Ca	e 3:17-cv-02014-H-AGS Document 1 F	iled 09/29/17 PageID.1 Page 1 of 8					
1	ANN M. SMITH, ESQ. (SBN 120733)						
2	SMITH, STEINER, VÄNDERPOOL & WAX, APC						
3	401 West A Street, Suite 320 San Diego, CA 92101						
	Telephone: 619-239-7200						
4	Fax: 619-239-6048						
5	Attorneys for Plaintiffs						
6							
7							
8	UNITED STATE	ES DISTRICT COURT					
9	SOUTHERN DIST	RICT OF CALIFORNIA					
10	CANDACE MITCHELL; JENNIFER )	CASE NO. '17CV2014H AGS					
11	BECKER; KEITH BOOTHE; GRANT ) BOWERS; GAVIN BROATCH; )						
12	ISABELLÉ CAMACHO; KENT ) CUEVAS; MARY ENYEART; )	COMPLAINT FOR OVERTIME WAGES UNDER FAIR LABOR STANDARDS					
13	ALEXANDER MILO FLORES; PATRICIA FOSS; JENNIFER	ACT					
	GERAN; JAMES A. GOLDEN;	[29 U.S.C. §§ 201 et seq.]					
14	THAIRÁ HAMMI; RYAN HAÝ; ) CYNTHIA HERNANDEZ; )						
15	STEPHANIE HOOVER; MIGUEL ) HUERTA; GRAHAM HUFFORD; )	JURY TRIAL DEMANDED					
16	WAYNE JARRELL; ANAS M. ) KAZIHA; TERI KIPNIS; )						
17	NICOLAS B. MANANSALA;						
18	ERIKA MCNEILL; GABRIELLE ) MEAD; DEBRA OWEN; ALEC )						
19	PHILLIPP; MICHAEL PRINZ; ) STEVEN RAMIREZ; PETE RAZO; )						
20	ANTHONY REA; ARNILDA REYES; ) CATHERINE RIVERA; SCOTT )						
21	ROBINSON; RICHARD RUSSELL; ) JIM SILVERSTEIN; CLEMENS )						
22	WASSENBERG; DÁNIEL WEISS; ) LORETTA WILLIAMS; CODY )						
23	WILKINSON; GREGORY WOODS, )						
24	employees similarly situated.						
25	Plaintiffs,						
	v. )						
26	CITY OF SAN DIEGO,						
27	Defendant.						
28							

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1	I.	
2	JURISDICTION	
3	1. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C.	
4	§§ 1331 and 1343(3), because the controversy arises under a law of the United States,	
5	specifically, the Fair Labor Standards Act of 1938, 29 U.S.C. §§ 201 et seq. ("FLSA"), and	
6	thus presents a federal question.	
7	П.	
8	VENUE	
9	2. Venue is proper in the Southern District of California pursuant to 28 U.S.C.	
10	§ 1391(b) because the City of San Diego is in this federal district and the acts, events, or	
11	omissions giving rise to the claims occurred in this District.	
12	III.	
13	PARTIES	
14	3. Plaintiffs are current or former employees of the City of San Diego who bring	
15	this action on their own behalf and, pursuant to 29 U.S.C. § 216(b), on behalf of all other	
16	non-exempt employees and former employees similarly situated, to recover underpaid	
17	overtime compensation, liquidated damages, interest, attorneys' fees and costs. Each	
18	Plaintiff's written consent to become a party to this action is being contemporaneously filed	
19	or will be filed in the future pursuant to 29 U.S.C. § 216(b). This is a proposed collective	
20	action for which Plaintiffs seek timely conditional certification with notice and a consent to	
21	join form sent to all similarly situated non-exempt current and former employees informing	
22	them of their right to opt-into this action.	
23	4. Defendant City of San Diego ("Defendant" or "City"), is or at all relevant times	
24	was, each Plaintiff's employer. Defendant is a Charter City and a political subdivision of the	
25	State of California.	
26	///	
27	///	
28	///	
		l

1	IV.				
2	GENERAL ALLEGATIONS				
3	5. City recognizes its obligation to comply with the FLSA. Pursuant to City's				
4	Charter, the San Diego City Council adopts a Salary Ordinance annually. At all relevant				
5	times, these Salary Ordinances have included an express provision identical to the one stated				
6	in Salary Ordinance O-20817, adopted on April 25, 2017: "WHEREAS, the United States				
7	Supreme Court in Garcia v. San Antonio Metropolitan Transit Authority, 469 U.S. 528				
8	(1985), held that the provisions of the Fair Labor Standards Act (FLSA), 29 U.S.C. § 201 et				
9	seq., as they relate to overtime pay, are applicable to states, cities, and local agencies,				
10	including the City; and WHEREAS, it is necessary to ensure compliance with the FLSA,				
11	including all applicable case law interpreting the FLSA and applicable regulations [] BE				
12	IT ORDAINED, by the Council of the City of San Diego, as follows (in pertinent part):				
13	Section 3. <u>Compliance with the FLSA</u>				
14	Full-time employees in the classifications listed in the Personnel Manual Index Code H-4, Addendum A, Groups A, B, C [], are				
15	not exempt under the FLSA and are eligible for premium rate overtime based on the employee's scheduled workweek.				
16	Premium rate overtime will be computed in accordance with the FLSA, including all applicable cases interpreting the FLSA, and				
17	with all applicable regulations."				
18	Each Plaintiff and those similarly-situated is or was employed in a job classification in				
19	Groups A, B, or C.				
20	6. City has also adopted Personnel Manual Index Code H-4 (last amended June				
21	6, 2013) and Administrative Regulation 95.01 (effective August 27, 1986) for purposes of				
22	FLSA compliance. These overtime compensation provisions cover Plaintiffs and all those				
23	similarly situated.				
24	7. Plaintiffs and those current or former employees similarly situated are or were				
25	non-exempt employees of City who worked more than forty hours in one or more 7-day work				
26	weeks during the relevant three-year period. Each was paid an overtime rate of pay for these				
27	FLSA-eligible overtime hours worked. Each was entitled to have his or her premium				
28	overtime rate of pay determined by reference to his or her "regular rate of pay," which is				

defined under 29 U.S.C. § 207(e) as "all remuneration for employment paid to, or on behalf
 of, the employee," subject to a number of exclusions set forth in the FLSA.

- 8. During each workweek when Plaintiffs and those similarly situated worked
  FLSA-eligible overtime, each was also a participant in City's Flexible Benefits Plan ("FBP")
  entitling him or her to an annual lump sum of money, commonly known as "flex dollars," to
  be used for the purchase of health and welfare benefits (by payments made by City on
  employees' behalf to trustees or third parties) or otherwise taken in various forms known as
  "cash-in-lieu" payments.
- 9 9. During the relevant period, City did not count or include any of these "flex 10 dollars" as eligible "remuneration" when determining the employee's premium overtime rate 11 payable for that workweek. Each Plaintiff and all similarly-situated non-exempt current and 12 former employees have been affected by the City's conduct in the same manner because 13 City's policy and practice of excluding all FBP-related compensation from eligible 14 "remuneration" when calculating an employee's regular and premium overtime rates of pay 15 has been uniformly applied to all Plaintiffs and others similarly situated when they have 16 worked in excess of 40 hours in a 7-day work week during the relevant period.
- 17 10. On or about June 30, 2017, City notified all City employees by e-mail that, 18 effective July 1, 2017, "in accordance with recent changes to federal law regarding FLSA 19 overtime," the City "will include in an employee's FLSA overtime calculations the cash 20 value of any flexible benefit credits that they did not use to pay for health, dental, vision or 21 life insurance." The City subsequently acknowledged in writing that the e-mail notification's 22 reference to "recent changes to federal law regarding FLSA overtime," refers to the decision 23 rendered in Flores v. City of San Gabriel (9th Cir. 2016) 824 F. 3d 890, review denied on 24 May 15, 2017 ("Flores"), addressing the proper treatment of an employer's "flex dollars" 25 when determining what "remuneration" to include in an employee's "regular rate of pay" and 26 what amount to pay as a premium for FLSA-eligible overtime.
- 27 ///
- 28 ///

- 4 -

## FIRST CLAIM FOR RELIEF

V.

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11. The allegations set forth in paragraphs 5 through 10 are hereby incorporated by reference as if fully set forth.

5 12. At all relevant times, each Plaintiff and those similarly-situated was or is a nonexempt employee of City employed in a job classification eligible to earn premium rate 6 overtime under the FLSA for all time worked in excess of 40 hours in a 7-day work week. 7 8 Each Plaintiff and those similarly-situated did in fact work such FLSA-eligible overtime during the three-year period before the filing of this complaint and/or before the filing of his 9 10 or her Consent to become a party plaintiff, and the City was obligated to pay him or her 11 overtime calculated at one-and-one-half times his/her regular rate of pay, with that rate 12 calculated to include all eligible "remuneration" in accordance with 29 U.S.C. § 207(e).

13 13. At all relevant times, as a participant in City's FBP, an IRS-qualified cafeteria14 style benefits program, each Plaintiff and those similarly situated had "flex dollars" available
15 as a form of compensation in addition to wages earned, with the option to take those "flex
16 dollars" in various cash forms in lieu of third-party-provided health and welfare benefits.

17 14. When determining an employee's "regular rate of pay" for FLSA-eligible
18 overtime worked, the full amount of these cash-in-lieu of benefits payments constituted
19 "remuneration" and could not properly be treated as payments to an employee "not made as
20 compensation for his/her hours of employment" within the meaning of the exclusion set forth
21 in § 207(e)(2). (*Flores, supra* [such payments must be included in the "regular rate"]).

15. The City failed to count or include these cash-in-lieu of benefits payments
under its FBP as remuneration when determining an employee's "regular rate" of pay.
Because the City excluded these payments, they are not incorporated into the City's
calculation of the employee's overtime rate. In this manner, the City underpaid Plaintiffs and
others similarly-situated for FLSA-eligible overtime hours worked because the premium
overtime rates paid did not represent time-and-one-half their eligible "regular rates" of pay.
///

1 16. Each Plaintiff and those similarly-situated are entitled to receive the full 2 amount of FLSA-eligible premium rate overtime earned during the relevant period based on 3 a "regular rate of pay" which includes all cash-in-lieu of benefits payments as remuneration. 4 17. Each Plaintiff and those similarly situated are also presumptively entitled to liquidated damages in an amount equal to the amount of the underpaid overtime City owes. 5 City did not act in good faith with reasonable grounds to believe that it was not in violation 6 7 of the FLSA and took no affirmative action to assure its FLSA compliance at any time before 8 Flores was decided by the District Court in 2013 (969 F. Supp.2d 1158), while it was 9 pending on appeal, or after the Ninth Circuit's *Flores* decision was rendered in June 2016. 10 18. City's violation of the FLSA as described herein was wilful within the meaning 11 of 29 U.S.C. § 255(a) because City acted voluntarily and deliberately when maintaining an 12 intentional practice of failing to compensate Plaintiffs and others similarly situated in 13 accordance with the FLSA. City continues to fail and refuse to compensate Plaintiffs and 14 others similarly situated for City's underpayment of FLSA-eligible overtime hours worked. 15 VI. 16 SECOND CLAIM FOR RELIEF 17 19. The allegations set forth in paragraphs 5 through 10 are hereby incorporated 18 by reference as if fully set forth. 19 In addition to cash-in-lieu of benefits payments made under its FBP, City also 20. made payments on employees' behalf to trustees or third parties for health, dental, vision, life 2021 or similar insurance benefits. Under § 207(e)(4), such "contributions irrevocably made 22 pursuant to a bona fide plan" may be excluded from the regular rate of pay when calculating premium rate FLSA overtime. However, for a plan to retain its bona fide status within the 23 24 meaning of § 207(e)(4), the plan must not give an employee the option to receive any part 25 of the employer's contributions in cash instead of the benefits under the plan, or, if some cash 26 payment to an employee is allowed, it must be an incidental part of the plan. 27 21. On information and belief, City's total cash-in-lieu of benefits payments under 28 its FBP were sufficiently large as a percentage of City's total contributions during each

- 6 -

relevant year that these payments could not lawfully be deemed incidental within the
 meaning of § 207(e)(4) and 29 C.F.R. § 778.215(a)(5), and, thus, could not lawfully be
 excluded from a determination of "remuneration" and regular rates of pay. (See *Flores*.)

4 22. Accordingly, *in addition to* counting any cash-in-lieu of benefits payments as
5 remuneration when determining an employee's "regular rate of pay" under the FLSA, City
6 was obligated to include as qualifying remuneration all "flex dollars" which City paid to
7 trustees or third parties on an employee's behalf under its FBP.

8 23. Having failed to count these additional "flex dollars" paid to trustees or third 9 parties as remuneration, and thus having excluded the value of these payments from its 10 determination of an employee's "regular rate of pay," the City has further underpaid the 11 overtime earned by and owed to Plaintiffs and others similarly-situated.

12 24. Each Plaintiff and those similarly-situated are entitled to receive the full
13 amount of FLSA-eligible premium rate overtime earned based on a "regular rate of pay"
14 which includes as remuneration all "flex dollars" which City paid to trustees or third parties
15 on an employee's behalf under its FBP.

16 25. Each Plaintiff and those similarly situated are also presumptively entitled to 17 liquidated damages in an amount equal to the amount of the underpaid overtime City owes. 18 City did not act in good faith with reasonable grounds to believe that it was not in violation 19 of the FLSA and took no affirmative action to assure its FLSA compliance at any time before 20 Flores was decided by the District Court in 2013 (969 F. Supp.2d 1158), while it was 21 pending on appeal, or after the Ninth Circuit's Flores decision was rendered in June 2016. 22 City's violation of the FLSA as described herein was wilful within the meaning 26. 23 of 29 U.S.C. § 255(a) because City acted voluntarily and deliberately when maintaining an 24 intentional practice of failing to compensate Plaintiffs and others similarly situated in 25 accordance with the FLSA. City continues to fail and refuse to compensate Plaintiffs and others similarly situated for City's underpayment of FLSA-eligible overtime hours worked. 26

27 27. As City's notice to employees dated June 30, 2017 confirms (see paragraph 10
28 above), City is continuing to violate the FLSA by excluding from remuneration those

- 7 -

1	contributions irrevocably being made to third party insurers under its FBP in reliance on the				
2	bona fide status of its FBP under $\S$ 207(e)(4) despite the now-final decision in Flores holding				
3	that this exclusion is not likely available to City's plan.				
4	WHEREFORE, Plaintiffs pray for relief as follows:				
5	1. That Notice be given to current and former non-exempt employees of City who				
6	have worked FLSA-eligible overtime during the relevant period while also participating in				
7	City's FBP informing them of their right to join in this action without retaliation;				
8	2. That judgment be entered against the City in the amounts respectively due the				
9	Plaintiffs and other similarly situated non-exempt employees and former employees of the				
10	City for underpaid FLSA-eligible overtime compensation, liquidated damages, and				
11	prejudgment interest as the Court may determine pursuant to 29 U.S.C. § 216(b);				
12	3. That a permanent injunction be entered pursuant to 29 U.S.C. § 217 restraining				
13	the City from further violations of the Fair Labor Standards Act on the basis of the				
14	remuneration it pays employees under its Flexible Benefits Plan or otherwise;				
15	4. That reasonable attorneys' fees and costs and expenses of suit be awarded				
16	pursuant to 29 U.S.C. § 216(b); and,				
17	5. For such additional and further relief as this Court may deem just.				
18					
19	Dated: September 29, 2017 Respectfully submitted,				
20	SMITH, STEINER, VANDERPOOL & WAX, APC				
21					
22	By: s/Ann M. Smith				
23	Attorneys for Plaintiffs CANDACE MITCHELL, et al. E-mail: asmith@ssvwlaw.com				
24					
25					
26					
27					
28					

## Case 3:17-cv-02014-H-AGS Document 1-1 Filed 09/29/17 PageID.9 Page 1 of 1 JS 44 (Rev. 06/17) 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.)* 

L (a) PLAINTIFFS Candace Mitchell, et al., on behalf of themselves and others similarly situated				DEFENDANTS City of San Diego	1	'17CV20	)14 H	AGS	-
(b) County of Residence of First Listed Plaintiff San Diego (EXCEPT IN U.S. PLAINTIFF CASES)				County of Residence NOTE: IN LAND CO THE TRACT	(IN U.S. PL.	AINTIFF CASES O		OF	
(c) Attorneys (Firm Name, Address, and Telephone Number) Ann M. Smith Smith, Steiner, Vanderpool & Wax, APC 401 W. A Street, Suite 320, San Diego, CA 92101; (619) 239-7200			)	Attorneys (If Known) Kristin M. J. Zlotnik 1200 Third Avenue San Diego, CA 92	e, Suite 110	00			
II. BASIS OF JURISDI	CTION (Place an "X" in C	ne Box Only)	III. CI	<b>FIZENSHIP OF P</b>	RINCIPA	L PARTIES	Place an "X" in	One Box f	or Plaintiff
□ 1 U.S. Government Plaintiff		Not a Party)			TF DEF	Incorporated or Pri of Business In T		for Defenda PTF I 4	DEF
2 U.S. Government Defendant	4 Diversity (Indicate Citizensh)	ip of Parties in Item III)				Incorporated and P of Business In A		05	05
				n or Subject of a 🛛 🗍 eign Country	3 0 3	Foreign Nation		06	06
IV. NATURE OF SUIT			E	DEPERTONNA		ere for: <u>Nature o</u>		escription STATUT	
<ul> <li>110 Insurance</li> <li>120 Marine</li> <li>130 Miller Act</li> <li>140 Negotiable Instrument</li> <li>150 Recovery of Overpayment &amp; Enforcement of Judgment</li> <li>151 Medicare Act</li> <li>152 Recovery of Defaulted Student Loans (Excludes Veterans)</li> <li>153 Recovery of Overpayment of Veteran's Benefits</li> <li>160 Stockholders' Suits</li> <li>190 Other Contract</li> <li>195 Contract Product Liability</li> <li>196 Franchise</li> </ul> <b>REAL PROPERTY</b> <ul> <li>210 Land Condemnation</li> <li>220 Forcelosure</li> <li>230 Rent Lease &amp; Ejectment</li> <li>245 Tort Product Liability</li> <li>290 All Other Real Property</li> </ul>	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 355 Motor Vehicle Droduct Liability 360 Other Personal Injury 362 Personal Injury - Medical Malpractice CIVIL RIGHTS 440 Voting 442 Employment 443 Housing/ Accommodations 445 Amer. w/Disabilities - Diter Civil and the second	<b>PERSONAL INJUR)</b> 365 Personal Injury -         Product Liability         367 Health Care/         Pharmaceutical         Personal Injury         Product Liability         368 Asbestos Personal         Injury Product Liability <b>368 Asbestos Personal</b> Injury Product Liability <b>PERSONAL PROPER</b> 370 Other Fraud         371 Truth in Lending         380 Other Personal         Property Damage         385 Property Damage         Product Liability <b>PRISONER PETITION</b> Habcas Corpus:         463 Alien Detainee         510 Motions to Vacate Sentence         530 General         535 Death Penalty         Other:         540 Mandamus & Othe         550 Civil Rights         550 Civil Detainee - Conditions of Confinement	Y         □         62.           0         69.           TY         ■           Ø         71.1           □         72.1           □         72.1           □         74.1           □         74.1           □         79.0           □         79.0           □         79.0           □         46.5	RFEITURE/PENALTY S Drug Related Seizure of Property 21 USC 881 Other LABOR LABOR D Fair Labor Standards Act D Labor/Management Relations Relations Railway Labor Act Family and Medical Leave Act Other Labor Litigation Employee Retirement Income Security Act IMMIGRATION Naturalization Application S Other Immigration Actions	□       422 Appea         □       423 Withdr 28 US         □       820 Copyri         □       820 Copyri         □       835 Patent New E         □       840 Trader         □       861 HIA (1)         □       862 Black         □       861 Black         □       864 SSID □         □       865 RSI (4)         ■       870 Taxes or Def         □       871 IRS— 26 US	I 28 USC 158 rawal C 157 TY RIGHTS ights - Abbreviated Drug Application nark SECURITY I395ff) Lung (923) /DIWW (405(g)) Title XVI 05(g)) CLTAX SUITS (U.S. Plaintiff fendant)	□ 375 False C □ 376 Qui Tan 3729(a □ 400 State R. □ 410 Antitru: □ 430 Banks a □ 450 Comme □ 460 Deporta □ 470 Rackete Corrupt □ 480 Consun □ 490 Cable/S □ 850 Securiti Excham □ 890 Other S □ 891 Agricul □ 895 Freedon Act □ 899 Admini Act/Rev	laims Act n (31 USC )) eapportionr st und Banking ree ttion er Influenc Organizati ner Credit at TV es/Commou ge tatutory Act tural Acts mental Mat n of Inform ion strative Pro view or App Decision ationality of	ed and ons dities/ tions ters iation cedure weal of
V. ORIGIN (Place an "X" in One Box Only) X i Original 2 Removed from State Court Appellate Court Appellate Court Appellate Court Court Appellate Court Cour									
VI. CAUSE OF ACTION       Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):         29 U.S.C. section 207         Brief description of cause:         Underpayment of FLSA-eligible overtime worked									
VII. REQUESTED IN COMPLAINT:       CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.				EMAND \$		IECK YES only i RY DEMAND:	if demanded in X Yes	complair □No	nt:
VIII. RELATED CASE IF ANY	C(S) (See instructions):	JUDGE Roger T. B			DOCKET	NUMBER '17	CV1464 BE	N BGS	
DATE 09/29/2017 FOR OFFICE USE ONLY	09/29/2017 s/ Ann M. Smith								
RECEIPT #AMOUNTAPPLYING IFPJUDGEMAG. JUDGE									

Case	3:17-cv-02014-H-AGS Document 1-2	Filed 09/29/17 PageID.10 Page 1 of 1
4		
1	ANN M. SMITH, ESQ. (SBN 120733) SMITH, STEINER, VANDERPOOL	
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3 4	San Diego, CA 92101 Telephone: 619-239-7200 Fax: 619-239-6048	
5	Attorneys for Plaintiffs	
6		
7		
8	UNITED STAT	ES DISTRICT COURT
9	SOUTHERN DIS	TRICT OF CALIFORNIA
10	CANDACE MITCHELL, et al., )	CASE NO. <b>'17 CV2014 H AGS</b>
11	on behalf of themselves and all other ) employees similarly situated,	
12	Plaintiffs,	CONSENT TO JOIN ACTION UNDER FAIR LABOR STANDARDS ACT
13	v.	[29 U.S.C. § 216(b)]
14	CITY OF SAN DIEGO,	
15	Defendant.	
16	<u> </u>	
17		
18		vant to join this lawsuit to seek unpaid overtime
19	compensation which may be owed to	me by the City of San Diego. Accordingly, I
20		his action under the Fair Labor Standards Act,
21	29 U.S.C. § 216(b).	
22	alogla	By: Candaci Amitchell
23	Dated: 9/28/17	By: <u>Camar A (Muthell</u> Candace A. Mitchell
24 25		
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Case	3:17-cv-02014-H-AGS Document 1-3	Filed 09/29/17 PageID.11 Page 1 of 1			
1 2 3 4 5 6 7 8		ATES DISTRICT COURT			
9	SOUTHERN DI	ISTRICT OF CALIFORNIA			
10	CANDACE MITCHELL, et al., ) on behalf of themselves and all other )	CASE NO. <b>'17 CV2014 H AGS</b>			
11	employees similarly situated,	CONSENT TO JOIN ACTION UNDER			
12	Plaintiffs,	FAIR LABOR STANDARDS ACT [29 U.S.C. § 216(b)]			
13	v. (				
14	CITY OF SAN DIEGO,				
15	Defendant.				
16	}				
17					
18	I, Jennifer Becker	, want to join this lawsuit to seek unpaid overtime			
19	compensation which may be owed t	o me by the City of San Diego. Accordingly, I			
20	* <b>F *</b>	this action under the Fair Labor Standards Act,			
21	29 U.S.C. § 216(b).				
22					
23	Dated: 9/28/17	By: <u>Jennifer Becker</u> Jonnifer Becker			
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25 26					
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Jennifer Bo

Case	3:17-cv-02014-H-AGS Document 1-	4 Filed 09/29/17 PageID.12 Page 1 of 1
1	ANN M. SMITH, ESQ. (SBN 120733	
2	SMITH, STEINER, VANDERPOOL & WAX, APC	,
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4	Telephone: 619-239-7200 Fax: 619-239-6048	
5	Attorneys for Plaintiffs	
6		
7		
8	UNITED ST	ATES DISTRICT COURT
9	SOUTHERN I	DISTRICT OF CALIFORNIA
10	CANDACE MITCHELL, et al., on behalf of themselves and all other	CASE NO. <u>'17CV2014 H AGS</u>
11	employees similarly situated,	
12	Plaintiffs,	) CONSENT TO JOIN ACTION UNDER ) FAIR LABOR STANDARDS ACT
13	V.	) [29 U.S.C. § 216(b)]
14	CITY OF SAN DIEGO,	
15	Defendant.	
16		\$
17		
18	I, Keith Boothe	_, want to join this lawsuit to seek unpaid overtime
19	compensation which may be owed	to me by the City of San Diego. Accordingly, I
20	consent to become a party plaintiff	to this action under the Fair Labor Standards Act,
21	29 U.S.C. § 216(b).	
22		
23	Dated: 9*28-17	By: A-ref
24		Keith Boothe
25		
26		
27		
28		

Keith Boothe

Case	3:17-cv-02014-H-AGS Do	cument 1-5	Filed 09/29/17	PageID.13	Page 1 of 1
1 2 3 4 5	ANN M. SMITH, ESQ. (SE SMITH, STEINER, VAND & WAX, APC 401 West A Street, Suite 32 San Diego, CA 92101 Telephone: 619-239-7200 Fax: 619-239-6048 Attorneys for Plaintiffs	ERPOOL			
6					
7					
8			FES DISTRICT (		
9			TRICT OF CAL		
10 11	CANDACE MITCHELL, e on behalf of themselves and employees similarly situated	t al., ) l all other ) l, )		'17 CV2014	
12	Plaintiffs,	}	FAIR LABO	DR STANDA	CTION UNDER ARDS ACT
13	<b>v</b> .	}	) [29 U.S.C. § 216(b)]		
14	CITY OF SAN DIEGO,	Ş			
15	Defendant.	Ş			
16		}			
17					
18	I, Grant Bowers	, ĭ	want to join this	lawsuit to se	ek unpaid overtime
19	compensation which may	be owed to	me by the City	of San Die	go. Accordingly, I
20	consent to become a party	plaintiff to	this action unde	r the Fair La	bor Standards Act,
21	29 U.S.C. § 216(b).				
22	0.000		~1	1	
23	Dated: 9-28-17		By: Grant Bo	wers	1
24			Grant Do	weis	
25					
26					
27					
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Case 3	:17-cv-02014-H-AGS Document 1-6	Filed 09/29/17 PageID.14 Page 1 of 1
1	ANN M. SMITH, ESQ. (SBN 120733)	
2	ANN M. SMITH, ESQ. (SBN 120733) SMITH, STEINER, VANDERPOOL & WAX, APC 401 West A Street, Suite 320	
3	I San Diego, CA 9210	
4	Telephone: 619-239-7200 Fax: 619-239-6048	
5	Attorneys for Plaintiffs	
6		
7		
8	UNITED STA	TES DISTRICT COURT
9	SOUTHERN DIS	STRICT OF CALIFORNIA
10	CANDACE MITCHELL, et al., ) on behalf of themselves and all other )	CASE NO. <b>'17 CV2014 H AGS</b>
11	employees similarly situated,	CONSENT TO JOIN ACTION UNDER
12	Plaintiffs,	FAIR LABOR STANDARDS ACT [29 U.S.C. § 216(b)]
13	v. Ś	ι, φ <b>ν</b> ζα
14	CITY OF SAN DIEGO,	
15	Defendant.	
16	<u> </u>	
17		
18	I, <u>Gavin Broatch</u> ,	want to join this lawsuit to seek unpaid overtime
19	compensation which may be owed to	me by the City of San Diego. Accordingly, I
20	consent to become a party plaintiff to	this action under the Fair Labor Standards Act,
21	29 U.S.C. § 216(b).	$\sim$
22	aladia	A
23	Dated: 9/24/17	By: Gavin Broatch
24		Gavin Bioach
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27		
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		·

cin Broatch

Case	3:17-cv-02014-H-AGS	Document 1-7	Filed 09/29/17	PageID.15	Page 1 of 1
1		) (CDN: 100700)			
1	ANN M. SMITH, ESC SMITH, STEINER, V	2. (SBN 120733) Anderpool	)		
2	& WAX, APC 401 West A Street, Su	ite 320			
3	San Diego, CA 92101 Telephone: 619-239-7 Fax: 619-239-6048	200			
4					
5	Attorneys for Plaintiff	S			
6					
7				COLIDE	
8			ATES DISTRICT		
9			ISTRICT OF CA		
10	CANDACE MITCHE on behalf of themselve	and all other)	CASE NO.	<u>'17CV2014</u>	H AGS
11	employees similarly si	)			CTION UNDER
12	Plaintiffs	5, )	) FAIR LABOR STANDARD ) [29 U.S.C. § 216(b)]	ARDS ACT	
13					
14	CITY OF SAN DIEGO	)			
15	Defenda	nt.)			
16		)			
17		1	a service to the attack	1	
18			-		eek unpaid overtime
19 20	compensation which	·	-	•	
20	consent to become a j	party plaintiff to	o this action und	er the Fair La	abor Standards Act,
21	29 U.S.C. § 216(b).				
22			<b>ъ 1</b> Å Å	n Al	8
23 24	Dated: <u>9-28-17</u>	• 	By: <u>Stabel</u> Isabelle	<u>le Carnae</u> Camacho	ano
24 25					
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27					
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Case	3:17-cv-02014-H-AGS Document 1-8	Filed 09/29/17 PageID.16 Page 1 of 1		
1 2 3 4 5 6 7	ANN M. SMITH, ESQ. (SBN 120733) SMITH, STEINER, VANDERPOOL & WAX, APC 401 West A Street, Suite 320 San Diego, CA 92101 Telephone: 619-239-7200 Fax: 619-239-6048 Attorneys for Plaintiffs			
8	UNITED STA	TES DISTRICT COURT		
9	SOUTHERN DIS	STRICT OF CALIFORNIA		
10	CANDACE MITCHELL, et al., )	CASE NO. 17CV2014 H AGS		
11	on behalf of themselves and all other ) employees similarly situated,			
12	Plaintiffs,	CONSENT TO JOIN ACTION UNDER FAIR LABOR STANDARDS ACT [29 U.S.C. § 216(b)]		
13	v. {	[29 0.5.0. § 210(0)]		
14	CITY OF SAN DIEGO,			
15	Defendant.			
16	}			
17				
18	I, Kent Cuevas ,	want to join this lawsuit to seek unpaid overtime		
19	compensation which may be owed to	me by the City of San Diego. Accordingly, I		
20	consent to become a party plaintiff to	this action under the Fair Labor Standards Act,		
21	29 U.S.C. § 216(b).			
22		17		
23	Dated: 9/28/17	By:		
24		Reproducivas		
25				
26				
27				
28				

Kent Cueva

Case	se 3:17-cv-02014-H-AGS Document 1-9 Filed 09/29/17 Page	elD.17	Page 1 of 1
1 2 3 4 5 6 7	<ul> <li>SMITH, STEINER, VANDERPOOL</li> <li>&amp; WAX, APC</li> <li>401 West A Street, Suite 320</li> <li>3 San Diego, CA 92101 Telephone: 619-239-7200</li> <li>4 Fax: 619-239-6048</li> <li>5 Attorneys for Plaintiffs</li> <li>6</li> </ul>		
8	8 UNITED STATES DISTRICT COU	RT	
9	9 SOUTHERN DISTRICT OF CALIFO	RNIA	
10	10 CANDACE MITCHELL, et al., ) CASE NO. <b>'17C</b> on behalf of themselves and all other )	V2014 H	I AGS
11	employees similarly situated,		TION LINDER
12		TANDA	
13	13 v. $\left\{\begin{array}{c} 1250.5.0.3210\\ \end{array}\right\}$	(0)]	
14	14 CITY OF SAN DIEGO,		
15	15 Defendant.		
16	16 <b></b>		
17			
18	, , , , , , , , , , , , , , , , , , ,		_
19			
20		Fair La	bor Standards Act,
21			
22 23		ann.	hat
23 24	Morry Environment	i i i i i i i i i i i i i i i i i i i	<u> </u>
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Mary Enveart

1 2	ANN M. SMITH, ESQ. (SBN 120733) SMITH, STEINER, VANDERPOOL & WAX, APC	
3	401 West A Street, Suite 320	
4	San Diego, CA 92101 Telephone: 619-239-7200 Fax: 619-239-6048	
5	Attorneys for Plaintiffs	
6		
7		
8	UNITED STATE	ES DISTRICT COURT
9	· SOUTHERN DIST	RICT OF CALIFORNIA
10	CANDACE MITCHELL, et al., ) on behalf of themselves and all other )	CASE NO. '17 CV2014 H AGS
11	employees similarly situated,	CONSENT TO JOIN ACTION UNDER
12	Plaintiffs,	FAIR LABOR STANDARDS ACT [29 U.S.C. § 216(b)]
13	v. , }	
14	CITY OF SAN DIEGO,	
15	Defendant.	
16	<u> </u>	
17		
18		ant to join this lawsuit to seek unpaid overtime
19		ne by the City of San Diego. Accordingly, I
20		is action under the Fair Labor Standards Act,
21	29 U.S.C. § 216(b).	
22		$\left( \begin{array}{c} 1 \\ 1 \\ 2 \\ 2 \\ 2 \\ 2 \\ 2 \\ 2 \\ 2 \\ 2 \\$
23	Dated: 09/2017	By:Alexander Milo Flores
24		Alexander Willo Fioles
25		
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27		
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ļ	l	

Case	3:17-cv-02014-H-AGS Document 1-11 Filed 09/29/17 PageID.19 Page 1 of 1
1 2 3 4 5 6 7 8	ANN M. SMITH, ESQ. (SBN 120733) SMITH, STEINER, VANDERPOOL & WAX, APC 401 West A Street, Suite 320 San Diego, CA 92101 Telephone: 619-239-7200 Fax: 619-239-6048 Attorneys for Plaintiffs UNITED STATES DISTRICT COURT
9	SOUTHERN DISTRICT OF CALIFORNIA
10 11 12 13	CANDACE MITCHELL, et al., on behalf of themselves and all other employees similarly situated, Plaintiffs, CASE NO. <u>'17CV2014 H AGS</u> CONSENT TO JOIN ACTION UNDER FAIR LABOR STANDARDS ACT [29 U.S.C. § 216(b)]
14 15 16	v. CITY OF SAN DIEGO, Defendant.
17 18	I, Patricia Foss, want to join this lawsuit to seek unpaid overtime
19	compensation which may be owed to me by the City of San Diego. Accordingly, I
20	consent to become a party plaintiff to this action under the Fair Labor Standards Act,
21	29 U.S.C. § 216(b).
22	
23	Dated: 9/27/17 By: P600 Patricia Foss
24	r autota 1'088
25	
26 27	
28	

Patricia Foss

Case 3	3:17-cv-02014-H-AGS Document 1-12	Filed 09/29/17 PageID.20 Page 1 of 1
1 2 3 4 5 6 7	ANN M. SMITH, ESQ. (SBN 120733) SMITH, STEINER, VANDERPOOL & WAX, APC 401 West A Street, Suite 320 San Diego, CA 92101 Telephone: 619-239-7200 Fax: 619-239-6048 Attorneys for Plaintiffs	
8		TES DISTRICT COURT
9	SOUTHERN DIS	STRICT OF CALIFORNIA
10	CANDACE MITCHELL, et al., ) on behalf of themselves and all other )	CASE NO. <u>'17CV2014 H AGS</u>
11	employees similarly situated,	CONSENT TO JOIN ACTION UNDER
12	Plaintiffs,	FAIR LABOR STANDARDS ACT [29 U.S.C. § 216(b)]
13		
14	CITY OF SAN DIEGO,	
15 16	Defendant.	
10	)	
18	L. Jennifer Geran	want to join this lawsuit to seek unpaid overtime
19		o me by the City of San Diego. Accordingly, I
20		this action under the Fair Labor Standards Act,
21	29 U.S.C. § 216(b).	
22	e 1	
23	Dated: 92817	By: Jennfer Geran
24		Jennifer Geran
25		
26		
27		
28		

Jennifer Gerar

Case 3	:17-cv-02014-H-AGS	Document 1-13	Filed 09/29/17	PageID.21	Page 1 of 1
1 2	ANN M. SMITH, ESQ. SMITH, STEINER, VA & WAX, APC	(SBN 120733) NDERPOOL			
3~	401 West A Street, Suite San Diego, CA 92101	e 320			
4	& WAX, APC 401 West A Street, Suite San Diego, CA 92101 Telephone: 619-239-72 Fax: 619-239-6048	00			
5	Attorneys for Plaintiffs				
· 6					
7					
8		UNITED STATE	S DISTRICT CO	URT	
9	S	OUTHERN DISTR	RICT OF CALIF	ORNIA	
10	CANDACE MITCHELI on behalf of themselves	L, et al., ) and all other )	CASE NO. <u>'1</u>	7CV2014 H	AGS
11	employees similarly situ	ated,	CONCENT TO	JOIN ACTIO	NUNDER
12	Plaintiffs,	Ş	FAIR LABOR [29 U.S.C. § 2]	<b>STANDARDS</b>	
13	<b>v.</b>	Ś	[29 0.0.0. 3 Z	(0)]	
14	CITY OF SAN DIEGO,	Ş			
15	Defendant.	. {			
16		}			
17					
18	I, James A. Go	olden , war	nt to join this law	vsuit to seek un	paid overtime
19	compensation which m	nay be owed to m	e by the City of	San Diego. A	Accordingly, I
20	consent to become a pa	rty plaintiff to thi	s action under th	e Fair Labor S	Standards Act,
21	29 U.S.C. § 216(b).				
22	<b>^</b>			$\overline{)}$	
23	Dated: 9.29.	/7В		<u> </u>	
24		<u> </u>	James A. G	olden	
25					
26					
27					
28					

Case	3:17-cv-02014-H-AGS Document 1-14	Filed 09/29/17 PageID.22 Page 1 of 1
1	ANN M. SMITH, ESQ. (SBN 120733)	
2	SMITH, STEINER, VANDERPOOL & WAX, APC	
3	401 West A Street, Suite 320 San Diego, CA 92101	
4	Telephone: 619-239-7200 Fax: 619-239-6048	
5	Attorneys for Plaintiffs	
6		
7		
8	UNITED STA	TES DISTRICT COURT
9	SOUTHERN DIS	STRICT OF CALIFORNIA
10	CANDACE MITCHELL, et al., ) on behalf of themselves and all other )	CASE NO. <b>'17 CV2014 H AGS</b>
11	employees similarly situated,	
12	Plaintiffs,	CONSENT TO JOIN ACTION UNDER FAIR LABOR STANDARDS ACT
13	v. {	[29 U.S.C. § 216(b)]
14	CITY OF SAN DIEGO,	
15	Defendant.	
16	}	
17		
18	I,,	want to join this lawsuit to seek unpaid overtime
19	compensation which may be owed to	o me by the City of San Diego. Accordingly, I
20	consent to become a party plaintiff to	this action under the Fair Labor Standards Act,
21	29 U.S.C. § 216(b).	
22		
23	Dated: 9/29/2017	By: Thaira Hamm
24		
25		
26		
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Case	e 3:17-cv-02014-H-AGS Document 1-15 Filed 09/29/17	PageID.23 Page 1 of 1
1 2 3 4 5 6 7 8	<ul> <li>SMITH, STEINER, VANDERPOOL</li> <li>&amp; WAX, APC</li> <li>401 West A Street, Suite 320</li> <li>3 San Diego, CA 92101 Telephone: 619-239-7200</li> <li>4 Fax: 619-239-6048</li> <li>5 Attorneys for Plaintiffs</li> <li>6</li> <li>7</li> </ul>	ΌΙRΤ
9 10 11 12 13 14 15 16	<ul> <li>CANDACE MITCHELL, et al., on behalf of themselves and all other employees similarly situated,</li> <li>Plaintiffs,</li> <li>V.</li> <li>CONSENT FAIR LABC [29 U.S.C. §</li> <li>Defendant.</li> </ul>	<b>'17 CV2014 H AGS</b> TO JOIN ACTION UNDER OR STANDARDS ACT
17	7	
18	8 I, <u>Ryan Hay</u> , want to join this l	awsuit to seek unpaid overtime
19		of San Diego. Accordingly, I
20		the Fair Labor Standards Act,
21 22		
22		241
24		
25	5	
26	6	
27	7	
28	8	

Ryan Hay

4 <sup>- 1</sup>	Case	3:17-cv-02014-H-AGS Document 1-1	6 Filed 09/29/17 PageID.24 Page 1 of 1
	1 2 3 4 5 6 7 8 9		TES DISTRICT COURT STRICT OF CALIFORNIA
	10 11	CANDACE MITCHELL, et al., ) on behalf of themselves and all other ) employees similarly situated, )	CASE NO. <b>'17 CV2014 H AGS</b>
	12	Plaintiffs,	CONSENT TO JOIN ACTION UNDER FAIR LABOR STANDARDS ACT
	13	V.	[29 U.S.C. § 216(b)]
	14	5	
		CITY OF SAN DIEGO,	
	15	Defendant.	
	16	)	
	17		
	18		want to join this lawsuit to seek unpaid overtime
	19	compensation which may be owed to	me by the City of San Diego. Accordingly, I
	20	consent to become a party plaintiff to	this action under the Fair Labor Standards Act,
	21	29 U.S.C. § 216(b).	
	22	1	
	23	Dated: 928 2017	By: Cynthia Hernandez
	24		
	25		They want the second se
	26		
	27		
	28		

(1)

Cynthia H

Case	3:17-cv-02014-H-AGS Document 1-17	Filed 09/29/17 PageID.25 Page 1 of 1
1 2 3 4 5	ANN M. SMITH, ESQ. (SBN 120733) SMITH, STEINER, VANDERPOOL & WAX, APC 401 West A Street, Suite 320 San Diego, CA 92101 Telephone: 619-239-7200 Fax: 619-239-6048 Attorneys for Plaintiffs	
6		
7 8	INITED STA	TES DISTRICT COURT
° 9		TES DISTRICT COURT STRICT OF CALIFORNIA
10		CASE NO. '17CV2014H AGS
10	CANDACE MITCHELL, et al., ) on behalf of themselves and all other ) employees similarly situated, )	CASE NO. <u>ITOVZOIHII AOU</u>
12	Plaintiffs,	CONSENT TO JOIN ACTION UNDER FAIR LABOR STANDARDS ACT
13	v. )	[29 U.S.C. § 216(b)]
14	CITY OF SAN DIEGO,	
15	) Defendant.	
16	}	
17		
18	I, Stephanie Hoover	want to join this lawsuit to seek unpaid overtime
19	compensation which may be owed to	o me by the City of San Diego. Accordingly, I
20	consent to become a party plaintiff to	this action under the Fair Labor Standards Act,
21	29 U.S.C. § 216(b).	
22		
23	Dated: September 28, 2017	By: Atyphanie Hoven
24		Stephanie Hoover
25		
26		
27		
28		

Stephanie Hoover

<ol> <li>ANN M. SMITH, ESQ. (SBN 120733)</li> <li>SMITH, STEINER, VANDERPOOL</li> <li>WAX, APC</li> <li>401 West A Street, Suite 320</li> </ol>	
<ul> <li>3 San Diego, CA 92101 Telephone: 619-239-7200</li> <li>4 Fax: 619-239-6048</li> <li>5 Attorneys for Plaintiffs</li> <li>6</li> <li>7</li> </ul>	
8 UNITED STATES DISTRICT COURT	
9 SOUTHERN DISTRICT OF CALIFORNIA	
<ul> <li>CANDACE MITCHELL, et al., on behalf of themselves and all other employees similarly situated,</li> <li>CASE NO. <u>'17CV2014 H AGS</u></li> </ul>	
12       Plaintiffs,       )       CONSENT TO JOIN ACTION UN         12       Plaintiffs,       )       FAIR LABOR STANDARDS ACT	DER
13 v. $(29 \text{ U.S.C. } \$ 216(b))$	
14 CITY OF SAN DIEGO,	
15 Defendant.	
16	
17	
<sup>18</sup> I, <u>Miguel Huerta</u> , want to join this lawsuit to seek unpaid	overtime
<sup>19</sup> compensation which may be owed to me by the City of San Diego. Accor	dingly, I
<sup>20</sup> consent to become a party plaintiff to this action under the Fair Labor Stand	ards Act,
<sup>21</sup> 29 U.S.C. § 216(b).	
$\frac{22}{22}$	
23 Dated: 9/28/2017 By: Miguel Huerta	
25	
25 26	
27	
28	

Miguel Huerta

1       ANN M. SMITH, ESQ. (SEN 120733)         2       MAX, APC         40) West A Street, Suite 320         3an Diego, CA 92101         1       Tstephone: 619-239-7200         4       Fax: 619-239-6048         5       Attorneys for Plaintiffs         6       0         7       SOUTHERN DISTRICT COURT         8       UNITED STATES DISTRICT COURT         9       SOUTHERN DISTRICT OF CALIFORNIA         10       CANDACE MITCHELL, et al., on behalf of themselves and all other imployees similarly stuated, proper similarl	Case 3	3:17-cv-02014-H-AGS Document 1-19	Filed 09/29/17 PageID.27 Page 1 of 1
9       SOUTHERN DISTRICT OF CALIFORNIA         10       CANDACE MITCHELL, et al., on behalf of themselves and all other employees similarly situated,       CASE NO. '17CV2014H AGS         11       mbehalf of themselves and all other employees similarly situated,       CASE NO. '17CV2014H AGS         12       Plaintiffs,       CONSENT TO JOIN ACTION UNDER FAIR LABOR STANDARDS ACT [29 U.S.C. § 216(b)]         13       v.       [29 U.S.C. § 216(b)]         14       CITY OF SAN DIEGO,       Defendant.         15       Defendant.       [10]         16	2 3 4 5 6	<ul> <li>SMITH, STEINER, VANDERPOOL &amp; WAX, APC</li> <li>401 West A Street, Suite 320</li> <li>San Diego, CA 92101</li> <li>Telephone: 619-239-7200</li> <li>Fax: 619-239-6048</li> </ul>	
10       CANDACE MITCHELL, et al., on behalf of themselves and all other employees similarly situated,       CASE NO. '17CV2014H AGS         11       Plaintiffs,       CONSENT TO JOIN ACTION UNDER FAIR LABOR STANDARDS ACT [29 U.S.C. § 216(b)]         13       v.       CITY OF SAN DIEGO,         14       CITY OF SAN DIEGO,       Defendant.         16	8	UNITED STA	ATES DISTRICT COURT
11       on behalf of themselves and all other employees similarly situated,         12       Plaintiffs,         13       V.         14       CITY OF SAN DIEGO,         15       Defendant.         16       .         17       I, Graham C. Hufford, want to join this lawsuit to seek unpaid overtime compensation which may be owed to me by the City of San Diego. Accordingly, I consent to become a party plaintiff to this action under the Fair Labor Standards Act,         19       Dated: <u>28560T17</u> 23       Dated: <u>28560T17</u> 24       By: Madda A.M.         25       Graham C. Hufford         26       .	9	SOUTHERN D	ISTRICT OF CALIFORNIA
11       employees similarly situated,       CONSENT TO JOIN ACTION UNDER         12       Plaintiffs,       FAIR LABOR STANDARDS ACT         13       v.       [29 U.S.C. § 216(b)]         14       CITY OF SAN DIEGO,       Defendant.         16	10	CANDACE MITCHELL, et al., )	CASE NO. '17CV2014 H AGS
12       Plaintiffs,       FAIR LABOR STANDARDS ACT         13       v.       [29 U.S.C. § 216(b)]         14       CITY OF SAN DIEGO,       [15         15       Defendant.       [16]         17       I.       Graham C. Hufford, want to join this lawsuit to seek unpaid overtime         19       compensation which may be owed to me by the City of San Diego. Accordingly, I         20       consent to become a party plaintiff to this action under the Fair Labor Standards Act,         21       29 U.S.C. § 216(b).         23       Dated: <u>28560717</u> 24       By: <u>Modume August</u> 25       Graham C. Hufford	11	on behalf of themselves and all other ) employees similarly situated,	
<ul> <li>v.</li> <li>CITY OF SAN DIEGO,</li> <li>Defendant.</li> <li>I, <u>Graham C. Hufford</u>, want to join this lawsuit to seek unpaid overtime</li> <li>compensation which may be owed to me by the City of San Diego. Accordingly, I</li> <li>consent to become a party plaintiff to this action under the Fair Labor Standards Act,</li> <li>29 U.S.C. § 216(b).</li> <li>Dated: <u>28560T17</u> By: <u>Made Made Made Made Made Made Made Made </u></li></ul>	12	Plaintiffs,	FAIR LABOR STANDARDS ACT
15       Defendant.         16	13	v.	$[29 0.5.0. \ 9 \ 210(0)]$
16	14	CITY OF SAN DIEGO,	
17       I, <u>Graham C. Hufford</u> , want to join this lawsuit to seek unpaid overtime         19       compensation which may be owed to me by the City of San Diego. Accordingly, I         20       consent to become a party plaintiff to this action under the Fair Labor Standards Act,         21       29 U.S.C. § 216(b).         22       Dated: <u>28560T17</u> 24       By: <u>Mahan C. Hufford</u> 25       Graham C. Hufford	15	Defendant.	
18       I, <u>Graham C. Hufford</u> , want to join this lawsuit to seek unpaid overtime         19       compensation which may be owed to me by the City of San Diego. Accordingly, I         20       consent to become a party plaintiff to this action under the Fair Labor Standards Act,         21       29 U.S.C. § 216(b).         22       Dated: <u>28560T17</u> 24       By: <u>Madea Auford</u> 25       Graham C. Hufford         26       27	16	Ś	
<ul> <li><sup>19</sup> compensation which may be owed to me by the City of San Diego. Accordingly, I</li> <li><sup>20</sup> consent to become a party plaintiff to this action under the Fair Labor Standards Act,</li> <li><sup>21</sup> 29 U.S.C. § 216(b).</li> <li><sup>22</sup> Dated: <u>28560T17</u> By: <u>Made Aufa</u> Graham C. Hufford</li> <li><sup>25</sup> 26</li> <li><sup>26</sup> 27</li> </ul>	17		
<ul> <li>consent to become a party plaintiff to this action under the Fair Labor Standards Act,</li> <li>29 U.S.C. § 216(b).</li> <li>Dated: <u>28560T17</u> By: <u>Modernal Auffan</u></li> <li>Graham C. Hufford</li> </ul>	18	I, <u>Graham C. Hufford</u>	, want to join this lawsuit to seek unpaid overtime
<ul> <li>29 U.S.C. § 216(b).</li> <li>Dated: <u>28560717</u> By: <u>Multic Auffed</u></li> <li>Graham C. Hufford</li> </ul>		compensation which may be owed t	o me by the City of San Diego. Accordingly, I
22 23 24 24 25 26 27			o this action under the Fair Labor Standards Act,
<ul> <li>Dated: <u>28560T17</u> By: <u>Multiple</u> Graham C. Hufford</li> <li>25</li> <li>26</li> <li>27</li> </ul>		29 U.S.C. § 216(b).	
Graham C. Hufford Graham C. Hufford 25 26 27			
25 26 27		Dated: <u>LOSEPTIF</u>	By: ////////////////////////////////////
26 27			
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20			
	20		

Graham C. Hufford

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Case	3:17-cv-02014-H-AGS Document 1-20 Filed 09/29/17 PageID.28 Page 1 of 1
1	ANN M. SMITH, ESQ. (SBN 120733) SMITH, STEINER, VANDERPOOL
2	& WAX, APC
3	401 West A Street, Suite 320 San Diego, CA 92101
4	Telephone: 619-239-7200 Fax: 619-239-6048
5	Attorneys for Plaintiffs
6	
7	
8	UNITED STATES DISTRICT COURT
9	SOUTHERN DISTRICT OF CALIFORNIA
10	CANDACE MITCHELL, et al., ) CASE NO. '17 CV2014 H AGS
11	on behalf of themselves and all other ) employees similarly situated,
12	Plaintiffs,
13	v. { [29 U.S.C. § 216(b)]
14	CITY OF SAN DIEGO,
15	Defendant.
16	}
17	
18	I, <u>Wayne Jarrell</u> , want to join this lawsuit to seek unpaid overtime
19	compensation which may be owed to me by the City of San Diego. Accordingly, I
20	consent to become a party plaintiff to this action under the Fair Labor Standards Act,
21	29 U.S.C. § 216(b).
22	
23	Dated: 9/29/2017 By: Wayne Jarcell
24	Wayne Jartell
25	
26	
27	
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Case	3:17-cv-02014-H-AGS Document 1-21	Filed 09/29/17 PageID.29 Page 1 of 1		
1 2 3 4 5 6 7 8	ANN M. SMITH, ESQ. (SBN 120733) SMITH, STEINER, VANDERPOOL & WAX, APC 401 West A Street, Suite 320 San Diego, CA 92101 Telephone: 619-239-7200 Fax: 619-239-6048 Attorneys for Plaintiffs UNITED STAT	TES DISTRICT COURT		
9	SOUTHERN DIS	TRICT OF CALIFORNIA		
10 11	CANDACE MITCHELL, et al., ) on behalf of themselves and all other ) employees similarly situated, )	CASE NO. 17CV2014 H AGS		
12	Plaintiffs,	CONSENT TO JOIN ACTION UNDER FAIR LABOR STANDARDS ACT		
13	V.	[29 U.S.C. § 216(b)]		
14	CITY OF SAN DIEGO,			
15	Defendant.			
16				
17				
18	I, <u>Anas M. Kaziha</u> , w	want to join this lawsuit to seek unpaid overtime		
19	compensation which may be owed to me by the City of San Diego. Accordingly, I			
20	consent to become a party plaintiff to this action under the Fair Labor Standards Act,			
21	29 U.S.C. § 216(b).	,		
22		AD.		
23	Dated: 9/29/17 By:			
24		Anas M. Kaziha		
25				
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Case	3:17 <sup>-</sup> cv-02014-H-AGS Document 1-2	2 Filed 09/29/17 PageID.30 Page 1 of 1		
1 2 3 4 5 6 7 8 9		ATES DISTRICT COURT ISTRICT OF CALIFORNIA		
10				
10	CANDACE MITCHELL, et al., on behalf of themselves and all other employees similarly situated,	CASE NO. <u>17CV2014 H AGS</u>		
12	Plaintiffs,	CONSENT TO JOIN ACTION UNDER FAIR LABOR STANDARDS ACT		
13	v.	[29 U.S.C. § 216(b)]		
14	CITY OF SAN DIEGO,			
15	Defendant.			
16				
17				
18	I, <u>Teri Kipnis</u>	, want to join this lawsuit to seek unpaid overtime		
19	compensation which may be owed to me by the City of San Diego. Accordingly, I			
20	consent to become a party plaintiff to this action under the Fair Labor Standards Act,			
21	29 U.S.C. § 216(b).			
22		$\frown DI$		
23	Dated: 9 28 2017	By: Fel Qo		
24		Teri Kipnis		
25				
26				
27				
28				

Case	3:17-cv-02014-H-AGS Document 1-23 Filed 09/29/17 PageID.31 Page 1 of 1			
-				
1	ANNIM SMITH ESO (SPN 120722)			
1 2	ANN M. SMITH, ESQ. (SBN 120733) SMITH, STEINER, VANDERPOOL & WAX, APC			
3	401 West A Street, Suite 320			
4	San Diego, CA 92101 Telephone: 619-239-7200 Fax: 619-239-6048			
5	Attorneys for Plaintiffs			
6				
7				
8	UNITED STATES DISTRICT COURT			
9	SOUTHERN DISTRICT OF CALIFORNIA			
10	CANDACE MITCHELL, et al., ) CASE NO. <b>'17CV2014 H AGS</b>			
11	employees similarly situated, )			
12	Plaintiffs, ) CONSENT TO JOIN ACTION UNDER FAIR LABOR STANDARDS ACT F20 U.S.C. § 216(b)]			
13	v. [29 U.S.C. § 216(b)]			
14	CITY OF SAN DIEGO,			
15	Defendant.			
16	}			
17				
18	I, Nicolas B. Manansala, want to join this lawsuit to seek unpaid overtime			
19	compensation which may be owed to me by the City of San Diego. Accordingly, I			
20	consent to become a party plaintiff to this action under the Fair Labor Standards Act,			
21	29 U.S.C. § 216(b).			
22				
23	Dated: 9/70/13 By:			
24	Nicolas B. Manansala			
25				
26				
27				
28				

Case 3	3:17-cv-02014-H-AGS Document 1-24	Filed 09/29/17 PageID.32 Page 1 of 1			
1 2 3 4 5 6 7	<ul> <li>ANN M. SMITH, ESQ. (SBN 120733)</li> <li>SMITH, STEINER, VANDERPOOL &amp; WAX, APC</li> <li>401 West A Street, Suite 320</li> <li>San Diego, CA 92101</li> <li>Telephone: 619-239-7200</li> <li>Fax: 619-239-6048</li> <li>Attorneys for Plaintiffs</li> </ul>				
8	UNITED STA	ATES DISTRICT COURT			
9	SOUTHERN DI	STRICT OF CALIFORNIA			
10 11	CANDACE MITCHELL, et al., ) on behalf of themselves and all other )	CASE NO. <b>'17 CV2014 H AGS</b>			
12	employees similarly situated, ) Plaintiffs, )	CONSENT TO JOIN ACTION UNDER FAIR LABOR STANDARDS ACT			
13	V.	[29 U.S.C. § 216(b)]			
14	CITY OF SAN DIEGO,				
15	Defendant.				
16	}				
17					
18	I, Erika McNeill	, want to join this lawsuit to seek unpaid overtime			
19	compensation which may be owed to me by the City of San Diego. Accordingly, I				
20	consent to become a party plaintiff to	this action under the Fair Labor Standards Act,			
21	29 U.S.C. § 216(b).				
22	, <i>4</i>				
23	Dated: 9/28/2017	By: Or the Manal			
24	Erika McNeill				
25					
26					
27					
28					

Case	3:17-cv-02014-H-AGS Document 1-25	Filed 09/29/17 PageID.33 Page 1 of 1
1 2 3 4 5 6 7 8	ANN M. SMITH, ESQ. (SBN 120733) SMITH, STEINER, VANDERPOOL & WAX, APC 401 West A Street, Suite 320 San Diego, CA 92101 Telephone: 619-239-7200 Fax: 619-239-6048 Attorneys for Plaintiffs UNITED STA	TES DISTRICT COURT
9	SOUTHERN DI	STRICT OF CALIFORNIA
10 11	CANDACE MITCHELL, et al., ) on behalf of themselves and all other ) employees similarly situated, )	CASE NO. <b>'17 CV2014 H AGS</b>
12	Plaintiffs,	CONSENT TO JOIN ACTION UNDER FAIR LABOR STANDARDS ACT
13	v.	[29 U.S.C. § 216(b)]
14	CITY OF SAN DIEGO,	
15	) Defendant.	
16	}	
17		
18	I, <u>Gabrielle A. Mead</u> ,	want to join this lawsuit to seek unpaid overtime
19	compensation which may be owed to	o me by the City of San Diego. Accordingly, I
20	consent to become a party plaintiff to	this action under the Fair Labor Standards Act,
21	29 U.S.C. § 216(b).	
22		
23	Dated: 9-26-17	By: Matruelle IM ead
24		- Gabrielle A. Mead
25		
26		
27		
28		

Case	3:17-cv-02014-H-AGS Document 1-26	Filed 09/29/17 PageID.34 Page 1 of 1		
1 2 3 4	ANN M. SMITH, ESQ. (SBN 120733) SMITH, STEINER, VANDERPOOL & WAX, APC 401 West A Street, Suite 320 San Diego, CA 92101 Telephone: 619-239-7200 Fax: 619-239-6048			
5	Attorneys for Plaintiffs			
6				
7				
8	UNITED STATE	S DISTRICT COURT		
9	SOUTHERN DIST	RICT OF CALIFORNIA		
10	CANDACE MITCHELL, et al., ) on behalf of themselves and all other )	CASE NO. <b>'17 CV2014 H AGS</b>		
11	employees similarly situated,	CONSENT TO JOIN ACTION UNDER		
12	Plaintiffs,	FAIR LABOR STANDARDS ACT [29 U.S.C. § 216(b)]		
13	v. {			
14	CITY OF SAN DIEGO,			
15	Defendant.			
16	<u> </u>			
17				
18	I, <u>Debra Owen</u> , wa	ant to join this lawsuit to seek unpaid overtime		
19	compensation which may be owed to me by the City of San Diego. Accordingly, I			
20	consent to become a party plaintiff to this action under the Fair Labor Standards Act,			
21	29 U.S.C. § 216(b).			
22				
23	Dated: Dept 29, 2017	By: Debra Owen		
24		Debra Owen		
25				
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Case	3:17-cv-02014-H-AGS Document 1-2	27 Filed 09/29/17 PageID.35 Page 1 of 1		
1 2 3 4 5 6 7 8		ATES DISTRICT COURT		
9		DISTRICT OF CALIFORNIA		
10 11	CANDACE MITCHELL, et al., on behalf of themselves and all other employees similarly situated,	CASE NO. <u>'17CV2014 H AGS</u>		
12	Plaintiffs,	) CONSENT TO JOIN ACTION UNDER ) FAIR LABOR STANDARDS ACT		
13	v.	) [29 U.S.C. § 216(b)]		
14	CITY OF SAN DIEGO,	}		
15	Defendant.	}		
16		}		
17				
18	I, <u>Alec Phillipp</u>	_, want to join this lawsuit to seek unpaid overtime		
19	compensation which may be owed to me by the City of San Diego. Accordingly, I			
20	consent to become a party plaintiff	to this action under the Fair Labor Standards Act,		
21	29 U.S.C. § 216(b).			
22	Dated: 9/28/2017 By: At Phillips			
23 24	Dated: 1/ 10/ 2017	By: At Millins Alec Phillipp		
24				
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20				
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20				
I	1			

Alec Phillip

Case	3:17-cv-02014-H-AGS	Document 1-28	Filed 09/29/17	PageID.36	Page 1 of 1
1 2 3 4 5 6 7 8	ANN M. SMITH, ES( SMITH, STEINER, V & WAX, APC 401 West A Street, Su San Diego, CA 92101 Telephone: 619-239-7 Fax: 619-239-6048 Attorneys for Plaintiff	ANDERPOOL ite 320 7200 s	TES DISTRICT	COURT	
9		SOUTHERN DIS	STRICT OF CAL	IFORNIA	
10 11	CANDACE MITCHE on behalf of themselve employees similarly si	LL, et al., ) es and all other ) tuated, )	CASE NO. <u>'17CV2014H AGS</u> CONSENT TO JOIN ACTION UNDER		
12	Plaintiffs	s, {	FAIR LAB	OR STANDA	
13	v.	Ş	[29 0.3.0. §	[29 U.S.C. § 216(b)]	
14	CITY OF SAN DIEG	D, {			
15	Defenda	nt.			
16		}			
17					
18	I, Michael Pr	inz,	want to join this	lawsuit to se	ek unpaid overtime
19	compensation which	may be owed to	me by the City	of San Dieg	go. Accordingly, I
20	consent to become a j	party plaintiff to	this action unde	r the Fair La	bor Standards Act,
21	29 U.S.C. § 216(b).				
22			1.	_	
23	Dated: 9.28.1	7	By: <u>Michael</u>	2	
24			Michael I	rinz	
25					
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Michael Prinz

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Case	3:17-cv-02014-H-AGS Document 1-29 Filed 09/29/17 PageID.37 Page 1 of 1
1 2 3 4 5 6 7	ANN M. SMITH, ESQ. (SBN 120733) SMITH, STEINER, VANDERPOOL & WAX, APC 401 West A Street, Suite 320 San Diego, CA 92101 Telephone: 619-239-7200 Fax: 619-239-6048 Attorneys for Plaintiffs
8	UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF CALIFORNIA
9 10	CANDACE MITCHELL, et al., ) CASE NO. <u>'17CV2014 H AGS</u> on behalf of themselves and all other )
11	employees similarly situated, ) CONSENT TO JOIN ACTION UNDER
12 13	Plaintiffs, [29 U.S.C. § 216(b)]
13	V. CITY OF SAN DIEGO,
15	Defendant.
16	
17	
18	I, Steven A. Ramirez, want to join this lawsuit to seek unpaid overtime
19	compensation which may be owed to me by the City of San Diego. Accordingly, I
20	consent to become a party plaintiff to this action under the Fair Labor Standards Act,
21	29 U.S.C. § 216(b).
22	
23	Dated: <u>a 28 1</u> By: <u>Steven A. Ramirez</u>
24 25	Steven/1. Adamitez
25	
20	
28	

Steven A. Ramirez

Case	3:17-cv-02014-H-AGS Document 1-30	Filed 09/29/17 PageID.38 Page 1 of 1
1 2 3 4 5 6 7	ANN M. SMITH, ESQ. (SBN 120733) SMITH, STEINER, VANDERPOOL & WAX, APC 401 West A Street, Suite 320 San Diego, CA 92101 Telephone: 619-239-7200 Fax: 619-239-6048 Attorneys for Plaintiffs	
8		TES DISTRICT COURT
9		STRICT OF CALIFORNIA
10	CANDACE MITCHELL, et al., ) on behalf of themselves and all other )	CASE NO. <u>'17 CV2014 H AGS</u>
11 12	employees similarly situated, ) Plaintiffs, )	CONSENT TO JOIN ACTION UNDER FAIR LABOR STANDARDS ACT
12	v.	[29 U.S.C. § 216(b)]
14	CITY OF SAN DIEGO,	
15	Defendant.	
16	}	
17		
18	I, Pete Razo	want to join this lawsuit to seek unpaid overtime
19	compensation which may be owed t	o me by the City of San Diego. Accordingly, I
20	consent to become a party plaintiff to	this action under the Fair Labor Standards Act,
21	29 U.S.C. § 216(b).	
22	alactit	
23	Dated: 09/08/17	By: Pete Razo
24 25		
23 26		
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-		

Case 3	:17-cv-02014-H-AGS Document 1-31	Filed 09/29/17 PageID.39 Page 1 of 1
1 2 3 4 5 6 7 8	ANN M. SMITH, ESQ. (SBN 120733) SMITH, STEINER, VANDERPOOL & WAX, APC 401 West A Street, Suite 320 San Diego, CA 92101 Telephone: 619-239-7200 Fax: 619-239-6048 Attorneys for Plaintiffs	TES DISTRICT COURT
9		STRICT OF CALIFORNIA
9 10		
10	CANDACE MITCHELL, et al., ) on behalf of themselves and all other ) employees similarly situated, )	CASE NO. <u>'17CV2014 H AGS</u>
12	) Plaintiffs, )	CONSENT TO JOIN ACTION UNDER FAIR LABOR STANDARDS ACT
13	v. )	[29 U.S.C. § 216(b)]
14	) CITY OF SAN DIEGO,	
15	) Defendant.	
16	)	
17		
18	I, Anthony Rea	, want to join this lawsuit to seek unpaid overtime
19	compensation which may be owed t	o me by the City of San Diego. Accordingly, I
20	consent to become a party plaintiff to	this action under the Fair Labor Standards Act,
21	29 U.S.C. § 216(b).	
22		
23	Dated: 9-28-2017	By: Anthong New
24		Anthony Rea
25		
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27		
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Case	3:17-cv-02014-H-AGS Document 1-	-32 Filed 09/29/17 PageID.40 Page 1 of 1
1 2 3 4 5 6 7	ANN M. SMITH, ESQ. (SBN 1207 SMITH, STEINER, VANDERPOO & WAX, APC 401 West A Street, Suite 320 San Diego, CA 92101 Telephone: 619-239-7200 Fax: 619-239-6048 Attorneys for Plaintiffs	L
8	· · · · · · · · · · · · · · · · · · ·	TATES DISTRICT COURT
9		DISTRICT OF CALIFORNIA
10 11	CANDACE MITCHELL, et al., on behalf of themselves and all othe employees similarly situated,	$\begin{array}{c} \text{CASE NO.} \\ \end{array} \begin{array}{c} \text{'17CV2014H} \\ \end{array} \\ \begin{array}{c} \text{AGS} \\ \end{array} \end{array}$
12	Plaintiffs,	<ul> <li>CONSENT TO JOIN ACTION UNDER</li> <li>FAIR LABOR STANDARDS ACT</li> </ul>
13	V.	) [29 U.S.C. § 216(b)]
14	CITY OF SAN DIEGO,	
15	Defendant.	
16		_}
17		
18	I, Arnilda P. Reyes	, want to join this lawsuit to seek unpaid overtime
19	compensation which may be owe	d to me by the City of San Diego. Accordingly, I
20	consent to become a party plaintif	f to this action under the Fair Labor Standards Act,
21	29 U.S.C. § 216(b).	
22		
23	Dated: 09-28-2017	By:Arnilda P. Reves
24 27		<i>y</i> miniou 1 · 100 y 00
25		
26 27		
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Case	3:17-cv-02014-H-AGS Document 1-33	Filed 09/29/17 PageID.41 Page 1 of 1
1 2 3 4 5 6 7 8	<ul> <li>ANN M. SMITH, ESQ. (SBN 120733)</li> <li>SMITH, STEINER, VANDERPOOL &amp; WAX, APC</li> <li>401 West A Street, Suite 320</li> <li>San Diego, CA 92101</li> <li>Telephone: 619-239-7200</li> <li>Fax: 619-239-6048</li> <li>Attorneys for Plaintiffs</li> </ul>	
9		STRICT OF CALIFORNIA
10	CANDACE MITCHELL, et al., )	CASE NO. '17 CV2014 H AGS
11	on behalf of themselves and all other ) employees similarly situated,	
12	Plaintiffs,	CONSENT TO JOIN ACTION UNDER FAIR LABOR STANDARDS ACT
13	v.	[29 U.S.C. § 216(b)]
14	CITY OF SAN DIEGO,	
15	Defendant.	
16	Ś	
17		
18		, want to join this lawsuit to seek unpaid overtime
19		o me by the City of San Diego. Accordingly, I
20		this action under the Fair Labor Standards Act,
21 22	29 U.S.C. § 216(b).	
22	Dated: 9-28.17	By:
24	Dated	Catherine Rivera
25		t
26		
27		
28		

Catherine Rivera

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Case 3	:17-cv-02014-H-AGS Document 1-34 Filed 09/29/17 PageID.42 Page 1 of 1
1 2 3 4 5 6 7	ANN M. SMITH, ESQ. (SBN 120733) SMITH, STEINER, VANDERPOOL & WAX, APC 401 West A Street, Suite 320 San Diego, CA 92101 Telephone: 619-239-7200 Fax: 619-239-6048 Attorneys for Plaintiffs
8	UNITED STATES DISTRICT COURT
9	SOUTHERN DISTRICT OF CALIFORNIA
10	CANDACE MITCHELL, et al., ) CASE NO. on behalf of themselves and all other )
11	employees similarly situated, ) CONSENT TO JOIN ACTION UNDER
12	Plaintiffs, ) FAIR LABOR STANDARDS ACT ) [29 U.S.C. § 216(b)]
13	V.
14	CITY OF SAN DIEGO,
15	Defendant.
16	)
17	
18	I, <u>Scott J. Robinson</u> , want to join this lawsuit to seek unpaid overtime
19 20	compensation which may be owed to me by the City of San Diego. Accordingly, I
20	consent to become a party plaintiff to this action under the Fair Labor Standards Act,
21	29 U.S.C. § 216(b).
23	Dated: 9,128/2017 By: By:
24	Scott J. Robinson
25	
26	
27	
28	

Scott J. Robinson

Case	3:17-cv-02014-H-AGS Document 1-35 Filed 09/29/17 PageID.43 Page 1 of 1
1 2 3 4	ANN M. SMITH, ESQ. (SBN 120733) SMITH, STEINER, VANDERPOOL & WAX, APC 401 West A Street, Suite 320 San Diego, CA 92101 Telephone: 619-239-7200 Fax: 619-239-6048
5	Attorneys for Plaintiffs
6	
7	
8	UNITED STATES DISTRICT COURT
9	SOUTHERN DISTRICT OF CALIFORNIA
10	CANDACE MITCHELL, et al., ) CASE NO. '17 CV2014 H AGS
11	on behalf of themselves and all other ) employees similarly situated, ) CONSENT TO JOIN ACTION UNDER
12	Plaintiffs, [29 U.S.C. § 216(b)]
13	V.
14	CITY OF SAN DIEGO,
15	Defendant.
16	
17	
18	I, <u>Richard Russell</u> , want to join this lawsuit to seek unpaid overtime
19	compensation which may be owed to me by the City of San Diego. Accordingly, I
20	consent to become a party plaintiff to this action under the Fair Labor Standards Act,
21	29 U.S.C. § 216(b).
22 23	Dated $Q_{-2}Q_{-1}$ Due $Q_{-1}$
23	Dated: <u>1-29-11</u> By: <u>CIAD</u> <u>COSSey</u> Richard Russell
25	
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	. ·	
1	ANN M. SMITH, ESQ. (SBN 120733)	)
2	SMITH, STEINER, VÀNDERPOOL ´ & WAX, APC	
3	401 West A Street, Suite 320 San Diego, CA 92101	
4	San Diego, CA 92101 Telephone: 619-239-7200 Fax: 619-239-6048	
5	Attorneys for Plaintiffs	
6		
7		
8	UNITED STA	ATES DISTRICT COURT
9	SOUTHERN D	ISTRICT OF CALIFORNIA
10	CANDACE MITCHELL, et al., ) on behalf of themselves and all other )	CASE NO. <b>'17 CV2014 H AGS</b>
11	employees similarly situated,	CONSENT TO JOIN ACTION UNDER
12	Plaintiffs,	FAIR LABOR STANDARDS ACT [29 U.S.C. § 216(b)]
13	v. (	T
14	CITY OF SAN DIEGO,	
15	Defendant.	
16	)	
17		
18		, want to join this lawsuit to seek unpaid overtime
19 20		to me by the City of San Diego. Accordingly, I
20 21		o this action under the Fair Labor Standards Act,
21	29 U.S.C. § 216(b).	
22	Dated: 9/29/2017	Pro Alucht
24	Dateu. <u>4/27/2017</u>	By: <u>Jun lineusla</u> Jim Silverstein
25		
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28	··· - ·· ··· ·· · · · · · · · · · · · ·	
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Jim Silvarstein

, ,	Case	3:17-cv-02014-H-AGS Document 1-37 Filed 09/29/17 PageID.45 Page 1 of 1
	1 2 3 4 5 6 7 8	ANN M. SMITH, ESQ. (SBN 120733) SMITH, STEINER, VANDERPOOL & WAX, APC 401 West A Street, Suite 320 San Diego, CA 92101 Telephone: 619-239-7200 Fax: 619-239-6048 Attorneys for Plaintiffs UNITED STATES DISTRICT COURT
	9	SOUTHERN DISTRICT OF CALIFORNIA
	10 11	CANDACE MITCHELL, et al., on behalf of themselves and all other employees similarly situated, CASE NO. <b>'17CV2014 H AGS</b>
	12	Plaintiffs, Plain
	13	v. [29 U.S.C. § 216(b)]
	14	CITY OF SAN DIEGO,
	15	Defendant.
	16	}
	17	
	18	I, <u>Clemens Wassenberg</u> , want to join this lawsuit to seek unpaid overtime
	19	compensation which may be owed to me by the City of San Diego. Accordingly, I
	20	consent to become a party plaintiff to this action under the Fair Labor Standards Act,
	21	29 U.S.C. § 216(b).
	22	$\frown$
	23	Dated: 09/29/2017 By: C. Way
	24	Clemens Wassenberg
	25	
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nens Wassenberg		

Clemens Wassenberg

Case	3:17-cv-02014-H-AGS Doc	ument 1-38	Filed 09/29/17	PageID.46	Page 1 of 1		
1 2 3 4 5 6 7	ANN M. SMITH, ESQ. (SI SMITH, STEINER, VAND & WAX, APC 401 West A Street, Suite 32 San Diego, CA 92101 Telephone: 619-239-7200 Fax: 619-239-6048 Attorneys for Plaintiffs						
8	ហ	NITED STAT	TES DISTRICT (	COURT			
9	SOU	THERN DIS	STRICT OF CAL	IFORNIA			
10	CANDACE MITCHELL, e	tal., )	CASE NO.	'17 CV2014 H	AGS		
11	employees similarly situate		CONSENT	TO JOIN AC	TION UNDER		
12	Plaintiffs,		<ul> <li>CONSENT TO JOIN ACTION UNDE</li> <li>FAIR LABOR STANDARDS ACT</li> <li>[29 U.S.C. § 216(b)]</li> </ul>				
13	v.	Ś	[27 0.0.0.3	, 210(0)]			
14	CITY OF SAN DIEGO,	{					
15	Defendant.	{					
16							
17							
18	I, Daniel Weiss	, ĭ	want to join this	lawsuit to see	ek unpaid overtime		
19	compensation which may						
20	consent to become a party	plaintiff to	this action unde	r the Fair La	bor Standards Act,		
21	29 U.S.C. § 216(b).				_		
22 23	Dated: 9/28/17		D	and the second se			
23 24	Dated: 9/28/14		By: Daniel We	viss			
24							
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Case 3	3:17-cv-02014-H-AGS Document 1-39	Filed 09/29/17 PageID.47 Page 1 of 1
1 2 3 4 5 6 7 8	ANN M. SMITH, ESQ. (SBN 120733) SMITH, STEINER, VANDERPOOL & WAX, APC 401 West A Street, Suite 320 San Diego, CA 92101 Telephone: 619-239-7200 Fax: 619-239-6048 Attorneys for Plaintiffs UNITED STAT	TES DISTRICT COURT
9		TRICT OF CALIFORNIA
9 10 11 12 13	CANDACE MITCHELL, et al., on behalf of themselves and all other employees similarly situated, Plaintiffs, V.	CASE NO. <u>'17CV2014 H AGS</u> CONSENT TO JOIN ACTION UNDER FAIR LABOR STANDARDS ACT [29 U.S.C. § 216(b)]
14	CITY OF SAN DIEGO,	
15	Defendant.	
16	}	
17		
18	I, Cody Wilkinson ,	want to join this lawsuit to seek unpaid overtime
19	compensation which may be owed to	me by the City of San Diego. Accordingly, I
20		this action under the Fair Labor Standards Act,
21	29 U.S.C. § 216(b).	
22 23	Dated: 9/28/2017	By: Cong
24	Dated	Cody Wilkinson
25		
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Case 3	3:17-cv-02014-H-AGS Documer	nt 1-40	Filed 09/29/17	PageID.48	Page 1 of 1				
1 2 3 4 5 6 7	ANN M. SMITH, ESQ. (SBN 12 SMITH, STEINER, VANDERP & WAX, APC 401 West A Street, Suite 320 San Diego, CA 92101 Telephone: 619-239-7200 Fax: 619-239-6048 Attorneys for Plaintiffs	20733) OOL							
8	UNITE	D STA	TES DISTRICT	COURT					
9	SOUTHE	RN DIS	STRICT OF CAL	IFORNIA					
10	CANDACE MITCHELL, et al., on behalf of themselves and all of	) other )	CASE NO.	'17 CV2014 F	AGS				
11	employees similarly situated,		CONSENT	TO JOIN AC	TION UNDER				
12	Plaintiffs,	Ś	FAIR LAB( [29 U.S.C. §	OR STANDARDS ACT					
13	V.	}	-						
14	CITY OF SAN DIEGO,								
15	Defendant.	}							
16 17		)							
17	I, Gregory Woods		want to join this	languit to see	akunnaid overtime				
19	compensation which may be o				_				
20	consent to become a party plain								
21	29 U.S.C. § 216(b).								
22			01						
23	Dated:09/28/2017	7	By: Jugo	y Rope	le				
24			Gregory	Woods					
25				$\mathbf{O}$					
26									
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Gregor

## **ClassAction.org**

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: <u>40 Plaintiffs Allege City of San Diego Miscalculated Wage Rates</u>, <u>Owes OT</u>