and through her attorneys Joshua West and Josh Sanford of the Sanford Law Firm, PLLC, and for her Original Complaint—Collective Action against Defendant Vino's, Inc. ("Vino's"), and Chris New ("New") (collectively "Defendants"), states and alleges as follows:

This case assigned to District Judge *Monday*
and to Magistrate Judge *Harris*

I. INTRODUCTION

1. This is an individual and collective action for wages owed. Vino's owns and/or operates a restaurant and brewery in Pulaski County, 923 West 7th Street, Little Rock, Arkansas 72201 ("Vino's").

2. Plaintiff and other servers spent more than twenty percent (20%) of their time performing non-tipped duties for Vino's such as opening and closing the restaurant, rolling silverware, performing side work, and other non-tipped duties. Because Plaintiff and other servers spent more than 20% of their time performing non-tipped duties for Vino's, Vino's was required to pay Plaintiff and its other servers at least \$7.25 per hour

for their non-tipped work.

3. Plaintiff, individually and on behalf of all other servers employed by VINO's, brings this action under the Fair Labor Standards Act, 29 U.S.C. § 201, et seq. ("FLSA"), and the Arkansas Minimum Wage Act, Ark. Code Ann. §11-4-201, et seq. ("AMWA") for declaratory judgment, monetary damages, liquidated damages, prejudgment interest, and costs, including a reasonable attorney's fee, as a result of VINO's failure to pay Plaintiff and all others similarly situated minimum wages as required by the FLSA and AMWA.

II. JURISDICTION AND VENUE

4. The United States District Court for the Eastern District of Arkansas has subject matter jurisdiction over this suit under the provisions of 28 U.S.C. § 1331 because this suit raises federal questions under the FLSA.

5. This Complaint also alleges AMWA violations, which arise out of the same set of operative facts as the federal cause of action herein alleged; accordingly, this state cause of action would be expected to be tried with the federal claim in a single judicial proceeding. This Court has supplemental jurisdiction over Plaintiff's AMWA claims pursuant to 28 U.S.C. § 1367(a).

6. The acts complained of herein were committed and had their principal effect against Plaintiff within the Western Division of the Eastern District of Arkansas. Therefore, venue is proper within this District pursuant to 28 U.S.C. § 1391.

III. THE PARTIES

7. Plaintiff repeats and re-alleges all the preceding paragraphs of this Complaint as if fully set forth in this section.

8. Plaintiff is a citizen and resident of Pulaski County.

9. Vino's is a domestic for-profit corporation that owns and operates a restaurant and brewery in Little Rock.

10. Vino's registered agent for service of process is Matthew B. Finch at 425 West Capitol Avenue, Suite 3801, Little Rock, Arkansas 72201.

11. Chris New is an individual and was the General Manager of Vino's at times material to this Complaint.

12. Chris New fired Plaintiff.

13. Chris New was in charge of hiring and firing Vino's employees.

14. Chris New regularly worked at Vino's restaurant location, directly managing the restaurant and directing its employees, including Plaintiff and other servers/hostesses.

IV. FACTUAL ALLEGATIONS

15. Plaintiff repeats and re-alleges all the preceding paragraphs of this Complaint as if fully set forth in this section.

16. At all times material to this Complaint, Plaintiff has been entitled to the rights, protection and benefits provided under the FLSA and AMWA.

17. Vino's annual gross volume of sales made or business done was not less than \$500,000.00 (exclusive of exercise taxes at the retail level that are separately stated) during each of the three calendar years preceding the filing of this Complaint.

18. During each of the three years preceding the filing of this Complaint, Vino's employed at least two individuals who were engaged in interstate commerce or in the production of goods for interstate commerce, or had employees handling, selling, or

otherwise working on goods or materials that had been moved in or produced for commerce by any person.

19. Vino's employed four or more individuals in each week in each of the three years preceding the filing of the Original Complaint.

20. Vino's employed Plaintiff as a hostess/server from approximately December of 2016 through April of 2018.

21. Plaintiff regularly used the telephone and processed credit card transactions as part of her job duties for Vino's.

22. Vino's was Plaintiff's employer and the employer of the proposed collective and class within the meaning of the FLSA, 29 U.S.C. § 203(d), and the Arkansas Minimum Wage Act, A.C.A. § 11-4-203, at all times relevant to this lawsuit.

23. Vino's paid Plaintiff less than the minimum wage under both the FLSA and AMWA ("tipped wage"). Instead of paying the required minimum wage, Vino's purported to take advantage of the tip credit allowed by 29 U.S.C. § 203(m).

24. Vino's paid Plaintiff a tipped wage of approximately \$3.50 per hour for all her recorded hours worked.

25. Plaintiff performed both duties that generated tips, such as delivering food to customers ("tipped work"), and duties that did not generate tips, such as opening the restaurant, cleaning, closing, and counting down the money till ("non-tipped work").

26. Upon information and belief, Vino's does not distinguish between time spent by servers on tipped work and time spent by servers on non-tipped work.

27. Non-tipped work regularly occupied more than twenty percent of Plaintiff's time working in each shift.

28. Vino's paid Plaintiff the same rate—a tipped wage below the applicable minimum wages under the FLSA and AMWA—for both tipped work and non-tipped work.

29. As a result of the policies put in place by Vino's, Plaintiff was often required to perform non-tipped work for less than minimum wage.

30. Plaintiff is entitled to wages and compensation based on the standard minimum wage for all hours worked.

31. Vino's knew, or showed reckless disregard for whether, the way they paid Plaintiff in violation of the FLSA and AMWA.

V. REPRESENTATIVE ACTION ALLEGATIONS

32. Plaintiff repeats and re-alleges all previous paragraphs of this Complaint as though fully set forth herein.

33. Other servers/hostesses, beside Plaintiff, worked for Vino's within the three years preceding the filing of the Original Complaint.

34. Other servers/hostesses regularly used the telephone and processed credit card transactions as part of their job duties for Vino's.

35. Vino's was the employer of the other servers/hostesses within the meaning of the FLSA, 29 U.S.C. § 203(d), and the Arkansas Minimum Wage Act, A.C.A. § 11-4-203, at all times relevant to this lawsuit.

36. Vino's paid other servers/hostesses less than the minimum wage under both the FLSA and AMWA ("tipped wage"). Instead of paying the required minimum wage, Vino's purported to take advantage of the tip credit allowed by 29 U.S.C. § 203(m).

37. Vino's paid other servers/hostesses a tipped wage of approximately \$3.50 per hour for all her recorded hours worked.

38. Other servers/hostesses performed both duties that generated tips, such as delivering food to customers ("tipped work"), and duties that did not generate tips, such as opening the restaurant, cleaning, closing, and counting down the money till ("non-tipped work").

39. Upon information and belief, Vino's does not distinguish between time spent by servers on tipped work and time spent by servers on non-tipped work.

40. Non-tipped work regularly occupied more than twenty percent of other servers'/hostesses' time working in each shift.

41. Vino's paid other servers/hostesses the same rate—a tipped wage below the applicable minimum wages under the FLSA and AMWA—for both tipped work and non-tipped work.

42. As a result of the policies put in place by Vino's, other servers/hostesses were often required to perform non-tipped work for less than minimum wage.

43. Other servers/hostesses are entitled to wages and compensation based on the standard minimum wage for all hours worked.

44. Vino's knew, or showed reckless disregard for whether, the way they paid other servers/hostesses in violation of the FLSA and AMWA.

45. Plaintiff brings her claims for relief for violation of the FLSA as a collective action pursuant to Section 16(b) of the FLSA, 29 U.S.C. § 216(b).

46. Plaintiff brings her FLSA claims on behalf of all other servers/hostesses who were paid tips and employed by Vino's at any time within the applicable statute of

limitations period, who are entitled to payment of the following types of damages:

- A. A lawful minimum wage for all hours worked; and
- B. Liquidated damages and attorneys' fees and costs.

47. The members of the proposed FLSA Collective are similarly situated in that they share these traits:

- A. They were subject to Vino's common policy of paying less than minimum wage;
- B. They spent more than twenty percent of their time performing non-tipped duties for Vino's; and
- C. They were paid hourly.

48. Plaintiff is unable to state the exact number of the potential members of the FLSA Collective but believes that the group includes ten or more persons.

49. Vino's can readily identify each of the other servers/hostesses who worked for a tipped wage within the three years preceding the filing of the Original Complaint.

VI. FIRST CLAIM FOR RELIEF

(Collective Action Claim for Violation of the FLSA)

50. Plaintiff repeats and re-alleges all previous paragraphs of this Complaint as though fully set forth herein.

51. This is a collective action filed on behalf of all tipped servers employed by Vino's to recover monetary damages owed by Vino's to Plaintiff and members of the putative collective for unpaid wages because they were required to spend more than 20% of their time on non-tipped duties.

52. Plaintiff brings this action on behalf of herself and all other similarly

situated employees, former and present, who were and/or are affected by Vino's willful and intentional violation of the FLSA.

53. At all relevant times, Plaintiff and all similarly situated employees have been entitled to the rights, protection, and benefits provided by the FLSA.

54. At all relevant times, Plaintiff and all similarly situated employees have been "employees" of Vino's, as defined by 29 U.S.C. § 203(e).

55. At all relevant times, Vino's was an "employer" of Plaintiff and all other similarly situated employees, as defined by 29 U.S.C. § 203(d).

56. Vino's failed to pay Plaintiff and all similarly situated employees the minimum wages required under the FLSA for tipped work and for non-tipped work.

57. Because these employees are similarly situated to Plaintiff, and are owed compensation for the same reasons, the proposed collective is properly defined as follows:

All servers who were tipped employees for Vino's within the past three years.

58. At all relevant times, Vino's willfully failed and refused to compensate Plaintiff and other similarly situated employees for all hours worked at the standard minimum wage under the FLSA because Vino's paid Plaintiff and other similarly situated employees less than minimum wage for non-tipped work.

59. Vino's violations entitle Plaintiff and all other similarly situated employees to compensatory damages calculated as the full amount of wages owed at the applicable minimum wage, less the amount of wages actually paid by Vino's.

60. Vino's violations entitle Plaintiff and all other similarly situated employees to liquidated damages pursuant to 29 U.S.C. § 216(b) of an amount equal to

compensatory damages.

61. Plaintiff and all other similarly situated employees are entitled to an award of their attorney's fees and court costs pursuant to 29 U.S.C. § 216(b).

VII. SECOND CLAIM FOR RELIEF

(Individual Claim for Violation of the FLSA)

62. Plaintiff repeats and re-alleges all previous paragraphs of this Complaint as though fully set forth herein.

63. At all relevant times, Plaintiff has been entitled to the rights, protection, and benefits provided by the FLSA.

64. At all relevant times, Plaintiff has been an "employee" of Vino's as defined by 29 U.S.C. § 203(e).

65. At all relevant times, Vino's was an "employer" of Plaintiff as defined by 29 U.S.C. § 203(d).

66. Vino's failed to pay Plaintiff the minimum wages required under the FLSA for tipped work and for non-tipped work.

67. At all relevant times, Vino's willfully failed and refused to compensate Plaintiff for all hours worked at the standard minimum wage under the FLSA because Vino's paid Plaintiff less than minimum wage for non-tipped work.

68. Vino's violations entitle Plaintiff to compensatory damages calculated as the full amount of wages owed at the applicable minimum wage, less the amount of wages actually paid by Vino's.

69. Vino's violations entitle Plaintiff to liquidated damages pursuant to 29 U.S.C. § 216(b) of an amount equal to compensatory damages.

70. Plaintiff is entitled to an award of her attorney's fees and court costs pursuant to 29 U.S.C. § 216(b).

VIII. THIRD CLAIM FOR RELIEF

(Individual Claim for Violation of AMWA)

71. Plaintiff repeats and re-alleges all previous paragraphs of this Complaint as though fully set forth herein.

72. At all relevant times, Plaintiff has been entitled to the rights, protection, and benefits provided by the AMWA.

73. At all relevant times, Plaintiff has been an "employee" of Vino's, as defined by Ark. Code Ann. § 11-4-203(3).

74. At all relevant times, Vino's was an "employer" of Plaintiff as defined by Ark. Code Ann. § 11-4-203(4).

75. Vino's failed to pay Plaintiff the minimum wages required under the AMWA for tipped work and for non-tipped work.

76. Vino's conduct and practice, as described above, has been and is willful, intentional, unreasonable, arbitrary and in bad faith.

77. By reason of the unlawful acts alleged herein, Vino's is liable to Plaintiff for monetary damages, liquidated damages and costs, including reasonable attorney's fees provided by the AMWA for all violations which occurred beginning at least three (3) years preceding the filing of this Complaint, plus periods of equitable tolling.

78. Vino's has not acted in good faith nor with reasonable grounds to believe its actions and omissions were not a violation of the AMWA, and, as a result thereof, Plaintiff is entitled to recover an award of liquidated damages in an amount equal to the

amount of unpaid minimum wages described above pursuant to Ark. Code Ann. § 11-4-218.

79. Alternatively, should the Court find that VINO's acted in good faith in failing to pay Plaintiff as provided by the AMWA, she is entitled to an award of prejudgment interest at the applicable legal rate.

IX. PRAYER FOR RELIEF

WHEREFORE, premises considered, Plaintiff Hannah Allen, individually and on behalf of all others similarly situated, respectfully requests that VINO's be summoned to appear and answer and for the following relief:

A. That VINO's be required to account to Plaintiff, the class members, and the Court for all of the hours worked by Plaintiff and the collective and class members and all monies paid to them;

B. A declaratory judgment that VINO's practices alleged herein violate the Fair Labor Standards Act, 29 U.S.C. § 201, *et seq.*, and attendant regulations;

C. A declaratory judgment that VINO's practices alleged herein violate the Arkansas Minimum Wage Act, Ark. Code Ann. § 11-4-201, *et seq.* and the related regulations;

D. Certification of, and proper notice to, together with an opportunity to participate in the litigation, all qualifying current and former employees;

E. Judgment for damages for all unpaid back wages at the applicable minimum wage owed to Plaintiff and members of the class from a period of three (3) years prior to this lawsuit through the date of trial under the Fair Labor Standards Act, 29 U.S.C. § 201, *et seq.*, and attendant regulations at 29 C.F.R. § 516 *et seq.*;

F. Judgment for damages for all unpaid back wages at the applicable minimum wage owed to Plaintiff from a period of three (3) years prior to this lawsuit through the date of trial under the Arkansas Minimum Wage Act, Ark. Code Ann. § 11-4-201, *et seq.* and the related regulations;

G. Judgment for liquidated damages pursuant to the Fair Labor Standards Act, 29 U.S.C. § 201, *et seq.*, and attendant regulations at 29 C.F.R. § 516 *et seq.*, in an amount equal to all unpaid back wages at the applicable minimum wage from a period of three (3) years prior to this lawsuit through the date of trial owed to Plaintiff and members of the class;

H. Judgment for liquidated damages pursuant to the Arkansas Minimum Wage Act, Ark. Code Ann. § 11-4-201, *et seq.*, and the relating regulations;


I. An order directing Vino's to pay Plaintiff and members of the collective and class pre-judgment interest, reasonable attorney's fees and all costs connected with this action; and

J. Such other and further relief as this Court may deem necessary, just and proper.


Respectfully submitted,

**HANNAH ALLEN, Individually and on
Behalf of All Others Similarly Situated,
PLAINTIFF**

SANFORD LAW FIRM, PLLC
One Financial Center
650 South Shackleford Road, Suite 411
Little Rock, Arkansas 72211
Telephone: (501) 221-0088
Facsimile: (888) 787-2040



Joshua West
Ark Bar No. 2012121
west@sanfordlawfirm.com



Josh Sanford
Ark. Bar No. 2001037
josh@sanfordlawfirm.com

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

4:18CV262-JM

I. (a) PLAINTIFFS

HANNAH ALLEN, Individually and on Behalf of All Others Similarly Situated

(b) County of Residence of First Listed Plaintiff _____
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Josh Sanford, SANFORD LAW FIRM, PLLC, One Financial Center, 650 South Shackleford, Suite 411, Little Rock, Arkansas 72211; 501-221-0088; josh@sanfordlawfirm.com

DEFENDANTS

VINO'S, INC., and CHRIS NEW

County of Residence of First Listed Defendant _____
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|-----------------------------------------|----------------------------|----------------------------|---------------------------------------------------------------|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input checked="" type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

29 U.S.C. 201 et seq.

Brief description of cause:

FLSA Violation: Unpaid Minimum Wages

VII. REQUESTED IN COMPLAINT:

- ☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☒ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

04/17/2018

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Little Rock, AK Restaurant Vino's Tagged with Ex-Server's Wage and Hour Complaint](#)
