

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION**

**ANDREA BIGELOW, on her own behalf and on
behalf of those similarly situated,**

Plaintiff,

vs.

Case No.:

**SYNEOS HEALTH, LLC, a Foreign Limited
Liability Company,**

Defendant.

**CLASS ACTION COMPLAINT
AND DEMAND FOR JURY TRIAL**

Plaintiff, ANDREA BIGELOW, on her own behalf and on behalf of those similarly situated (collectively “Plaintiffs”), hereby files her Class Action Complaint against Defendant, SYNEOS HEALTH, LLC., a Foreign Limited Liability Company (“SH” or “Defendant”) and alleges as follows:

INTRODUCTION AND CLASS DEFINITION

1. This is a class action brought pursuant to the Family Medical Leave Act (“FMLA”) at Section 29 U.S.C. § 2601 *et. al.*

2. Defendant is liable for FMLA interference and/or retaliation based upon its uniform and common policies and procedures of negatively utilizing and considering protected FMLA leave and absences by employees, against said employees with regard to career advancement and pay opportunities.

3. The purported class sought to be certified is defined as:

Any and all employees who worked for Defendant during the relevant limitations period who were denied promotions, pay increases, and/or suffered any adverse

employment action, as a result of her/his/their prior or anticipated use of protected FMLA leave during her/his/their employment.

JURISDICTION AND VENUE

4. This Court has jurisdiction over these claims pursuant to 28 U.S.C. § 1331.

5. Venue is proper in the Court because all facts material to all claims set forth herein occurred in St. Johns County, Florida.

PARTIES

6. At all times material to this action, Defendant was a foreign limited liability company that conducted business in, among others St. Johns County, Florida.

7. Plaintiff worked for Defendant in St. Johns County, Florida.

GENERAL ALLEGATIONS

8. Defendant holds itself out to the public through its website as follows:

“Syneos Health is the the only fully integrated biopharmaceutical solutions organization. Our company, including a Contract Research Organization (CRO) and Contract Commercial Organization (CCO), is purpose-built to accelerate customer performance to address modern market realities. Created through the merger of two industry leading companies – INC Research and inVentiv Health – we bring together more than 21,000 clinical and commercial minds with the ability to support customers in more than 110 countries. Together we share insights, use the latest technologies and apply advanced business practices to speed our customers’ delivery of important therapies to patients.”

9. Defendant employs in excess of twenty-two thousand (22,000) employees throughout the world with thousands of FMLA eligible employees working throughout the United States at any given time.

10. Plaintiff has worked for Defendant from July 10, 2017, through current, in the capacity of a “Clinical Operations Lead.”

11. While Plaintiff telecommutes from her home in St. Johns County, Florida, she reports directly to Defendant's headquarters in North Carolina, which is considered her home office for FMLA purposes.

12. At all times relevant, Defendant was an employer covered by the FMLA, because it was engaged in commerce, or in an industry affecting commerce, who employed fifty (50) or more employees within seventy-five (75) miles of where Plaintiff reported, for each working day during each of twenty (20) or more calendar workweeks during the relevant period of time.

13. At all times relevant hereto, Plaintiff was an employee entitled to leave under the FMLA, based on the fact that she: (a) necessitated FMLA leave for the birth of her child; and (b) she was employed by Defendant for at least 12 months and worked at least 1,250 hours during the relevant 12-month period prior to her seeking to exercise her right to FMLA leave.

14. Plaintiff utilized FMLA leave for the birth of her child from April 1, 2019, through May 28, 2019.

15. Upon the conclusion of her FMLA leave, Plaintiff returned to work without consequence at that time, and commenced her job duties and responsibilities without issue.

16. However, in August 2019, Plaintiff discovered that Defendant promoted one of her male peers, who had not recently utilized FMLA, into a position of Senior Clinical Operations Lead.

17. Plaintiff was as qualified, if not more qualified, than this non-FMLA protected male peer to receive the same promotion, but Plaintiff was never contacted, notified, nor considered for, the promotion.

18. On August 30, 2019, Plaintiff met with Defendant's management, during which time she inquired as to why she was not considered and/or notified of the promotion opportunity.

19. At this time, and in response to Plaintiff's inquiry, Defendant's management explained that it was Defendant's company policy that, if employees are/were on FMLA leave in the year and/or during the time promotions are made available and/or considered, said employee is not eligible and/or considered for said promotion because of his/her/their use of FMLA leave.

20. To that end, Defendant's management corroborated that Defendant uniformly and negatively considered its employees' use of FMLA leave in making promotion decisions, pay decisions, and/or taking adverse employment actions against with regard to its employees.

21. The FMLA strictly prohibits employers from discriminating or retaliating against an employee for asserting her rights under the Act.

22. Further, an employer may not consider an employee's use of FMLA leave as "a negative factor in employment actions such as hiring, promotions, or disciplinary actions; nor can FMLA leave be counted under no fault attendance policies." 29 C.F.R. § 825.220(c) (emphasis added).

23. Defendant's management's statements regarding employees' use of FMLA leave and the effect same had on said employees' promotions violates the foregoing FMLA regulation.

24. Shocked by what was being said to her and the fact that she was penalized in her career advancement based on her use of FMLA leave, Plaintiff emailed Defendant's management on September 9, 2019, asking for a description of the factors other than her FMLA leave that were used in excluding her from the opportunity of a promotion.

25. On September 13, 2019, Plaintiff met with Defendant's management once again to discuss her concerns.

26. During this conversation, Defendant's management once again confirmed that it was Defendant's company policy that Plaintiff and others could not be considered for a promotion during a year or during such time as she/he/they "are not working and are/were on [FMLA] leave."

27. Plaintiff objected to this statement and corroboration of Defendant's illegal practice, notified Defendant's management that it was illegal for management to use her FMLA against her as part of the promotion process within Defendant's company, and further escalated the issue to Defendant's Human Resources department.

28. Shockingly, on September 27, 2019, Defendant's Human Resources Manager confirmed that it was Defendant's policy that Plaintiff and others were not eligible for promotion within the company, if they utilized FMLA in the year the promotion was available, and/or during the time the promotion was available.

29. Plaintiff, and numerous other employees, have been damaged by Defendant's illegal FMLA practices in this regard in the form of lost promotions, lost career opportunities and advancement, and lost pay/wages.

30. Based on the foregoing statements from Defendant's management and Human Resources, Defendant utilizes the same policies and procedures with regard to penalizing employees for their FMLA use, companywide.

31. As a result of the foregoing, Defendant interfered with Plaintiff's and putative class members' FMLA rights.

32. Further, because Defendant acted with intent to interfere with, and otherwise retaliate against, Plaintiff and putative class members for her/their use of protected FMLA leave, Defendant's actions likewise constitute FMLA retaliation.

33. Defendant did not have a subjective or objective good faith basis for its actions, and Plaintiff and the putative class members who likewise were subjected to these illegal practices, are entitled to liquidated damages.

34. Plaintiff has retained the services of the undersigned attorneys and is obligated to pay the undersigned a reasonable fee for their services.

CLASS ACTION ALLEGATIONS

35. Plaintiff sues under Rule 23(a) and (b) of the Federal Rules of Civil Procedure for violations of the FMLA, on behalf of herself, and for the defined class of employees above.

36. The persons in the Class (“Class Members”) are so numerous based on the sheer size of Defendant’s workforce, that joinder of all members is impracticable as there are, upon information and belief, thousands of employees affected by this practice during the relevant limitations period.

37. There are questions of law and fact common to the Class Members, namely:

(a) Whether the Class Members were employees of Defendant within the United States? and

(b) Whether Defendant negatively considered an employee’s use of FMLA in taking adverse employment actions such as, among others, decisions involving promotions, pay increases, and career opportunities?

38. The named Plaintiff’s claims are typical of the claims of the Class, as Defendant has uniformly and negatively considered the use of FMLA by its employees during her/his/their employment.

39. The named Plaintiff will fairly and adequately protect the interests of the class.

40. Plaintiff has retained counsel competent and experienced in complex class action employment litigation.

41. A class action is superior to other available methods for the fair and efficient adjudication of this controversy—particularly in the context of FMLA litigation – where the named Plaintiff and Class members may lack the financial resources to vigorously prosecute a lawsuit in federal court against a corporate defendant and separate actions would create a risk of inconsistent or varying adjudications with respect to individual class members and the adjudications with respect to individual class members would be dispositive of the interests of other members.

42. Defendant has acted on grounds that apply generally to the class.

COUNT I- FMLA INTERFERENCE

43. Plaintiff reincorporates and readopts all allegations contained within Paragraphs 1-41, above.

44. At all times relevant hereto, Plaintiff and all putative class members was/were protected by the FMLA.

45. At all times relevant hereto, Plaintiff and all putative class members was/were protected from interference under the FMLA.

46. At all times relevant hereto, Defendant interfered Plaintiff and all putative class members by negatively considering her/their FMLA use against them with regard to employment decisions within the company.

47. As a result of Defendant’s willful and unlawful acts by interfering with Plaintiff and all putative class members exercising her/their rights pursuant to the FMLA, Plaintiff and all putative class members has/have suffered damages and incurred reasonable attorneys’ fees and costs.

48. As a result of Defendant's willful violation of the FMLA, Plaintiff and all putative class members is/are entitled to liquidated damages.

COUNT II- FMLA RETALIATION

49. Plaintiff reincorporates and readopts all allegations contained within Paragraphs 1-41, above.

50. At all times relevant hereto, Plaintiff and all putative class members was/were protected by the FMLA.

51. At all times relevant hereto, Plaintiff and all putative class members was/were protected from retaliation under the FMLA.

52. At all times relevant hereto, Defendant intentionally retaliated against Plaintiff and all putative class members by negatively considering her/their FMLA use against them with regard to employment decisions within the company.

53. As a result of Defendant's willful and unlawful acts by retaliating against Plaintiff and all putative class members exercising her/their rights pursuant to the FMLA, Plaintiff and all putative class members has/have suffered damages and incurred reasonable attorneys' fees and costs.

54. As a result of Defendant's willful violation of the FMLA, Plaintiff and all putative class members is/are entitled to liquidated damages.

55. Defendant acted with the intent to retaliate against Plaintiff and all putative class members, because Plaintiff and all putative class members exercised her/their right to take approved leave pursuant to the FMLA.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays that this Court award the following relief:

- (a) Awarding all damages available under the FMLA sustained as the result of Defendant's illegal actions relating to the FMLA;
- (b) Awarding an equal award of liquidated damages available under the FMLA;
- (c) Certification that, pursuant to Fed. R. Civ. P. 23 (a) and (b) and the FMLA, Plaintiff and all putative class members constitute a single class;
- (d) Designation of Plaintiff, Andre Bigelow as the Class Representative;
- (e) Appointment of the undersigned attorneys as Class Counsel;
- (f) Interest as allowed by law on the amounts owed under the preceding paragraphs;
- (g) The reasonable attorneys' fees and the costs and disbursements the Plaintiff incurred in prosecuting this action, as authorized by the FMLA; and
- (h) Such other and any other additional relief as the Court deems just and proper.

DEMAND FOR JURY TRIAL

Plaintiffs further demand a jury trial on all issues so triable as of right.

Dated this 7th day of October 2019.

Respectfully submitted

By:/s Noah E. Storch

Noah E. Storch, Esq.

Florida Bar No. 0085476

Richard Celler Legal, P.A.

10368 West State Road 84, Suite 103

Davie, Florida 33324

Telephone: (866) 344-9243

Facsimile: (954) 337-2771

E-mail: noah@floridaovertimelawyer.com

Trial Counsel for Plaintiffs

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.)

I. (a) PLAINTIFFS
ANDREA BIGELOW, on her own behalf and on behalf of those similarly situated

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

(c) Attorneys *(Firm Name, Address, and Telephone Number)*
 Richard Celler Legal, P.A., Noah E. Storch, Esq., 10368 W. State Road 84, Suite 103, Davie, FL 33324 (866) 344-9243; Email: noah@floridaovertimelawyer.com

DEFENDANTS
SYNEOS HEALTH, LLC, a Foreign Limited Liability Company

County of Residence of First Listed Defendant St. Johns
(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)*

(For Diversity Cases Only)

	PTF	DEF		PTF	DEF
Citizen of This State	<input checked="" 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	<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))	<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 (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <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	CIVIL RIGHTS	PRISONER PETITIONS	LABOR	FEDERAL TAX SUITS	
<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	<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	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	<input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input checked="" type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	

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. § 2601, et seq. ("the FMLA")

Brief description of cause:
FMLA

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: 10/07/2019 SIGNATURE OF ATTORNEY OF RECORD: Noah E. Storch

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading 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. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
- (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
- (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
 United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.
 United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
 Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
 Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- V. Origin.** Place an "X" in one of the seven boxes.
 Original Proceedings. (1) Cases which originate in the United States district courts.
 Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441.
 Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
 Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
 Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
 Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
 Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.
PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7. Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
 Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
 Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

Date and Attorney Signature. Date and sign the civil cover sheet.

UNITED STATES DISTRICT COURT

for the

Middle District of Florida

ANDREA BIGELOW, on her own behalf and on behalf of those similarly situated

Plaintiff(s)

v.

SYNEOS HEALTH, LLC, a Foreign Limited Liability Company

Defendant(s)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) SYNEOS HEALTH, LLC
UNITED AGENT GROUP INC.-REGISTERED AGENT
11380 PROSPERITY FARMS ROAD # 221E
PALM BEACH GARDENS, FL 33410

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

RICHARD CELLER LEGAL, P.A.
NOAH E. STORCH, ESQUIRE
10368 W. STATE ROAD 84, SUITE 103
DAVIE, FLORIDA 33324
TELEPHONE: (866) 344-9243
E-mail: noah@floridaovertimelawyer.com

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: 10/07/2019

Signature of Clerk or Deputy Clerk

Civil Action No. _____

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____
was received by me on *(date)* _____ .

I personally served the summons on the individual at *(place)* _____
_____ on *(date)* _____ ; or

I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____ , and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* _____ , who is
designated by law to accept service of process on behalf of *(name of organization)* _____
_____ on *(date)* _____ ; or

I returned the summons unexecuted because _____ ; or

Other *(specify)*:

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Class Action Claims Syneos Health Refuses to Promote Employees Who Took Protected FMLA Leave](#)
