

HAYES PAWLENKO LLP
MATTHEW B. HAYES (SBN 220639)
mhayes@helpcounsel.com
KYE D. PAWLENKO (SBN 221475)
kpawlenko@helpcounsel.com
595 E. COLORADO BLVD., SUITE 303
PASADENA, CA 91101
(626) 808-4357; FAX (626) 921-4932

Attorneys for Plaintiff
JACQUELINE CARLINO

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

JACQUELINE CARLINO, an
individual on behalf of herself and
others similarly situated,

Plaintiff,

v.

CHG MEDICAL STAFFING, INC.;
and DOES 1 to 10 inclusive,

Defendants.

Case No.

COLLECTIVE AND CLASS ACTION
COMPLAINT FOR:

1. Failure to Pay Overtime Wages (Cal. Labor Code §§ 510, 1194)
2. Unfair Business Practices (Cal. Business & Professions Code § 17200, et seq.)
3. Waiting Time Penalties (Cal. Labor Code § 203)
4. Violations of the Fair Labor Standards Act (29 U.S.C. § 201, et seq.)

AND DEMAND FOR JURY TRIAL

1 Plaintiff JACQUELINE CARLINO (“Plaintiff”), on behalf of herself and all
2 others similarly situated, alleges as follows:

3 **NATURE OF THE ACTION**
4

5 1. This is a California-wide class action and a nation-wide FLSA
6 collective action against CHG MEDICAL STAFFING, INC. (“CHG”) for (1)
7 failing to include all remuneration in the regular rate of pay when calculating
8 overtime wages and (2) failing to timely pay all wages owing at termination of
9 employment.
10

11 **JURISDICTION**
12

13 2. This Court has jurisdiction under 28 U.S.C. § 1332 because the
14 amount in controversy in this action exceeds \$75,000, exclusive of interest and
15 costs, and because the parties are citizens of different States.
16

17 3. This Court also has jurisdiction over the Fourth Cause of Action under
18 28 U.S.C. § 1331 because it arises under the Fair Labor Standards Act (“FLSA”),
19 29 U.S.C. § 216(b), and supplemental jurisdiction over the California state law
20 causes of action under 28 U.S.C. § 1367 because they are so related to the FLSA
21 claim that they form part of the same case or controversy under Article III of the
22 United States Constitution.
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VENUE

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2 4. This action may be brought in this judicial district pursuant to 28
3 U.S.C. § 1391 because CHG employed Plaintiff and other putative class members
4 in this judicial district, CHG transacts business in this judicial district, and a
5 substantial part of the acts and/or omissions giving rise to the claims occurred in
6 this judicial district.
7
8

PARTIES

9
10 5. Plaintiff is a citizen of Wyoming who was employed by RNnetwork, a
11 division of CHG, as a travel nurse in, among other places, Bakersfield, California
12 between May 2016 and August 2016.
13

14 6. Defendant CHG is a Delaware corporation that maintains its principal
15 place of business in Midvale, Utah.
16

17 7. Plaintiff is currently unaware of the true names and capacities of the
18 defendants sued by the fictitious names DOES 1 through 10, inclusive, and,
19 therefore, sues those defendants by fictitious names. Plaintiff alleges on
20 information and belief that each of the DOE defendants is responsible or liable in
21 some manner for the conduct alleged in the complaint and that Plaintiff's damages
22 as herein alleged were proximately caused by those DOE defendants. Plaintiff will
23 amend this complaint to allege the true names and capacities of such fictitiously
24 named defendants when they are ascertained.
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1 8. Plaintiff alleges on information and belief that, at all times herein
2 mentioned, each of the defendants was the agent, servant and employee of each of
3 the other defendants, and in connection with the conduct hereinafter alleged, was
4 acting within the scope of such agency and employment, and each defendant
5 ratified each and every act, omission and thing done by each and every other
6 defendant named herein.
7

8
9 9. Defendants CHG and DOES 1 through 10 will be referred to hereafter,
10 collectively, as “Defendants.”
11

12 **FACTUAL ALLEGATIONS COMMON TO ALL CAUSES OF ACTION**

13 10. CHG is healthcare staffing company that employs hourly health care
14 professionals for short-term travel assignments at health care providers throughout
15 California and elsewhere (hereafter “Travelers”).
16

17 11. The terms and conditions of employment between CHG and Travelers
18 are governed by a form agreement titled “Professional Services Agreement”
19 (hereafter “Agreement”) and a form confirmation titled “Confirmation” (hereafter
20 “Confirmation”).
21

22 12. In addition to an hourly wage, Travelers’ compensation includes a
23 meal per diem and either a housing allowance or in-kind housing furnished by
24 CHG.
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1 13. The Agreement provides that in the event Travelers miss partial or
2 whole days of work during an assignment for any reason, CHG may deduct from
3 the compensation owed Travelers a pro rata amount as reimbursement for benefits
4 provided to Travelers including, but not limited to, per diems and housing
5 allowances or costs of housing.
6

7
8 14. Similarly, the Confirmation provides that in the event Travelers call in
9 sick or request time off, including approved time off, at any time during the
10 assignment and are unable to makeup that time within that same pay week, CHG
11 will charge Travelers a “Missed Shift Benefit” adjustment and deduct a portion of
12 the combined meal per diem and housing allowance or costs of housing.
13

14 15. The meal per diem, housing allowance, and in-kind housing benefit
15 amounts are thus not based upon the actual meal and housing expenses incurred by
16 Travelers while on assignment for CHG, but instead are based upon, and vary with,
17 the number of hours that Travelers actually work.
18
19

20 16. Notwithstanding that the meal per diem, housing allowance, and in-
21 kind housing benefit amounts are tied to the number of hours actually worked by
22 Travelers, CHG does not include the value of these benefit amounts in Travelers’
23 regular rates of pay for purposes of calculating overtime wages.
24

25 17. Plaintiff’s employment with CHG was governed by several
26 Agreements and Confirmations, each of which provided for a meal per diem and
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1 housing allowance or in-kind housing benefit which were subject to a “Missed
2 Shift Benefit” adjustment if all of her contracted hours were not worked.

3 18. When Plaintiff worked in excess of 8 hours per day and/or 40 hours
4 per week, CHG did not include the value of her meal per diem, housing allowance,
5 and/or in-kind housing benefit in her regular rate of pay for purposes of calculating
6 her overtime wages.
7
8

9 **REPRESENTED PARTIES UNDER THE FLSA COLLECTIVE ACTION**

10 19. Plaintiff brings the FLSA claim on behalf of herself and all non-
11 exempt hourly health care professionals employed by Defendants in the United
12 States at any time since September 29, 2014 who were compensated with a meal
13 per diem, housing allowance, and/or housing accommodation that was subject to a
14 “Missed Shift Benefit” adjustment (hereafter “FLSA Collective”).
15
16

17 **CLASS ACTION ALLEGATIONS**

18 20. Plaintiff brings this action on behalf of herself and all others similarly
19 situated pursuant to Federal Rule of Civil Procedure 23. Plaintiff seeks to
20 represent a California class composed of the following:
21
22

23 All non-exempt hourly health care professionals employed by
24 Defendants in California from September 29, 2013 through the date of
25 class certification who were compensated with a meal per diem, housing
26 allowance, and/or housing accommodation that was subject to a “Missed
27
28

1 Shift Benefit” adjustment.

2 21. Plaintiff reserves the right to amend or modify the class description or
3 establish additional subclasses as appropriate.
4

5 22. This action has been brought and may properly be maintained as a
6 class action under Rule 23.
7

8 **A. Numerosity**

9 23. The potential members of the class as defined are so numerous that
10 joinder of all the members of the class is impracticable. While the precise number
11 of members of the class has not been determined at this time, Plaintiff is informed
12 and believes that the class contains in excess of 100 individuals.
13

14 **B. Commonality**

15 24. There are questions of law and fact common to the class that
16 predominate over any questions affecting only individual class members. These
17 common questions include, without limitation, whether Defendants unlawfully
18 excluded remuneration from class members’ regular rates of pay for purposes of
19 calculating overtime wages.
20
21

22 **C. Typicality**

23 25. The class claims of the proposed class representative are typical of the
24 claims of each class member. As with other members of the class, when Plaintiff
25 worked in excess of 8 hours per day and/or 40 hours per week, Defendants failed
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1 to include all remuneration in her regular rate of pay for purposes of calculating
2 her overtime wages.

3 **D. Adequacy of Representation**

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5 26. Plaintiff will fairly and adequately represent and protect the interests
6 of the members of the class. Counsel who represent Plaintiff are competent and
7 experienced in litigating employment class actions.
8

9 **E. Superiority of Class Action**

10 27. A class action is superior to other available means for the fair and
11 efficient adjudication of the class claims. Individual joinder of all class members is
12 not practicable, and questions of law and fact common to the class predominate
13 over any questions affecting only individual members of the class. Each member
14 of the class has been damaged and is entitled to recover by reason of Defendants'
15 illegal common policies.
16
17

18 **FIRST CAUSE OF ACTION**

19 **CLASS ACTION CLAIM FOR FAILURE TO PAY OVERTIME**

20 **(LABOR CODE §§ 510, 1194)**

21
22
23 28. Plaintiff realleges and incorporates herein by reference each and every
24 allegation contained in the preceding paragraphs of this Complaint as though fully
25 set forth herein.
26

27 ///

1 34. A violation of California Business & Professions Code section 17200,
2 *et seq.* may be predicated on the violation of any state or federal law.

3 35. Defendants' failure to pay Plaintiff and other class members the
4 correct premium overtime rates for all hours worked in excess of 8 hours per day
5 and/or 40 hours per week violates Business & Professions Code section 17200, *et*
6 *seq.*, by virtue of violating Labor Code section 510.
7
8

9 36. Defendants' collection of wages from Plaintiff and other class
10 members when they did not work the number of hours required by their contracts
11 violates Business & Professions Code section 17200, *et seq.*, by virtue of violating
12 Labor Code section 221, which prohibits an employer from collecting or receiving
13 any part of wages paid.
14
15

16 37. Defendants' conduct, as alleged herein, has been, and continues to be,
17 unfair, unlawful, and harmful to Plaintiff, the other class members, and the general
18 public. Plaintiff seeks to enforce important rights affecting the public interest
19 within the meaning of Code of Civil Procedure section 1021.5.
20

21 38. Defendants' activities, as alleged herein, are violations of California
22 law, and constitute unlawful business acts and practices in violation of California
23 Business & Professions Code section 17200, *et seq.*
24

25 39. Pursuant to California Business & Professions Code section 17200, *et*
26 *seq.*, Plaintiff and other class members are entitled to an accounting for and
27
28

1 restitution of the wages unlawfully withheld and retained by Defendants during the
2 class period, an award of attorneys' fees pursuant to California Code of Civil
3 Procedure section 1021.5 and other applicable laws, and an award of costs.
4

5 **THIRD CAUSE OF ACTION**

6 **CLASS ACTION CLAIM FOR WAITING TIME PENALTIES**

7 **(LABOR CODE §§ 201, 202, 203)**

8
9 40. Plaintiff realleges and incorporates herein by reference each and every
10 allegation contained in the preceding paragraphs of this Complaint as though fully
11 set forth herein.
12

13 41. Labor Code sections 201 and 202 require an employer to promptly
14 pay all wages owing to an employee at the conclusion of employment.
15

16 42. Plaintiff and some other members of the class are no longer employed
17 by Defendants.
18

19 43. Throughout the class period, Plaintiff and other class members who
20 are former employees of Defendants were not timely paid all wages owing at the
21 time of termination of employment because during their employment they were not
22 paid the correct overtime rates of pay.
23

24 44. Defendants' failure to pay Plaintiff and other class members who are
25 former employees of Defendants all wages owing, as alleged above, was willful, as
26 Defendants intentionally excluded remuneration from their regular rates of pay for
27
28

1 purposes of calculating overtime wages.

2 45. Plaintiff and other class members who are former employees of
3 Defendants commencing on September 29, 2014 are therefore entitled to penalties,
4 in an amount to be determined at trial, pursuant to Labor Code section 203, which
5 provides that an employee's wages shall continue as a penalty until paid for a
6 period of up to thirty (30) days from the time they were due.
7
8

9 **FOURTH CAUSE OF ACTION**

10 **COLLECTIVE ACTION CLAIM FOR VIOLATION OF THE FLSA**

11 **(29 U.S.C. §§ 207, 216)**

12
13 46. Plaintiff realleges and incorporates herein by reference each and every
14 allegation contained in the preceding paragraphs of this Complaint as though fully
15 set forth herein.
16

17 47. At all relevant times, Defendants were an "employer" engaged in
18 interstate "commerce" and/or in the production of "goods" for "commerce," within
19 the meaning of the FLSA, 29 U.S.C. § 203, and grossed more than \$50,000 in each
20 of the last three calendar years. At all relevant times, Defendants employed hourly
21 health care professionals, including Plaintiff and the FLSA Collective.
22

23
24 48. Attached hereto, as Exhibit 1, is the consent to sue form signed by
25 Plaintiff in this action pursuant to section 16(b) of the FLSA, 29 U.S.C. §§ 216(b)
26 and 256. Other FLSA Collective members will likely sign consent to sue forms
27
28

1 and join as opt-in plaintiffs on this claim in the future.

2 49. The FLSA requires each covered employer, such as Defendants, to
3 compensate all non-exempt employees for all hours worked and pay overtime at a
4 rate of not less than one and one-half times the regular rate of pay for work
5 performed in excess of forty hours in a workweek.
6

7 50. As alleged above, in violation of 29 U.S.C. § 207, Defendants failed
8 to include all remuneration in health care professionals' regular rates of pay for
9 purposes of calculating overtime wages when they worked in excess of 40 hours
10 per week. As a result, Plaintiff and other FLSA Collective members were not paid
11 the correct premium overtime rates for all hours worked in excess of 40 hours per
12 week.
13
14

15 51. The foregoing conduct, as alleged, constitutes a willful violation of
16 the FLSA within the meaning of 29 U.S.C. § 255(a).
17

18 52. Plaintiff, on behalf of herself and the FLSA Collective, seek damages
19 in the amount of their respective unpaid overtime wages, liquidated damages,
20 attorneys' fees and costs as provided by the FLSA, 29 U.S.C. § 216(b), and such
21 other legal and equitable relief as the Court deems just and proper.
22
23

24 **PRAYER FOR RELIEF**

25 WHEREFORE, Plaintiff prays for the following relief:
26

27 ///

Class Certification

- 1
- 2 1. That this action be certified as a class action;
- 3 2. That Plaintiff be appointed as the representative of the class; and
- 4 3. That counsel for Plaintiff be appointed as class counsel.
- 5

Collective Action Certification

- 6
- 7 4. That the FLSA claim be certified as a collective action and that notice be
- 8 sent to the FLSA Collective members providing them notice of the opportunity to
- 9 join this case pursuant to 29 U.S.C. § 216(b).
- 10

First Cause of Action

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12

13 5. That the Court declare, adjudge and decree that Defendants violated

14 Labor Code section 510 by failing to pay Plaintiff and other class members the

15 correct overtime rates for all hours worked in excess of 8 hours per day and/or 40

16 hours per week;

17

18

19 6. For unpaid overtime wages and such general and special damages as

20 may be appropriate;

21

22 7. For pre-judgment interest on any unpaid overtime wages owing

23 commencing from the date such amounts were due;

24 8. For reasonable attorneys' fees and costs of suit incurred herein

25 pursuant to Labor Code section 1194(a); and

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1 are former employees of Defendants commencing on September 29, 2014;

2 15. For statutory wage penalties pursuant to California Labor Code
3 section 203 for Plaintiff and all other class members who are former employees of
4 Defendants commencing on September 91, 2014; and
5

6 16. For such other and further relief as the Court may deem equitable and
7 appropriate.
8

9 **Fourth Cause of Action**

10 17. That the Court declare, adjudge and decree that Defendants violated
11 29 U.S.C. § 207 by failing to pay Plaintiff and other members of the FLSA
12 Collective the correct overtime rates for all hours worked in excess of 40 hours per
13 week;
14

15 18. For unpaid overtime compensation wages;

16 19. For liquidated damages as provided by the FLSA, 29 U.S.C. § 216(b);

17 20. For attorneys' fees and costs of suit as provided by the FLSA, 29
18 U.S.C. § 216(b); and
19

20 21. For such other and further relief as the Court may deem equitable and
21 appropriate.
22

23 **DEMAND FOR JURY TRIAL**

24 Plaintiff hereby demands trial of these claims by jury to the extent
25 authorized by law.
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DATED: September 29, 2017

HAYES PAWLENKO LLP

By: /s/Kye D. Pawlenko
Matthew B. Hayes
Kye D. Pawlenko
Attorneys for Plaintiff

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CONSENT TO SUE UNDER THE FLSA

I, Jacqueline Carlino, hereby consent to be a plaintiff in an action under the Fair Labor Standards Act, 29 U.S.C. § 201 *et seq.*, to secure any unpaid wages, overtime pay, liquidated damages, attorneys' fees, costs and other relief arising out of my employment with CHG Medical Staffing, Inc. and other associated parties.

I authorize Hayes Pawlenko LLP, and any associated attorneys as well as any successors or assigns to represent me in such action.

/s/ Jacqueline Carlino

Jacqueline Carlino

(original signature retained by Hayes Pawlenko LLP)

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
Jacqueline Carlino

DEFENDANTS
CHG Medical Staffing, Inc.

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

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.

(c) Attorneys (Firm Name, Address, and Telephone Number)
Hayes Pawlenko LLP
595 E. Colorado Blvd., Ste. 303
Pasadena, CA 91101 (626) 808-4357

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: 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)

Click here for: Nature of Suit Code Descriptions.

Large table with categories: CONTRACT, REAL PROPERTY, TORTS, CIVIL RIGHTS, 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 USC 216

Brief description of cause: Wage Payment Violations

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 09/29/2017 SIGNATURE OF ATTORNEY OF RECORD /s/Kye D. Pawlenko

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

Case 1:17-cv-01323-DAD-JLT Document 1-2 Filed 09/29/17 Page 2 of 2
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: [CHG Medical Staffing Improperly Calculated Overtime Pay, Suit Says](#)
