

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**SHAWN COSTON, Individually and on behalf of all
those Similarly Situated,**

Plaintiff,

v.

**CARE ROADSIDE SERVICE, LLC, and
GREGORY MILLER, Jointly and Severally,**

Defendants.

Case No.: _____

COLLECTIVE ACTION COMPLAINT
(Jury Trial Demanded)

Plaintiff, Shawn Coston, individually and on behalf of all others similarly situated, upon personal knowledge, and upon information and belief as to other matters, alleges as follows:

NATURE OF THE ACTION

1. Defendant operate a roadside assistance company called Care Roadside Service, LLC (“Care Roadside Service”).

2. Plaintiff worked for Care Roadside Service as a roadside assistance technician.
3. Plaintiff was not paid minimum wages and overtime wages for all hours worked, despite working well in excess of 40 hours per week throughout his employment.
4. Plaintiff bring this action on behalf of himself and all other similarly situated employees of Defendants, to recover unpaid minimum wages and overtime premium pay, owed to them pursuant to the Fair Labor Standards Act (FLSA), 29 U.S.C. §§ 201 et seq, and supporting regulations.

JURISDICTION AND VENUE

5. This Court has subject matter jurisdiction over this matter pursuant to 28 U.S.C. §§ 1331, 1337, 1343. In addition, the Court has jurisdiction over Plaintiff's claims under the FLSA pursuant to 29 U.S.C. § 216(b).
6. Venue is proper in this district pursuant to 28 U.S.C. § 1391 because a substantial part of the events or omissions leading to this claim occurred while Plaintiff performed work for Care Roadside Service, which has its principal place of business at 50 Hurt Plaza, Suite 819, Atlanta, Georgia 30309, which is in Fulton County.

7. This Court is empowered to issue a declaratory judgment pursuant to 28 U.S.C. §§ 2201 and 2202.

THE PARTIES

Plaintiffs:

8. Plaintiff, Shawn Coston, was at all relevant times, an adult-individual residing 1472 Raintree Drive, Apt. F, Roswell, Georgia 30076, which is in Fulton County.

Defendants:

9. Defendant Care Roadside Service, is a Georgia limited liability company with its principal place of business at 50 Hurt Plaza, Suite 819, Atlanta, Georgia 30309, which is in Fulton County.

10. Upon information and belief, Defendant Gregory Miller is an owner, officer, director and/or managing agent of Care Roadside Service. Mr. Miller's address is unknown at this time.

11. Miller participated in the day-to-day operations of the Care Roadside Service and acted intentionally and maliciously, in his failure to pay minimum wages and overtime wages to Plaintiff. Miller is an "employer" pursuant to the FLSA, 29 U.S.C.

§ 203(d), and the regulations promulgated under 29 C.F.R. § 791.2, and is jointly and severally liable with Care Roadside Service as a joint employer.

12. Upon information and belief, the Miller set the unlawful payroll policies complained of in this complaint for Care Roadside Service.

13. Upon information and belief, at all relevant times, Defendants have had gross revenues in excess of \$500,000, within the meaning of 29 U.S.C. § 203(s)(1)(A)(ii).

14. Additionally, upon information and belief, at all relevant times, Defendants have had employees performing work on vehicles requiring roadside assistance, and these vehicles have been moved and produced in interstate commerce, within the meaning of 29 U.S.C. § 203(s)(1)(A)(i).

STATEMENT OF FACTS

15. At all relevant times, Defendants have been in the roadside assistance industry, providing services for vehicles such as towing, tire replacement, jump starting batteries, unlocking doors, and other roadside services.

16. Upon information and belief, the Miller handles payroll and record keeping for the Care Roadside Service, and is actively involved with Care Roadside Service's day-to-day operations.

17. Plaintiff was employed by Defendants as a roadside assistance technician. Plaintiff's job duties involved towing vehicles, tire replacement, jump starting batteries, unlocking doors, and other roadside services. Plaintiff was paid \$10-13 for each car he provided roadside assistance services on. The pay would vary between \$10-13 per car, depending on which insurance company was paying for the service.

18. Plaintiff worked for Defendants from May 25, 2017 to July 13, 2017. Plaintiff worked seven days per week. Plaintiff was required to be on call from 7 a.m. to 11 p.m. throughout his employment. Plaintiff was not able to obtain other employment due to the need for him being on call at all times. Plaintiff worked 13 hours per day, for seven days a week, totaling 91 hours per week.

19. At all relevant times, Plaintiff operated a tow truck weighing less than 10,000 pounds throughout his time working for Defendants.

20. Defendants exerted constant control over Plaintiff's pay and schedule. Defendants provided Plaintiff with detailed forms describing how the job was to be performed, the expected hours that would be worked, and established a chain of command through a "field supervisor."

21. Additionally, Defendants provided a "Technician Core Work Schedule &

Coverage Agreement” which stated that Plaintiff “Must conform with the policies, procedures, requirements and work ethics put forth by CRS.” The agreement required that Plaintiff stay in “constant contact” with dispatch during the core hours listed, and that he is required to take any roadside assistance call within the agreed upon radius. Thus, from 7am-11pm, 7 days per week, Plaintiff was engaged to be on call for Defendants, and under the terms of his employment, could not elect to decline to work in his agreed upon radius.

22. When Plaintiff attempted to decline work or ask for a day off, he was met by complaints by Defendants, and told he could not take off because his work was needed.

23. Plaintiff was not paid minimum wages or an overtime wage piece rate for all hours worked over 40 hours, despite working well in excess of 40 hours per week.

24. This failure to pay minimum wages and overtime wages, to Plaintiff and similar situated employees, can only be considered a willful violation of the FLSA, within the meaning of 29 U.S.C. § 255(a).

FLSA COLLECTIVE ACTION ALLEGATIONS

25. Pursuant to 29 U.S.C. §§ 206, 207, and 216(b), Plaintiff brings his First and

Second Causes of Action as a collective action under the FLSA on behalf of himself and the following collective:

All persons employed by Defendants, at any time since September 8, 2017, and through the entry of judgment in this case (the “Collective Action Period”) who worked as roadside assistance technicians, mechanics, general laborers, and all other employees paid on a piece rate basis (the “Collective Action Members”).

26. A collective action is appropriate in this circumstance because Plaintiff and the Collective Action Members are similarly situated, in that they were all subjected to Defendants’ illegal policy of failing to pay minimum wages and overtime premiums for work performed in excess of 40 hours per week. As a result of this policy, Plaintiff and the Collective Action Members did not receive the legally-required minimum wages of \$7.25 per hour, and overtime premium payments for all hours worked in excess of 40 hours per week.

FIRST CAUSE OF ACTION
FAIR LABOR STANDARDS ACT – UNPAID MINIMUM WAGES

27. Plaintiff, on behalf of himself the and the Collective Action Members, repeat and reallege each and every allegation of the preceding paragraphs hereof with the same force and effect as though fully set forth herein.

28. Defendants have failed to pay minimum wages to Plaintiff and the Collective Action Members the minimum wage of \$7.25 per hour for all hours worked, in violation of the FLSA, 29 U.S.C. § 206(a)(1)(C).

29. As a result of Defendant's failure to compensate its employees, including Plaintiff and Collective Action Members, at a rate of not less than \$7.25 hour for all hours worked, Defendants have violated and continue to violate the FLSA, 29 U.S.C. § 201 *et seq.*, including 29 U.S.C. § 206(a)(1)(C) and § 215(a), for which Plaintiff and the Collective Action Members are entitled to relief pursuant to 29 U.S.C. § 216(b).

30. The failure to pay minimum wages has caused Plaintiff to suffer lost of wages and interest thereon. Plaintiff and the Collective Action Members are entitled to recover minimum wages, liquidated damages, attorney's fees, and costs and disbursements of the action pursuant to 29 U.S.C. § 216(b).

SECOND CAUSE OF ACTION
FAIR LABOR STANDARDS ACT – UNPAID OVERTIME

31. Plaintiff, on behalf of himself the Collective Action Members, repeat and reallege each and every allegation of the preceding paragraphs hereof with the same

force and effect as though fully set forth herein.

32. Defendants have failed to pay overtime wages to Plaintiff and the Collective Action Members for all hours worked in excess of 40 hours, in violation of the FLSA, 28 U.S.C. § 207(a)(1).

33. Defendants have failed to pay overtime to these employees, with no colorable argument as to why these workers are exempt. This constitutes a willful violation of the FLSA within the meaning of 29 U.S.C. § 255(a).

PRAYER FOR RELIEF

Therefore, Plaintiff respectfully requests that this Court grant the following relief:

- a. An order tolling the relevant statutes of limitations;
- b. An order declaring that Defendants violated the FLSA;
- c. An award of unpaid minimum wages due under the FLSA;
- d. An award of unpaid overtime wages due under the FLSA;
- e. An award of liquidated and/or punitive damages as a result of Defendant's willful failure to pay minimum wages and overtime wages
- f. An award of prejudgment and post-judgment interest;

- g. An award of costs and expenses of this action together with attorney's fees;
- h. Such other and further relief and this Court deems just and proper.

DEMAND FOR TRIAL BY JURY

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, Plaintiff demands a trial by jury on all questions of fact raised by the complaint.

Dated: September 8, 2017

Respectfully submitted,

s/ Brandon A. Thomas

BRANDON A. THOMAS

GA BAR NO.: 742344

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brandon@brandonthomaslaw.com

JS44 (Rev. 6/2017 NDGA)

CIVIL COVER SHEET

The JS44 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 is required for the use of the Clerk of Court for the purpose of initiating the civil docket record. (SEE INSTRUCTIONS ATTACHED)

<p>I. (a) PLAINTIFF(S) Shawn Coston, Individually and on behalf of all those Similarly Situated</p>	<p>DEFENDANT(S) Care Roadside Service, LLC, and Gregory Miller, Jointly and Severally</p>
<p>(b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF <u>Fulton</u> <small>(EXCEPT IN U.S. PLAINTIFF CASES)</small></p>	<p>COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT <u>Fulton</u> <small>(IN U.S. PLAINTIFF CASES ONLY)</small></p> <p><small>NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED</small></p>
<p>(c) ATTORNEYS <small>(FIRM NAME, ADDRESS, TELEPHONE NUMBER, AND E-MAIL ADDRESS)</small></p> <p>The Law Offices of Brandon A. Thomas, PC 1800 Peachtree Street, Suite 300 Atlanta, GA 30309 (404) 343-2441 brandon@brandonthomaslaw.com</p>	<p>ATTORNEYS <small>(IF KNOWN)</small></p>

<p>II. BASIS OF JURISDICTION <small>(PLACE AN "X" IN ONE BOX ONLY)</small></p> <p><input type="checkbox"/> 1 U.S. GOVERNMENT PLAINTIFF <input checked="" type="checkbox"/> 3 FEDERAL QUESTION (U.S. GOVERNMENT NOT A PARTY)</p> <p><input type="checkbox"/> 2 U.S. GOVERNMENT DEFENDANT <input type="checkbox"/> 4 DIVERSITY (INDICATE CITIZENSHIP OF PARTIES IN ITEM III)</p>	<p>III. CITIZENSHIP OF PRINCIPAL PARTIES <small>(PLACE AN "X" IN ONE BOX FOR PLAINTIFF AND ONE BOX FOR DEFENDANT) (FOR DIVERSITY CASES ONLY)</small></p> <table style="width:100%; border: none;"> <tr> <td style="text-align: center;"><small>PLF</small></td> <td style="text-align: center;"><small>DEF</small></td> <td style="border: none;"></td> <td style="text-align: center;"><small>PLF</small></td> <td style="text-align: center;"><small>DEF</small></td> <td style="border: none;"></td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/> 1</td> <td style="text-align: center;"><input type="checkbox"/> 1</td> <td style="border: none;">CITIZEN OF THIS STATE</td> <td style="text-align: center;"><input type="checkbox"/> 4</td> <td style="text-align: center;"><input type="checkbox"/> 4</td> <td style="border: none;">INCORPORATED OR PRINCIPAL PLACE OF BUSINESS IN THIS STATE</td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/> 2</td> <td style="text-align: center;"><input type="checkbox"/> 2</td> <td style="border: none;">CITIZEN OF ANOTHER STATE</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> <td style="border: none;">INCORPORATED AND PRINCIPAL PLACE OF BUSINESS IN ANOTHER STATE</td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td style="border: none;">CITIZEN OR SUBJECT OF A FOREIGN COUNTRY</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> <td style="border: none;">FOREIGN NATION</td> </tr> </table>	<small>PLF</small>	<small>DEF</small>		<small>PLF</small>	<small>DEF</small>		<input type="checkbox"/> 1	<input type="checkbox"/> 1	CITIZEN OF THIS STATE	<input type="checkbox"/> 4	<input type="checkbox"/> 4	INCORPORATED OR PRINCIPAL PLACE OF BUSINESS IN THIS STATE	<input type="checkbox"/> 2	<input type="checkbox"/> 2	CITIZEN OF ANOTHER STATE	<input type="checkbox"/> 5	<input type="checkbox"/> 5	INCORPORATED AND PRINCIPAL PLACE OF BUSINESS IN ANOTHER STATE	<input type="checkbox"/> 3	<input type="checkbox"/> 3	CITIZEN OR SUBJECT OF A FOREIGN COUNTRY	<input type="checkbox"/> 6	<input type="checkbox"/> 6	FOREIGN NATION
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IV. 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 District) 6 MULTIDISTRICT LITIGATION - TRANSFER 7 APPEAL TO DISTRICT JUDGE FROM MAGISTRATE JUDGE JUDGMENT

8 MULTIDISTRICT LITIGATION - DIRECT FILE

V. 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)

Fair Labor Standards Act, 29 U.S.C. Section 201 et. seq.
Defendants have failed to play Plaintiff minimum wages and overtime wages for all hours worked.

(IF COMPLEX, CHECK REASON BELOW)

<p><input type="checkbox"/> 1. Unusually large number of parties.</p> <p><input type="checkbox"/> 2. Unusually large number of claims or defenses.</p> <p><input type="checkbox"/> 3. Factual issues are exceptionally complex</p> <p><input type="checkbox"/> 4. Greater than normal volume of evidence.</p> <p><input type="checkbox"/> 5. Extended discovery period is needed.</p>	<p><input type="checkbox"/> 6. Problems locating or preserving evidence</p> <p><input type="checkbox"/> 7. Pending parallel investigations or actions by government.</p> <p><input type="checkbox"/> 8. Multiple use of experts.</p> <p><input type="checkbox"/> 9. Need for discovery outside United States boundaries.</p> <p><input type="checkbox"/> 10. Existence of highly technical issues and proof.</p>
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CONTINUED ON REVERSE

FOR OFFICE USE ONLY			
RECEIPT # _____	AMOUNT \$ _____	APPLYING IFP _____	MAG. JUDGE (IFP) _____
JUDGE _____	MAG. JUDGE _____ <small>(Referral)</small>	NATURE OF SUIT _____	CAUSE OF ACTION _____

VI. NATURE OF SUIT (PLACE AN "X" IN ONE BOX ONLY)

CONTRACT - "0" MONTHS DISCOVERY TRACK

- 150 RECOVERY OF OVERPAYMENT & ENFORCEMENT OF JUDGMENT
- 152 RECOVERY OF DEFAULTED STUDENT LOANS (Excl. Veterans)
- 153 RECOVERY OF OVERPAYMENT OF VETERAN'S BENEFITS

CONTRACT - "4" MONTHS DISCOVERY TRACK

- 110 INSURANCE
- 120 MARINE
- 130 MILLER ACT
- 140 NEGOTIABLE INSTRUMENT
- 151 MEDICARE ACT
- 160 STOCKHOLDERS' SUITS
- 190 OTHER CONTRACT
- 195 CONTRACT PRODUCT LIABILITY
- 196 FRANCHISE

REAL PROPERTY - "4" MONTHS DISCOVERY TRACK

- 210 LAND CONDEMNATION
- 220 FORECLOSURE
- 230 RENT LEASE & EJECTMENT
- 240 TORTS TO LAND
- 245 TORT PRODUCT LIABILITY
- 290 ALL OTHER REAL PROPERTY

TORTS - PERSONAL INJURY - "4" MONTHS DISCOVERY TRACK

- 310 AIRPLANE
- 315 AIRPLANE PRODUCT LIABILITY
- 320 ASSAULT, LIBEL & SLANDER
- 330 FEDERAL EMPLOYERS' LIABILITY
- 340 MARINE
- 345 MARINE PRODUCT LIABILITY
- 350 MOTOR VEHICLE
- 355 MOTOR VEHICLE PRODUCT LIABILITY
- 360 OTHER PERSONAL INJURY
- 362 PERSONAL INJURY - MEDICAL MALPRACTICE
- 365 PERSONAL INJURY - PRODUCT LIABILITY
- 367 PERSONAL INJURY - HEALTH CARE/ PHARMACEUTICAL PRODUCT LIABILITY
- 368 ASBESTOS PERSONAL INJURY PRODUCT LIABILITY

TORTS - PERSONAL PROPERTY - "4" MONTHS DISCOVERY TRACK

- 370 OTHER FRAUD
- 371 TRUTH IN LENDING
- 380 OTHER PERSONAL PROPERTY DAMAGE
- 385 PROPERTY DAMAGE PRODUCT LIABILITY

BANKRUPTCY - "0" MONTHS DISCOVERY TRACK

- 422 APPEAL 28 USC 158
- 423 WITHDRAWAL 28 USC 157

CIVIL RIGHTS - "4" MONTHS DISCOVERY TRACK

- 440 OTHER CIVIL RIGHTS
- 441 VOTING
- 442 EMPLOYMENT
- 443 HOUSING/ ACCOMMODATIONS
- 445 AMERICANS with DISABILITIES - Employment
- 446 AMERICANS with DISABILITIES - Other
- 448 EDUCATION

IMMIGRATION - "0" MONTHS DISCOVERY TRACK

- 462 NATURALIZATION APPLICATION
- 465 OTHER IMMIGRATION ACTIONS

PRISONER PETITIONS - "0" MONTHS DISCOVERY TRACK

- 463 HABEAS CORPUS- Alien Detainee
- 510 MOTIONS TO VACATE SENTENCE
- 530 HABEAS CORPUS
- 535 HABEAS CORPUS DEATH PENALTY
- 540 MANDAMUS & OTHER
- 550 CIVIL RIGHTS - Filed Pro se
- 555 PRISON CONDITION(S) - Filed Pro se
- 560 CIVIL DETAINEE: CONDITIONS OF CONFINEMENT

PRISONER PETITIONS - "4" MONTHS DISCOVERY TRACK

- 550 CIVIL RIGHTS - Filed by Counsel
- 555 PRISON CONDITION(S) - Filed by Counsel

FORFEITURE/PENALTY - "4" MONTHS DISCOVERY TRACK

- 625 DRUG RELATED SEIZURE OF PROPERTY 21 USC 881
- 690 OTHER

LABOR - "4" MONTHS DISCOVERY TRACK

- 710 FAIR LABOR STANDARDS ACT
- 720 LABOR/MGMT. RELATIONS
- 740 RAILWAY LABOR ACT
- 751 FAMILY and MEDICAL LEAVE ACT
- 790 OTHER LABOR LITIGATION
- 791 EMPL. RET. INC. SECURITY ACT

PROPERTY RIGHTS - "4" MONTHS DISCOVERY TRACK

- 820 COPYRIGHTS
- 840 TRADEMARK

PROPERTY RIGHTS - "8" MONTHS DISCOVERY TRACK

- 830 PATENT
- 835 PATENT-ABBREVIATED NEW DRUG APPLICATIONS (ANDA) - a/k/a Hatch-Waxman cases

SOCIAL SECURITY - "0" MONTHS DISCOVERY TRACK

- 861 HIA (1395f)
- 862 BLACK LUNG (923)
- 863 DIWC (405(g))
- 863 DIWW (405(g))
- 864 SSID TITLE XVI
- 865 RSI (405(g))

FEDERAL TAX SUITS - "4" MONTHS DISCOVERY TRACK

- 870 TAXES (U.S. Plaintiff or Defendant)
- 871 IRS - THIRD PARTY 26 USC 7609

OTHER STATUTES - "4" MONTHS DISCOVERY TRACK

- 375 FALSE CLAIMS ACT
- 376 Qui Tam 31 USC 3729(a)
- 400 STATE REAPPORTIONMENT
- 430 BANKS AND BANKING
- 450 COMMERCE/ICC RATES/ETC.
- 460 DEPORTATION
- 470 RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS
- 480 CONSUMER CREDIT
- 490 CABLE/SATELLITE TV
- 890 OTHER STATUTORY ACTIONS
- 891 AGRICULTURAL ACTS
- 893 ENVIRONMENTAL MATTERS
- 895 FREEDOM OF INFORMATION ACT
- 899 ADMINISTRATIVE PROCEDURES ACT/ REVIEW OR APPEAL OF AGENCY DECISION
- 950 CONSTITUTIONALITY OF STATE STATUTES

OTHER STATUTES - "8" MONTHS DISCOVERY TRACK

- 410 ANTI TRUST
- 850 SECURITIES / COMMODITIES / EXCHANGE

OTHER STATUTES - "0" MONTHS DISCOVERY TRACK

- 896 ARBITRATION (Confirm / Vacate / Order / Modify)

*** PLEASE NOTE DISCOVERY TRACK FOR EACH CASE TYPE. SEE LOCAL RULE 26.3**

VII. REQUESTED IN COMPLAINT:

CHECK IF CLASS ACTION UNDER F.R.Civ.P. 23 DEMAND \$ _____

JURY DEMAND YES NO (CHECK YES ONLY IF DEMANDED IN COMPLAINT)

VIII. RELATED/REFILED CASE(S) IF ANY

JUDGE _____ DOCKET NO. _____

CIVIL CASES ARE DEEMED RELATED IF THE PENDING CASE INVOLVES: (CHECK APPROPRIATE BOX)

- 1. PROPERTY INCLUDED IN AN EARLIER NUMBERED PENDING SUIT.
- 2. SAME ISSUE OF FACT OR ARISES OUT OF THE SAME EVENT OR TRANSACTION INCLUDED IN AN EARLIER NUMBERED PENDING SUIT.
- 3. VALIDITY OR INFRINGEMENT OF THE SAME PATENT, COPYRIGHT OR TRADEMARK INCLUDED IN AN EARLIER NUMBERED PENDING SUIT.
- 4. APPEALS ARISING OUT OF THE SAME BANKRUPTCY CASE AND ANY CASE RELATED THERETO WHICH HAVE BEEN DECIDED BY THE SAME BANKRUPTCY JUDGE.
- 5. REPETITIVE CASES FILED BY PRO SE LITIGANTS.
- 6. COMPANION OR RELATED CASE TO CASE(S) BEING SIMULTANEOUSLY FILED (INCLUDE ABBREVIATED STYLE OF OTHER CASE(S)):

7. EITHER SAME OR ALL OF THE PARTIES AND ISSUES IN THIS CASE WERE PREVIOUSLY INVOLVED IN CASE NO. _____, WHICH WAS DISMISSED. This case IS IS NOT (check one box) SUBSTANTIALLY THE SAME CASE.


SIGNATURE OF ATTORNEY OF RECORD

9/8/17
DATE

ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Care Roadside Service Hit with Wage and Hour Lawsuit](#)
