

**UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND
Greenbelt Division**

CAMILLA MCINTYRE,)	
1200 North Capitol St. NW, Apt. A310)	COMPLAINT
Washington, DC 20002)	Collective Action
)	
<i>Individually and on behalf of all</i>)	
<i>other similarly-situated persons</i>)	
)	
Plaintiff)	
)	
v.)	Civil Action No.: 8:17-cv-02201
)	
INTERNATIONAL HEALTH CARE)	JURY TRIAL DEMANDED
CONSULTANTS, INC.,)	
11584 Scaggsville Rd.)	
Fulton, MD 20759)	
(Howard County, MD))	
)	
Serve: Lois E. Peters)	
11584 Scaggsville Rd.)	
Fulton, MD 20759)	
)	
and)	
)	
LOIS E. PETERS)	
11584 Scaggsville Rd.)	
Fulton, MD 20759)	
(Howard County, MD))	
)	
Defendants.)	

COMPLAINT

Plaintiff CAMILLA MCINTYRE, by and through her undersigned counsel, on behalf of herself and all other similarly-situated persons, hereby complains of Defendant INTERNATIONAL HEALTH CARE CONSULTANTS, INC. (hereinafter "IHCC"), and Defendant LOIS E. PETERS (hereinafter, "Peters") (collectively, "Defendants"), as follows:

NATURE OF THE CASE

1. Plaintiff brings this collective action, on behalf of herself and on behalf of herself and a class consisting of all persons performing non-exempt work for Defendants between August 4, 2014 and the present, to recover unpaid wages, unpaid overtime compensation, liquidated damages, and reasonable attorneys' fees and costs under section 16(b) of the Federal Fair Labor Standards Act of 1938, as amended, 29 U.S.C. §§ 201 *et seq.* (hereinafter "FLSA").
2. Plaintiff also brings an individual action to recover unpaid wages, unpaid overtime compensation, and reasonable attorneys' fees and costs under the Maryland Wage and Hour Law, Maryland Code, Labor and Employment Article §§ 3-401 *et seq.* (hereinafter "MWHL"), and for unpaid wages, unpaid overtime compensation, liquidated damages, and reasonable attorney's fees and costs under the Maryland Wage Payment and Collection Law, Maryland Code, Labor and Employment Article §§ 3-501 *et seq.* (hereinafter "MWPCL").

JURISDICTION AND VENUE

3. The U.S. District Court for the District of Maryland maintains federal question jurisdiction pursuant to 29 U.S.C. § 201, *et seq.* and 28 U.S.C. § 1331. This Court maintains supplemental jurisdiction over the Maryland state law claims pursuant to 28 U.S.C. § 1367.
4. Venue is proper pursuant to 28 U.S.C. § 1391(b), as Defendants do business in, and may therefore be deemed to reside in, this judicial district.

PARTIES

5. Plaintiff is an adult resident of the District of Columbia. During the relevant time period, she was employed by Defendants in and worked in Maryland.
6. At all times relevant herein, Plaintiff was Defendants' "employee" within the meaning of and subject to the FLSA, MWHL, and MWPCL. She was a non-exempt employee entitled to the

minimum wage, overtime pay, and other protections of the FLSA, MWHL, and MWPCCL.

7. Pursuant to 29 U.S.C. § 216(b), Plaintiff has consented in writing to be a party Plaintiff in this FLSA action. Her written consent is attached to this Complaint.
8. On information and belief, IHCC is a domestic corporation with its principal location of business located at 11584 Scaggsville Road, Fulton, MD 20759.
9. At all times relevant herein, Peters, President of IHCC, held and exercised economic control over the business decisions of IHCC.
10. At all times relevant herein, Defendants were “employers” engaged in an enterprise conducting interstate commerce, within the meaning and subject to the requirements of the FLSA.
11. At all times relevant herein, Defendants have operated a hospital or facility for the care of sick, elderly within the definition of the FLSA, 29 U.S.C. § 203(s)(B).
12. At all times relevant herein, Defendants have operated an institution providing on-premise care for the sick, the aged, or individuals with disabilities, within the definition of the MWHL.
13. At all times relevant herein, Defendants were Plaintiff’s “employers,” within the meaning and subject to the requirements of the FLSA, MWHL, and MWPCCL.

PUTATIVE COLLECTIVE ACTION PLAINTIFFS

14. On information and belief, there are additional persons who may become plaintiffs in this action, and who Plaintiff believes are entitled to notification of the pendency of this action and of their right to opt-in to the FLSA claims.
15. These putative collective action plaintiffs are current and former employees of Defendants who are similarly-situated to Plaintiff, in that they: (a) were, or are currently, non-exempt employees of Defendants, within the meaning of the FLSA; (b) subjected to the same terms and conditions of employment, as described in the paragraphs below; and (c) were not, or are

not currently, paid minimum wage and/or overtime premiums as prescribed by the FLSA.

16. On information and belief, these putative collective action plaintiffs have not joined this suit because they fear retaliation by Defendants, as occurred with Plaintiff.

FACTS

Background

17. Defendants operate hospice facilities in Mt. Airy, Burtonsville, and Columbia Maryland. These facilities provide care for sick and elderly people.
18. Defendants employ “Care Takers” who are live-in home health aides. Care Takers are required to live at their assigned facility from the beginning of their first shift for the week until the end of their last shift for the week.
19. Care Taker job duties include, but are not limited to, bathing the residents, cooking, checking the residents’ vital signs, cleaning, doing laundry, and occasionally administering medication to the residents.
20. Care Takers would leave after their final shift of the week. If employees asked to go home after each shift, Defendant Peters would threaten to terminate his or her employment.
21. On or about November 16, 2015, Defendants hired Plaintiff as a Care Taker. Plaintiff’s first line supervisor was Frank Dickerson. Plaintiff’s second line supervisor was Lois Peters.
22. Plaintiff worked at the Mount Airy location for the first month of her employment. Afterwards, in January and February 2016, Plaintiff worked at both the Burtonsville and Columbia locations.
23. Plaintiff typically worked between four and seven shifts per week; each shift began at 6:00 am and ended at 6:00 pm. Plaintiff was paid \$80 per 12-hour shift (*i.e.*, \$6.67 per hour), and she was required to live at the facility after shifts and during the week.
24. Defendants also employ Certified Medical Technicians (hereinafter, “CMTs”), who have the

same job duties and are otherwise subject to the same terms and conditions of employment as Care Takers, except that CMTs are paid \$100 per 12-hour shift (*i.e.*, \$8.33 per hour).

25. If the residents required assistance after a shift ended, Plaintiff and her coworkers were required to assist, but were not paid additional compensation for time worked beyond their 12-hour shift. Plaintiff kept a personal notebook of the time she worked beyond her 12-hour shifts; but Defendant never returned the notebook to Plaintiff after terminating her employment.
26. Without explicitly notifying their employees, Defendants deducted costs for board and lodging from employee wages.
27. Plaintiff did not give Defendants written authorization to deduct board and lodging costs from her pay.
28. On information and belief, Defendants did not obtain written authorization from any other employees to deduct board and lodging costs from their pay.
29. On information and belief, Defendants do not maintain and preserve records substantiating the board and lodging costs for their employees.

Hours worked and wages paid

30. The federal minimum wage during the relevant time period was \$7.25 per hour.
31. Plaintiff worked for Defendants in Maryland, where the minimum wage at that time was \$8.25 per hour. Plaintiff sometimes worked at the Burtonsville facility in Montgomery County, Maryland, where the minimum wage at that time was \$9.55 per hour.
32. For the pay period November 15– 28, 2015, Plaintiff worked at the Mt. Airy location. She was paid \$640 for working at least a 12-hour shift on at least eight days during that pay period. Based on the federal minimum wage, Defendants should have paid Plaintiff at least \$754.00

(\$580.00 in regular wages, \$174.00 in overtime wages). Based on Maryland's minimum wage, Defendants should have paid Plaintiff at least \$792.00. Plaintiff was underpaid at least \$114.00 under the FLSA and at least \$152.00 under the MWHL.

33. For the pay period November 29, 2015, to December 12, 2015 Plaintiff worked at the Mt. Airy location at least a 12-hour shift on each of at least 12 days, and was paid \$960.00. Based on the federal minimum wage, Defendants should have paid Plaintiff at least \$1,276.00 (\$580.00 in regular wages, \$696.00 in overtime wages). Based on Maryland's minimum wage, Defendants should have paid Plaintiff at least \$1,386.00 (\$792.00 in regular wages, \$594 in overtime wages). Plaintiff was underpaid at least \$316.00 under the FLSA and at least \$426.00 under the MWHL.
34. On information and belief, for the two pay periods between December 31, 2015, and January 9, 2016, Defendants paid Plaintiff \$1,520.00 for working at least a 12-hour shift on at least 19 days. Based on the federal minimum wage, Defendants should have paid Plaintiff at least \$1,899.50 (\$1,160.00 in regular wages, \$739.50 in overtime wages). Based on Maryland's minimum wage, Defendants should have paid Plaintiff at least \$2,029.50 (\$1,584 in regular wages, \$445.50 in overtime wages). Plaintiff was underpaid at least \$379.50 under the FLSA and at least \$509.50 under the MWHL.
35. For the pay period January 10–23, 2016, Defendants paid Plaintiff \$1,040.00 for working at least a 12-hour shift on at least 13 days. Based on the federal minimum wage, Defendants should have paid Plaintiff at least \$1,406.50 (\$580.00 in regular wages, \$826.50 in overtime wages). Based on Maryland's minimum wage, Defendants should have paid Plaintiff at least \$1,534.50 (\$792.00 in regular wages, \$742.40 in overtime wages). Plaintiff was underpaid at least \$366.50 under the FLSA and at least \$495.50 under the MWHL.

36. On information and belief, for the pay period January 24, 2016, to February 6, 2016, Defendants paid Plaintiff \$960 for working at least 12-hour shifts on at least 12 days. Based on the federal minimum wage, Defendants should have paid Plaintiff at least \$1,276.00 (\$580.00 in regular wages, \$696.00 in overtime wages). Based on Maryland's minimum wage, Defendants should have paid Plaintiff at least \$1,386.00 (\$792.00 in regular wages, \$594.00 in overtime wages). Plaintiff was underpaid at least \$316.00 under the FLSA and at least \$426.00 under the MWHL.
37. For the pay period February 7–20, 2016, Defendant paid Plaintiff \$1,120.00 for working at least 12-hour shifts on at least 14 days. Based on the federal minimum wage, Defendants should have paid Plaintiff at least \$754 (\$580.00 in regular wages, \$957.00 in overtime wages). Based on Maryland's minimum wage, Defendants should have paid Plaintiff at least \$1,683.00 (\$792.00 in regular wages, \$891.00 in overtime wages). Plaintiff was underpaid at least \$417.00 under the FLSA and at least \$563.00 under the MWHL.
38. In sum, Defendants paid Plaintiff approximately \$6,240.00 during the course of her employment. However, based on the federal minimum wage, Defendants should have paid Plaintiff at least \$8,149.00 (\$4,060.00 in regular wages, \$4,089.00 in overtime wages). Based on Maryland's minimum wage, Defendants should have paid Plaintiff at least \$8,811.00 (\$5,544.00 in regular wages, \$3,267.00 in overtime wages). Defendants underpaid Plaintiff by at least \$1,909.00 under the FLSA and at least \$2,571 under the MWHL.

Retaliation

39. In December 2015, Plaintiff complained to her direct supervisor, Mr. Dickerson, about being underpaid and required to stay overnight at the facilities without additional compensation. Mr. Dickerson told Plaintiff there was nothing he could do about it.

40. In early January 2016, Plaintiff, again, complained to Mr. Dickerson about being underpaid.
41. On February 26, 2016, Peters, terminated Plaintiff's employment over the phone. Peters told Plaintiff she was being fired for three reasons: (a) residents complained about her; (b) Plaintiff complained about being required to live at the facility; and (c) Plaintiff complaining about being underpaid.
42. The first reason is untrue because Plaintiff had spoken with Peters on February 25, 2016, the day before. Peters did not mention any complaints; in fact, Peters asked whether Plaintiff planned to work on the weekend. Additionally, when Plaintiff asked Peters about the alleged complaints, Peters responded that Plaintiff was fired because of her complaints about pay and living at the facility.
43. On information and belief, Defendants have deleted all records of Plaintiff's employment.

COUNT 1

Collective Action — FLSA Failure to Pay Minimum Wage

44. Plaintiff repeats and realleges the above paragraphs as if fully set forth herein.
45. Defendants failed to pay Plaintiff and putative collective action plaintiffs the federal minimum wage of at least \$7.25 per hour.
46. By and through their conduct, Defendants violated and continue to violate the FLSA.
47. Defendants acted willfully, intentionally, and not in good faith, within the meaning of 29 U.S.C. § 255(a).
48. As a result of Defendants' unlawful actions, Plaintiff and putative collective action plaintiffs have sustained damages, including but not limited to lost wages and liquidated damages.

COUNT 2

Collective Action — FLSA Failure to Pay Overtime Wages

49. Plaintiff repeats and realleges the above paragraphs as if fully set forth herein.

50. Defendants failed to pay Plaintiff and putative collective action plaintiffs a rate of one-and-one-half times their regular hourly rate (of no less than \$7.25 per hour) for hours worked in excess of 40 per week.
51. By and through their conduct, Defendants violated and continue to violate the FLSA.
52. Defendants acted willfully, intentionally, and not in good faith, within the meaning of 29 U.S.C. § 255(a).
53. As a result of Defendants' unlawful actions, Plaintiff and putative collective action plaintiffs have sustained damages, including but not limited to lost wages and liquidated damages.

COUNT 3

Individual Action — MWHL Failure to Pay Minimum Wage

54. Plaintiff repeats and realleges the above paragraphs as if fully set forth herein.
55. Defendants failed to pay Plaintiff the state minimum wage of at least \$8.25 per hour.
56. By and through their conduct, Defendants violated and continue to violate the MWHL.
57. Defendants acted willfully, intentionally, and not in good faith.
58. As a result of Defendants' unlawful actions, Plaintiff has sustained damages, including but not limited to lost wages and liquidated damages.

COUNT 4

Individual Action — MWHL Failure to Pay Overtime Wages

59. Plaintiff repeats and realleges the above paragraphs as if fully set forth herein.
60. Defendants failed to pay Plaintiff and putative collective action plaintiffs a rate of one-and-one-half times their regular hourly rate (of no less than \$8.25 per hour) for hours worked in excess of 48 per week.
61. By and through their conduct, Defendants violated and continue to violate the MWHL.
62. Defendants acted willfully, intentionally, and not in good faith.

63. As a result of Defendants' unlawful actions, Plaintiff has sustained damages, including but not limited to lost wages and liquidated damages.

COUNT 5

Individual Action — MWPCCL Unpaid Wages

64. Plaintiff repeats and realleges the above paragraphs as if fully set forth herein.
65. Defendant failed to pay Plaintiff her full wages.
66. By and through their conduct, Defendants violated and continue to violate the MWPCCL.
67. Defendants acted willfully, intentionally, and not in good faith.
68. As a result of Defendants' unlawful actions, Plaintiff has sustained damages, including but not limited to lost wages and liquidated damages.

COUNT 6

Individual Action — FLSA Retaliation

69. Plaintiff repeats and realleges the above paragraphs as if fully set forth herein.
70. Plaintiff engaged in activity protected by the FLSA when she complained to Defendants about Defendants' violations of the FLSA.
71. Defendants fired Plaintiff in retaliation for engaging in protected activity.
72. By and through their conduct, Defendants violated the FLSA.
73. Defendants acted willfully, intentionally, and not in good faith.
74. As a result of Defendants' unlawful actions, Plaintiff has sustained damages, including but not limited to lost wages, liquidated damages, and compensatory damages for pain and suffering.

COUNT 7

Individual Action — MWHL Retaliation

75. Plaintiff repeats and realleges the above paragraphs as if fully set forth herein.

76. Plaintiff engaged in activity protected by the MWHL when she complained to Defendants about Defendants' violations of the MWHL.
77. Defendants fired Plaintiff in retaliation for engaging in protected activity.
78. By and through their conduct, Defendants violated the MWHL.
79. Defendants acted willfully, intentionally, and not in good faith.
80. As a result of Defendants' unlawful actions, Plaintiff has sustained damages, including but not limited to lost wages, liquidated damages, and compensatory damages for pain and suffering.

DEMAND FOR JURY TRIAL

Plaintiff hereby demands a trial by jury on all Counts.

WHEREFORE, Plaintiff respectfully requests that the Court enter judgment against Defendants, jointly and severally, on all Counts; declare that Defendants violated the FLSA, MWHL, and MWPCCL; enjoin Defendants, their agents, employees, officers, and successors in interest, from engaging in the unlawful customs, policies and practices described herein; and award Plaintiff and any putative collective action plaintiff lost wages, future earnings, and benefits, plus interest; compensatory damages; liquidated damages; punitive damages; costs; attorney's fees; an amount equal to the tax on any award; pre- and post-judgment interest; and any other such relief as is fair and just.

Date: August 4, 2017

RESPECTFULLY SUBMITTED,

Alan Lescht and Associates, P.C.

By: /s/ Alan Lescht

Alan Lescht [Bar No. 12928]

Susan Kruger [Bar No. 15313]

Rani Rolston [Bar No. 17402]

1050 17th Street, N.W., Suite 400

Washington, D.C. 20036

Tel: (202) 463-6036

Fax: (202) 463-6067

alan.lescht@leschtlaw.com

susan.kruger@leschtlaw.com

rani.rolston@leschtlaw.com

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

for the

District of Maryland

Camilla McIntyre

Plaintiff(s)

v.

International Health Care Consultants, Inc.
Lois Peters

Defendant(s)

Civil Action No. 8:17-cv-02201

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) International Health Care Consultants, Inc.
11584 Scaggsville Rd.
Fulton, MD 20759

Registered Agent: Lois Peters, 11584 Scaggsville Rd., Fulton, MD 20759

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: Alan Lescht and Associates, PC
1050 17th St. NW, Suite 400
Washington, DC 20036

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

Civil Action No. 8:17-cv-02201

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:

Print

Save As...

Reset

UNITED STATES DISTRICT COURT

for the

District of Maryland

Camilla McIntyre

Plaintiff(s)

v.

International Health Care Consultants, Inc.
Lois Peters

Defendant(s)

Civil Action No. 8:17-cv-02201

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) Lois Peters
11584 Scaggsville Rd.
Fulton, MD 20759

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: Alan Lescht and Associates, PC
1050 17th St. NW, Suite 400
Washington, DC 20036

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

Civil Action No. 8:17-cv-02201

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:

Print

Save As...

Reset

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
Camilla McIntyre
(b) County of Residence of First Listed Plaintiff Washington, DC
(c) Attorneys (Firm Name, Address, and Telephone Number)
Alan Lescht and Associates, P.C.
1050 17th St. NW, Suite 400
Washington, DC 20036

DEFENDANTS
International Health Care Consultants, Inc.
Lois E. Peters
County of Residence of First Listed Defendant
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)
Citizen of This State
Citizen of Another State
Citizen or Subject of a Foreign Country
PTF DEF
1 1
2 2
3 3
Incorporated or Principal Place of Business In This State
Incorporated and Principal Place of Business In Another State
Foreign Nation
PTF DEF
4 4
5 5
6 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)
CONTRACTS
PERSONAL INJURY
TORTS
ROBBERY/PENALTY
BANKRUPTCY
OTHER STATUTES
LABOR
SOCIAL SECURITY
FEDERAL TAX SUITS
IMMIGRATION
PRISONER PETITIONS
CIVIL RIGHTS

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 USC 201
Brief description of cause:
Collective action for unpaid wages and unpaid overtime compensation.

VII. REQUESTED IN COMPLAINT:
CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ 300,000.00
CHECK YES only if demanded in complaint:
JURY DEMAND: X Yes [] No

VIII. RELATED CASE(S) IF ANY (See Instructions): JUDGE DOCKET NUMBER

DATE 8/4/17 SIGNATURE OF ATTORNEY OF RECORD Alan Lescht

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: [Hospice Operating Company Denies Care Takers Proper Wages, Suit Says](#)
