

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA
PITTSBURGH DIVISION

CHRISTOPHER BOURQUE, Individually §
and on behalf of all others similarly situated §

Plaintiff, §

v. §

STALLION OILFIELD
HOLDINGS, INC. §

Defendant. §

Docket No. 2:18-cv-779

JURY TRIAL DEMANDED

COLLECTIVE ACTION
PURSUANT TO 29 U.S.C. § 216(b)

ORIGINAL COLLECTIVE ACTION COMPLAINT

I. SUMMARY

1. Plaintiff Christopher Bourque (“Bourque”) brings this lawsuit to recover unpaid overtime wages and other damages under Fair Labor Standards Act, 29 U.S.C. § 201, *et seq.* (“FLSA”) against Defendant Stallion Oilfield Holdings, Inc. (“Stallion” or “Defendant”).

2. Stallion is a rental and distribution company operating in nationwide but with offices in Canonsburg, Carmichaels, and Williamsport, PA.

3. Stallion specializes in solids control, drilling support, completion and production, wellsite construction, offshore services, StaRComm, camp complexes, and inland-water marine services.

4. Stallion required Bourque to work substantial time over 40 hours in a week without overtime compensation due to its day rate pay practices.

5. Bourque worked at least 12 hours a day for at least 7 days a week. As a result, he often worked weeks consisting of 84 hours or more.

6. Stallion treated Bourque as an independent contractor.

7. This collective action alleges that Stallion misclassified Bourque as exempt from the

overtime requirements as day rate independent contractor, alleges that Stallion failed to pay Bourque overtime at one and one half times their regular rate of pay, and seeks to recover the unpaid overtime wages, liquidated damages, attorney fees, and costs permitted by the FLSA.

II. JURISDICTION AND VENUE

8. This Court has original subject matter jurisdiction pursuant to 28 U.S.C. § 1331 because this action involves a federal question under the FLSA. 29 U.S.C. § 216(b).

9. Venue is proper in this Court pursuant to 28 U.S.C. §§ 1391(b) and (c) because a substantial part of the events or omissions giving rise to the claim occurred in this District and because Stallion has offices in Canonsburg, PA, which is in Washington County.

10. Stallion employed Putative Class Members within this district and division.

III. THE PARTIES

11. While employed by Stallion, Plaintiff Bourque has worked exclusively for Stallion as solids control operator. Throughout his employment with Stallion, he was paid a day-rate with no overtime compensation and was classified as an independent contractor. Bourque's written consent has been filed with the Court. *See* Ex. A.

12. Bourque seeks conditional certification under 29 U.S.C. § 216(b) of the following class:

All independent contractors paid through Stallion's day-rate system in the past three years. ("Putative Class Members").

13. Stallion Oilfield Holdings, Inc. can be served through its registered agent: **Corporation Service Company at 251 Little Falls Drive, Wilmington, DE 19808.**

IV. COVERAGE UNDER THE FLSA

14. At all times hereinafter mentioned, Stallion has been an employer within the meaning of the Section 3(d) of the FLSA, 29 U.S.C. § 203(d).

15. At all times hereinafter mentioned, Stallion has been part of an enterprise within the meaning of Section 3(r) of the FLSA, 29 U.S.C. § 203(r).

16. At all times hereinafter mentioned, Stallion has been part of an enterprise engaged in commerce or in the production of goods for commerce within the meaning of Section 3(s)(1) of the FLSA, 29 U.S.C. § 203(s)(1), in that said enterprise has and has had employees engaged in commerce or in the production of goods for commerce, or employees handling, selling, or otherwise working on goods or materials that have been moved in or produced for commerce by any person and in that said enterprise has had and has an annual gross volume of sales made or business done of not less than \$500,000 (exclusive of excise taxes at the retail level which are separately stated).

17. At all times hereinafter mentioned, Bourque and the Putative Class Members were engaged in commerce or in the production of goods for commerce.

18. As will be shown through this litigation, Stallion treated Bourque and the Putative Class Members as employees and uniformly dictated the pay practices Bourque and Stallion's other employees (including its so-called "independent contractors") were subjected to.

19. Stallion's misclassification of Bourque as an independent contractor does not alter its status as an employer for purposes of this FLSA collective action.

V. FACTS

20. Stallion is a rental and distribution services company with significant operations throughout Pennsylvania.

21. Plaintiff Bourque, for example, worked as a solids control operator on behalf of Stallion.

22. Stallion provides solids control, drilling support, completion and production, wellsite construction, offshore services, StaRComm, camp complexes, and inland-water marine services.

23. Many of the individuals working for Stallion as solids control consultants (among

other positions) are paid on a day-rate basis and make up the proposed Putative Class.

24. While exact job titles and job duties may differ, these workers are subjected to the same or similar illegal pay practices for similar work.

25. Specifically, Stallion paid its independent contractors a flat sum for each day worked, regardless of the number of hours that they worked that day (or in that work week).

26. Stallion failed to provide its day rate independent contractors with overtime pay for hours that they worked in excess of forty (40) hours in a workweek.

27. For example, Plaintiff Bourque was employed by Stallion as a solids control consultant during the statutory time period and was paid on a day-rate basis.

28. In this regard, his primary job duties (and the job duties of all other solids control consultants employed by Stallion who were paid a day-rate) included maintaining and operating solids control equipment (centrifuge, drying shakers, desanders, desilters, etc.), repairing electrical issues, and assisting with rigging up and rigging down of solids control equipment.

29. Stallion typically scheduled Bourque to work twelve (12) hour shifts, for as many as seven (7) days a week.

30. Bourque estimates that he worked anywhere from eighty-four (84) to one-hundred (100) hours per week while employed by Stallion as a solids control consultant.

31. The daily and weekly activities of the Putative Class Members were routine and largely governed by standardized plans, procedures, and checklists created by Stallion. Virtually every job function was pre-determined by Stallion, including the tools to use at a job site, the data to compile, the schedule of work, and related work duties.

32. The Putative Class Members were prohibited from varying their job duties outside of the pre-determined parameters. Moreover, the job functions of the Putative Class Members were primarily manual labor/technical in nature, requiring little to no official training, much less a college

education or other advanced degree. In fact, there was no unique skill or initiative required to before the services Bourque or the other Putative Class Members performed for Stallion.

33. The Putative Class Members did not have any supervisory or management duties. To the contrary, Stallion dictated the duties performed by Bourque and the other Putative Class Members.

34. The Putative Class Members were not paid on a salary basis. Stallion decided to pay Bourque and the Putative Class Members on a day rate, prohibiting their ability to determine their own profit and loss.

35. Stallion employed solids control workers as W-2 employees during the limitations period.

36. The Putative Class Members worked alongside the W-2 employees of Stallion.

37. The Putative Class Members performed the same duties as the W-2 employees of Stallion.

38. The fact that Stallion employed W-2 solids control workers and 1099 consultant solids control workers side by side, performing the same duties demonstrates that Bourque and the Putative Class Members are integral to the operations of Stallion.

39. Finally, for the purposes of an FLSA overtime claim, the Putative Class Members performed substantially similar job duties related to servicing oil and gas operations in the field.

40. The Putative Class Members also worked similar hours and were denied overtime as a result of the same illegal pay practice.

41. The Putative Class Members were generally scheduled to work eighty-four (84) hours per workweek, but often worked more.

42. Instead of paying them overtime, Stallion paid the Putative Class Members a day-rate. Stallion denied the Putative Class Members overtime for any and all hours worked in excess of

forty (40) hours in a single workweek. As the controlling law makes clear, the day rate pay practice to employees, without a salary, violates the FLSA and requires overtime pay. Therefore, Stallion owes back overtime wages to hundreds of their solids control independent contractors, all of whom work long hours each workweek.

VI. FLSA VIOLATIONS

43. As set forth herein, Stallion violated the FLSA by misclassifying Bourque and the Putative Class Members as independent contractors and paying only a day rate for hours worked in excess of 40 in a workweek. 29 U.S.C. § 207(a); NMSA § 50-4-22.

44. Stallion knowingly, willfully, or in reckless disregard carried out this illegal pattern or practice of failing to pay Bourque and the Putative Class Members proper overtime compensation. Stallion's failure to pay proper overtime compensation to Bourque and the Putative Class Members and intentional misclassification of Bourque and the Putative Class Members was neither reasonable, nor was the decision not to pay proper overtime to Bourque and the Putative Class Members made in good faith.

45. Accordingly, Bourque and the Putative Class Members are entitled to overtime wages under the FLSA in an amount equal to 1.5 times their regular rates of pay, plus liquidated damages or double damages, attorney's fees, and costs. 29 U.S.C. § 216(b).

46. The improper pay practices at issue were part of a continuing course of conduct, entitling Bourque and the Putative Class Members to recover for all such violations, regardless of the date they occurred.

VII. COLLECTIVE ACTION ALLEGATIONS

47. As described above, Bourque and the Putative Class Members have been victimized by Stallion's pattern, practice, and/or policy, which is in willful violation of the FLSA.

48. Many Putative Class Members worked alongside Bourque and reported that they

were paid in the same manner and were not properly compensated for all hours worked as required by the FLSA.

49. Many Putative Class Members, regardless of the division or location in which the worked, performed similar job duties to Bourque.

50. Thus, Stallion imposed a uniform practice or policy on Bourque and the Putative Class Members regardless of any individualized factors.

51. Bourque and the Putative Class Members received a day rate, regularly worked in excess of 40 hours per week, and were not paid overtime compensation.

52. Bourque and the Putative Class Members did not receive a salary.

53. As described above, these day rate Putative Class Members are similarly situated to Bourque in terms of relevant pay provisions and employment practices.

54. Stallion's failure to pay wages and overtime compensation at the rates required by the FLSA result from generally applicable, systematic policy, and/or practice which are not dependent on the personal circumstances of any member of the day rate Class Members.

55. Bourque's experiences are typical of the experiences of all day rate Putative Class Members.

56. Bourque has no interests contrary to, or in conflict with, the members of the FLSA Putative Class Members. Like each member of the proposed class, Bourque has an interest in obtaining the unpaid overtime wages owed under federal law.

57. A collective action, such as the instant one, is superior to other available means for fair and efficient adjudication of the lawsuit.

58. Absent this action, many FLSA Putative Class Members likely will not obtain redress of their injuries and Stallion will reap the unjust benefits of violating the FLSA.

59. Furthermore, even if some of the FLSA Putative Class Members could afford

individual litigation against Stallion, it would be unduly burdensome to the judicial system.

60. Concentrating the litigation in one forum will promote judicial economy and parity among the claims of individual members of the classes and provide for judicial consistency.

61. The questions of law and fact common to each of the FLSA Putative Class Members predominate over any questions affecting solely the individual members. Among the common questions of law and fact are:

- (a) Whether Stallion employed the FLSA Putative Class Members within the meaning of the FLSA;
- (b) Whether the FLSA Putative Class Members were exempt from overtime as independent contractors;
- (c) Whether the FLSA Putative Class Members were paid on a salary basis;
- (d) Whether Stallion's decision to not pay overtime to the FLSA Putative Class Members and was made in good faith; and
- (e) Whether Stallions violation of the FLSA was willful.

62. Bourque and the FLSA Putative Class Members have sustained damages arising out of Stallion's illegal and uniform employment policy.

63. Bourque knows of no difficulty that will be encountered in the management of this litigation that would preclude its ability to go forward as a collective action.

64. Although the issue of damages may be somewhat individual in character, there is no detractor from the common nucleus of liability facts. Therefore, this issue does not preclude class or collective action treatment.

VIII. JURY DEMAND

65. Bourque demands a trial by jury.

IX. RELIEF SOUGHT

66. WHEREFORE, Bourque prays for judgment against Stallion as follows:
- (a) For an order certifying this case as a collective action for the purposes of the FLSA claims;
 - (b) For an order finding Stallion liable for violations of federal wage laws with respect to Bourque and all Putative Class Members covered by this case;
 - (c) For a judgment awarding all unpaid wages, liquidated damages, and/or penalty damages, to Bourque and all Putative Class Members covered by this case;
 - (d) For a judgment Bourque and all Putative Class Members covered by this case their costs of this action;
 - (e) For a judgment awarding Bourque and all Putative Class Members covered by this case their attorneys' fees;
 - (f) For a judgment awarding Bourque and all Putative Class Members covered by this case pre - and post-judgment interest at the highest rates allowed by law; and
 - (g) For all such other and further relief as may be necessary and appropriate.

Respectfully submitted,

By: /s/Andrew W. Dunlap
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ATTORNEYS IN CHARGE FOR PLAINTIFFS

EXHIBIT A

CONSENT TO JOIN WAGE CLAIM

Print Name: Christopher Bourque

1. I hereby consent to participate in a collective action lawsuit against Stallion Oilfield Service to pursue my claims of unpaid overtime during the time that I worked with the company.
2. I understand that this lawsuit is brought under the Fair Labor Standards Act, and consent to be bound by the Court's decision.
3. I designate the law firm and attorneys at JOSEPHSON DUNLAP and BRUCKNER BURCH as my attorneys to prosecute my wage claims.
4. I authorize the law firm and attorneys at JOSEPHSON DUNLAP and BRUCKNER BURCH to use this consent to file my claim in a separate lawsuit, class/collective action, or arbitration against the company.

Signature: 
Christopher Bourque (Jun 13, 2018)

Date Signed: 06/13/18

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

CHRISTOPHER BOURQUE, Individually and on behalf of all others similarly situated

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

(c) Attorneys (Firm Name, Address, and Telephone Number) Andrew W. Dunlap, Josephson Dunlap Law Firm, 11 Greenway Plaza, Ste. 3050, Houston, TX 77046; Tel 713-352-1100

DEFENDANTS

STALLION OILFIELD HOLDINGS, INC.

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, 2 U.S. Government Defendant, 3 Federal Question (U.S. Government Not a Party), 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)

Table with columns for Plaintiff (PTF) and Defendant (DEF) citizenship and business location (Citizen of This State, Citizen of Another State, Citizen or Subject of a Foreign Country, Incorporated or Principal Place of Business In This State, Incorporated and Principal Place of Business In Another State, Foreign Nation).

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

Large table with categories: CONTRACT, REAL PROPERTY, CIVIL RIGHTS, TORTS, PRISONER PETITIONS, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES.

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. § 216(b)
Brief description of cause: Unpaid overtime compensation

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 06/14/2018 SIGNATURE OF ATTORNEY OF RECORD /s/ Andrew W. Dunlap

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

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JS 44A REVISED June, 2009
IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA
THIS CASE DESIGNATION SHEET MUST BE COMPLETED

PART A

This case belongs on the (Erie Johnstown Pittsburgh) calendar.

1. **ERIE CALENDAR** - If cause of action arose in the counties of Crawford, Elk, Erie, Forest, McKean, Venang or Warren, OR any plaintiff or defendant resides in one of said counties.
2. **JOHNSTOWN CALENDAR** - If cause of action arose in the counties of Bedford, Blair, Cambria, Clearfield or Somerset OR any plaintiff or defendant resides in one of said counties.
3. Complete if on **ERIE CALENDAR**: I certify that the cause of action arose in _____ County and that the _____ resides in _____ County.
4. Complete if on **JOHNSTOWN CALENDAR**: I certify that the cause of action arose in _____ County and that the _____ resides in _____ County.

PART B (You are to check ONE of the following)

1. This case is related to Number _____ . Short Caption _____
2. This case is not related to a pending or terminated case.

DEFINITIONS OF RELATED CASES:

CIVIL: Civil cases are deemed related when a case filed relates to property included in another suit or involves the same issues of fact or it grows out of the same transactions as another suit or involves the validity or infringement of a patent involved in another suit

EMINENT DOMAIN: Cases in contiguous closely located groups and in common ownership groups which will lend themselves to consolidation for trial shall be deemed related.

HABEAS CORPUS & CIVIL RIGHTS: All habeas corpus petitions filed by the same individual shall be deemed related. All pro se Civil Rights actions by the same individual shall be deemed related.

PART C

I. CIVIL CATEGORY (Select the applicable category).

1. Antitrust and Securities Act Cases
2. Labor-Management Relations
3. Habeas corpus
4. Civil Rights
5. Patent, Copyright, and Trademark
6. Eminent Domain
7. All other federal question cases
8. All personal and property damage tort cases, including maritime, FELA, Jones Act, Motor vehicle, products liability, assault, defamation, malicious prosecution, and false arrest
9. Insurance indemnity, contract and other diversity cases.
10. Government Collection Cases (shall include HEW Student Loans (Education), V A Overpayment, Overpayment of Social Security, Enlistment Overpayment (Army, Navy, etc.), HUD Loans, GAO Loans (Misc. Types), Mortgage Foreclosures, SBA Loans, Civil Penalties and Coal Mine Penalty and Reclamation Fees.)

I certify that to the best of my knowledge the entries on this Case Designation Sheet are true and correct

Date: 06/14/2018

Andrew W. Dunlap

ATTORNEY AT LAW

NOTE: ALL SECTIONS OF BOTH ÔŠPRU MUST BE COMPLETED BEFORE CASE CAN BE PROCESSED.

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. When the petition for removal is granted, check this box.
 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.

ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Stallion Oilfield Holdings Accused of Misclassifying Workers, Denying OT Pay](#)
