

VINCENT J. BARTOLOTTA, JR., ESQ. (SBN 055139)  
E-mail: Bartolotta@tbmlawyers.com  
KAREN R. FROSTROM, ESQ. (SBN 207044)  
E-mail: Frostrom@tbmlawyers.com  
CHARLYNNE I. REJAIAN. (SBN 299705)  
E-mail: Rejaian@tbmlawyers.com  
THORSNES BARTOLOTTA MCGUIRE LLP  
2550 Fifth Avenue, 11<sup>th</sup> Floor  
San Diego, California 92103  
Tel: (619) 236-9363 Fax: (619) 236-9653

Attorneys for Plaintiff Christopher Jenkins

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

Christopher Jenkins

Plaintiff,

v.

Dickey’s Barbecue Restaurants, Inc.,

Defendant.

Case No.:

**[CLASS ACTION]**

**COMPLAINT**

**[DEMAND FOR JURY TRIAL]**

Plaintiff alleges as follows under information and belief:

**PARTIES**

1. Plaintiff Christopher Jenkins, and at all times relevant herein was, a resident of the State of California. Mr. Jenkins obtained a Dickey’s Franchise Disclosure Document and subsequently purchased a Dickey’s franchise in Tracy, California.

2. Defendant Dickey’s Barbecue Restaurant is a Texas corporation with its principal place of business at 4514 Cole Avenue, Suite 1015, Dallas, Texas 75205. Defendant operates a chain of corporate and franchise restaurants known as Dickey’s Barbecue Pits.

**JURISDICTION**

3. The Court has jurisdiction over this action pursuant to 28 U.S.C. § 1332(a)(1) in that there is complete diversity of citizenship between all of the Plaintiffs and all of the Defendants and the amount in controversy exceeds \$75,000.

THORSNES BARTOLOTTA MCGUIRE LLP  
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SAN DIEGO, CALIFORNIA 92103  
(619) 236-9363  
FAX (619) 236-9653

1 4. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b)(2) in that a  
2 substantial part of the events or omissions giving rise to the claims occurred in the judicial district.

3 **FACTS**

4 **Defendants:**

5 5. Defendant Dickey’s was formed in 1994 for the purpose of selling Dickey’s Barbecue  
6 Pit franchises. Dickey’s has affiliated companies, Dickey’s Barbecue Pit, Inc., Restaurant Growth,  
7 Inc. and Pitmaster Team, Inc., that operates corporate Dickey’s Barbecue Pit restaurants in Texas  
8 and South Dakota. The first Dickey’s Barbecue Pit opened in 1941.

9 6. Dickey’s Barbecue Pit is a combination quick service/fast casual dining experience.  
10 Customers place protein orders at the beginning of the service counter, then move down cafeteria-  
11 style picking side dishes. When they reach the cash register, their protein order is waiting, allowing  
12 them to pay and immediately eat.

13 **THE FRANCHISE**

14 7. The Dickey’s FDD provided to Plaintiff contained the following representations:

15 a. It would cost approximately \$60,000 to build out a restaurant conversion  
16 franchise location;

17 b. Dickey’s would allow a franchise to request an alternate supplier, which  
18 request would be granted upon evaluation of objective and reasonable criteria.

19 c. Dickey’s would protect Plaintiff’s territory, which territory was to be selected  
20 by Plaintiff;

21 d. Dickey’s would provide on-site evaluation to assist in the establishment of the  
22 franchise;

23 e. Dickey’s would provide an initial training prior to the opening of the  
24 franchise;

25 f. Dickey’s would allow a franchise to request menu changes, which request  
26 would be granted upon evaluation of objective and reasonable criteria; and

27 g. Plaintiff owed a total of 9% of **net** sales to Dickey’s to cover its royalty and  
28 marketing fund.

1 8. Outside of the FDD, Dickey’s employees made the following representations to  
2 Plaintiff:

3 a. Dickey’s employees represented to the Plaintiff that Dickey’s was  
4 experiencing “tremendous growth” with store revenues increasing at a rate of 5% each year, that  
5 Dickey’s was the fastest growing barbecue concept in the country and that they were beating their  
6 “record low build out costs” at just under \$60,000 including the franchise fee and purchase of initial  
7 inventory;

8 b. It would cost Plaintiff nothing in “build out” costs to convert a restaurant  
9 because Plaintiff would be taking over an already existing Dickey’s franchise location from another  
10 franchisee;

11 c. Dickey’s would provide everything that a bank would need to approve a loan  
12 to open the franchise;

13 d. Dickey’s had never had a franchise that ever had trouble finding financing  
14 once they saw Dickey’s business plan;

15 e. Dickey’s would only sell one franchise in each Northern California city;

16 f. If Plaintiff did not accept the locations chosen by Dickey’s, they would lose  
17 their deposit and not be given another opportunity to open a franchise store in that city;

18 g. Plaintiff did not need to have prior restaurant experience because they would  
19 be trained completely by Dickey’s;

20 h. Dickey’s was willing to overlook Plaintiff’s lack of experience because he had  
21 \$100,000 cash to invest in the franchise;

22 i. Plaintiff’s store would make at least \$800,000 in the first year and it would  
23 only go up from there. Plaintiff would make so much money that he would want a second and then a  
24 third restaurant, at which point he could retire and just collect the income;

25 j. Plaintiff should get a secondary, not a prime, location because a Dickey’s will  
26 draw as a destination restaurant;

27 k. Dickey’s provided national advertising for the franchisees out of the  
28 marketing fund;

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- 1 l. Plaintiff was required to buy a dedicated van to support the catering business;
- 2 m. Dickey’s would provide accountings showing how it used the marketing fund;
- 3 n. Franchisees could purchase used equipment;
- 4 o. Dickey’s required the stores to purchase from US Foods at a price that
- 5 Dickey’s negotiated for the benefit of its stores;
- 6 p. Dickey’s would cover Plaintiff’s first order of inventory with the US Foods up
- 7 to \$10,000; and
- 8 q. A franchise could be sold, including transfer of all store obligations.

**CLASS ALLEGATIONS**

9  
10 9. The joinder of all class members as parties is impracticable. The disposition of these  
11 claims in a class action will provide substantial benefits to both the parties and the Court. The class  
12 is ascertainable and maintains a sufficient community of interest. The rights of each class member  
13 were violated in a similar fashion upon Defendant’s wrongful conduct. The remedy requested will  
14 involve all class members.

15 10. The class representative’s claims are typical of the claims of the members of the class  
16 because of class representatives and all other members of the class were damaged by the same  
17 wrongful conduct committed by Defendant as alleged more fully above and below.

18 11. Plaintiff will fairly and adequately protect the interests of the class. The interests of  
19 the class representative are coincident with, and not antagonistic to, the interests of the other  
20 members of the class.

21 12. The class representative has retained competent class counsel who are experienced in  
22 the prosecution of class-action litigation.

23 13. Questions of law and fact common to the members of the class are central here and  
24 predominate over questions which may affect only individual members.

25 14. Plaintiff brings this lawsuit individually and on behalf of those similarly situated.  
26 The class is defined as follow: All companies and individuals who own or have owned some portion  
27 of a Dickey’s Barbecue Pit franchise restaurant in the State of California.

28 15. Common issues amongst class members include:

THORSNES BARTOLOTTA MCGUIRE LLP  
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- 1 a. They were sold a franchise based on a false FDD.
- 2 b. They were misled about the cost of opening the restaurant.
- 3 c. They were not provided with appropriate marketing and promotional support.
- 4 d. They were not provided a protected territory.
- 5 e. They were forced to purchase goods at above-market prices.
- 6 f. They were subjected to excessive expenses.
- 7 g. They were not provided adequate training.

**FIRST CAUSE OF ACTION**

**Fraud**

- 10 16. All preceding allegations are incorporated by reference.
- 11 17. Defendant made the following representations to Plaintiff:
  - 12 a. It would cost Plaintiff nothing in “build out” costs to convert a restaurant
  - 13 because Plaintiff would be taking over an already existing Dickey’s franchise location from another
  - 14 franchisee;
  - 15 b. Dickey’s would cover Plaintiff’s first opening order up to \$10,000;
  - 16 c. Dickey’s was selling franchises in Northern California pursuant to a lawful
  - 17 FDD;
  - 18 d. Dickey’s would provide a protected territory;
  - 19 e. Dickey’s would provide an on-site evaluation prior to lease execution;
  - 20 f. Dickey’s would provide pre-opening training;
  - 21 g. Royalties and marketing fees would be based on the “net” sales;
  - 22 h. Dickey’s provided a valid basis for estimating anticipated restaurant revenues;
  - 23 i. Franchisees could use alternate suppliers so long as they suggested sources
  - 24 that could be objectively evaluated as reliable;
  - 25 j. Franchisees could add new menu items so long as they could demonstrate that
  - 26 they were conducive to the Dickey’s image and standards;
  - 27 k. Dickey’s operated a national marketing program and conducted promotions;
  - 28 l. Dickey’s would provide accountings related to its marketing program;

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- 1 m. The franchisees could purchase used equipment;
- 2 n. A senior member of Dickey's would be present for the restaurant opening; and
- 3 o. That Dickey's negotiated competitive prices at group discount rates.
- 4 18. Those representations were false as follows:
  - 5 a. The cost of opening the store exceeded specific and written representations;
  - 6 b. Dickey's did not cover the cost of Plaintiff's initial order of \$10,000 with US
  - 7 Foods;
  - 8 c. The FDD contained material falsities;
  - 9 d. Dickey's did not provide a protected territory;
  - 10 e. Dickey's did not provide a pre-opening evaluation of the restaurants;
  - 11 f. Dickey's did not provide pre-opening training, instead, they made the
  - 12 franchisees travel to Texas to wash dishes in their affiliates' corporate stores;
  - 13 g. Royalties and marketing fees were not calculated based on the net sales, but
  - 14 rather, were calculated based on gross sales. Had they been calculated based on net sales, no
  - 15 royalties would ever have been due because the store was never profitable;
  - 16 h. Pre-contract representations created an unreasonable expectation of how much
  - 17 Plaintiff's store would earn;
  - 18 i. Plaintiff requested a change in vendors to decrease costs and improve product
  - 19 quality, and each time the new vendor was either superior or equal to the existing vendor, but no
  - 20 approval was forthcoming;
  - 21 j. Plaintiff requested permission to offer new menu items such as BBQ chicken
  - 22 salad or breakfast items, all of which are offered by other Dickey's stores, however, Dickey's
  - 23 refused each request;
  - 24 k. Dickey's did not offer a marketing program in Northern California, those
  - 25 dollars were spent in Texas where they provided no benefit to Plaintiff's restaurant;
  - 26 l. Dickey's also did not provide promotions; the franchisees, Plaintiff included,
  - 27 were on their own to come up with their own promotions on a case by case basis;
  - 28 m. Plaintiff never received any marketing fund accountings;

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1 n. Dickey’s required Plaintiff to purchase expensive oversized and new  
2 equipment;

3 o. A senior member of Dickey’s did not attend Plaintiff’s store opening; and

4 p. Dickey’s franchisees, including Plaintiff, were forced to purchase product at  
5 over-market prices and were not permitted to source cheaper equivalent quality replacement.

6 19. At the time each of the above misrepresentations was made, Defendants knew or  
7 should have known of the falsity.

8 20. Plaintiff relied on the representations in deciding to pay the application fee and open a  
9 Dickey’s Barbecue Pit.

10 21. As a result of Defendant’s bad conduct, Plaintiff suffered injury in an amount to be  
11 proven at the time of trial.

12 22. Defendant committed the above-described conduct with oppression, fraud, and  
13 malice, entitling Plaintiff to an award of punitive damages.

14 **SECOND CAUSE OF ACTION**

15 **Violation of California Franchise Investment Law**

16 23. All preceding allegations are incorporated by reference.

17 24. California Corporations Code §§ 31200 and 31201 prohibits misrepresentation or  
18 material omission in a Franchise Disclosure Document.

19 25. California Corporations Code § 31302 provides that anyone who participates in the  
20 violation of the California Franchise Investment Law is jointly and severally liable for all damages  
21 awarded.

22 26. Defendant violated each of the above-referenced laws.

23 27. Defendant’s violation of the Franchise Investment Laws caused damage to Plaintiff in  
24 an amount to be proven at the time of trial.

25 28. Plaintiff will also seek an award of attorneys’ fees, declaratory relief and injunctive  
26 relief as provided by California Corporations Code § 31302.5.

27 ///

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SAN DIEGO, CALIFORNIA 92103  
(619) 236-9363  
FAX (619) 236-9653

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**THIRD CAUSE OF ACTION**

**Violation of Unfair Competition Laws**

- 29. All preceding allegations are incorporated by reference.
- 30. Defendant engaged in unfair conduct as is set forth above.
- 31. Defendant engaged in fraudulent conduct as is set forth above.
- 32. Defendant engaged in unlawful conduct as is set forth above.
- 33. Plaintiff was proximately harmed as the result of Defendant’s unfair, fraudulent and/or unlawful conduct.

**FOURTH CAUSE OF ACTION**

**Declaratory Relief**

- 34. All preceding allegations are incorporated by reference.
- 35. Section 27 of the franchise agreement purports to require all disputes between Plaintiff and Dickey’s to be resolved by AAA arbitration. This provision is unenforceable and Plaintiff seeks a judicial declaration to that end and, if necessary, an injunction to prevent Dickey’s from enforcing the provision unlawfully.

**DEMAND FOR JURY TRIAL**

Plaintiff hereby demands a trial by jury, on all issues triable by a jury, in the above-entitled action.

**PRAYER FOR RELIEF**

Wherefore, Plaintiff prays for relief as follows:

On the First Cause of Action:

- 1. For damages according to proof;
- 2. For punitive damages;
- 3. For costs of suit;
- 4. For such and other relief as the Court deems appropriate.

On the Second Cause of Action:

- 1. For damages according to proof;
- 2. For an award of attorneys’ fees;



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- 3. For costs of suit; and
- 4. For such and other relief as the Court deems appropriate.

On the Third Cause of Action:

- 1. For declaratory relief;
- 2. For injunctive relief;
- 3. For restitution and disgorgement.
- 4. For costs of suit; and
- 5. For such and other relief as the Court deems appropriate.

On the Fourth Cause of Action:

- 1. For declaratory relief;
- 2. For injunctive relief;
- 3. For costs of suit; and
- 4. For such and other relief as the Court deems appropriate.

Dated: December 14, 2016

THORSNES BARTOLOTTA McGUIRE LLP

By: /s/Karen R. Frostrom  
 VINCENT J. BARTOLOTTA, JR., ESQ.  
 KAREN R. FROSTROM, ESQ.  
 CHARLYNNE I. REJAIAN, ESQ.  
 Attorneys for Christopher Jenkins

THORSNES BARTOLOTTA McGUIRE LLP  
 2550 FIFTH AVENUE, 11TH FLOOR  
 SAN DIEGO, CALIFORNIA 92103  
 (619) 236-9363  
 FAX (619) 236-9653

CIVIL COVER SHEET

The JS-CAND 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 in its original form by the Judicial Conference of the United States in September 1974, is required for the Clerk of Court to initiate the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS
Christopher Jenkins
(b) County of Residence of First Listed Plaintiff San Joaquin
(c) Attorneys (Firm Name, Address, and Telephone Number)
Vincent J. Bartolotta, Jr., Esq./Karen R. Frostrom, Esq.
Thorsnes Bartolotta McGuire LLP
2550 Fifth Avenue, 11th Floor, San Diego, CA 92103 (619); 236-9363

DEFENDANTS
Dickey's Barbecue Restaurants, Inc.
County of Residence of First Listed Defendant Dallas
NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.
Attorneys (If Known)
Paul J. Ferak, Esq.
Greenberg Traurig, LLP
77 West Wacker Drive, Suite 3100, Chicago, Illinois 60601; (312) 456-8400

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
Citizen of This State
Citizen of Another State
Citizen or Subject of a Foreign Country
1 2 3
4 5 6
Incorporated or Principal Place of Business In This State
Incorporated and Principal Place of Business In Another State
Foreign Nation

IV. NATURE OF SUIT (Place an "X" in One Box Only)
CONTRACT
110 Insurance
120 Marine
130 Miller Act
140 Negotiable Instrument
150 Recovery of Overpayment Of Veteran's Benefits
151 Medicare Act
152 Recovery of Defaulted Student Loans (Excludes Veterans)
153 Recovery of Overpayment of Veteran's Benefits
160 Stockholders' Suits
190 Other Contract
195 Contract Product Liability
196 Franchise
REAL PROPERTY
210 Land Condemnation
220 Foreclosure
230 Rent Lease & Ejectment
240 Torts to Land
245 Tort Product Liability
290 All Other Real Property
PERSONAL INJURY
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
PERSONAL INJURY
365 Personal Injury - Product Liability
367 Health Care/Pharmaceutical Personal Injury Product Liability
368 Asbestos Personal Injury Product Liability
PERSONAL PROPERTY
370 Other Fraud
371 Truth in Lending
380 Other Personal Property Damage
385 Property Damage Product Liability
FORFEITURE/PENALTY
625 Drug Related Seizure of Property 21 USC § 881
690 Other
LABOR
710 Fair Labor Standards Act
720 Labor/Management Relations
740 Railway Labor Act
751 Family and Medical Leave Act
790 Other Labor Litigation
791 Employee Retirement Income Security Act
IMMIGRATION
462 Naturalization Application
465 Other Immigration Actions
BANKRUPTCY
422 Appeal 28 USC § 158
423 Withdrawal 28 USC § 157
PROPERTY RIGHTS
820 Copyrights
830 Patent
840 Trademark
SOCIAL SECURITY
861 HIA (1395ff)
862 Black Lung (923)
863 DIWC/DIWW (405(g))
864 SSID Title XVI
865 RSI (405(g))
FEDERAL TAX SUITS
870 Taxes (U.S. Plaintiff or Defendant)
871 IRS-Third Party 26 USC § 7609
OTHER STATUTES
375 False Claims Act
376 Qui Tam (31 USC § 3729(a))
400 State Reapportionment
410 Antitrust
430 Banks and Banking
450 Commerce
460 Deportation
470 Racketeer Influenced and Corrupt Organizations
480 Consumer Credit
490 Cable/Sat TV
850 Securities/Commodities/Exchange
890 Other Statutory Actions
891 Agricultural Acts
893 Environmental Matters
895 Freedom of Information Act
896 Arbitration
899 Administrative Procedure Act/Review or Appeal of Agency Decision
950 Constitutionality of State Statutes

V. ORIGIN (Place an "X" in One Box Only)
1 Original Proceeding
2 Removed from State Court
3 Remanded from Appellate Court
4 Reinstated or Reopened
5 Transferred from Another District (specify)
6 Multidistrict Litigation-Transfer
8 Multidistrict Litigation-Direct File

VI. CAUSE OF ACTION
Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
28 U.S.C Section 1332(a)(1)
Brief description of cause:
Violation of CA Franchise Investment Law; Fraud, Violation of Unfair Competition Laws and Declaratory Relief

VII. REQUESTED IN COMPLAINT:
CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, Fed. R. Civ. P.
DEMAND \$
CHECK YES only if demanded in complaint:
JURY DEMAND: Yes No

VIII. RELATED CASE(S), IF ANY (See instructions):
JUDGE Hon. Jon S. Tigar
DOCKET NUMBER 15-cv-02139-JST

IX. DIVISIONAL ASSIGNMENT (Civil Local Rule 3-2)
(Place an "X" in One Box Only)
SAN FRANCISCO/OAKLAND
SAN JOSE
EUREKA-MCKINLEYVILLE

DATE: 12/13/2016
SIGNATURE OF ATTORNEY OF RECORD: /s/ Karen R. Frostrom

## INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS-CAND 44

**Authority For Civil Cover Sheet.** The JS-CAND 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved in its original form by the Judicial Conference of the United States in September 1974, is required for the Clerk of Court to initiate the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I. a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
- b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the “defendant” is the location of the tract of land involved.)
- c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section “(see attachment).”
- II. Jurisdiction.** The basis of jurisdiction is set forth under Federal Rule of Civil Procedure 8(a), which requires that jurisdictions be shown in pleadings. Place an “X” in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
- (1) United States plaintiff. Jurisdiction based on 28 USC §§ 1345 and 1348. Suits by agencies and officers of the United States are included here.
  - (2) United States defendant. When the plaintiff is suing the United States, its officers or agencies, place an “X” in this box.
  - (3) Federal question. This refers to suits under 28 USC § 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
  - (4) Diversity of citizenship. This refers to suits under 28 USC § 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS-CAND 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an “X” in the appropriate box. If the nature of suit cannot be determined, be sure the cause of action, in Section VI below, is sufficient to enable the deputy clerk or the statistical clerk(s) in the Administrative Office to determine the nature of suit. If the cause fits more than one nature of suit, select the most definitive.
- V. Origin.** Place an “X” in one of the six boxes.
- (1) Original Proceedings. Cases originating in the United States district courts.
  - (2) Removed from State Court. Proceedings initiated in state courts may be removed to the district courts under Title 28 USC § 1441. When the petition for removal is granted, check this box.
  - (3) Remanded from Appellate Court. Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
  - (4) Reinstated or Reopened. Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
  - (5) Transferred from Another District. For cases transferred under Title 28 USC § 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
  - (6) Multidistrict Litigation Transfer. Check this box when a multidistrict case is transferred into the district under authority of Title 28 USC § 1407. When this box is checked, do not check (5) above.
  - (8) Multidistrict Litigation Direct File. Check this box when a multidistrict litigation case is filed in the same district as the Master MDL docket. Please note that there is no Origin Code 7. Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC § 553. Brief Description: Unauthorized reception of cable service.
- VII. Requested in Complaint.** Class Action. Place an “X” in this box if you are filing a class action under Federal Rule of Civil Procedure 23. Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction. Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS-CAND 44 is used to identify related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.
- IX. Divisional Assignment.** If the Nature of Suit is under Property Rights or Prisoner Petitions or the matter is a Securities Class Action, leave this section blank. For all other cases, identify the divisional venue according to Civil Local Rule 3-2: “the county in which a substantial part of the events or omissions which give rise to the claim occurred or in which a substantial part of the property that is the subject of the action is situated.”
- Date and Attorney Signature.** Date and sign the civil cover sheet.

# ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Lawsuit: Dickey's Barbecue Restaurants, Inc. Lied to Franchisees](#)

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