

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA**

Natasha Edwards, Tamesia Albert,)
Marcella Wilson, Wakiza Hutchins,)
and Angela Burgess, individually and)
on behalf of other similarly situated)
individuals,)

Plaintiffs,)

v.)

E.A. Renfroe & Company, Inc.,)

Defendant.)

Civil Action File

No. _____

(JURY TRIAL DEMANDED)

COMPLAINT

Plaintiffs Natasha Edwards, Tamesia Albert, Marcella Wilson, Wakiza Hutchins, and Angela Burgess, individually and on behalf of other similarly situated individuals, by and through their attorneys, bring this action for damages and other legal and equitable relief, stating the following as their claims against Defendant E.A. Renfroe & Company, Inc. (hereinafter “Defendant” or “Renfroe”):

PRELIMINARY STATEMENT

Plaintiffs worked for Renfroe in Atlanta, Georgia, between May and September 2015. They all worked to support the same client (State Farm), and they all worked under the same supervisor (Benjamin Mize). Plaintiffs allege that Defendant paid them less than the value of their work because of their race and

gender. Specifically, Defendant maintained a segregated job classification scheme in which black women were put into a lower paying job class than was warranted by their qualifications, performance, and interest. Worse yet, Defendant made Plaintiffs perform the *same* job duties as those working in the higher-paying job class. By misclassifying Plaintiffs as “Claim Associates,” Defendant paid them \$15.00 less per hour than it paid their (mostly) white and (mostly) male counterparts who Defendant classified as “Claim Adjusters.” Accordingly, Plaintiffs bring this civil action against Defendant on grounds that it violated their civil rights under both the Equal Pay Act and Title VII of the Civil Rights Act of 1964.

PARTIES

1. Plaintiff Natasha Edwards (“Edwards”) (formerly Natasha Dwarika) is a black woman who resides in Atlanta, Georgia.
2. Plaintiff Tamesia Albert (“Albert”) is a black woman who resides in Conyers, Georgia.
3. Plaintiff Marcella Wilson (“Wilson”) is a black woman who resides in Fayetteville, Georgia.
4. Plaintiff Wakiza Hutchins (“Hutchins”) is a black woman who resides in Douglasville, Georgia.

5. Plaintiff Angela Burgess (“Burgess”) is a black woman who resides in Stone Mountain, Georgia.

6. Defendant Renfroe is a domestic corporation organized and duly existing pursuant to the laws of the State of Georgia, whose registered agent is Corporation Service Company, 40 Technology Parkway South, #300, Gwinnett County, Norcross, Georgia 30092, and whose principal executive office is located at 1600 Corporate Drive, Birmingham, Alabama 35242.

7. During all relevant times, Plaintiffs were “employees” of Defendant within the meaning of 42 U.S.C. §2000e(f) and 29 U.S.C. §203(e). Likewise, Defendant was an “employer” within the meaning of 29 U.S.C. §2000e(b) and 29 U.S.C. §203(d).

JURISDICTION AND VENUE

8. Jurisdiction is proper under 28 U.S.C. §1331 because Plaintiffs’ claims arise under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. §§2000e, *et seq.*, and the Equal Pay Act, 29 U.S.C. §206.

9. Venue is proper under 28 U.S.C. §1391 because Plaintiffs’ claims arise from conduct that occurred in the Northern District of Georgia.

10. This Court has personal jurisdiction over Renfroe because it is a Georgia corporation, and because it does a significant amount of business in Georgia.

FACTUAL ALLEGATIONS

Plaintiff Natasha Edwards

11. On or about October 27, 2014, Edwards applied for a job as a Claim Adjuster with Renfroe.

12. Following completion of her background check and obtaining the licensures required by the company, Renfroe told her that she had been placed on their roster and would be contacted when a position became available.

13. First, however, Renfroe required Edwards to submit a picture of herself which she submitted.

14. In or about March 2015, Renfroe asked Edwards whether she would be interested in a Claim Associate position. Renfroe said it was the only position available.

15. At the time, a Claim Associate made about \$22.00 per hour while a Claim Adjuster made about \$37.50 per hour.

16. Edwards accepted the Claim Associate position intending to transfer to a Claim Adjuster position in the near future.

17. Edwards began employment with Renfroe on or around May 19, 2015.

18. Renfroe classified Edwards as a Claim Associate and sent her to its location in Atlanta, Georgia, where she worked in support of Renfroe's client, State Farm.

19. Approximately 22 new Claim Associates started with Edwards. In this group, there were roughly eighteen (18) black women, two (2) black men, and two (2) white men.

20. Although Renfroe classified Edwards as a Claim Associate, her job duties were substantially similar to those being performed by Renfroe's Claim Adjusters.

21. For example, Renfroe expected Edwards to make coverage decisions and settle claims.

22. Indeed, State Farm even referred to Edwards as a Claim Adjuster.

23. When Edwards asked her supervisor, Benjamin Mize, about State Farm calling her an adjuster, Mize instructed her to quit asking questions.

24. While Edwards continued to contact Renfroe's human resources department to see if there were any open Claim Adjuster positions, she was repeatedly told no.

25. Yet, on or around June 1, 2015, Defendant hired approximately fifteen (15) new Claim Adjusters.

26. Of these new Claim Adjusters, six (6) were white men; four (4) were white women; three (3) were black men; and one (1) was an Asian man.

27. Then, on or around June 22, 2015, Renfroe hired approximately ten (10) new Claim Adjusters and three (3) new Claim Associates.

28. Of the Claim Adjusters hired on or about June 22, 2015, six (6) were white men and four (4) were white women. Everyone hired as a Claim Associate was a black woman.

29. Finally, on or around September 12, 2015, Edwards emailed Renfroe's Director of Administration, Jana Renfroe, to complain about discrimination.

30. Renfroe responded a couple days later by simply asserting that there was no discrimination at Renfroe.

31. Later, when pressed, Renfroe falsely claimed that Edwards was not qualified to be a Claim Adjuster and that the duties she was performing were not Claim Adjuster duties.

32. Soon thereafter, Edwards left employment with Renfroe, in part, because of Renfroe's pattern and practice of discriminating against black women.

33. The EEOC issued Edwards a right to sue letter on September 29, 2016. Edwards received the letter through counsel on October 3, 2016.

Plaintiff Tamesia Albert

34. In or around October 2014, Albert submitted an application to Renfroe.

35. Following completion of her background check and obtaining required licensures, Renfroe told Albert that she was placed on its roster and would be contacted when a position became available.

36. In or around February 2015, Albert went to Renfroe's office in Alabama to complete certification for Claim Adjuster positions.

37. Around that time, Renfroe told Albert that she needed to submit a picture of herself to continue with her training. She complied.

38. During the spring of 2015, Albert continued to express interest in working for Renfroe as a Claim Adjuster.

39. On or around May 19, 2015, Renfroe put Albert on standby for a Claim Associate position.

40. Like the other Plaintiffs, Albert agreed to accept the Claim Associate position intending to transfer to a Claim Adjuster position in the near future.

41. Albert began employment with Renfroe on or around June 19, 2015.

42. Renfroe classified Albert as a Claim Associate and sent her to its location in Atlanta, Georgia, where she worked in support of Renfroe's client, State Farm.

43. Like the other Plaintiffs, Albert's job duties were substantially similar to those performed by Claim Adjusters.

44. For example, Albert was responsible for issuing payments and closing claims.

45. She was also instructed to send correspondence stating that she was a Claim Adjuster and that she needed licensures that were only required for Claim Adjusters.

46. Albert left employment with Renfroe on or around July 30, 2015.

47. Within a couple of months, Albert obtained a Claim Adjuster position at another company in the same State Farm office where she worked as a Claim Associate for Renfroe.

48. In her new Claim Adjuster position, Albert performed job duties like those she performed at Renfroe.

49. The EEOC issued Albert a right to sue letter on September 29, 2016. Albert received the letter through counsel on October 3, 2016.

Plaintiff Marcella Wilson

50. In or around July 2014, Wilson applied for a job as a Claim Adjuster with Renfroe.

51. Following completion of her background check and obtaining required licensures, Renfroe told Wilson that she was placed on its roster and would be contacted when a position became available.

52. Between July 2014 and May 2015, Wilson attended several trainings provided by Renfroe. Renfroe told Wilson she needed to submit a picture of herself in order to continue with the training. She complied.

53. In the spring of 2015, Renfroe offered Wilson a job as a Claim Associate.

54. Wilson accepted the position intending to transfer to a Claim Adjuster position in the near future.

55. Wilson began employment at Renfroe with Edwards on or around May 19, 2015.

56. Renfroe classified Wilson as a Claim Associate and sent her to its location in Atlanta, Georgia, where she worked in support of Renfroe's client, State Farm.

57. Like the other Plaintiffs, Wilson's job duties were substantially similar to those performed by Claim Adjusters.

58. For example, Wilson had signing authority for claims up \$25,000 and was responsible for issuing checks to insureds. She was also responsible for closing claims and informing policy-holders of their rights.

59. Like other Plaintiffs, Wilson was instructed to send correspondence stating that she was a Claim Adjuster, and Renfroe told her she needed licensures that were only required for Claim Adjusters.

60. While working in support of State Farm, Wilson worked with employees from other insurance vendors. Renfroe instructed Wilson and other Renfroe Claim Associates not to speak with these employees about their job classification.

61. On information and belief, the other vendors working in support of State Farm did not split their employees into Claim Adjusters and Claim Associates.

62. In or about June 2015, Renfroe hired two new groups of Claim Adjusters.

63. Renfroe did not tell Wilson about these openings and never offered her a Claim Adjuster position.

64. Wilson left employment with Renfroe on or around July 8, 2015.

65. The EEOC issued Wilson a right to sue on September 29, 2016. Wilson received the letter through counsel on October 3, 2016.

Plaintiff Wakiza Hutchins

66. In or around October 2014, Hutchins applied for a job as a Claim Adjuster with Renfroe.

67. Like the other Plaintiffs, Renfroe told Hutchins that she was required to submit a picture of herself which she submitted.

68. In the spring of 2015, Renfroe offered Hutchins a Claim Associate position.

69. Hutchins accepted intending to transfer to a Claim Adjuster position in the near future.

70. Hutchins began employment with Renfroe on or around May 19, 2015.

71. Renfroe classified Hutchins as a Claim Associate and sent her to its location in Atlanta, Georgia, where she worked in support of Renfroe's client, State Farm.

72. Like the other Plaintiffs, Hutchins's job duties were substantially similar to those performed by Claim Adjusters.

73. For example, Hutchins was responsible for contacting customers, setting up rentals, communicating coverage decisions, and issuing checks.

74. Hutchins was also instructed to send correspondence stating that she was a Claim Adjuster, and Renfroe told her she needed licensures that were only required for Claim Adjusters.

75. In or about June 2015, Renfroe hired two new groups of Claim Adjusters.

76. Renfroe did not tell Hutchins about these openings and never offered her a Claim Adjuster position.

77. Hutchins left employment with Renfroe on or around July 23, 2015.

78. Like Albert, Hutchins soon found a Claim Adjuster position with another vendor in the same State Farm office where she previously worked for Renfroe.

79. In her new Claim Adjuster position, Hutchins performed job duties like those she performed at Renfroe.

80. The EEOC issued Hutchins a right to sue on November 1, 2016. Hutchins received the letter through counsel on November 4, 2016.

Plaintiff Angela Burgess

81. In or around January 2015, Burgess applied for a job as a Claim Adjuster with Renfroe.

82. Subsequently, she attended training with Renfroe while waiting for a job opening.

83. In or around March 2015, Renfroe invited Burgess to a “meet and greet” to learn more about working for the company.

84. While there, Burgess learned that Renfroe would not consider her for a Claim Adjuster position until she gained additional experience in the industry.

85. Soon thereafter, Renfroe asked Burgess to submit a picture of herself to the company. She complied, was put on standby, and then offered a Claim Associate position.

86. Burgess began employment with Renfroe on or around May 19, 2015.

87. Burgess accepted intending to transfer to a Claim Adjuster position in the near future.

88. Renfroe classified Burgess as a Claim Associate and sent her to its location in Atlanta, Georgia, where she worked in support of Renfroe’s client, State Farm.

89. Like the other Plaintiffs, Wilson's job duties were substantially similar to those performed by Claim Adjusters.

90. For example, Burgess was responsible for issuing checks, paying claims, completing investigations, and verifying coverage.

91. Burgess was also instructed to send correspondence stating that she was a Claim Adjuster.

92. In the meantime, Burgess continued to express interest in the Claim Adjuster position: asking her supervisor, Benjamin Mize, how she ranked with respect to advancement. He told her it would be determined on a "case-by-case" basis.

93. Burgess left employment with Renfroe on or around July 24, 2015.

94. The EEOC issued Burgess a right to sue on September 29, 2016. Burgess received the letter through counsel on October 3, 2016.

Plaintiffs' Qualifications and Experience

95. Plaintiffs all possessed the necessary licensures for a Claim Adjuster position with Renfroe.

96. Likewise, Plaintiffs were all qualified for the position of Claim Adjuster.

97. On information and belief, Renfroe's pattern and practice of segregating job classifications by race and sex was not based on differences in qualifications, experience, or any other legitimate business criteria.

98. As a result of Renfroe's discrimination against black women, Plaintiffs have all suffered wage loss, emotional distress, and other significant injuries.

COLLECTIVE ACTION ALLEGATIONS

99. Pursuant to 29 U.S.C. § 216, Plaintiffs bring this action individually and as a collective action on behalf of all similarly situated individuals nationwide, the "Equal Pay Collective." The proposed Equal Pay Collective is defined as follows:

All female Claim Associates who worked for Defendant within three years prior to the filing of this Complaint.

100. Through this collective action, Plaintiffs seek to represent all female Claim Associates who were paid less than male employees for doing substantially equal work.

101. Plaintiffs have consented in writing to be a part of this action; their consent forms are attached as Exhibit A. As this case progresses, other individuals may sign consent forms and join as plaintiffs.

102. Defendant's failure to pay female Claim Associates equally is and was willful.

103. Defendant is liable under the Equal Pay Act for failing to compensate Plaintiffs and the Equal Pay Collective equally for equal work. Accordingly, notice should be sent to the Equal Pay Collective. On information and belief, there

are other individuals who are similarly situated to Plaintiffs who have also suffered damages due to Defendant's common policy of misclassifying females as Claim Associates and paying them less than their male counterparts who were classified as Claim Adjusters. These individuals would benefit from the issuance of court-supervised notice of this lawsuit and the opportunity to join. It is believed that these individuals are known to Defendant and are readily identifiable through its employment records.

CAUSES OF ACTION

COUNT I

**VIOLATION OF TITLE VII OF THE CIVIL RIGHTS ACT OF 1964,
AS AMENDED
42 U.S.C. §§2000e, *et seq.*
(SEX DISCRIMINATION)**

104. Plaintiffs re-allege and incorporate by reference all other paragraphs of this Complaint as if fully set forth herein.

105. 42 U.S.C. §2000e-2(a)(1) provides that it is “an unlawful employment practice for an employer to fail or refuse to hire or to discharge any individual, or to otherwise discriminate against any individual with respect to his compensation, terms, conditions, or privileges of employment, because of such individuals ... sex”

106. Defendant's conduct described herein violates 42 U.S.C. §2000e-2.

107. As a result of Defendant's violations of 42 U.S.C. §2000e-2, Plaintiffs have suffered and will continue to suffer past and present loss of income, mental anguish, emotional distress, humiliation, embarrassment, loss of reputation, and other damages in an amount in excess of \$75,000. Plaintiffs are also entitled to attorneys' fees and costs incurred in connection with this claim.

108. Defendant committed the above-alleged facts with malice or reckless indifference to the federally protected rights of Plaintiffs. As a result, Plaintiffs are entitled to punitive damages.

COUNT II
VIOLATION OF TITLE VII OF THE CIVIL RIGHTS ACT OF 1964,
AS AMENDED
42 U.S.C. §§2000e, *et seq.*
(RACE DISCRIMINATION)

109. Plaintiffs re-allege and incorporate by reference all other paragraphs of this Complaint as if fully set forth herein.

110. 42 U.S.C. §2000e-2(a)(1) provides that it is “an unlawful employment practice for an employer ... to fail or refuse to hire or to discharge any individual, or to otherwise discriminate against any individual with respect to his compensation, terms, conditions, or privileges of employment, because of such individuals ... race”

111. Defendant's conduct described herein violates 42 U.S.C. §2000e-2.

112. As a result of Defendant's violations of 42 U.S.C. §2000e-2, Plaintiffs have suffered and will continue to suffer past and present loss of income, mental anguish, emotional distress, humiliation, embarrassment, loss of reputation, and other damages in an amount in excess of \$75,000. Plaintiffs are also entitled to attorneys' fees and costs incurred in connection with this claim.

113. Defendant committed the above-alleged facts with malice or reckless indifference to the federally protected rights of Plaintiffs. As a result, Plaintiffs are entitled to punitive damages.

COUNT III
VIOLATION OF TITLE VII OF THE CIVIL RIGHTS ACT OF 1964,
AS AMENDED
42 U.S.C. §§2000e, et seq.
(COLOR DISCRIMINATION)

114. Plaintiffs re-allege and incorporate by reference all other paragraphs of this Complaint as if fully set forth herein.

115. 42 U.S.C. §2000e-2(a)(1) provides that it is "an unlawful employment practice for an employer ... to fail or refuse to hire or to discharge any individual, or to otherwise discriminate against any individual with respect to his compensation, terms, conditions, or privileges of employment, because of such individuals ... color"

116. Defendant's conduct described herein violates 42 U.S.C. §2000e-2.

117. As a result of Defendant's violations of 42 U.S.C. §2000e-2, Plaintiffs have suffered and will continue to suffer past and present loss of income, mental anguish, emotional distress, humiliation, embarrassment, loss of reputation, and other damages in an amount in excess of \$75,000. Plaintiffs are also entitled to attorneys' fees and costs incurred in connection with this claim.

118. Defendant committed the above-alleged facts with malice or reckless indifference to the federally protected rights of Plaintiffs. As a result, Plaintiff is entitled to punitive damages.

COUNT IV
VIOLATION OF THE EQUAL PAY ACT
29 U.S.C. §206

119. Plaintiffs re-allege and incorporate by reference all other paragraphs of this Complaint as if fully set forth herein.

120. The Equal Pay Act provides that "no employer ... shall discriminate...on the basis of sex by paying wages to employees at a rate less than the rate at which he pays wages to employees of the opposite sex ... for equal work" 29 U.S.C. §206(d).

121. Defendant denied Plaintiffs equal pay for equal work by misclassifying them as Claim Associates while classifying their male counterparts as Claim Adjusters for performing substantially equal work.

122. Defendant's conduct violates 29 U.S.C. §206(d).

123. As a result of Defendant's violations of the Equal Pay Act, Plaintiffs have suffered wage loss. Plaintiffs are also entitled to liquidated damages, attorneys' fees, and other costs incurred in connection with this claim.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray for judgment against Renfroe as follows:

1. That the practices of Defendant complained of herein be determined and adjudged to constitute violations of Title VII and the Equal Pay Act;
2. An injunction against Defendant and its directors, officers, owners, agents, successors, employees, and representatives, and any and all persons acting in concert with them, from engaging in each of the unlawful practices, policies, and customs set forth herein;
3. For an award of compensatory relief and damages arising from past and future loss of income, benefits, mental anguish, emotional distress, and other damages in excess of \$75,000;
4. For pre-judgment interest, as provided by law;
5. For Plaintiffs' costs, disbursements, and attorneys' fees pursuant to law;
6. For all relief available under Title VII, including punitive damages;

7. For all relief available under the Equal Pay Act, including liquidated damages;
8. For such other further relief available by statute; and
9. For such other and further relief as the Court deems just and equitable.

Demand for Jury Trial

Plaintiffs hereby demand a trial by jury.

Designation of Venue for Trial

Plaintiffs request Atlanta, Georgia, as the place for trial.

Respectfully submitted this 20th day of December, 2016.

AUSTIN & SPARKS, P.C.

By: /s/ John T. Sparks, Sr.
Georgia Bar No. 669575

2974 Lookout Place N.E., Suite 200
Atlanta, Georgia 30305
404-869-0100 / 404-869-0200 (fax)
jsparks@austinsparks.com

NICHOLS KASTER, PLLP

Matthew H. Morgan
Minn. Bar No. 304657
(*pro hac vice* forthcoming)
Matthew A. Frank
Minn. Bar No. 395362
(*pro hac vice* forthcoming)

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Minneapolis, MN 55402
612-256-3200 / 612-338-4878 (fax)
morgan@nka.com
mfrank@nka.com

Attorneys for Plaintiffs

EXHIBIT A

PLAINTIFF NATASHA EDWARDS (née DWARIKA)
FLSA CONSENT FORM

1. I hereby consent to make a claim under the Fair Labor Standards Act, 29 U.S.C. § 201, *et seq.* against my former employer, E.A. Renfroe & Company, Inc. (hereinafter, “Defendant”).

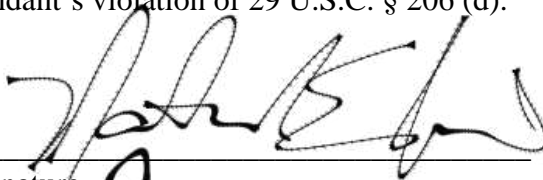
2. I was employed by Defendant from approximately May 2015, until approximately September 2015, as a Claims Associate for Defendant deployed in Atlanta, Georgia, to support Defendant’s client, State Farm.

3. During my employment, I became aware Defendant did not pay female employees the same wages as male employees doing equal or substantially similar work.

4. I believe Defendant’s actions were in violation of the Equal Pay Act, 29 U.S.C. § 206 (d).

5. I am seeking recovery of my lost wages and for all other relief as the Court may deem appropriate as a result of Defendant’s violation of 29 U.S.C. § 206 (d).

Date: 12/16/2016



Signature

Natasha Edwards

Print Name

**PLAINTIFF TAMESIA ALBERT
FLSA CONSENT FORM**

1. I hereby consent to make a claim under the Fair Labor Standards Act, 29 U.S.C. § 201, *et seq.* against my former employer, E.A. Renfroe & Company, Inc. (hereinafter, "Defendant").

2. I was employed by Defendant from approximately June 2015, until approximately July 2015, as a Claims Associate for Defendant deployed in Atlanta, Georgia, to support Defendant's client, State Farm.

3. During my employment, I became aware Defendant did not pay female employees the same wages as male employees doing equal or substantially similar work.

4. I believe Defendant's actions were in violation of the Equal Pay Act, 29 U.S.C. § 206 (d).

5. I am seeking recovery of my lost wages and for all other relief as the Court may deem appropriate as a result of Defendant's violation of 29 U.S.C. § 206 (d).

Date: 12/15/2016



Signature

Tamesia Albert
Print Name

**PLAINTIFF MARCELLA WILSON
FLSA CONSENT FORM**

1. I hereby consent to make a claim under the Fair Labor Standards Act, 29 U.S.C. § 201, *et seq.* against my former employer, E.A. Renfroe & Company, Inc. (hereinafter, "Defendant").

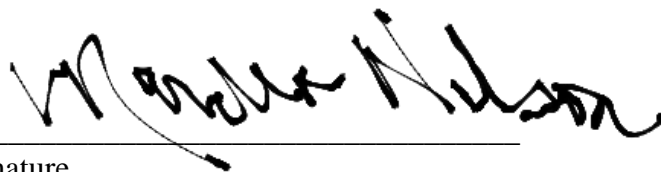
2. I was employed by Defendant from approximately May 2015, until approximately July 2015, as a Claims Associate for Defendant deployed in Atlanta, Georgia, to support Defendant's client, State Farm.

3. During my employment, I became aware Defendant did not pay female employees the same wages as male employees doing equal or substantially similar work.

4. I believe Defendant's actions were in violation of the Equal Pay Act, 29 U.S.C. § 206 (d).

5. I am seeking recovery of my lost wages and for all other relief as the Court may deem appropriate as a result of Defendant's violation of 29 U.S.C. § 206 (d).

Date: 12/15/2016



Signature

Marcella Wilson
Print Name

**PLAINTIFF WAKIZA HUTCHINS
FLSA CONSENT FORM**

1. I hereby consent to make a claim under the Fair Labor Standards Act, 29 U.S.C. § 201, *et seq.* against my former employer, E.A. Renfroe & Company, Inc. (hereinafter, "Defendant").

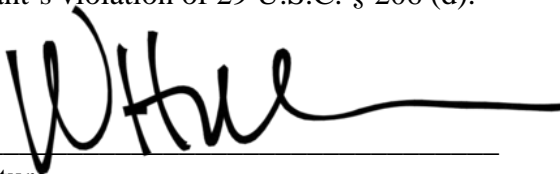
2. I was employed by Defendant from approximately May 2015, until approximately July 2015, as a Claims Associate for Defendant deployed in Atlanta, Georgia, to support Defendant's client, State Farm.

3. During my employment, I became aware Defendant did not pay female employees the same wages as male employees doing equal or substantially similar work.

4. I believe Defendant's actions were in violation of the Equal Pay Act, 29 U.S.C. § 206 (d).

5. I am seeking recovery of my lost wages and for all other relief as the Court may deem appropriate as a result of Defendant's violation of 29 U.S.C. § 206 (d).

Date: 12/18/2016



Signature

Wakiza Hutchins

Print Name

**PLAINTIFF ANGELA BURGESS
FLSA CONSENT FORM**

1. I hereby consent to make a claim under the Fair Labor Standards Act, 29 U.S.C. § 201, *et seq.* against my former employer, E.A. Renfroe & Company, Inc. (hereinafter, "Defendant").

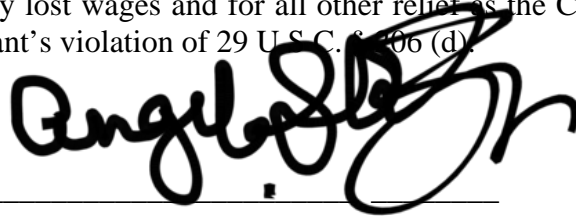
2. I was employed by Defendant from approximately May 2015, until approximately July 2015, as a Claims Associate for Defendant deployed in Atlanta, Georgia, to support Defendant's client, State Farm.

3. During my employment, I became aware Defendant did not pay female employees the same wages as male employees doing equal or substantially similar work.

4. I believe Defendant's actions were in violation of the Equal Pay Act, 29 U.S.C. § 206 (d).

5. I am seeking recovery of my lost wages and for all other relief as the Court may deem appropriate as a result of Defendant's violation of 29 U.S.C. § 206 (d).

Date: 12/15/2016



Signature

Angela Burgess
Print Name

JS44 (Rev. 11/16 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)

I. (a) PLAINTIFF(S)

Natasha Edwards, Tamesia Albert, Marcella Wilson, Wakiza Hutchins, and Angela Burgess, individually and on behalf of other similarly situated individuals

DEFENDANT(S)

E.A. Renfroe & Company, Inc.

(b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF Fulton County
(EXCEPT IN U.S. PLAINTIFF CASES)

COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT _____
(IN U.S. PLAINTIFF CASES ONLY)

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

(c) ATTORNEYS (FIRM NAME, ADDRESS, TELEPHONE NUMBER, AND E-MAIL ADDRESS)

John T. Sparks, AUSTIN & SPARKS, P.C.
2974 Lookout Place NE, Suite 200
Atlanta, GA 30305
Tel: (404) 869-0100
jsparks@austinsparks.com

ATTORNEYS (IF KNOWN)

II. BASIS OF JURISDICTION
(PLACE AN "X" IN ONE BOX ONLY)

- 1 U.S. GOVERNMENT PLAINTIFF
- 2 U.S. GOVERNMENT DEFENDANT
- 3 FEDERAL QUESTION (U.S. GOVERNMENT NOT A PARTY)
- 4 DIVERSITY (INDICATE CITIZENSHIP OF PARTIES IN ITEM III)

III. CITIZENSHIP OF PRINCIPAL PARTIES
(PLACE AN "X" IN ONE BOX FOR PLAINTIFF AND ONE BOX FOR DEFENDANT)
(FOR DIVERSITY CASES ONLY)

- | | | | | | |
|----------------------------|----------------------------|---|----------------------------|----------------------------|---|
| PLF | DEF | | PLF | DEF | |
| <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 |

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)

Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. Sec. 2000e, et seq., and the Equal Pay Act, 29 U.S.C. Sec. 206

(IF COMPLEX, CHECK REASON BELOW)

- 1. Unusually large number of parties.
- 2. Unusually large number of claims or defenses.
- 3. Factual issues are exceptionally complex
- 4. Greater than normal volume of evidence.
- 5. Extended discovery period is needed.
- 6. Problems locating or preserving evidence
- 7. Pending parallel investigations or actions by government.
- 8. Multiple use of experts.
- 9. Need for discovery outside United States boundaries.
- 0. Existence of highly technical issues and proof.

CONTINUED ON REVERSE

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT \$ _____ APPLYING IFP _____ MAG. JUDGE (IFP) _____
JUDGE _____ MAG. JUDGE _____ (Referral) 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 153
- 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

SOCIAL SECURITY - "0" MONTHS DISCOVERY TRACK

- 861 HIA (1395(f))
- 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 ANTRUST
- 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 \$ >\$75,000.00
 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.



Dec. 20, 2016

SIGNATURE OF A ATTORNEY OF RECORD

DATE

ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [E.A. Renfroe Hit with Race, Gender Discrimination Suit](#)
