

“GEICO”), seeking to recover for Defendant’s violations of the Fair Labor Standards Act, 29 U.S.C. § 201, *et. seq.* (the “FLSA”), the Pennsylvania Minimum Wage Act (“PMWA”), 43 P.S. § 333.101, *et seq.*, and the Pennsylvania Wage Payment and Collection Law (“WPCL”), 43 P.S. § 260.1, *et seq.* Plaintiff, on behalf of herself and all others similarly situated, alleges as follows:

PARTIES AND JURISDICTION

1. Plaintiff is an adult resident of the Commonwealth of Pennsylvania.
2. By acting as the named Plaintiff in this action, Plaintiff hereby consents in the writing of the heading of this Complaint to act as a Class Action Class Representative and participate as a Plaintiff in an FLSA Collective Action.
3. GEICO is a corporation formed under the laws of the State of Nebraska.
4. At all times relevant to this action, GEICO has maintained its principal place of business in Chevy Chase, Maryland.
5. At all times relevant to this action, GEICO has operated substantially and continuously in State College, Pennsylvania, across the Commonwealth of Pennsylvania, and in each of the 50 States of the United States.
6. This Court has subject matter jurisdiction pursuant to 28 U.S.C. § 1331 because this action involves a federal question under the FLSA and properly

confers supplemental jurisdiction over alleged common and interrelated state law claims seeking recovery of unpaid wages and damages under Pennsylvania law.

7. Venue is proper in this Court pursuant to 28 U.S.C. § 1391(b).

8. GEICO is an enterprise engaged in commerce under the FLSA because material hereto it had an annual gross volume of sales more than \$500,000.00.

9. At all times relevant, GEICO was Plaintiff's employer and the employer of all other similarly situated Region 1 Automobile and/or Residential Damage Adjusters 1 and/or II ("hereinafter, "Region 1 Adjusters") as defined by the FLSA and applicable state law.

FACTS

10. During the relevant period of at least May 2018 through the present ("the relevant period"), Plaintiff has been employed by GEICO as a Region 1 Adjuster.

11. During the relevant period, Plaintiff primarily performed her work duties within the Commonwealth of Pennsylvania and in or around State College, Pennsylvania.

12. During the relevant period, Plaintiff typically and customarily performed compensable job duties for the benefit of GEICO Monday through

Friday, from about 8:00 AM until about 5:30 PM – 6:30 PM, and as needed on weekends.

13. During the relevant period, Plaintiff did not cease performing her compensable work duties for the benefit of GEICO during workdays for a 45-minute meal period, or a *bona fide* meal period of any significant length.

14. During the relevant period, GEICO paid Plaintiff a flat weekly salary or at an hourly rate designed and intended to compensate Plaintiff for 7.75 hours per day or 38.75 hours per week (8:00 AM – 4:30 PM, with no wages paid for a 45-minute meal period = 7.75 hours per day) * 5 days per week = 38.75 hours per week).

15. During the relevant period, GEICO directed Plaintiff and other similarly situated Region 1 Adjusters to enter 7.75 hours of compensable time per day on employee time records to ensure overtime and, by extension, time-and-one-half overtime wages would not be due and owing to non-exempt employees like Plaintiff and other similarly situated Region 1 Adjusters.

16. Through GEICO company-wide policies and business practices, carried out through intimidation tactics and implied adverse employment consequences, GEICO successfully pressured Plaintiff and other similarly situated Region 1 Adjusters to customarily enter 7.75 hours of compensable time per day notwithstanding that Plaintiff and other similarly situated Region 1 Adjusters

regularly and customarily worked more between 8-10 hours per day and, by extension, about 40-50 hours per week.

17. Through GEICO company-wide policies and business practices, GEICO instructed the supervisors for Plaintiff and other similarly situated Region 1 Adjusters to inform Plaintiff and other similarly situated Region 1 Adjusters that 7.75 hours per day was sufficient if Plaintiff and other similarly situated Region 1 Adjusters were working hard and doing their job. This policy and strategy resulted in the logical conclusion that if Plaintiff or any other similarly situated Region 1 Adjuster advised supervisors they worked more than eight (8) hours in a day, the additional working hours evinced poor work performance. Thus, GEICO created a company and class-wide policy and practice, reinforced by supervisors and GEICO company culture, that it was better for Plaintiff and other similarly situated Region 1 Adjuster's career to stay quiet and allow GEICO to steal their hours/wages rather than speak up, complain about additional compensable work hours, and risk a poor workplace reputation, negative performance reviews, and risk additional negative workplace consequences.

18. At all times relevant, GEICO had actual knowledge employee complaints, text messages, emails, internal employee chat or messaging programs, and other employee monitoring systems that GEICO's time sheet system and the content thereof was not accurate and that Plaintiff and other similarly situated

Region 1 Adjusters regularly and customarily worked more than eight (8) hours per day and more than forty (40) hours per week.

19. At all times relevant to this action, GEICO had actual or constructive knowledge and otherwise suffered or permitted Plaintiff and other similarly situated Region 1 Adjusters to perform compensable work duties over eight (8) hours per day and more than forty (40) hours per week.

20. On some occasions, GEICO approved Plaintiff and/or other similarly situated Region 1 Adjuster's compensable work exceeding 7.75 hours per day and/or 40 hours per week. These instances, customarily, occurred when GEICO directed Plaintiff or other similarly situated Region 1 Adjusters to service additional GEICO customers. In these instances, GEICO paid Plaintiff and/or other similarly situated Region 1 Adjusters for some, but not all compensable hours worked.

21. At all times relevant, GEICO had actual knowledge that it was obligated under the FLSA and Pennsylvania law to track and record Plaintiff and other similarly situated Region 1 Adjuster's compensable hours accurately and with precision.

22. At all times relevant, GEICO had actual knowledge that its failure to track and record Plaintiff and other similarly situated Region 1 Adjuster's

compensable hours accurately and/or with precision was in direct violation of GEICO's FLSA and Pennsylvania law record keeping requirements.

23. At all times relevant, GEICO had actual knowledge that it was obligated to pay Plaintiff and other similarly situated Region 1 Adjusters all wages due and owing for all hours Plaintiff and other similarly situated Region 1 Adjusters worked each week and pay Plaintiff and other similarly situated Region 1 Adjusters overtime wages at the time-and-one-half rate for overtime Plaintiff and other similarly situated Region 1 Adjusters worked over forty (40) hours each week.

24. At all times relevant, GEICO had actual knowledge that its failure to pay Plaintiff and other similarly situated Region 1 Adjusters all wages due and owing for all hours Plaintiff and other similarly situated Region 1 Adjusters worked each week and its failure to pay Plaintiff and other similarly situated Region 1 Adjusters overtime wages at the time-and-one-half rate for overtime Plaintiff and other similarly situated Region 1 Adjusters worked over forty (40) hours each week was in direct violation of GEICO's FLSA and Pennsylvania wage payment obligations.

FLSA COLLECTIVE ACTION ALLEGATIONS

25. Plaintiff brings her Count for violations of the FLSA as a collective action pursuant to 29 U.S.C. § 216(b), on behalf of herself and all similarly

situated employees.

26. Similarly situated employees, for purposes of the FLSA collective action claims, include Region 1 Adjusters who work or have worked for GEICO as Region 1 Adjusters performing compensable work duties for GEICO's benefit in Pennsylvania, Maryland, District of Columbia, Delaware, and/or West Virginia at any time within the three (3) year period prior to joining this lawsuit under 29 U.S.C. § 216(b), who were (i) paid by GEICO on an hourly basis and (ii) were not paid by GEICO at the time-and-one-half rate owed for all overtime worked over forty (40) hours per week as required by the FLSA time-and-one-half overtime compensation mandate.

27. Pursuit of this action collectively will provide the most efficient mechanism for adjudicating the claims of the Plaintiff and the Class Plaintiffs.

28. Plaintiff requests she be permitted to serve as representative of those who consent to participate in this action, and that this action be conditionally certified as a collective action pursuant to 29 U.S.C. § 216(b).

PMWA / WPCL CLASS ACTION ALLEGATIONS

29. Plaintiff brings her state law counts for violations of the PMWA and WPCL (in sub-classes for each relevant statute) pursuant to Rule 23(a) and (b)(3) of the Federal Rules of Civil Procedure, on behalf of herself and all similarly situated Region 1 Adjusters, for relief to redress and remedy GEICO's overtime

compensation violations of the PWWA and/or GEICO's failure to pay wages in violation of the WPCL.

30. Pursuit of this action as a class will provide the most efficient mechanism for adjudicating the claims of the Plaintiff and the Class Plaintiffs.

31. The Proposed Sub-Classes:

i. The PMWA Sub-Class: All Region 1 Adjusters who work or have worked for GEICO as Region 1 Adjusters performing compensable work duties for GEICO's benefit in Pennsylvania at any time within the three (3) year period prior to the filing of this lawsuit who were (i) were not paid all wages due and owing for work duties performed in the Commonwealth of Pennsylvania as a result of GEICO's class-wide payroll practice of shaving shift minutes and/or hours worked exceeding 7.75 per shift and/or (ii) who were subject to GEICO's payroll policies and practices denying payment of wages for all hours worked and/or payment of overtime wages at the time-and-one-half rate for overtime worked over forty (40) hours per week

ii. The WPCL Sub-Class: All Region 1 Adjusters who work or have worked for GEICO as Region 1 Adjusters performing compensable work duties for GEICO's benefit in Pennsylvania at any time within the three (3) year period prior to the filing of this lawsuit who (i) were not paid all wages due and owing for work duties performed as a result of GEICO's class-wide payroll practice of

shaving shift minutes and/or hours worked exceeding 7.75 per shift and/or (ii) who were subject to GEICO's payroll policies and practices denying payment of wages for all hours worked each week.

32. Numerosity: The proposed class is so numerous that the joinder of all such persons is impracticable, and the disposition of their claims as a class will benefit the parties and the Court. While the exact number of Class Plaintiffs is unknown to the Plaintiff at this time, upon information and belief, each Sub-Class comprises at least fifty (50) Region 1 Adjusters.

33. Common Questions Predominate: There is a well-defined commonality of interest in the questions of law and fact involving and affecting the proposed class, and these common questions of law and fact predominate over any questions affecting members of the proposed class individually, in that Plaintiff and all Class Plaintiffs have been harmed by GEICO's common and class-wide payroll practices of (i) shaving compensable work hours exceeding 7.75 hours per shift and/or (ii) denying payment of all wages earned and contractually and/or equitably due and owing for all hours compensable hours worked each week.

34. Typicality: The claims of the Plaintiff are typical of the claims of the Class Plaintiffs and the relief sought by the Plaintiff is typical of the relief which would be sought by each of the Class Members in separate actions.

35. All Class Plaintiffs were subject to the same common and class-wide unlawful compensation practices perpetrated by GEICO, as alleged herein.

36. GEICO's common and class-wide unlawful compensation policies and practices affected and caused damages to the Plaintiff and all Class Plaintiffs similarly.

37. Plaintiff and the Class Plaintiffs sustained similar losses, injuries, and damages arising from the same unlawful and class-wide payroll policies and practice perpetrated by GEICO.

38. Adequacy of Representation: Plaintiff individually and collectively, can fairly and adequately protect the interests of all members of the proposed class, and there are no known conflicts of interest between any of the Plaintiff and any of the Class Plaintiffs.

39. Plaintiff has retained counsel who is experienced and competent in both wage and hour law and complex class action litigation.

40. Superiority: A class action is superior to other available means for the fair and efficient adjudication of this controversy. Individual joinder of all Class Plaintiffs is impracticable. Class action treatment will permit a large number of similarly situated persons to prosecute their common claims in a single forum simultaneously, efficiently, and without the unnecessary duplication of effort and expense that numerous individual actions engender. Because the

losses, injuries and damages suffered by each of the individual Class Plaintiffs may be small for some in the sense pertinent to the class action analysis, the expenses and burden of individual litigation would make it extremely difficult or impossible for the individual Class Plaintiffs to redress the wrongs done to them.

41. Further, important public interests will be served by addressing the matter as a class action. The cost to the court system and the public for the adjudication of individual litigation and claims would be substantially greater than if the claims are treated as a class action. Prosecution of separate actions by individual members of the proposed class would create a risk of inconsistent and/or varying adjudications with respect to the individual members of the class, establishing incompatible standards of conduct for GEICO, and resulting in the impairment of Class Plaintiffs' rights and the disposition of their interests through actions to which they are not parties. The issue in this action can be decided by means of common, class-wide proof. In addition, if appropriate, the Court can and is empowered to fashion methods to efficiently manage this action as a class action.

42. Public Policy Considerations: GEICO violated wage payment laws and contractual wage payment obligations. Just as current employees are often afraid to assert their rights out of fear of direct or indirect retaliation, former employees may also be fearful of bringing claims because doing so can harm

their employment, future employment, and future efforts to secure employment. Class action lawsuits provide Class Plaintiffs who are not named in the Complaint a degree of anonymity, which allows for vindication of their rights while eliminating or reducing these risks.

COUNT I
VIOLATION OF THE FLSA OVERTIME COMPENSATION MANDATE

43. Plaintiff incorporates by reference all preceding paragraphs as if the same were repeated here verbatim.

44. Pursuant to the FLSA, employers must pay non-exempt employees such as Plaintiff and the Class Plaintiffs at the rate of one-and-one-half times (1.5x) their regular hourly rate for all overtime worked over 40 hours per week.

45. As set forth above, GEICO failed to pay Plaintiff and the Class Plaintiffs at the FLSA required rate of one-and-one-half times (1.5x) their regular hourly rate for all overtime Plaintiff and the Class Plaintiffs worked over 40 hours per week.

46. GEICO had actual knowledge that its failure to pay Plaintiff and the Class Plaintiffs at the FLSA required rate of one-and-one-half times (1.5x) their regular hourly rate for all overtime worked over 40 hours per week was in direct violation of Plaintiff and the Class Plaintiffs' FLSA overtime compensation rights.

47. The foregoing conduct, as alleged above, constitutes willful violations of the FLSA which permits the recovery of unpaid overtime wages for up to three

(3) years, rather than two (2) years.

48. Plaintiff and the Class Plaintiffs seek to recover from GEICO of the following damages:

- a. Unpaid wages due and owing for compensable overtime work duties performed over forty (40) hours per week;
- b. Statutory liquidated damages;
- c. Attorneys' fees and costs; and
- d. All other legal and equitable relief as the Court deems just and proper.

COUNT II
VIOLATION OF THE PENNSYLVANIA MINIMUM WAGE ACT
OVERTIME VIOLATIONS

49. Plaintiff re-alleges and reasserts each allegation set forth in the paragraphs above as if each were set forth herein.

50. During the relevant period, GEICO have employed, and/or continues to employ Plaintiff and other similarly situated Region 1 Adjusters within the meaning of the PMWA.

51. During the relevant time, Plaintiff and other similarly situated Region 1 Adjusters worked more than forty (40) hours during weeks of their employ and GEICO has perpetrated a willful policy and practice of refusing to pay premium overtime compensation for all hours worked over 40 hours per workweek.

52. As set forth above, GEICO failed to pay Plaintiff and the Class Plaintiffs at the PMWA required rate of one-and-one-half times (1.5x) their regular hourly rate for all overtime Plaintiff and the Class Plaintiffs worked over 40 hours per week.

53. GEICO had actual knowledge that its failure to pay Plaintiff and the Class Plaintiffs at the PMWA required rate of one-and-one-half times (1.5x) their regular hourly rate for all overtime worked over 40 hours per week was in direct violation of Plaintiff and the Class Plaintiffs' FLSA overtime compensation rights.

54. GEICO has violated and continues to violate, the PMWA, 43 Pa. C.S.C. § 333.101 et seq.

55. Plaintiff and the Class Plaintiffs seek to recover from GEICO of the following damages:

- a. Unpaid wages due and owing for compensable overtime work duties performed over forty (40) hours per week;
- b. Statutory liquidated damages;
- c. Attorneys' fees and costs; and
- d. All other legal and equitable relief as the Court deems just and proper.

COUNT III
VIOLATION OF THE PENNSYLVANIA WAGE PAYMENT
AND COLLECTION LAW

56. Plaintiff re-alleges and reasserts each allegation set forth in the paragraphs above as if each were set forth herein.

57. At all relevant times, GEICO have employed and/or continue to employ Plaintiff and all similarly situated Region 1 Adjusters within the meaning of the WPCL.

58. Pursuant to the WPCL, 43 Pa. S. § 260.1 *et seq.* Plaintiff and all other similarly situated Region 1 Adjusters were entitled to receive all compensation due and owing to them on their regular payday.

59. As a result of GEICO's unlawful policies, Plaintiff and all other similarly situated Region 1 Adjusters have been deprived of compensation due and owing.

60. Plaintiff and the Class Plaintiffs seek to recover from GEICO of the following damages:

- a. Unpaid wages due and owing for compensable overtime work duties performed over forty (40) hours per week;
- b. Statutory liquidated damages;
- c. Attorneys' fees and costs; and
- d. All other legal and equitable relief as the Court deems just and

proper.

RELIEF SOUGHT

WHEREFORE, Plaintiff, and all those similarly situated Region 1 Adjusters, collectively pray that this Honorable Court:

1. Issue an Order certifying this action as a collective action under the FLSA, and designate Plaintiff as the representative of all those similarly situated under the FLSA collective action;

2. Issue an Order certifying this action as a class action under the PMWA and WPCL sub-classes, and designate Plaintiff as the representatives on behalf of all those similarly situated under the PMWA and PWCL sub-classes;

3. Award Plaintiff and all those similarly situated Class Plaintiffs actual damages in the amount of all wages found due to Plaintiff and those similarly situated Class Plaintiffs and an award of liquidated damages as provided by the FLSA, PMWA, and WPCL.

4. Award Plaintiff and all those similarly situated Class Plaintiffs pre- and post-judgment interest at the statutory rate;

5. Award Plaintiff and all those similarly situated Class Plaintiffs attorneys' fees, costs, and disbursements; and

6. Award Plaintiff and all those similarly situated Class Plaintiffs further legal and/or equitable relief as this Court deems necessary, just and proper.

JURY DEMAND

Plaintiff requests a jury trial on all issues so triable.

Dated: May 12, 2021

Respectfully submitted,

CGA LAW FIRM

/s/ Zachary E. Nahass

Zachary E. Nahass,

PA ID 314834

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York, PA 17401

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Email: znahass@cglaw.com

JS 44 (Rev. 04/21)

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

Susan Olivia Hart

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

(c) Attorneys (Firm Name, Address, and Telephone Number)
Zachary E. Nahass, Esquire, CGA Law Firm,
135 N. George St., York, PA 17401, 717-848-4900

DEFENDANTS

Government Employees Insurance Company d/b/a GEICO

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)

Unknown

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)

	PTF	DEF		PTF	DEF
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)

Click here for: [Nature of Suit Code Descriptions](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 375 False Claims Act
<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 690 Other	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 376 Qui Tam (31 USC 3729(a))
<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 320 Assault, Libel & Slander		INTELLECTUAL PROPERTY RIGHTS	<input type="checkbox"/> 400 State Reapportionment
<input type="checkbox"/> 140 Negotiable Instrument	<input type="checkbox"/> 330 Federal Employers' Liability		<input type="checkbox"/> 820 Copyrights	<input type="checkbox"/> 410 Antitrust
<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 340 Marine		<input type="checkbox"/> 830 Patent	<input type="checkbox"/> 430 Banks and Banking
<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 345 Marine Product Liability		<input type="checkbox"/> 835 Patent - Abbreviated New Drug Application	<input type="checkbox"/> 450 Commerce
<input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans)	<input type="checkbox"/> 350 Motor Vehicle	LABOR	<input type="checkbox"/> 840 Trademark	<input type="checkbox"/> 460 Deportation
<input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits	<input type="checkbox"/> 355 Motor Vehicle Product Liability	<input checked="" type="checkbox"/> 710 Fair Labor Standards Act	<input type="checkbox"/> 880 Defend Trade Secrets Act of 2016	<input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations
<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 720 Labor/Management Relations	SOCIAL SECURITY	<input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692)
<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<input type="checkbox"/> 740 Railway Labor Act	<input type="checkbox"/> 861 HIA (1395ff)	<input type="checkbox"/> 485 Telephone Consumer Protection Act
<input type="checkbox"/> 195 Contract Product Liability		<input type="checkbox"/> 751 Family and Medical Leave Act	<input type="checkbox"/> 862 Black Lung (923)	<input type="checkbox"/> 490 Cable/Sat TV
<input type="checkbox"/> 196 Franchise		<input type="checkbox"/> 790 Other Labor Litigation	<input type="checkbox"/> 863 DIWC/DIWW (405(g))	<input type="checkbox"/> 850 Securities/Commodities/Exchange
		<input type="checkbox"/> 791 Employee Retirement Income Security Act	<input type="checkbox"/> 864 SSID Title XVI	<input type="checkbox"/> 890 Other Statutory Actions
REAL PROPERTY	CIVIL RIGHTS		<input type="checkbox"/> 865 RSI (405(g))	<input type="checkbox"/> 891 Agricultural Acts
<input type="checkbox"/> 210 Land Condemnation	<input type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS	FEDERAL TAX SUITS	<input type="checkbox"/> 893 Environmental Matters
<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 441 Voting	<input type="checkbox"/> 463 Alien Detainee	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)	<input type="checkbox"/> 895 Freedom of Information Act
<input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 442 Employment	<input type="checkbox"/> 510 Motions to Vacate Sentence	<input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 896 Arbitration
<input type="checkbox"/> 240 Torts to Land	<input type="checkbox"/> 443 Housing/Accommodations	<input type="checkbox"/> 530 General		<input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision
<input type="checkbox"/> 245 Tort Product Liability	<input type="checkbox"/> 445 Amer. w/Disabilities - Employment	<input type="checkbox"/> 535 Death Penalty		<input type="checkbox"/> 950 Constitutionality of State Statutes
<input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 446 Amer. w/Disabilities - Other	<input type="checkbox"/> 540 Mandamus & Other		
	<input type="checkbox"/> 448 Education	<input type="checkbox"/> 550 Civil Rights		
		<input type="checkbox"/> 555 Prison Condition		
		<input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement		

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):
29 U.S.C. §201, et. seq., 43 P.S. §333.101, and 43 P.S. §260.1

Brief description of cause:
Violations of the FLSA, PMWA and WPCL

VII. REQUESTED IN COMPLAINT:

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

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE _____

DOCKET NUMBER _____

DATE: 5/12/2021 SIGNATURE OF ATTORNEY OF RECORD: Zachary E. Nahass/s/

FOR OFFICE USE ONLY

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

ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [‘Intimidation Tactics’: Lawsuit Claims GEICO ‘Pressured’ Adjusters into Reporting Fewer Work Hours](#)
