

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA

-----	X
	:
VERONICA L. HUNT,	:
on behalf of herself	:
and all others similarly situated,	: Civil Action No. _____
	:
<i>Plaintiff,</i>	: INDIVIDUAL, COLLECTIVE- AND
	: CLASS-ACTION COMPLAINT
v.	:
	: Jury Trial Demanded
MCKESSON CORPORATION,	:
	:
<i>Defendant.</i>	: Electronically Filed
	:
-----	X

INDIVIDUAL, COLLECTIVE- AND CLASS-ACTION COMPLAINT

Nature of the Action, Jurisdiction, and Venue

1. This is an individual and collective action under the Fair Labor Standards Act (FLSA), 29 U.S.C. §§ 207(a) & 216(b), and an individual and class action under the Pennsylvania Minimum Wage Act (PMWA), 43 P.S. §§ 333.104(c) & 333.113, to recover damages for non-payment of wages.
2. Jurisdiction of this court is invoked under 28 U.S.C. § 1331 and, for supplemental state claims, 28 U.S.C. § 1367(a). This action is authorized and instituted under the FLSA and the PMWA.
3. Many of the actions and policies alleged to be unlawful were committed in and around Moon Township, Pennsylvania, where Plaintiff worked for Defendant and where Defendant conducts regular business. Therefore, this action is within the jurisdiction of, and venue is proper in, the United States District Court for the Western District of

Pennsylvania.

PARTIES

4. **Plaintiff Veronica Hunt (“Plaintiff” or “Hunt”)** resides at 116 Marie Drive, Pittsburgh, PA 15237. Plaintiff has been working in Pennsylvania for Defendant McKesson Corporation since on or about September 15, 2014.
5. **Defendant McKesson Corporation (“Defendant” or “McKesson”)** is a corporation with its corporate headquarters at One Post Street, San Francisco, CA 94104. McKesson provides pharmaceutical, medical supplies and health care solutions for medical providers, pharmacies, health plans and manufacturers in Pennsylvania and elsewhere in the United States, Canada, Ireland, Israel, New Zealand and the United Kingdom. At all relevant times McKesson has maintained an office in Moon Township, Pennsylvania, located at 450 Lindbergh Drive, Moon Township, PA 15108.
6. At all relevant times Defendant has been an enterprise engaged in interstate commerce with annual revenues in excess of \$500,000 and has been subject to the provisions of the FLSA and the PMWA.

Statement of Individual Claims

7. Defendant hired Plaintiff as a Salesforce.com Administrator on or about October 1, 2014. She is currently titled as a Marketing Research analyst.
8. At all relevant times, Plaintiff was based in the office that Defendant maintains in Moon Township, Pennsylvania, and also regularly performed some of her duties from her home.
9. When Defendant hired Plaintiff, Defendant promised to pay Plaintiff an annual salary of \$65,000, less payroll deductions and all required withholdings.
10. On or about September 26, 2016, Plaintiff was notified by Defendant that her position

was being changed to non-exempt (hourly) beginning October 23, 2016.

11. The change, according to Defendant, was due to the Department of Labor (“DOL”) releasing its “Final Rule” on changes to the Fair Labor Standards Act on May 18, 2016.
12. In the Final Rule, the DOL changed the minimum salary threshold that applies to certain overtime exemptions from \$455/week (\$23,660 per year) to \$913/week (\$47,476 per year).
13. Defendant distributed a handout for employees entitled *New FLSA Regulations Project, Employee Q&A – Confidential Information*. In the handout Defendant explains its decision to reclassify Plaintiff’s position and other positions based on grade and job to be consistent across the company to meet the DOL requirements. The process used by McKesson ultimately received executive approval.
14. In fact, McKesson was not required by the change in the DOL Regulation to reclassify Plaintiff’s position or the classification of other positions that received a salary in excess of \$47,476 per year: the new DOL Regulation only changed the salary test for the exemption, not the duties test. Had the duties test been met, no change in exemption status was necessary.
15. Rather, Defendant simply used the new DOL Regulation as a pretext for correcting what it knew was the misclassification of Plaintiff’s position and other similar positions in an effort to hide the fact of the misclassification prior to October 23, 2016.
16. Plaintiff now tracks her work time using a WorkForce Central timekeeping system.
17. The change in classification will not change Plaintiff’s annual base pay, benefits or PTO.
18. In fact, she was already receiving in excess of the new DOL minimum.
19. However, per Defendant’s Handout, Plaintiff will now be eligible to be paid for hours worked over certain thresholds depending on the state where she works (e.g., overtime

pay at time-and-one-half the regular rate of pay for hours worked in excess of 40 in a single workweek).

20. Prior to October 23, 2016, Plaintiff was paid no overtime.
21. Prior to October 23, 2016, Defendant told Plaintiff that she was exempt from overtime.
22. This was incorrect. In fact, Plaintiff was entitled to overtime under both the FLSA and the PMWA.
23. Plaintiff normally worked in excess of 50 hours each week (10 hours or more of uncompensated overtime) until the change in classification on October 23, 2016.
24. During the course of Plaintiff's employment, Defendant knew that the policies, practices and procedures prior to October 23, 2016, concerning Plaintiff's compensation were in violation of the overtime provisions of the FLSA and PMWA, and Defendant acted in reckless disregard of the overtime provisions of the FLSA and PMWA.
25. Defendant's failure to pay overtime and failure to maintain accurate time records prior to October 23, 2016, are violations of the FLSA and the PMWA.

Class- and Collective-Action Allegations

26. This is a "hybrid" action that may be maintained as an individual action, as a collective action under the FLSA, 29 U.S.C. § 216(b), and as a class action under Federal Rule of Civil Procedure 23. *See Knepper v. Rite Aid Corp.*, 675 F.3d 249 (3d Cir. 2012).
27. The FLSA collective class includes all persons who have worked as Salesforce.com Administrators, Market Research Analysts, or similar positions at Defendant's Moon Township, PA, office and elsewhere in the United States at any time during the past three years until the change in classification on October 23, 2016.
28. The Rule 23 class definition is the same as the FLSA collective definition, except that the Rule 23 class applies only to PA employees, and also extends back three years prior to

the filing of this complaint until the change in classification on October 23, 2016.

29. Before October 23, 2016, five hundred (500) or more individuals, like Plaintiff, have been employed by Defendant in positions, including Salesforce.com Administrators, Market Research Analysts, or similar positions at Defendant's Moon Township, PA, office and elsewhere in the United States, that were knowingly misclassified as exempt.
30. Before October 23, 2016, members of the Class, like Plaintiff, were misclassified as exempt and were entitled to be paid overtime pay at time-and-one-half the regular rate of pay for hours worked in excess of 40 in a single workweek.
31. Before October 23, 2016, members of the Class, like Plaintiff, were misclassified based on the common policy by Defendant of simply assuming – without any meaningful evaluation of the actual job duties – that certain positions were exempt because these positions were paid a salary above the regulatory minimum.
32. Plaintiff and the members of the Class were not paid for overtime worked at time-and-one-half the regular rate of pay for the hours worked in excess of 40 in a single workweek.
33. The duties performed by Plaintiff and the members of the Class were substantially the same.
34. Plaintiff and the members of the Class worked normally at least 50 hours or more each week (10 hours or more of uncompensated overtime each week) until the change in classification on October 23, 2016.
35. Before the change in classification Plaintiff and the members of the Class did not record their time worked either at Defendant's offices or at home in Defendant's WorkForce Central timekeeping system.

36. Plaintiff and the members of the Class were subjected to the same or similar unlawful policies, practices and procedures concerning their compensation and allegedly exempt status during the Class Period—namely:
- a. Prior to October 23, 2016, members of the Class, like Plaintiff, were paid based on a salary, rather than on an hourly basis;
 - b. Prior to October 23, 2016, members of the Class, like Plaintiff, were misclassified based on the common policy by Defendant of simply assuming – without any meaningful evaluation of the actual job duties – that certain positions were exempt because these positions were paid a salary above the regulatory minimum;
 - c. Prior to October 23, 2016, members of the Class, like Plaintiff, were not paid any overtime premium pay for hours worked over 40 hours in workweeks during the Class Period; and,
 - d. Prior to October 23, 2016, members of the Class, like Plaintiff, worked long hours: they normally worked at least 50 or more hours each week (10 hours or more of uncompensated overtime each week).
37. During the Class Period, Defendant knew that the policies, practices and procedures concerning the compensation and allegedly exempt status of Plaintiff and the members of the Class were in violation of the overtime provisions of the FLSA and PMWA, and Defendant acted in reckless disregard of the overtime provisions of the FLSA and PMWA.
38. Prosecuting the misclassification and unpaid overtime hours claims in this case as a class action will promote judicial efficiency and will best protect the interests of the class members because the misclassification and unpaid overtime hours claims present common questions of fact and law about Defendant’s blanket policy of refusing to compensate Plaintiff and members of the Class for overtime hours worked in workweeks prior to the change in classification on October 23, 2016.

39. There are no conflicts of interest among the class members, nor does Plaintiff have any conflicts of interest with any member of the class.
40. Plaintiff will fairly and adequately represent the interests of the class.
41. Members of the class are so numerous that joinder of all members is impractical, as Plaintiff estimates that the class includes more than 500 persons.
42. Prosecuting this case as a collective action under the FLSA, and a class action under the PMWA, will promote judicial efficiency and best protect the interests of the Class.
43. Undersigned counsel for Plaintiff and the Class is experienced in the fields of employment law, FLSA collective actions, and class-action litigation, and counsel will fairly and competently represent the interests of the class.

**COUNT I: Fair Labor Standards Act - Failure to Pay Overtime
(Individual and Collective)**

44. Plaintiff incorporates by reference the preceding paragraphs of this complaint as though the same were set forth fully herein.
45. Plaintiff and members of the Class (SalesForce.com Administrators, Market Research Analysts, or similar positions at Defendant's Moon Township, PA, office and elsewhere in the United States) are current or former employees of Defendant within the meaning of the FLSA.
46. Defendant is an employer within the meaning of the FLSA.
47. During the Class Period prior to October 23, 2016, Defendant classified Plaintiff and members of the Class as exempt from the overtime provisions of the FLSA.

48. During the Class Period prior to October 23, 2016, Defendant did not pay overtime after 40 hours worked in a workweek to Plaintiff or members of the Class.
49. During the Class Period prior to October 23, 2016, Plaintiff and members of the Class were not exempt from the overtime provisions of the FLSA.
50. Defendant knew that the policies, practices and procedures concerning Plaintiff's and the Class's compensation were in violation of the overtime provisions of the FLSA, and acted in reckless disregard of the overtime provisions of the FLSA.
51. During the Class Period prior to October 23, 2016, Plaintiff and members of the Class worked in excess of 40 hours in many workweeks and were not paid any overtime premium for time worked in excess of 40 hours.
52. Defendant's failure to pay overtime wages to Plaintiff and members of the Class violated the overtime provisions of the FLSA.
53. Under the FLSA, Plaintiff and members of the Class are entitled to recover from Defendant the overtime pay improperly withheld by Defendant, plus interest, attorneys' fees, and costs.
54. Under the FLSA, Plaintiff and members of the Class are also entitled to recover liquidated damages in an amount equal to their unpaid overtime.
55. Because Defendant's violations of the FLSA were knowing and intentional, the FLSA's three-year statute of limitation applies to Plaintiff's and the Class members' claims for overtime under the FLSA.

**COUNT II: Pennsylvania Minimum Wage Act - Failure to Pay Overtime
(Individual and Class)**

56. Plaintiff incorporates by reference the preceding paragraphs of this complaint as though the same were set forth fully herein.
57. Plaintiff and members of the Class (SalesForce.com Administrators, Market Research Analysts, or similar positions at Defendant's Moon Township, PA, office and elsewhere in Pennsylvania) are current or former employees of Defendant within the meaning of the PMWA.
58. Defendant is an employer within the meaning of the PMWA.
59. During the Class Period prior to October 23, 2016, Defendant classified Plaintiff and members of the Class as exempt from the overtime provisions of the PMWA.
60. During the Class Period prior to October 23, 2016, Defendant did not pay overtime to Plaintiff or members of the Class.
61. During the Class Period prior to October 23, 2016, Plaintiff and members of the Class were not exempt from the overtime provisions of the PMWA.
62. During the Class Period prior to October 23, 2016, Plaintiff and members of the Class worked in excess of 40 hours in many workweeks and were not paid any overtime premium for time worked in excess of 40 hours in a workweek.
63. Defendant's failure to pay overtime wages to Plaintiff and members of the Class violated the overtime provisions of the PMWA.
64. Under the PMWA, Plaintiff and members of the Class are entitled to recover from

Defendant the overtime pay improperly withheld by Defendant, plus interest, attorneys' fees, and costs.

Prayer for Relief

65. Wherefore, Plaintiff, on behalf of herself and members of the Class, respectfully requests this Court enter judgment awarding them:
- a. money damages in an amount equal to the overtime compensation they are due,
 - b. liquidated damages under the FLSA in an amount equal to the overtime compensation they are due,
 - c. interest, reasonable attorneys' fees, and costs, and
 - d. all other relief that is just and proper.

Dated: December 8, 2016

Pittsburgh, PA

Respectfully submitted,

s/ Joseph H. Chivers

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*Counsel for Plaintiff
and all others similarly situated*

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

Veronica L. Hunt, on behalf of herself and all others similarly situated
 116 Marie Drive, Pittsburgh, PA 15237

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

(c) Attorneys (Firm Name, Address, and Telephone Number)

Joseph H. Chivers, Esq./John R. Linkosky, Esq.
 100 First Ave., Ste. 650, Pittsburgh, PA 15222 (412) 227-0763

DEFENDANTS

McKesson Corporation
 450 Lindbergh Drive, Moon Township, PA 15108

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)

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)

- | | | | | | |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| | 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)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input checked="" type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <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):
 Fair Labor Standards Act (FLSA) 29 U.S.C. 207(a) & 216(b)

Brief description of cause:
 FLSA/PMWA - Failure to Pay Overtime

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
 12/08/2016

SIGNATURE OF ATTORNEY OF RECORD
 /s/Joseph H. Chivers

FOR OFFICE USE ONLY

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

JS 44A REVISED June, 2009
IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA
THIS CASE DESIGNATION SHEET MUST BE COMPLETED

PART A

This case belongs on the (Erie Johnstown Pittsburgh) calendar.

1. **ERIE CALENDAR** - If cause of action arose in the counties of Crawford, Elk, Erie, Forest, McKean, Venang or Warren, OR any plaintiff or defendant resides in one of said counties.
2. **JOHNSTOWN CALENDAR** - If cause of action arose in the counties of Bedford, Blair, Cambria, Clearfield or Somerset OR any plaintiff or defendant resides in one of said counties.
3. Complete if on **ERIE CALENDAR**: I certify that the cause of action arose in _____ County and that the _____ resides in _____ County.
4. Complete if on **JOHNSTOWN CALENDAR**: I certify that the cause of action arose in _____ County and that the _____ resides in _____ County.

PART B (You are to check ONE of the following)

1. This case is related to Number _____ . Short Caption _____
2. This case is not related to a pending or terminated case.

DEFINITIONS OF RELATED CASES:

CIVIL: Civil cases are deemed related when a case filed relates to property included in another suit or involves the same issues of fact or it grows out of the same transactions as another suit or involves the validity or infringement of a patent involved in another suit
EMINENT DOMAIN: Cases in contiguous closely located groups and in common ownership groups which will lend themselves to consolidation for trial shall be deemed related.

HABEAS CORPUS & CIVIL RIGHTS: All habeas corpus petitions filed by the same individual shall be deemed related. All pro se Civil Rights actions by the same individual shall be deemed related.

PART C

I. CIVIL CATEGORY (Select the applicable category).

1. Antitrust and Securities Act Cases
2. Labor-Management Relations
3. Habeas corpus
4. Civil Rights
5. Patent, Copyright, and Trademark
6. Eminent Domain
7. All other federal question cases
8. All personal and property damage tort cases, including maritime, FELA, Jones Act, Motor vehicle, products liability, assault, defamation, malicious prosecution, and false arrest
9. Insurance indemnity, contract and other diversity cases.
10. Government Collection Cases (shall include HEW Student Loans (Education), V A Overpayment, Overpayment of Social Security, Enlistment Overpayment (Army, Navy, etc.), HUD Loans, GAO Loans (Misc. Types), Mortgage Foreclosures, SBA Loans, Civil Penalties and Coal Mine Penalty and Reclamation Fees.)

I certify that to the best of my knowledge the entries on this Case Designation Sheet are true and correct

/s/Joseph H. Chivers

Date: 12/8/16

ATTORNEY AT LAW

NOTE: ALL SECTIONS OF BOTH FORMS MUST BE COMPLETED BEFORE CASE CAN BE PROCESSED.

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT
for the

VERONICA L. HUNT, on behalf of herself and all
others similarly situated,

Plaintiff(s)

v.

MCKESSON CORPORATION

Defendant(s)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) McKesson Corporation
450 Lindbergh Drive
Moon Township, PA 15108

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you
are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ.
P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of
the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney,
whose name and address are:

Joseph H. Chivers, Esquire
The Employment Rights Group
100 First Avenue, Suite 650
Pittsburgh, PA 15222
jchivers@employmentrightsgroup.com

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint.
You also must file your answer or motion with the court.

CLERK OF COURT

Date:

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. _____

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____
was received by me on *(date)* _____.

I personally served the summons on the individual at *(place)* _____
_____ on *(date)* _____ ; or

I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____, and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* _____, who is
designated by law to accept service of process on behalf of *(name of organization)* _____
_____ on *(date)* _____ ; or

I returned the summons unexecuted because _____ ; or

Other *(specify)*: _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Marketing Research Analyst Files Unpaid Overtime Suit Following](#)
