

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO.

PAUL CHAPPA, and others similarly-situated,

Plaintiffs,

vs.

LARGAESPADA KITCHEN CABINET
CORP., EDITH MIRANDA and ANDY W.
LARGAESPADA, individually,

Defendants.

COMPLAINT

COMES NOW, Plaintiff, PAUL CHAPPA, by and through his undersigned attorney, and hereby sues Defendants, LARGAESPADA KITCHEN CABINET CORP., a Florida profit corporation, EDITH MIRANDA and ANDY W. LARGAESPADA (herein collectively referred to "the EMPLOYER", unless referred to individually), and alleges:

JURISDICTIONAL ALLEGATIONS AND VENUE

1. This is an action to recover money damages for unpaid overtime and minimum wages. This action is brought pursuant to the Fair Labor Standards Act, 29 U.S.C. §§ 201-219 ("FLSA") and pursuant to Fla. Const. Art. 10 § 24.
2. Plaintiff is a resident of Miami-Dade County, Florida.
3. The corporate Defendant, LARGAESPADA KITCHEN CABINET CORP., is a Florida profit corporation, which at all times material hereto, was doing business in Broward County, Florida, where Plaintiff was employed, and at all times material hereto was and is engaged in interstate commerce. The individual Defendants reside in Broward County, Florida.

4. This action is brought by Plaintiff to recover from the Employer unpaid overtime and minimum wages, as well as an additional amount as liquidated damages, costs and reasonable attorney's fees under the provisions of 29 U.S.C. § 201 et seq., and specifically under the provisions of 29 U.S.C. §§ 206, 207, and Fla. Const. Art. 10 § 24.

5. FLSA coverage is triggered because the corporate Defendant is and, at all times pertinent to this Complaint, was engaged in interstate commerce. At all times pertinent to this Complaint, the Employer operates as an organization which sells and/or markets its services and/or goods and/or materials to customers from throughout the United States and also provides its services for goods sold and transported from across state lines of numerous other States, and the Employer obtains and solicits funds from non-Florida sources, accepts funds from non-Florida sources, uses telephonic transmissions going over State lines to do its business, transmits funds outside the State of Florida, and otherwise regularly engages in interstate commerce, particularly with respect to its employees. Upon information and belief, the annual gross revenue of the Employer was at all times material hereto in excess of \$500,000.00 per annum, and two or more employees handled goods or materials that moved in the stream of commerce on a frequent and recurrent basis, and/or Plaintiff and those similarly-situated, by virtue of working in interstate commerce, otherwise satisfies the FLSA's requirements.

6. Plaintiff, and those similarly-situated employees, regularly, and on a recurring basis utilized and handled equipments, goods or materials manufactured and purchased from outside the State of Florida, or which originate from places outside the State of Florida and regularly used the instrumentalities of interstate commerce in their work.

7. Those similarly-situated employees are current and former employees who worked at the facility, performed the same or similar duties as the Plaintiff and were not paid overtime and minimum wages for their hours worked.

8. By reason of the foregoing, the Employer is and was, during all times hereafter mentioned, an enterprise engaged in commerce or in the production of goods for commerce as defined in 29 U.S.C. §§ 203(r) and 203(s) and/or Plaintiff is within interstate commerce.

PLAINTIFF'S EMPLOYMENT

9. Plaintiff was employed by Defendants, LARGAESPADA KITCHEN CABINET CORP., EDITH MIRANDA and ANDY W. LARGAESPADA, as a kitchen cabinet installer. Plaintiff's job duties included: installing kitchen cabinets as well as assisting with other regular duties associated with his work. Plaintiff worked for Defendants from approximately February 2016 through January 6, 2017. Plaintiff worked an average of 48 hours a week on-the-clock and an additional 6 off-the-clock hours a week. For the first five (5) months of his employment, Plaintiff was paid at an hourly-rate of \$8.00. Thereafter, Plaintiff's hourly-rate increased to \$10.00; however, he was not paid for all hours that he worked.

COUNT I **UNPAID FEDERAL MINIMUM WAGE AGAINST** **LARGAESPADA KITCHEN CABINET CORP.**

10. Plaintiff re-alleges and re-avers paragraphs 1 through 10 as fully set forth herein.

11. Defendants are required to pay their employees a minimum wage not less than \$8.05 per hour from January 1, 2016 through December 31, 2016.

12. Plaintiff was employed with Defendant as a kitchen cabinet installer. He worked an average of 48 hours per week, on-the-clock and an additional 6 off-the-clock hours, where he was not paid any wages at all. For the first five (5) months of Plaintiff's employment (approximately February 2016 through July 2016), he was paid an average of \$8.00 per hour, while the required minimum wage was \$8.05.

13. The FLSA requires that the Employer pay Plaintiff a required minimum wage per hour. During Plaintiff's employment with Defendants, he worked an average of 6 off-the-clock hours per week where he was not paid any wages. The average of the hours worked and pay received each week was below the minimum wage.

14. Plaintiff is entitled to receive at least minimum wage for each and every hour he worked. On approximately June 2016, Defendant failed to pay any wages to Plaintiff for one week of work he duly performed. Additionally, on approximately January 1, 2017 through January 6, 2017, Defendant failed to pay Plaintiff his wages. Defendant's failure to pay any wages during this time period constitutes a minimum wage violation as Plaintiff was paid \$0.00 per hour during this time period. The Defendant is indebted to the Plaintiff for minimum wages in the amount of liquidated damages, as a result of its failure to pay wages.

15. As a result of the under-payments of wages alleged above, Defendant is indebted to Plaintiff in the amount of the unpaid minimum wage compensation. Plaintiff proposes to obtain the necessary records and information to determine the amount of the under-payment to him by appropriate discovery proceedings to be promptly taken in this cause.

16. Defendant willfully and intentionally failed to pay Plaintiff the statutory minimum wage as set forth above and remain owing him back wages. Defendant knew of the failure to pay Plaintiff. Defendant showed reckless disregard by failing to pay Plaintiff for his work and failing to comply with the Florida Constitution requirement of minimum wages. Defendant did not keep time records, or other payroll records so as to avoid liability for the legally mandated wages. Defendant chose to pay Plaintiff a wage which was below the required minimum wage. Defendant misclassified Plaintiff as an independent contractor, and not an employee in order to avoid FLSA obligations. Defendant also failed to pay overtime wages knowing that Plaintiff was entitled to be paid the overtime wage required by the FLSA. Defendant remains owing Plaintiff these minimum wages since the commencement of Plaintiff's employment with Defendant as set forth above and is entitled to a recovery of double damages.

17. Plaintiff has retained the law offices of the undersigned attorney to represent him in this action and is entitled to recover a reasonable attorney's fee.

18. Plaintiff has complied with all conditions precedent to filing this action.

WHEREFORE, Plaintiff requests compensatory and liquidated damages and reasonable attorney's fees from the corporate Defendant, LARGAESPADA KITCHEN CABINET CORP., jointly and severally with the individual Defendants, EDITH MIRANDA and ANDY W. LARGAESPADA, pursuant to the Fair Labor Standards Act as cited above, to be proven at the time of trial for minimum wages owing from Plaintiff's employment period as stated above with Defendant, or as much as allowed by the Fair Labor Standards Act, whichever is greater, along with court costs. Plaintiff is also entitled to injunctive relief restraining Defendant from committing any future FLSA violations. In the event that Plaintiff does not recover double damages, then Plaintiff seeks an award of prejudgment interest for the unpaid minimum wages,

and any and all other relief which this Court deems reasonable under the circumstances.

COUNT II
UNPAID FEDERAL MINIMUM WAGE AGAINST
EDITH MIRANDA AND ANDY W. LARGAESPADA

19. Plaintiff re-alleges and re-avers paragraphs 1 through 19 as fully set forth herein.

20. The individual Defendants, EDITH MIRANDA and ANDY W. LARGAESPADA, are FLSA employers, as defined in 29 U.S.C. § 203(d), as they had operational control over the Defendant corporation and additionally were directly involved in decisions affecting employee compensation and hours worked by employees, such as Plaintiff. EDITH MIRANDA and ANDY W. LARGAESPADA, also controlled the purse strings for the Defendant corporation.

21. As FLSA employers, EDITH MIRANDA and ANDY W. LARGAESPADA are liable to Plaintiff, together with the corporate Defendant.

22. The FLSA requires that the Employer pay Plaintiff a required minimum wage per hour. During Plaintiff's employment with Defendants, he worked an average of 6 off-the-clock hours per week where he was not paid any wages. Plaintiff was entitled to be paid the minimum wage for each hour worked.

23. Plaintiff was employed with Defendants as a kitchen cabinet installer. He worked an average of 48 on-the-clock hours a week and an additional 6 off-the-clock hours, where he was not paid any wages. For the first five (5) months of Plaintiff's employment (approximately February 2016 through July 2016), he was paid an average of \$8.00 per hour, while the required minimum wage was \$8.05.

24. Plaintiff is entitled to receive at least minimum wages for each and every hour he worked. On approximately June 2016, the individual Defendants failed to pay any wages to

Plaintiff for one week of work he duly performed. Additionally, on approximately January 1, 2017 through January 6, 2017, Defendants failed to pay Plaintiff his wages. The individual Defendants' failure to pay any wages constitutes a minimum wage violation. The Defendants are indebted to the Plaintiff for minimum wages in the amount of liquidated damages, as a result of their failure to pay wages.

25. As a result of the under-payments of wages alleged above, Defendants are indebted to Plaintiff in the amount of the unpaid minimum wage compensation. Plaintiff proposes to obtain the necessary records and information to determine the amount of the under-payment to him by appropriate discovery proceedings to be promptly taken in this cause.

26. Defendants willfully and intentionally failed to pay Plaintiff the statutory minimum wage as set forth above and remain owing him back wages. Defendants knew of the failure to pay Plaintiff. Defendants showed reckless disregard by failing to pay Plaintiff for his work and failing to comply with the Florida Constitution requirement of minimum wages. Defendants did not keep time records, or other payroll records so as to avoid liability for the legally mandated wages. Defendants remain owing Plaintiff these minimum wages since the commencement of Plaintiff's employment with Defendants as set forth above and is entitled to a recovery of double damages.

27. Plaintiff has retained the law offices of the undersigned attorney to represent him in this action and is entitled to recover a reasonable attorney's fee.

28. Plaintiff has complied with all conditions precedent to filing this action.

WHEREFORE, Plaintiff requests compensatory and liquidated damages and reasonable attorney's fees from the individual Defendants, EDITH MIRANDA and ANDY W. LARGAESPADA, jointly and severally with the corporate Defendant, LARGAESPADA

KITCHEN CABINET CORP., pursuant to the Fair Labor Standards Act as cited above, to be proven at the time of trial for minimum wages owing from Plaintiff's employment period as stated above with Defendants, or as much as allowed by the Fair Labor Standards Act, whichever is greater, along with court costs. Plaintiff is also entitled to injunctive relief restraining Defendants from committing any future FLSA violations. In the event that Plaintiff does not recover double damages, then Plaintiff seeks an award of prejudgment interest for the unpaid minimum wages, and any and all other relief which this Court deems reasonable under the circumstances.

COUNT III
UNPAID OVERTIME WAGES AGAINST
LARGAESPADA KITCHEN CABINET CORP.

29. Plaintiff re-alleges and re-avers paragraphs 1 through 10, as fully set forth herein.

30. Plaintiff was employed with Defendant as a kitchen cabinet installer. He worked an average of 48 hours per week and was not paid half-time his hourly-rate for hours he worked in excess of forty (40). Moreover, Plaintiff worked an additional 6 off-the-clock hours per week where he was not paid any wages and is therefore owed time-and-a-half. Plaintiff was not paid the appropriate overtime wages for hours worked in excess of 40 per week.

31. At all times material hereto, Defendant failed to comply with Title 29 U.S.C. §§ 201-219 and 29 C.F.R. § 516.2 and § 516.4 et seq. in that Plaintiff performed services and worked in excess of the maximum hours provided by the FLSA but no provision was made by the Employer to properly pay him at the rate of time and one-half for all hours worked in excess of forty (40) per workweek as provided in the FLSA.

32. Defendant willfully and intentionally failed to pay Plaintiff overtime wages as required by the Fair Labor Standards Act. Defendant has knowledge of Plaintiff's work schedule

and the amount of hours he worked. Defendant did not keep time records, or other payroll records so as to avoid liability for the legally mandated wages. Defendant remains owing Plaintiff these overtime wages since the commencement of Plaintiff's employment with Defendant as set forth above and is entitled to a recovery of double damages.

33. Plaintiff has retained the law offices of the undersigned attorney to represent him in this action and is entitled to recover a reasonable attorney's fee.

WHEREFORE, Plaintiff requests compensatory and liquidated damages and reasonable attorney's fees and costs from the corporate Defendant, LARGAESPADA KITCHEN CABINET CORP., jointly and severally with the individual Defendants, EDITH MIRANDA and ANDY W. LARGAESPADA, pursuant to the Fair Labor Standards Act as cited above, to be proven at the time of trial for overtime owing from Plaintiff's entire employment period with Defendant, or as much as allowed by the Fair Labor Standards Act, whichever is greater, along with court costs. In the event that Plaintiff does not recover liquidated damages, then Plaintiff will seek an award of prejudgment interest for the unpaid overtime, and any and all other relief which this Court deems reasonable under the circumstances.

COUNT IV
INDIVIDUAL LIABILITY AGAINST
EDITH MIRANDA AND ANDY W. LARGAESPADA

34. Plaintiff re-alleges and re-avers paragraphs 1 through 10, 30 through 34 as fully set forth herein.

35. Under the FLSA, the individuals who had operational control over the Defendant corporation may be held individually liable, together with the Defendant corporation.

36. The individual Defendants, EDITH MIRANDA and ANDY W. LARGAESPADA, are "employers", as defined in 29 U.S.C. § 203(d), as they had operational

control over the Defendant corporation and are directly involved in decisions affecting employee compensation and hours worked by employees such as Plaintiff and opt-in plaintiffs. Moreover, EDITH MIRANDA and ANDY W. LARGAESPADA controlled the purse strings for the corporate Defendant.

37. EDITH MIRANDA and ANDY W. LARGAESPADA, hired and fired employees, determined the rate of compensation and were responsible for ensuring that employees were paid the wages required by the FLSA.

WHEREFORE, Plaintiff requests compensatory and liquidated damages and reasonable attorney's fees and costs from the individual Defendants, EDITH MIRANDA and ANDY W. LARGAESPADA, jointly and severally together with the corporate Defendant, LARGAESPADA KITCHEN CABINET CORP., pursuant to the Fair Labor Standards Act as cited above, to be proven at the time of trial for overtime owing from Plaintiff's entire employment period, or as much as allowed by the Fair Labor Standards Act, whichever is greater, along with court costs. In the event that Plaintiff does not recover liquidated damages, then Plaintiff will seek an award of prejudgment interest for the unpaid overtime, and any and all other relief which this Court deems reasonable under the circumstances.

JURY DEMAND

Plaintiff demands trial by jury of all issues triable as of right by jury.

THE LAW OFFICES OF
EDDY O. MARBAN
1600 Ponce De Leon Boulevard, Suite 902
Coral Gables, Florida 33134
Telephone (305) 448-9292
Facsimile (305) 448-9477
E-mail: marbanlaw@gmail.com

By: s/Edilberto O. Marban
EDDY O. MARBAN, ESQ.
Fl. Bar No. 435960

JS 44 (Rev. 12/07)

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 THE REVERSE OF THE FORM.)

I. (a) PLAINTIFFS
 PAUL CHAPPA, and others similarly-situated,

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

(c) Attorney's (Firm Name, Address, and Telephone Number)
 Eddy O. Marban, Esq.
 1600 Ponce De Leon Boulevard, Suite 902
 Coral Gables, Florida 33134

DEFENDANTS
 LARGAESPADA KITCHEN CABINET CORP., EDITH MIRANDA
 AND ANDY W. LARGAESPADA, individually.

County of Residence of First Listed Defendant Broward
 (IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

1 U.S. Government Plaintiff

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

2 U.S. Government Defendant

4 Diversity (Indicate Citizenship of Parties in Item III)

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

(For Diversity Cases Only)

Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6

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

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 Overpayment of Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury	PERSONAL INJURY <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<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"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <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	CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus: <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition	LABOR <input checked="" type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus - Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions		

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

7 Appeal to District Judge from Magistrate Judgment

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

VI. CAUSE OF ACTION

Brief description of cause:
Unpaid Overtime and Minimum wage.

VII. 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

VIII. RELATED CASE(S) IF ANY (See instructions):

JUDGE _____ DOCKET NUMBER _____

DATE: 03/14/2017

SIGNATURE OF ATTORNEY OF RECORD: 

FOR OFFICE USE ONLY

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

AO 440 (Rev. 12/09) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Southern District of Florida

PAUL CHAPPA

Plaintiff

v.

LARGAESPADA KITCHEN CABINET CORP., ET
AL.

Defendant

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Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* LARGAESPADA KITCHEN CABINET CORP.
c/o Edith Miranda, Registered Agent
8 Acorn Drive
Hollywood, Florida 33021

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:

Eddy O. Marban, Esq.
The Law Offices of Eddy O. Marban
1600 Ponce de Leon Boulevard, Suite 902
Coral Gables, Florida 33134

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: 03/14/2017

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 12/09) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Southern District of Florida

PAUL CHAPPA

Plaintiff

v.

LARGAESPADA KITCHEN CABINET CORP., ET
AL.

Defendant

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Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Edith Miranda
8 Acorn Drive
Hollywood, Florida 33021

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:

Eddy O. Marban, Esq.
The Law Offices of Eddy O. Marban
1600 Ponce de Leon Boulevard, Suite 902
Coral Gables, Florida 33134

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: 03/14/2017

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 12/09) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Southern District of Florida

PAUL CHAPPA

Plaintiff

v.

LARGAESPADA KITCHEN CABINET CORP., ET
AL.

Defendant

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Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Andy W. Largaespada
8 Acorn Drive
Hollywood, Florida 33021

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:

Eddy O. Marban, Esq.
The Law Offices of Eddy O. Marban
1600 Ponce de Leon Boulevard, Suite 902
Coral Gables, Florida 33134

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: 03/14/2017

Signature of Clerk or Deputy Clerk

ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [FLSA Action Filed Against Largaespada Kitchen Cabinet Corp.](#)
