

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. _____

DAGMA DANIEL CASTRO on behalf of
herself and similarly situated employees,

Plaintiff,

vs.

VIP KIDZ, LLC, a Florida
limited liability company,

Defendant.

_____ /

COMPLAINT FOR DAMAGES

Plaintiff, DAGMA DANIEL CASTRO (“CASTRO”) on behalf of herself and similarly situated employees, sues Defendant, VIP KIDZ, LLC, a Florida limited liability company (“VIP KIDZ”), and state as follows:

Jurisdiction

1. This is an action for damages brought pursuant to the Fair Labor Standard Act of 1938, as amended, 29 U.S.C. §§ 201-209 (hereinafter “FLSA”) and or other relief.
2. Plaintiff invokes this Court’s supplemental and pendant jurisdiction over Plaintiff’s state law claims.
3. Venue is proper in Palm Beach County, Florida since the Defendant does business in Palm Beach County and since all of the claims accrued in Palm Beach County, Florida.

The Parties/Participants

4. CASTRO is an individual residing in Palm Beach County, Florida and is *sui juris*. CASTRO was at all material times hereto an employee of VIP KIDZ.

5. Defendant does business in South Florida as an owner and operator of two day care facilities in West Palm Beach and Loxahatchee Groves, Florida, that caters to and provides skilled nursing care to children ages birth to 21 years of age with special medical needs.

General Allegations

6. This is an action seeking recovery of unpaid overtime compensation owed to Plaintiff and similarly situated employees, pursuant to the Fair Labor Standards Act, 29 U.S.C. Section 201, *et. seq.*, as amended.

7. At all times material hereto, Plaintiff was and is a resident of the State of Florida and was employed by Defendant.

8. At all times material hereto, Defendant was doing business in the State of Florida and has regularly engaged in activities that involve interstate commerce or that are specifically covered by the FLSA. Moreover, at all times material hereto, the Defendant had annual gross sales or business in an amount not less than \$500,000.00. By reason of the foregoing, the Defendant was and is an “employer” within the meaning of Section 3(d) of the FLSA.

9. On many occasions throughout her employment with Defendant, CASTRO worked in excess of forty hours per week and was not paid overtime.

10. During the time that CASTRO has been employed at VIP KIDZ, she and all similarly situated employees have been improperly characterized as an independent contractors rather than an employee and wrongfully issued and filed with the IRS 1099’s, so that VIP KIDZ could attempt to avoid complying with Federal and State laws including, but not limited to, the failure to pay Federal payroll taxes and State unemployment taxes. As to Plaintiff and all similar situated employees, VIP KIDZ (a) dictated the days and hours they would work; (b) provided all

tools they needed to perform their work; (c) required them to work in Defendant's facilities; and (d) dictated and directed, supervised and managed them in all work they did and otherwise always acted as their employer.

11. CASTRO has retained the undersigned law firm in this matter and has agreed to pay it a reasonable fee for its services.

COUNT I – RECOVERY OF OVERTIME COMPENSATION (FLSA)

12. The Plaintiff reasserts and re-alleges the allegations contained within paragraphs 1 through 11 as if the same were more fully set forth herein.

13. For purposes of this claim, Plaintiff and all similarly situated individuals were employees mischaracterized as independent contractors of VIP KIDZ when they were in fact employees as defined by the FLSA.

14. At all times relevant the Defendant was otherwise charged with the responsibility of paying wages to Plaintiff and all similarly situated individuals.

15. Defendant is an employer as defined by the Fair Labor Standards Act.

16. The Plaintiff brings this action on her own behalf and on behalf of all similarly situated individuals to recover overtime compensation or other relief as guaranteed them under the Fair Labor Standards Act, as amended, 29 U.S.C. § 216(b).

17. Plaintiff, and all similarly situated individuals, were all non-exempt hourly paid employees of Defendant wrongfully classified as independent contractors employed as laborers and particularly medical assistants/nurse assistants and transport assistants at VIP KIDZ day care facilities in Florida, which provides services to children and clients of Defendant in a day care center for medically needy children in South Florida.

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18. This action is brought to recover from Defendant overtime compensation, liquidated damages, and costs and reasonable attorneys' fees under provisions of Title 29 U.S.C. §216(b)(the "Act").

19. Jurisdiction is conferred on this Court by Title 28 U.S.C. §1337 and by Title 29 U.S.C. §216(b). At all times pertinent to this Complaint, Plaintiff and all similarly situated individuals were characterized and paid as independent contractors but in fact employees of Defendant, who acted as an enterprise engaged in interstate commerce or in the production of goods for commerce as defined by §3(r) and 3(s) of the Act, 29 U.S.C. §203(s). The annual gross sales volume of Defendant was in excess of five hundred thousand dollars per annum.

20. At all times pertinent to this action, Defendant failed to comply with Title 29 U.S.C. §§201-209 in that Plaintiff and all similarly situated individuals performed services for Defendant for which no provision was made by Defendant to properly pay Plaintiff and all similarly situated individuals for all hours worked in excess of forty (40) hours within a work week. Plaintiff, and all similarly situated individuals, worked overtime hours on one or more work weeks.

21. Defendant had full knowledge that Plaintiff and all similarly situated individuals were required to and in fact did work hours in excess of forty (40) hours on a regular basis and failed to compensate Plaintiff and all similarly situated individuals for the same.

22. The records, if any, concerning the number of hours actually worked by Plaintiff and the compensation that each was paid are in the possession and custody of Defendant or have been deliberately altered and/or destroyed by Defendant.

23. Plaintiff, and all similarly situated individuals are entitled to be paid time and a half their regular rate of pay for each and every hour worked in excess of forty (40) hours per work

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week whether worked on or off the clock or whether reflected on any documents maintained by Defendants. A preliminary estimated summary of the overtime hours worked by Plaintiff during the relevant period of time and the damages due Plaintiff under the FLSA is attached hereto as Exhibit "A".

24. By reason of said unlawful acts of Defendant, Plaintiff and all similarly situated individuals have suffered damages plus incurred costs and reasonable attorney's fees.

25. As a result of Defendant's violations of the Act, Plaintiff and all similarly situated individuals are entitled to liquidated damages.

WHEREFORE, Plaintiff, AGMA DANIEL CASTRO individually and on behalf of all similarly situated individuals demands judgment against Defendant, VIP KIDZ, LLC, a Florida limited liability company, for payment of all overtime hours at one and on half times their regular rate of pay due each of them for the hours worked by them for which they have not been properly compensated, liquidated damages and reasonable attorneys' fees and costs of suit, and for all other proper relief including injunctive, declaratory relief and pre-judgment interest.

Count II – Violations of Unfair and Deceptive Trade Practices Act

26. The Plaintiff reasserts and re-alleges the allegations contained within paragraphs 1 through 11 as if the same were more fully set forth herein.

27. The actions of Defendant in intentionally misclassifying Plaintiff as an independent contractor and thus avoiding payment of all required taxes and insurance premiums and required overtime are an unfair and deceptive trade practice prohibited by Florida Statutes.

28. As a direct and proximate result of Defendant's unfair and deceptive trade practices, CASTRO has suffered damages in an amount in excess of \$15,000.00

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WHEREFORE, CASTRO demands judgment against Defendant for damages in excess of \$15,000.00, together with interest, costs, attorneys' fees as provided by Fla. Stat. §501.211, and for any and all other relief this Court deems just and proper under the circumstances.

Count III – Declaratory Relief

29. The Plaintiff reasserts and re-alleges the allegations contained within paragraphs 1 through 11 as if the same were more fully set forth herein.

30. VIP KIDZ contends that CASTRO is an independent contractor.

31. There is a bona fide, actual and present need for declaratory relief between the parties. CASTRO contends that she has been improperly classified as an independent contractor when in fact she was an employee.

32. CASTRO seeks a declaration concerning a present, ascertained or ascertainable state of facts and in particular a declaration of whether she was an independent contractor or employee.

33. An immunity, power, privilege or right of CASTRO is dependent upon the facts or the law applicable to the facts.

34. CASTRO has, or is reasonably expected to have, an actual, present, adverse and antagonistic interest in the subject matter, either in fact or law.

35. The antagonistic and/or adverse interests are before this Court by proper process.

36. The relief sought is not merely for giving of legal advise.

WHEREFORE, CASTRO demands declaratory judgment and requests damages, together with interest and court costs, and for any and all other and further relief this Court deems just and proper under the circumstances.

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Count IV – Violation of 26 U.S.C. Section 7434

37. The Plaintiff reasserts and re-alleges the allegations contained within paragraphs 1 through 11 as if the same were more fully set forth herein.

38. Based upon the foregoing, Defendant has violated 26 U.S.C. Section 7424 by willfully filing of fraudulent information returns.

39. CASTRO is entitled to damages for violation of this statute by Defendant resulting in harm to her, as well as attorney's fees and costs.

WHEREFORE, CASTRO demands judgment for damages, fees and costs, as allowed by law pursuant to 26 U.S.C. Section 7424(b) and any further relief this court deems just and proper under the circumstances.

Demand for Jury Trial

Plaintiff demands trial by jury on all issues so triable.

CHRISTOPHER C. COPELAND, P.A.
824 W. Indiantown Road
Jupiter, FL 33458
561-691-9048 (office)
866-259-0719 (FAX)
Primary e-mail: Chris@CopelandPA.com
Secondary e-mail: Carla@CopelandPA.com

/s/ Christopher C. Copeland
CHRISTOPHER C. COPELAND, ESQ.
Florida Bar #938076
Attorney for Plaintiff

EXHIBIT "A"

Work Week Ending	PTO	Holiday	Hours Worked	Meal Time deducted	Hours worked over 40	O/T Rate	FLSA Damages
5/27/2017			19.50		0.00	\$5.50	\$0.00
6/3/2017			26.95	1.00	0.00	\$5.50	\$0.00
6/10/2017			48.40	2.00	6.40	\$5.50	\$70.40
6/17/2017			27.60	0.50	0.00	\$5.50	\$0.00
6/24/2017			37.10	1.50	0.00	\$5.50	\$0.00
7/1/2017					0.00	\$5.50	\$0.00
7/8/2017					0.00	\$5.50	\$0.00
7/15/2017			27.50	1.00	0.00	\$5.50	\$0.00
7/22/2017			35.90	1.50	0.00	\$5.50	\$0.00
7/29/2017			60.75	2.50	18.25	\$5.50	\$200.75
8/5/2017			57.75	2.50	15.25	\$5.50	\$167.75
8/12/2017			63.10	2.50	20.60	\$5.50	\$226.60
8/19/2017			60.15	2.50	17.65	\$5.50	\$194.15
8/26/2017			58.50	2.50	16.00	\$5.50	\$176.00
9/2/2017			63.00	2.50	20.50	\$5.50	\$225.50
9/9/2017			28.00	1.00	0.00	\$5.50	\$0.00
9/16/2017			20.00	1.00	0.00	\$5.50	\$0.00
9/23/2017			59.60	2.50	17.10	\$5.50	\$188.10
9/30/2017			59.60	2.50	17.10	\$5.50	\$188.10
10/7/2017			56.25	2.50	13.75	\$5.00	\$137.50
10/14/2017			65.00	2.50	22.50	\$6.00	\$270.00
10/21/2017					0.00		\$0.00
10/28/2017					0.00		\$0.00
11/4/2017			64.08	2.50	21.58	\$6.00	\$258.96
11/11/2017			55.91	2.50	13.41	\$6.00	\$160.92
11/18/2017			64.75	2.50	22.25	\$6.00	\$267.00
11/25/2017			32.46	1.50	0.00	\$6.00	\$0.00
12/2/2017			54.58	2.50	12.08	\$6.00	\$144.96
12/9/2017			58.33	2.50	15.83	\$6.00	\$189.96
12/16/2017			53.50	2.50	11.00	\$6.00	\$132.00
12/23/2017			53.50	2.50	11.00	\$6.00	\$132.00
12/30/2017			0.00		0.00	\$6.00	\$0.00
1/6/2018			46.50	2.00	4.50	\$6.00	\$54.00
1/13/2018			53.08	2.50	10.58	\$6.00	\$126.96

Work Week Ending	PTO	Holiday	Hours Worked	Meal Time deducted	Hours worked over 40	O/T Rate	FLSA Damages
1/20/2018			42.50	2.00	0.50	\$6.00	\$6.00
1/27/2018			53.58	2.50	11.08	\$6.00	\$132.96
2/3/2018			52.08	2.50	9.58	\$6.00	\$114.96
2/10/2018			48.50	2.50	6.00	\$6.00	\$72.00
2/17/2018			50.58	2.50	8.08	\$6.00	\$96.96
2/24/2018			50.25	0.00	10.25	\$6.00	\$123.00
3/3/2018			54.91	0.00	14.91	\$6.00	\$178.92
3/10/2018			34.25		0.00	\$6.00	\$0.00
3/17/2018			48.58		8.58	\$6.00	\$102.96
3/24/2018			58.90		18.90	\$6.00	\$226.80
3/31/2018			60.13		20.13	\$6.00	\$241.56
4/7/2018			55.63		15.63	\$6.00	\$187.56
4/14/2018			51.93		11.93	\$6.00	\$143.16
4/21/2018			64.12		24.12	\$6.00	\$289.44
4/28/2018			58.10		18.10	\$6.00	\$217.20
5/5/2018			50.62		10.62	\$6.00	\$127.44
5/12/2018			48.87		8.87	\$6.00	\$106.44
5/19/2018			63.91		23.91	\$6.00	\$286.92
5/26/2018			61.66		21.66	\$6.00	\$259.92
6/2/2018			51.42		11.42	\$6.00	\$137.04
6/9/2018			56.91		16.91	\$6.00	\$202.92
6/16/2018			60.74		20.74	\$6.00	\$248.88
6/23/2018			59.18		19.18	\$6.00	\$230.16
6/30/2018			61.67		21.67	\$6.25	\$270.88
7/7/2018			25.23		0.00	\$6.25	\$0.00
7/14/2018			62.45		22.45	\$6.25	\$280.63
7/21/2018			61.57		21.57	\$6.25	\$269.63
7/28/2018			54.97		0.00	\$6.25	\$0.00
8/4/2018			56.60		16.60	\$6.25	\$207.50
8/11/2018			74.32		34.32	\$6.25	\$429.00
8/18/2018			62.78		22.78	\$6.25	\$284.75
8/25/2018					0.00		\$0.00
9/1/2018					0.00		\$0.00
9/8/2018					0.00		\$0.00

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.) NOTICE: Attorneys MUST Indicate All Re-filed Cases Below.

I. (a) PLAINTIFFS DAGMA DANIEL CASTRO on behalf of herself and similarly situated employees DEFENDANTS VIP KIDZ, LLC, a Florida limited liability company

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

(c) Attorneys (Firm Name, Address, and Telephone Number) Christopher C. Copeland, Esq., Christopher C. Copeland, P.A., 824 W. Indiantown Rd., Jupiter, FL 33458; 561-691-9048 Attorneys (If Known)

(d) Check County Where Action Arose: MIAMI-DADE MONROE BROWARD PALM BEACH MARTIN ST. LUCIE INDIAN RIVER OKEECHOBEE HIGHLANDS

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

Grid for Basis of Jurisdiction and Citizenship of Principal Parties with checkboxes for U.S. Government Plaintiff/Defendant, Federal Question, Diversity, Citizen of This/Another State, Citizen or Subject of a Foreign Country, PTF/DEF 1-6, and Incorporated/Principal Place of Business.

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

Grid for Nature of Suit with categories: CONTRACT, REAL PROPERTY, CIVIL RIGHTS, PERSONAL INJURY, TORTS, PRISONER PETITIONS, LABOR, IMMIGRATION, FORFEITURE/PENALTY, 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 Re-filed (See VI below) 4 Reinstated or Reopened 5 Transferred from another district (specify) 6 Multidistrict Litigation Transfer 7 Appeal to District Judge from Magistrate Judgment 8 Multidistrict Litigation - Direct File 9 Reremanded from Appellate Court

VI. RELATED/ RE-FILED CASE(S) (See instructions): a) Re-filed Case YES NO b) Related Cases YES NO JUDGE: DOCKET NUMBER:

VII. CAUSE OF ACTION Cite the U.S. Civil Statute under which you are filing and Write a Brief Statement of Cause (Do not cite jurisdictional statutes unless diversity): 29 U.S.C. 201-209; 26 U.S.C. §7424

LENGTH OF TRIAL via 2 days estimated (for both sides to try entire case)

VIII. REQUESTED IN COMPLAINT: CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 DEMAND \$ CHECK YES only if demanded in complaint: JURY DEMAND: Yes No

ABOVE INFORMATION IS TRUE & CORRECT TO THE BEST OF MY KNOWLEDGE DATE November 5, 2018 SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY RECEIPT # AMOUNT IFP JUDGE MAG JUDGE

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.C.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; 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. 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.

Refiled (3) Attach copy of Order for Dismissal of Previous case. Also complete VI.

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. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407. When this box is checked, do not check (5) above.

Appeal to District Judge from Magistrate Judgment. (7) Check this box for an appeal from a magistrate judge's decision.

Remanded from Appellate Court. (8) Check this box if remanded from Appellate Court.

VI. Related/Refiled Cases. This section of the JS 44 is used to reference related pending cases or re-filed cases. Insert the docket numbers and the corresponding judges name for such cases.

VII. 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

VIII. 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 dollar amount (in thousands of dollars) 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.

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

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

UNITED STATES DISTRICT COURT

for the

Southern District of Florida

DAGMA DANIEL CASTRO on behalf of herself and
similarly situated employees,

Plaintiff(s)

v.

VIP KIDZ, LLC, a Florida limited liability company,

Defendant(s)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) VIP KIDZ, LLC, a Florida limited liability company
Registered Agent - John Lage
2500 Metrocentre Blvd., Suite 1
West Palm Beach, FL 33407

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:

Christopher C. Copeland, Esq.
Christopher C. Copeland, P.A.
824 W. Indiantown Road
Jupiter, FL 33458
Chris@CopelandPA.com
(561) 691-9048

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:

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:

Print

Save As...

Reset

ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Lawsuit: VIP Kidz, LLC Refused to Pay OT to Misclassified Daycare Staff](#)
