

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA

KEITH MASON, on behalf of)	
himself and others similarly)	CIVIL ACTION NO.
situated,)	_____
)	
Plaintiffs,)	
)	JURY TRIAL DEMANDED
v.)	
)	
ATLANTA BEVERAGE COMPANY,)	COLLECTIVE ACTION
)	
Defendant.)	

COLLECTIVE ACTION COMPLAINT

I. SUMMARY

1. ATLANTA BEVERAGE COMPANY ("ABC"), a major beer and other beverage distributor in the metropolitan Atlanta area, is violating the Fair Labor Standards Act ("FLSA") by forcing its employees to work a substantial amount of overtime without properly paying all compensation due, thus depriving them of rightful compensation for their work that ABC is legally obligated to pay.

2. Plaintiff Keith Mason works for ABC as a merchandiser/stocker in and around Atlanta, Georgia and was damaged by this illegal policy or practice. Plaintiff was denied the compensation he is due under the FLSA. Plaintiff brings this lawsuit on behalf of himself and all other similarly

situated current or former merchandisers/stockers to recover unpaid wages and overtime compensation, liquidated damages, attorneys' fees, and costs owed to him individually and on behalf of other similarly situated individuals.

II. JURISDICTION AND VENUE

3. This Court has original subject matter jurisdiction under 28 U.S.C. § 1331 because Plaintiff's claims arise under federal law, namely the FLSA, 29 U.S.C. § 201 *et seq.*

4. Venue is proper because a substantial part of the acts and omissions giving rise to Plaintiff's claims occurred in the Northern District of Georgia. 28 U.S.C. § 1391(b)(2).

III. THE PARTIES

5. Plaintiff Mason works as a merchandiser/stocker for ABC in and around Atlanta, Georgia. Mr. Mason's job as a merchandiser/stocker for ABC is to travel to various retail establishments in Atlanta, such as Wal-Mart stores, and to restock the shelves of such stores with ABC's beverage products from the stores' stockroom supply. He is not responsible nor did he participate in selling or supplying ABC beverage products to such stores. He was tasked with making sure that the beverage products in the retail store stockrooms made their way to the store sales floors, and that the shelves of such stores were fully stocked with ABC's products. He regularly worked in

excess of 40 hours per week without receiving all the compensation he was due under the FLSA. Plaintiff Mason's consent is attached as Exhibit A.

6. The class of similarly situated employees consists of all current and former merchandisers/stockers who were employed by ABC during the three-year period preceding the filing of this Complaint. These similarly situated individuals are referred to as the "Members of the Class" or "the Class."

7. Defendant ATLANTA BEVERAGE COMPANY (ABC) is a Domestic For Profit Corporation incorporated under the laws of the State of Georgia with a principal place of business at 5000 Fulton Industrial Boulevard, Atlanta, Georgia 30336 that is engaged in commerce in the United States and is otherwise subject to the FLSA. ABC employs Plaintiff within the meaning of the FLSA. ABC may be served with process by serving ABC's registered agent, C. Mark Pirrung, at 5000 Fulton Industrial Boulevard, Atlanta, Georgia 30336.

IV. BACKGROUND

8. ABC is a major beer and other beverage distributor in the Atlanta, Georgia metropolitan area. ABC distributed Anheuser-Busch beer products and dozens of other beverage types, both alcoholic and non-alcoholic, to retail stores and other establishments in Greater Atlanta.

9. ABC's merchandiser/stockers are responsible for restocking the sales floor shelves of retailers like Wal-Mart in the Atlanta area. They arrive at a store on their route, move ABC products from the stockroom to the sales floor, and fill the shelves on the sales floor with such products. They do not take orders for products from the retailers, and are not involved in selling or supplying such products to the retailers from the ABC distribution warehouse. Upon information and belief, Plaintiff and Members of the Class regularly worked in excess of 40 hours per work week. However, ABC did not pay its merchandisers/stockers one and one-half times their regular rate for all hours in excess of 40 each week. Instead, ABC misclassified Plaintiff and Members of the Class as salaried employees, paying them a flat-rate salary per week no matter how many hours they work during the workweek. As a result, ABC fails to properly compensate its employees under the FLSA.

V. PLAINTIFF'S INDIVIDUAL ALLEGATIONS

A. ABC Failed to Properly Pay Regular and Overtime Compensation.

10. Plaintiff works for ABC as a merchandiser/stocker. In the past, ABC had paid this position an hourly rate plus overtime. More recently, ABC pays the merchandisers/stockers, including Plaintiff, a salary without any overtime paid, no

matter how many hours the merchandisers/stockers work. Plaintiff frequently works more than 40 hours in a workweek, sometimes working several 14 hour days in a workweek.

11. Instead of a salary, the FLSA requires ABC to pay hourly compensation to the merchandisers/stockers for each hour they are suffered or permitted to work, and to pay overtime compensation at one and a half times their regular rates of pay for each hour they work in excess of 40 hours in a week. ABC should have paid Plaintiff for 40 hours of regular pay and several more hours of overtime in a typical workweek, but ABC failed to pay the Plaintiff that amount.

12. By failing to pay Plaintiff as described above, ABC has deprived Plaintiff of a significant amount of regular and overtime compensation to which he is rightfully entitled.

B. ABC Willfully Violated the FLSA.

13. The FLSA and Department of Labor regulations require that individuals receive at least minimum wage for all hours suffered or permitted to work. In addition, the FLSA and Department of Labor regulations set forth the proper means for calculating and paying minimum wage and overtime compensation to non-exempt employees like Plaintiff. ABC failed to follow these rules when paying Plaintiff.

14. ABC had a policy and/or practice of not paying its employees for all of the regular time and overtime they worked each week at the proper rate. ABC should have paid its employees their regular hourly rate for all hours worked, and it should have paid its employees overtime compensation at one and one-half their regular rates for all hours worked in excess of 40 per workweek.

15. ABC knows or has shown reckless disregard for the requirements of the FLSA with respect to compensation for Plaintiff.

VI. COLLECTIVE ACTION ALLEGATIONS

16. Plaintiff is aware that ABC's illegal policies or practices have been imposed upon Members of the Class. Like Plaintiff, the Members of the Class are employed by ABC merchandisers/stockers performing the same or similar duties as Plaintiff in the Greater Atlanta area.

17. As with Plaintiff, Members of the Class frequently work more than 40 hours in a workweek without receiving any overtime compensation. And like Plaintiff, the Members of the Class are not properly paid for all hours suffered or permitted to work, as described above with regard to Plaintiff.

18. ABC's failure to properly compensate Plaintiff and Members of the Class results, upon information and belief, from

a generally applicable policy and/or practice. Specifically, upon information and belief, it is a policy and/or practice at ABC to pay its merchandisers/stockers a flat salary amount per week, regardless of the number of hours worked. As such, the Members of the Class are owed additional regular time and overtime compensation for precisely the same reasons as Plaintiff.

19. Accordingly, the class of similarly situated plaintiffs is properly defined as:

All current and former merchandisers/stockers who were employed by Atlanta Beverage Company or its predecessors during the three-year period preceding the filing of this complaint.

20. Members of the Class should be notified of this lawsuit and given the opportunity to opt-in if they so desire.

21. Notice from this Court should be expedited to protect these workers from losing a portion of their damages due to the running of the statute of limitations.

VII. CAUSES OF ACTION

22. All preceding paragraphs herein are incorporated by reference.

23. As set forth above, ABC violated the FLSA with respect to Plaintiff and Members of the Class by failing to pay at least minimum wage for all hours suffered or permitted to work in a

week and by failing to provide proper overtime pay for all hours worked in excess of 40 hours in a week. 29 U.S.C. §§ 206, 207.

24. Plaintiff and Members of the Class are entitled to recover at least a minimum wage for all hours worked as well as overtime compensation, at one and one-half times their regular rate of pay, for all hours worked in excess of 40 hours in a week.

25. In addition, Plaintiff and Members of the Class are entitled to liquidated damages in an amount equal to their unpaid wages and overtime wages.

26. Moreover, Plaintiff and Members of the Class are entitled to reasonable attorneys' fees and costs. 29 U.S.C. § 216 (b).

VIII. JURY DEMAND

27. Plaintiff demands a jury trial. Any required jury fee has been or will be timely paid.

PRAYER

WHEREFORE, Plaintiff requests that this Court award him and Members of the Class judgment against ATLANTA BEVERAGE COMPANY for:

1. damages for the full amount of their unpaid wages;
2. damages for the full amount of their unpaid overtime compensation;

3. an amount equal to their unpaid wages and unpaid overtime compensation as liquidated damages;
4. reasonable attorneys' fees, costs and expenses of this action;
5. pre-judgment and post-judgment interest at the highest rate allowed by law; and
6. such other and further relief as may be allowed by law.

DATED this 19th day of June, 2017.

Respectfully submitted,


s/ Michael A. Mills

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EXHIBIT A

NOTICE OF CONSENT

I consent to be a party plaintiff in this action and, if necessary, a subsequent action, to recover any unpaid wages owed to me by:

Atlanta Beverage Company and related entities

I consent to join the lawsuit in which this Notice of Consent is filed by Bailey Peavy Bailey Cowan Heckaman PLLC and/or any of its co-counsel (collectively "BPB") and on my behalf (the "Lawsuit").

I performed the duties and was paid in the manner described in the active Complaint or Petition in this Lawsuit.

If I am not a named Plaintiff in this Lawsuit, then I authorize the named Plaintiff(s) and BPB to file and prosecute the Lawsuit on my behalf, and I designate the named Plaintiff(s) to make decisions on my behalf concerning the Lawsuit, including negotiating and deciding a resolution of my claims, and I understand that I may be bound by such decisions, subject to Court approval if required.

I agree to be represented by BPB in this Lawsuit. I agree to be bound by the Contract of Representation executed between the named Plaintiffs in this Lawsuit and BPB, subject to the additional terms stated in this Notice of Consent. I may obtain a copy of the executed Contract(s) of Representation by contacting BPB in writing.

In the event this Lawsuit is not certified or is decertified, I authorize BPB to reuse this Notice of Consent to re-file my claims in separate or related action(s) against the named Defendant(s) in this Lawsuit.

Keith E. Mason

Signature

Keith Eugene Mason

Full Legal Name (print)

5/10/17

Date

BAILEY PEAVY BAILEY COWAN HECKAMAN PLLC
440 Louisiana Street, Suite 2100, Houston, Texas 77002
overtime@bpblaw.com • 1-866-713-8300

CERTIFICATE OF COMPLIANCE

The undersigned hereby certifies that the foregoing pleading complies with the font and point selections approved by the Court in Local Rule 5.1B. This document has been prepared in Courier New font, 12 point.

MICHAEL A MILLS, P.C.



/s/ Michael A. Mills

Michael A. Mills

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JS44 (Rev. 1/08 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)

Keith Mason, on behalf of himself and others similarly situated

DEFENDANT(S)

Atlanta Beverage Company

(b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF

Cobb
(EXCEPT IN U.S. PLAINTIFF CASES)

COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT

Fulton
(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)

Michael A. Mills, Esq., Michael A. Mills, P.C.
1349 West Peachtree St., N.W., Suite 1995, Atlanta GA 30309
Telephone: (404) 815-9220
Email: mike@millslegal.net

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 checked="" type="checkbox"/> 1 | <input type="checkbox"/> 1 | CITIZEN OF THIS STATE | <input type="checkbox"/> 4 | <input checked="" 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
- 7 APPEAL TO DISTRICT JUDGE FROM MAGISTRATE JUDGE JUDGMENT

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)

This is a Fair Labor Standards Act case under 29 U.S.C. sec. 201, et seq.

(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.
- 10. Existence of highly technical issues and proof.

CONTINUED ON REVERSE

FOR OFFICE USE ONLY					
RECEIPT #	AMOUNT \$	APPLYING IFP	MAG. JUDGE (IFP)		
JUDGE	MAG. JUDGE	NATURE OF SUIT	CAUSE OF ACTION		
(Referral)					

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
- 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 158
- 423 WITHDRAWAL 28 USC 157

CIVIL RIGHTS - "4" MONTHS DISCOVERY TRACK

- 441 VOTING
- 442 EMPLOYMENT
- 443 HOUSING/ ACCOMMODATIONS
- 444 WELFARE
- 440 OTHER CIVIL RIGHTS
- 445 AMERICANS with DISABILITIES - Employment
- 446 AMERICANS with DISABILITIES - Other

IMMIGRATION - "0" MONTHS DISCOVERY TRACK

- 462 NATURALIZATION APPLICATION
- 463 HABEAS CORPUS- Alien Detainee
- 465 OTHER IMMIGRATION ACTIONS

PRISONER PETITIONS - "0" MONTHS DISCOVERY TRACK

- 510 MOTIONS TO VACATE SENTENCE
- 530 HABEAS CORPUS
- 535 HABEAS CORPUS DEATH PENALTY
- 540 MANDAMUS & OTHER
- 550 CIVIL RIGHTS - Filed Pro se
- 555 PRISON CONDITIONS(S) - Filed Pro se

PRISONER PETITIONS - "4" MONTHS DISCOVERY TRACK

- 550 CIVIL RIGHTS - Filed by Counsel
- 555 PRISON CONDITIONS(S) - Filed by Counsel

FORFEITURE/PENALTY - "4" MONTHS DISCOVERY TRACK

- 610 AGRICULTURE
- 620 FOOD & DRUG
- 625 DRUG RELATED SEIZURE OF PROPERTY 21 USC 881
- 630 LIQUOR LAWS
- 640 R.R. & TRUCK
- 650 AIRLINE REGS.
- 660 OCCUPATIONAL SAFETY / HEALTH
- 690 OTHER

LABOR - "4" MONTHS DISCOVERY TRACK

- 710 FAIR LABOR STANDARDS ACT
- 720 LABOR/MGMT. RELATIONS
- 730 LABOR/MGMT. REPORTING & DISCLOSURE ACT
- 740 RAILWAY LABOR 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 IIIA (1395ff)
- 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 - THIR D PARTY 26 USC 7609

OTHER STATUTES - "4" MONTHS DISCOVERY TRACK

- 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
- 810 SELECTIVE SERVICE
- 875 CUSTOMER CHALLENGE 12 USC 3410
- 891 AGRICULTURAL ACTS
- 892 ECONOMIC STABILIZATION ACT
- 893 ENVIRONMENTAL MATTERS
- 894 ENERGY ALLOCATION ACT
- 895 FREEDOM OF INFORMATION ACT
- 900 APPEAL OF FEE DETERMINATION UNDER EQUAL ACCESS TO JUSTICE
- 950 CONSTITUTIONALITY OF STATE STATUTES
- 890 OTHER STATUTORY ACTIONS

OTHER STATUTES - "8" MONTHS DISCOVERY TRACK

- 410 ANTITRUST
- 850 SECURITIES / COMMODITIES / EXCHANGE

OTHER STATUTES - "0" MONTHS DISCOVERY TRACK

- ARBITRATION (Confirm / Vacate / Order / Modify)

(Note: Mark underlying Nature of Suit as well)

*** 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 \$ _____

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.

s/ 

6/19/17

SIGNATURE OF 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: [Atlanta Beverage Company Eyed with Unpaid Wage, Misclassification Suit](#)
