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11 **UNITED STATES DISTRICT COURT**
 12 **SOUTHERN DISTRICT OF CALIFORNIA**

13 CAMERON ECKSTEIN, individually)
 14 and on behalf of all others similarly)
 15 situated,)

16 Plaintiff,)

17 vs.)

18)
 19 GLOBE LIFE AND ACCIDENT)
 20 INSURANCE COMPANY, and DOES)
 21 1 through 10, inclusive, and each of)
 22 them,)

23 Defendants.)

Case No. '18CV1037 JM JMA

CLASS ACTION

**COMPLAINT FOR VIOLATIONS
 OF:**

1. NEGLIGENT VIOLATIONS OF THE TELEPHONE CONSUMER PROTECTION ACT, 47 U.S.C. §227(b)
2. WILLFUL VIOLATIONS OF THE TELEPHONE CONSUMER PROTECTION ACT, 47 U.S.C. §227(b)
3. NEGLIGENT VIOLATIONS OF THE TELEPHONE CONSUMER PROTECTION ACT, 47 U.S.C. §227(c)
4. WILLFUL VIOLATIONS OF THE TELEPHONE CONSUMER PROTECTION ACT, 47 U.S.C. §227(c)

DEMAND FOR JURY TRIAL

1 Plaintiff CAMERON ECKSTEIN (“Plaintiff”), individually and on behalf
2 of all others similarly situated, alleges the following upon information and belief
3 based upon personal knowledge:

4 **NATURE OF THE CASE**

5 1. Plaintiff brings this action individually and on behalf of all others
6 similarly situated seeking damages and any other available legal or equitable
7 remedies resulting from the illegal actions of GLOBE LIFE AND ACCIDENT
8 INSURANCE COMPANY (“Defendant”) in negligently, knowingly, and/or
9 willfully contacting Plaintiff on Plaintiff’s cellular telephone in violation of the
10 Telephone Consumer Protection Act, *47 U.S.C. § 227 et seq.* (“TCPA”), thereby
11 invading Plaintiff’s privacy.

12 **JURISDICTION & VENUE**

13 2. Jurisdiction is proper under *28 U.S.C. § 1331* because Plaintiff alleges
14 violations of federal law, in particular the Telephone Consumer Protection Act, *47*
15 *U.S.C. § 227 et seq.*

16 3. Venue is proper in the United States District Court for the Central
17 District of California pursuant to *18 U.S.C. 1391(b)* and *18 U.S.C. § 1441(a)*
18 because Defendant does business within the State of California and the calls at issue
19 were transmitted within the County of San Diego.

20 **PARTIES**

21 4. Plaintiff, Cameron Eckstein (“Plaintiff”), is a natural person residing
22 in San Diego, California and is a “person” as defined by *47 U.S.C. § 153 (39)*.

23 5. Defendant, GLOBE LIFE AND ACCIDENT INSURANCE
24 COMPANY is a telemarketer who sells life and accident insurance policies, and is
25 a “person” as defined by *47 U.S.C. § 153 (39)*.

26 6. The above named Defendant, and its subsidiaries and agents, are
27 collectively referred to as “Defendants.” The true names and capacities of the
28 Defendants sued herein as DOE DEFENDANTS 1 through 10, inclusive, are

1 currently unknown to Plaintiff, who therefore sues such Defendants by fictitious
2 names. Each of the Defendants designated herein as a DOE is legally responsible
3 for the unlawful acts alleged herein. Plaintiff will seek leave of Court to amend the
4 Complaint to reflect the true names and capacities of the DOE Defendants when
5 such identities become known.

6 7. Plaintiff is informed and believes that at all relevant times, each and
7 every Defendant was acting as an agent and/or employee of each of the other
8 Defendants and was acting within the course and scope of said agency and/or
9 employment with the full knowledge and consent of each of the other Defendants.
10 Plaintiff is informed and believes that each of the acts and/or omissions complained
11 of herein was made known to, and ratified by, each of the other Defendants.

12 **FACTUAL ALLEGATIONS**

13 8. Beginning in or around January 11, 2018, Defendants contacted
14 Plaintiff on Plaintiff's cellular telephone numbers ending in -6081, in an attempt to
15 solicit Plaintiff to purchase Defendants' services.

16 9. When Plaintiff picked up a call from Defendants, he heard a robotic
17 or artificial voice.

18 10. Defendants used an "automatic telephone dialing system", as defined
19 by *47 U.S.C. § 227(a)(1)* to place its call to Plaintiff seeking to solicit its services.

20 11. Defendants contacted or attempted to contact Plaintiff from telephone
21 number (469) 617-4400.

22 12. Additionally, Plaintiff's telephone number ending in -6081 has been
23 registered on the National Do-Not-Call List since 2014.

24 13. Despite this, Defendants continued to call Plaintiff in an attempt to
25 solicit its services and in violation of the Do-Not-Call provisions of the TCPA thus
26 repeatedly violating Plaintiff's privacy.

27 14. Defendants' calls constituted calls that were not for emergency
28 purposes as defined by *47 U.S.C. § 227(b)(1)(A)*.

1 15. Defendants' calls were placed to telephone number assigned to a
2 cellular telephone service for which Plaintiff incurs a charge for incoming calls
3 pursuant to *47 U.S.C. § 227(b)(1)*.

4 16. During all relevant times, Defendants did not possess Plaintiff's "prior
5 express consent" to receive calls using an automatic telephone dialing system or an
6 artificial or prerecorded voice on his cellular telephone pursuant to *47 U.S.C. §*
7 *227(b)(1)(A)*.

8 17. Additionally, based off the pattern and content of the calls, Plaintiff
9 alleges that Defendants did not have in place procedures for not calling individuals
10 on the national do-not-call registry for telemarketing purposes in violation of *47*
11 *U.S.C. § 227(c)*, which incorporates the provisions of *47 C.F.R. 64.1200(d)*.

12 18. Through this action, Plaintiff suffered an invasion of a legally
13 protected interest in privacy, which is specifically addressed and protected by the
14 TCPA.

15 19. Defendants' calls forced Plaintiff and class members to live without
16 the utility of their cellular phones by forcing Plaintiff and class members to
17 silence their cellular phones and/or block incoming numbers.

18 **CLASS ALLEGATIONS**

19 20. Plaintiff brings this action individually and on behalf of all others
20 similarly situated, as a member of the proposed class (hereafter "The Class")
21 defined as follows:

22 All persons within the United States who received any
23 solicitation/telemarketing telephone calls from
24 Defendants to said person's cellular telephone made
25 through the use of any automatic telephone dialing
26 system or an artificial or prerecorded voice and such
27 person had not previously consented to receiving such
28 calls within the four years prior to the filing of this
Complaint

1 21. Plaintiff represents, and is a member of, The Class, consisting of All
2 persons within the United States who received any collection telephone calls from
3 Defendants to said person's cellular telephone made through the use of any
4 automatic telephone dialing system or an artificial or prerecorded voice and such
5 person had not previously not provided their cellular telephone number to
6 Defendants within the four years prior to the filing of this Complaint.

7 22. Defendants, their employees and agents are excluded from The Class.
8 Plaintiff does not know the number of members in The Class, but believes the Class
9 members number in the thousands, if not more. Thus, this matter should be
10 certified as a Class Action to assist in the expeditious litigation of the matter.

11 23. Additionally, Plaintiff represents, and is a member of, the Do-Not-Call
12 Class ("the DNC Class, and together with The Class, "The Classes"), consisting of:

13 All persons within the United States whose telephone
14 numbers were listed on the National Do-Not-Call
15 Registry, but who received calls by or on behalf of
16 Defendants for the purpose of promoting the sale of
17 Defendants' products or services within the four years
18 prior to the filing of this Complaint

19 24. The Classes are so numerous that the individual joinder of all of its
20 members is impractical. While the exact number and identities of The Classes
21 members are unknown to Plaintiff at this time and can only be ascertained through
22 appropriate discovery, Plaintiff is informed and believes and thereon alleges that
23 The Classes includes thousands of members. Plaintiff alleges that The Classes
24 members may be ascertained by the records maintained by Defendants.

25 25. Plaintiff and members of The Classes were harmed by the acts of
26 Defendants in at least the following ways: Defendants, either directly or through
27 its agents, illegally contacted Plaintiff and Classes members via their cellular
28 telephones thereby causing Plaintiff and Classes members to incur certain charges
or reduced telephone time for which Plaintiff and Classes members had previously

1 paid by having to retrieve or administer messages left by Defendants during those
2 illegal calls, and invading the privacy of said Plaintiff and Classes members.

3 26. Common questions of fact and law exist as to all members of The
4 Classes which predominate over any questions affecting only individual members
5 of The Classes. These common legal and factual questions, which do not vary
6 between Classes members, and which may be determined without reference to the
7 individual circumstances of any Classes members, include, but are not limited to,
8 the following:

- 9 a. Whether, within the four years prior to the filing of this
10 Complaint, Defendants made any telemarketing/solicitation
11 call (other than a call made for emergency purposes or made
12 with the prior express consent of the called party) to a Class
13 member using any automatic telephone dialing system or any
14 artificial or prerecorded voice to any telephone number
15 assigned to a cellular telephone service;
- 16 b. Whether Defendants failed to maintain adequate procedures to
17 comply with the National Do-Not-Call Registry and placed
18 calls to individuals registered on the National Do-Not-Call
19 Registry for whom they had no prior business relationship;
- 20 c. Whether Plaintiff and the Classes members were damaged
21 thereby, and the extent of damages for such violation; and
- 22 d. Whether Defendants should be enjoined from engaging in such
23 conduct in the future.

24 27. As a person that received numerous telemarketing/solicitation calls
25 from Defendants using an automatic telephone dialing system or an artificial or
26 prerecorded voice, without Plaintiff's prior express consent, and in violation of the
27 Do-Not-Call Provisions of the TCPA, Plaintiff is asserting claims that are typical
28 of The Classes.

1 28. Plaintiff will fairly and adequately protect the interests of the members
2 of The Classes. Plaintiff has retained attorneys experienced in the prosecution of
3 class actions.

4 29. A class action is superior to other available methods of fair and
5 efficient adjudication of this controversy, since individual litigation of the claims
6 of all Classes members is impracticable. Even if every Classes member could
7 afford individual litigation, the court system could not. It would be unduly
8 burdensome to the courts in which individual litigation of numerous issues would
9 proceed. Individualized litigation would also present the potential for varying,
10 inconsistent, or contradictory judgments and would magnify the delay and expense
11 to all parties and to the court system resulting from multiple trials of the same
12 complex factual issues. By contrast, the conduct of this action as a class action
13 presents fewer management difficulties, conserves the resources of the parties and
14 of the court system, and protects the rights of each Classes member.

15 30. The prosecution of separate actions by individual Classes members
16 would create a risk of adjudications with respect to them that would, as a practical
17 matter, be dispositive of the interests of the other Classes members not parties to
18 such adjudications or that would substantially impair or impede the ability of such
19 non-party Classes members to protect their interests.

20 31. Defendants have acted or refused to act in respects generally
21 applicable to The Classes, thereby making appropriate final and injunctive relief
22 with regard to the members of the Classes as a whole.

23 **FIRST CAUSE OF ACTION**

24 **Negligent Violations of the Telephone Consumer Protection Act**

25 **47 U.S.C. §227(b)**

26 *Individually and on behalf of the Class*

27 32. Plaintiff repeats and incorporates by reference into this cause of
28 action the allegations set forth above at Paragraphs 1-31.

1 33. The foregoing acts and omissions of Defendants constitute numerous
2 and multiple negligent violations of the TCPA, including but not limited to each
3 and every one of the above cited provisions of 47 U.S.C. § 227(b).

4 34. As a result of Defendants’ negligent violations of 47 U.S.C. § 227(b),
5 Plaintiff and the Class Members are entitled an award of \$500.00 in statutory
6 damages, for each and every violation, pursuant to 47 U.S.C. § 227(b)(3)(B).

7 35. Plaintiff and the Class members are also entitled to and seek
8 injunctive relief prohibiting such conduct in the future.

9 **SECOND CAUSE OF ACTION**

10 **Knowing and/or Willful Violations of the Telephone Consumer**
11 **Protection Act**

12 **47 U.S.C. §227 et seq.**

13 *Individually and on behalf of the Class*

14 36. Plaintiff repeats and incorporates by reference into this cause of
15 action the allegations set forth above at Paragraphs 1-31.

16 37. The foregoing acts and omissions of Defendants constitute numerous
17 and multiple knowing and/or willful violations of the TCPA, including but not
18 limited to each and every one of the above cited provisions of 47 U.S.C. § 227(b).

19 38. As a result of Defendants’ knowing and/or willful violations of 47
20 U.S.C. § 227(b), Plaintiff and the Class members are entitled an award of
21 \$1,500.00 in statutory damages, for each and every violation, pursuant to 47 U.S.C.
22 § 227(b)(3)(B) and 47 U.S.C. § 227(b)(3)(C).

23 39. Plaintiff and the Class members are also entitled to and seek
24 injunctive relief prohibiting such conduct in the future.

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1 **THIRD CAUSE OF ACTION**

2 **Negligent Violations of the Telephone Consumer Protection Act**

3 **47 U.S.C. §227(c)**

4 *Individually and on behalf of the DNC Class*

5 40. Plaintiff repeats and incorporates by reference into this cause of
6 action the allegations set forth above at Paragraphs 1-31.

7 41. The foregoing acts and omissions of Defendants constitute numerous
8 and multiple negligent violations of the TCPA, including but not limited to each
9 and every one of the above cited provisions of 47 U.S.C. § 227(c).

10 42. As a result of Defendants' negligent violations of 47 U.S.C. § 227(c),
11 Plaintiff and the DNC Class Members are entitled an award of \$500.00 in statutory
12 damages, for each and every violation, pursuant to 47 U.S.C. § 227(c)(5).

13 43. Plaintiff and the DNC Class members are also entitled to and seek
14 injunctive relief prohibiting such conduct in the future.

15 **FOURTH CAUSE OF ACTION**

16 **Knowing and/or Willful Violations of the Telephone Consumer**

17 **Protection Act**

18 **47 U.S.C. §227(c)**

19 *Individually and on behalf of the DNC Class*

20 44. Plaintiff repeats and incorporates by reference into this cause of
21 action the allegations set forth above at Paragraphs 1-31.

22 45. The foregoing acts and omissions of Defendants constitute numerous
23 and multiple knowing and/or willful violations of the TCPA, including but not
24 limited to each and every one of the above cited provisions of 47 U.S.C. § 227(c).

25 46. As a result of Defendants' knowing and/or willful violations of 47
26 U.S.C. § 227(c), Plaintiff and the DNC Class members are entitled an award of
27 \$1,500.00 in statutory damages, for each and every violation, pursuant to 47 U.S.C.
28 § 227(c)(5).

1 47. Plaintiff and the DNC Class members are also entitled to and seek
2 injunctive relief prohibiting such conduct in the future.

3 **PRAYER FOR RELIEF**

4 WHEREFORE, Plaintiff requests judgment against Defendants for the following:

5 **FIRST CAUSE OF ACTION**

6 **Negligent Violations of the Telephone Consumer Protection Act**

7 **47 U.S.C. §227(b)**

- 8 • As a result of Defendants' negligent violations of *47 U.S.C.*
9 *§227(b)(1)*, Plaintiff and the Class members are entitled to and
10 request \$500 in statutory damages, for each and every violation,
11 pursuant to *47 U.S.C. 227(b)(3)(B)*.
12 • Any and all other relief that the Court deems just and proper.

13 **SECOND CAUSE OF ACTION**

14 **Knowing and/or Willful Violations of the Telephone Consumer Protection**
15 **Act**

16 **47 U.S.C. §227(b)**

- 17 • As a result of Defendants' willful and/or knowing violations of *47*
18 *U.S.C. §227(b)(1)*, Plaintiff and the Class members are entitled to
19 and request treble damages, as provided by statute, up to \$1,500, for
20 each and every violation, pursuant to *47 U.S.C. §227(b)(3)(B)* and *47*
21 *U.S.C. §227(b)(3)(C)*.
22 • Any and all other relief that the Court deems just and proper.

23 **THIRD CAUSE OF ACTION**

24 **Negligent Violations of the Telephone Consumer Protection Act**

25 **47 U.S.C. §227(c)**

- 26 • As a result of Defendants' negligent violations of *47 U.S.C.*
27 *§227(c)(1)*, Plaintiff and the DNC Class members are entitled to and
28 request \$500 in statutory damages, for each and every violation,

pursuant to 47 U.S.C. 227(c)(5).

- Any and all other relief that the Court deems just and proper.

FOURTH CAUSE OF ACTION

Knowing and/or Willful Violations of the Telephone Consumer Protection Act

47 U.S.C. §227(c)

- As a result of Defendants’ willful and/or knowing violations of 47 U.S.C. §227(c)(1), Plaintiff and the DNC Class members are entitled to and request treble damages, as provided by statute, up to \$1,500, for each and every violation, pursuant to 47 U.S.C. §227(c)(5).
- Any and all other relief that the Court deems just and proper.

48. Pursuant to the Seventh Amendment to the Constitution of the United States of America, Plaintiff is entitled to, and demands, a trial by jury.

Respectfully Submitted this 24th Day of May, 2018.

LAW OFFICES OF TODD M. FRIEDMAN, P.C.

By: /s/ Todd M. Friedman
Todd M. Friedman
Law Offices of Todd M. Friedman
Attorney for Plaintiff

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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

CAMERON ECKSTEIN, individually and on behalf of all others similarly situated,

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

(c) Attorneys (Firm Name, Address, and Telephone Number) Law Offices of Todd M. Friedman, P.C. 21550 Oxnard St., #780, Woodland Hills, CA 91780 (866) 206-4741

DEFENDANTS

GLOBE LIFE AND ACCIDENT INSURANCE COMPANY, and DOES 1 through 10, inclusive, and each of them,

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.

Attorneys (If Known)

'18CV1037 JM JMA

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)

Large table with categories: CONTRACT, REAL PROPERTY, CIVIL RIGHTS, TORTS, 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): 47 U.S.C. 227

Brief description of cause: Violations of the Telephone Consumer Protection Act

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ 5,000,000.00 CHECK YES only if demanded in complaint: JURY DEMAND: X Yes No

VIII. RELATED CASE(S) IF ANY

(See instructions): JUDGE DOCKET NUMBER

DATE 05/24/2018 SIGNATURE OF ATTORNEY OF RECORD s/Todd M. Friedman

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING 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.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: [Globe Life and Accident Insurance Co. Hit with Class Action Over Suspected Robocalls](#)
