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**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON AT TACOMA**

CHARLES BRENNAN, individually and on behalf of all others similarly situated,

Plaintiff,

v.

HANEY TRUCK LINE, LLC, an Oregon Corporation,

Defendant.

COMPLAINT - CLASS ACTION

Case No.

**COMPLAINT FOR UNPAID WAGES,
EXEMPLARY DAMAGES, AND
DECLARATORY RELIEF**

DEMAND FOR JURY TRIAL

1 Plaintiff Charles Brennan (“Plaintiff”), on behalf of himself and all others similarly
2 situated, complains and alleges the following:

3 **NATURE OF ACTION**

4 1. This is a class action, pursuant to Federal Rule of Civil Procedure 23, seeking lost
5 and/or unpaid wages, exemplary damages, interest, and reasonable attorney’s fees and costs
6 pursuant to Revised Code Washington (hereinafter “RCW”) 49.12, 49.46.020, 49.46.090,
7 49.52.050, and 49.052.070 and Washington Annotated Code (hereinafter “WAC”) 296-126-092
8 on behalf of Plaintiff and all other individuals who have been employed in the State of
9 Washington by Haney Truck Line, LLC (hereinafter “Defendant”) during the three years prior to
10 the filing of this Complaint through the present (hereinafter “Class Period”) as truck drivers
11 (hereinafter “Class Members”).

12 **THE PARTIES**

13 2. Plaintiff is a resident of the State of Washington in Pierce County. Defendant
14 employed Plaintiff as a truck driver at it Yakima, Washington location from 2008 until the first
15 quarter of 2017. During his employment, Plaintiff spent virtually every day of each week driving
16 routes in Washington State for Defendant

17 3. Defendant is an Oregon corporation with its headquarters located in Yakima,
18 Washington. Defendant transports general commodities, including food and consumer products,
19 by truck to customers throughout the Western United States and Western Canada, including
20 Washington, Oregon, Idaho, Montana, Utah, California, Nevada, British Columbia and Alberta.
21 Defendant’s revenue in 2015 was approximately \$100 million.

22 4. Defendant employs Class Members to make deliveries to its customers from 11
23 locations throughout the Western United States, including 5 locations in Washington State.

24 **JURISDICTION**

25 5. This Court has jurisdiction pursuant to the Class Action Fairness Act (“CAFA”),
26 28 U.S.C. §1332(d), because there is minimal diversity, more than 100 class members, and more
27 than \$5,000,000 in controversy, exclusive of interest and costs.

1 relevant times herein, were willful and deliberate, and not the result of error or a bona fide
2 dispute regarding the payment of wages.

3 **CLASS ACTION ALLEGATIONS**

4 14. Plaintiff asserts his claims under WAC and RCW on behalf of himself and a class
5 of similarly-situated people defined as: All persons employed as truck drivers by Haney Truck
6 Line, LLC, who drove at least one route of 3 hours or more within Washington State, and who
7 were paid on a piece-rate basis, at any time during the Class Period.

8 15. Upon information and belief, there are at least 100 current and former employees
9 in the Class. Given Defendant's systemic failure to comply with the WAC and RCW, the
10 members of the Class are so numerous that joinder of all members is impractical.

11 16. Plaintiff's claims are typical of the claims of the Class because he was a truck
12 driver who was not paid separately and hourly for rest periods during the Class Period.

13 17. Plaintiff will fairly and adequately represent the interests of the Class. Plaintiff
14 has no conflict of interest with any member of the Class. Plaintiff has retained competent and
15 experienced counsel in complex action class litigation. Plaintiff's counsel has the expertise and
16 financial resources to adequately represent the interests of the Class.

17 18. Common questions of law and fact exist as to all members of the Class and
18 predominate over any questions solely affecting individual members of the Class. Among the
19 questions of law and fact common to the Plaintiff and the Class are the following:

20 a. Whether Defendant violated WAC 196-126-092 by failing to pay Plaintiff and
21 Class Members separately and hourly for rest periods;

22 b. Whether Defendant violated WAC 296-126-040 for furnishing wage statements to
23 Class Members that failed to include Class Members' total hours worked and that failed to
24 accurately sum up the total wages earned;

25 c. Whether Defendant violated WAC 296-126-023 by failing to meet its legal
26 obligation to pay all wages due to Plaintiff and Class Members at the established regular pay
27 periods;

1 d. Whether Defendant violated RCW 49.48.010 by failing to pay Class Members all
2 wages due to them upon termination of their employment with Defendant;

3 e. Whether Defendant's violations of Washington wage and hour law were willful
4 and with intent to deprive pursuant to RCW 49.52.050;

5 f. Whether Defendant's violations of Washington wage and hour law are unfair or
6 deceptive acts or practices in the conduct of any trade or commerce, in violation of the Consumer
7 Protection Act, RCW 19.86; and

8 g. The nature and extent of class-wide injury and the measure of damages for the
9 injury.

10 19. Class action treatment is superior to any alternative to ensure the fair and efficient
11 adjudication of the controversy alleged herein. Such treatment will permit a large number of
12 similarly situated persons to prosecute their common claims in a single forum simultaneously,
13 efficiently, and without duplication of effort and expense that numerous individuals would entail.
14 No difficulties are likely to be encountered in the management of this class action that would
15 preclude its maintenance as a class action, and no superior alternative exists for the fair and
16 efficient adjudication of this controversy. The Class members are readily identifiable from
17 Defendant's employee rosters and/or payroll records.

18 20. Defendant's actions are generally applicable to the entirety of the Class.
19 Prosecution of separate actions by individual members of the Class creates the risk of
20 inconsistent or varying adjudications of the issues presented herein, which, in turn, would
21 establish incompatible standards of conduct for Defendant.

22 21. Because joinder of all members of the Class is impractical, a class action is
23 superior to other available methods for the fair and efficient adjudication of this controversy.
24 Furthermore, the amounts at stake for many members of the Class, while substantial, may not be
25 sufficient to enable them to maintain separate suits against Defendant.

FIRST CAUSE OF ACTION

Failure to Pay Hourly and Separately for Rest Periods In Violation of WAC 296-131-020

22. Plaintiff re-alleges and incorporates by reference each and every allegation set forth in the preceding paragraphs.

23. Throughout the Class Period, Defendant failed to pay Class Members separately and hourly for rest breaks in violation of WAC 296-131-020(2).

24. As a result, Plaintiff and Class Members are entitled to recover the full amount of their underpaid wages, and attorney's fees and costs, pursuant to RCW 49.12 and 49.48.030.

SECOND CAUSE OF ACTION

**Failure to Issue Accurate Itemized Wage Statements
In Violation of WAC 296-126-040 and RCW 49.46.070**

25. Plaintiff re-alleges and incorporates by reference each and every allegation set forth in the preceding paragraphs.

26. Throughout the Class Period, Defendant failed to furnish Plaintiff and Class Members with accurate itemized wage statements because the statements issued by Defendant failed to itemize wages owed for rest breaks, in violation of WAC 296-126-040 and RCW 49.46.070.

27. As a result, Plaintiff and the Class are entitled to declaratory and injunctive relief, and reasonable attorney's fees and costs, as allowed by law.

THIRD CAUSE OF ACTION

**Failure to Pay All Wages Due at Established Pay Periods
In Violation of WAC 296-126-023**

28. Plaintiff re-alleges and incorporates by reference each and every allegation set forth in the preceding paragraphs.

29. Throughout the Class Period, as a result of its failure to pay wages owed for rest breaks, Defendant failed to meet its legal obligation to pay all wages due to Plaintiff and Class Members at the established regular pay periods because it failed to pay them wages owed for rest breaks in violation of WAC 296-126-023.

1 30. As a result, Plaintiff and Class Members are entitled to recover the full amount of
2 their underpaid wages, and attorney's fees and costs, pursuant to RCW 49.12.

3 **FOURTH CAUSE OF ACTION**

4 **Failure to Pay All Wages on Termination in Violation of RCW 49.48.010**

5 31. Plaintiff re-alleges and incorporates by reference each and every allegation set
6 forth in the preceding paragraphs.

7 32. During the Class Period, as a result of its failure to pay wages owed for rest
8 breaks, Defendant failed to pay Class Members all wages due to them upon termination of their
9 employment with Defendant, in violation of RCW 49.48.010.

10 33. As a result, Plaintiff and Class Members are entitled to recover the full amount of
11 their underpaid wages, and attorney's fees and costs, pursuant to RCW 49.12 and 49.48.030.

12 **FIFTH CAUSE OF ACTION**

13 **Willful Refusal to Pay Wages In Violation of RCW 49.52.050**

14 34. Plaintiff re-alleges and incorporates by reference each and every allegation set
15 forth in the preceding paragraphs.

16 35. During the Class Period, Defendant paid Plaintiff and Class Members less than
17 the amounts they were entitled to under Washington law, willfully and with the intent to deprive
18 Class Members of their wages, in violation RCW 49.52.050.

19 36. As a result, Plaintiff and Class Members are entitled to recover twice the amount
20 of the wages withheld, as well as attorneys' fees and costs, pursuant to RCW 49.52.070.

21 **SIXTH CAUSE OF ACTION**

22 **Violation of Washington's Consumer Protection Act, RCW 19.86**

23 37. Plaintiff re-alleges and incorporates by reference each and every allegation set
24 forth in the preceding paragraphs.

25 38. During the four years prior to the filing of this Complaint, and continuing at the
26 present, Defendant's violations of the WAC and RCW, as alleged above, were unfair or
27 deceptive acts or practices that occurred in Defendant's trade or business, and injured Plaintiff,
Class Members in violation of RCW 19.86.

1 39. As a result, Plaintiff is entitled pursuant to RCW 19.86.090 to actual damages,
2 reasonable attorney's fees and costs, and treble damages.

3 **VIII. PRAYER FOR RELIEF**

4 Wherefore, Plaintiff, on behalf of himself and the members of the Class, pray for
5 judgment against Defendant as follows:

- 6 A. An Order that this action may proceed and be maintained as a class action and
certifying the Class as defined above;
- 7 B. Unpaid wages pursuant to RCW 49.12, 49.12.150 and 49.46.090;
- 8 C. An award of double damages in an additional amount equal to the amount wages
9 unlawfully withheld during the Class Period pursuant to RCW 49.52.050 and 70;
- 10 D. An award of actual damages in the amount wages unlawfully withheld during the
11 four years prior to the filing of this Complaint, reasonable attorney's fees and costs, and
12 treble damages, pursuant to RCW 19.86.090;
- 13 E. An award of costs and reasonable attorney's fees pursuant to 49.48.030;
- 14 F. An award of prejudgment and post judgment interest;
- 15 G. All other relief this Court deems proper.

16 **VII. JURY DEMAND**

17 Plaintiff hereby demands trial by jury of his and the Class' claims against Defendant.

18 Dated: August 4, 2017

19 Respectfully submitted,

20 /s/ Julian Hammond

21 Julian Hammond
22 HAMMONDLAW, P.C.
23 1829 Reisterstown Road, Suite 410
24 Baltimore, MD 21208
25 (310) 601-6766
26 (310) 295-2385 (Fax)

27 Attorneys for Plaintiff and Putative Class

JS 44 (Rev. 06/17)

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.)

<p>I. (a) PLAINTIFFS Charles Brennan, individually and on behalf of all others similarly situated</p> <p>(b) County of Residence of First Listed Plaintiff <u>Pierce County, WA</u> <i>(EXCEPT IN U.S. PLAINTIFF CASES)</i></p> <p>(c) Attorneys <i>(Firm Name, Address, and Telephone Number)</i> Hammond Law, P.C., 1829 Reisterstown Rd., Suite 410, Baltimore, MD 21208; 310-601-6766</p>	<p>DEFENDANTS Haney Truck Line LLC, an Oregon Corporation</p> <p>County of Residence of First Listed Defendant <u>Multnomah County, Oregon</u> <i>(IN U.S. PLAINTIFF CASES ONLY)</i></p> <p>NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.</p> <p>Attorneys <i>(If Known)</i></p>
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<p>II. BASIS OF JURISDICTION <i>(Place an "X" in One Box Only)</i></p> <p><input type="checkbox"/> 1 U.S. Government Plaintiff</p> <p><input type="checkbox"/> 2 U.S. Government Defendant</p> <p><input type="checkbox"/> 3 Federal Question <i>(U.S. Government Not a Party)</i></p> <p><input checked="" type="checkbox"/> 4 Diversity <i>(Indicate Citizenship of Parties in Item III)</i></p>	<p>III. CITIZENSHIP OF PRINCIPAL PARTIES <i>(Place an "X" in One Box for Plaintiff and One Box for Defendant)</i></p> <table style="width:100%; border-collapse: collapse;"> <tr> <td style="width:33%;"></td> <td style="width:10%; text-align: center;">PTF</td> <td style="width:10%; text-align: center;">DEF</td> <td style="width:33%;"></td> <td style="width:10%; text-align: center;">PTF</td> <td style="width:10%; text-align: center;">DEF</td> </tr> <tr> <td>Citizen of This State</td> <td style="text-align: center;"><input checked="" type="checkbox"/> 1</td> <td style="text-align: center;"><input type="checkbox"/> 1</td> <td>Incorporated <i>or</i> Principal Place of Business In This State</td> <td style="text-align: center;"><input type="checkbox"/> 4</td> <td style="text-align: center;"><input checked="" type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td style="text-align: center;"><input type="checkbox"/> 2</td> <td style="text-align: center;"><input type="checkbox"/> 2</td> <td>Incorporated <i>and</i> Principal Place of Business In Another State</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> </tr> </table>		PTF	DEF		PTF	DEF	Citizen of This State	<input checked="" type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated <i>or</i> Principal Place of Business In This State	<input type="checkbox"/> 4	<input checked="" type="checkbox"/> 4	Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated <i>and</i> 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
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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	<p>PERSONAL INJURY</p> <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 <p>PERSONAL INJURY</p> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/ Pharmaceutical Personal Injury <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <p>PERSONAL PROPERTY</p> <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	<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
<p>REAL PROPERTY</p> <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	<p>CIVIL RIGHTS</p> <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	<p>PRISONER PETITIONS</p> <p>Habeas Corpus:</p> <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 <p>Other:</p> <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	<p>LABOR</p> <input 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 checked="" type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act	<p>PROPERTY RIGHTS</p> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <p>SOCIAL SECURITY</p> <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))
		<p>IMMIGRATION</p> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<p>FEDERAL TAX SUITS</p> <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)*:
28 USC 1332(d)

Brief description of cause:
Violations of WAC 296-126-092 and RCW 49.020 and 120

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 08/04/2017 SIGNATURE OF ATTORNEY OF RECORD /s/ Julian Hammond

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Western District of Washington [dropdown]

Charles Brennan, individually and on behalf of all others similarly situated)

Plaintiff(s)

v.

Haney Truck Line, LLC, an Oregon Corporation)

Defendant(s)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) Haney Truck Line, LLC

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:

HammondLaw, P.C.
Julian Hammond
1829 Reisterstown Rd., Suite 410
Baltimore, MD 21208
310-601-6766

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: 08/04/2017

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: [Haney Truck Line Accused of Denying Drivers Rest Break Pay](#)
