

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

**MICHAEL NIXON, individually and  
on behalf of all others similarly  
situated,**

**Plaintiff,**

**vs.**

**ACTION STAFFING SOLUTIONS,  
LLC; KAMAL BHATIA; and  
MANSI ANAND;**

**Defendants.**

Civil Action No. \_\_\_\_\_

Jury Trial Demanded

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**COMPLAINT**

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Plaintiff Michael Nixon (“Nixon”), individually and on behalf of all others similarly situated who consent to their inclusion in a collective action, brings this Complaint against Action Staffing Solutions, LLC (“Action Staffing”), Kamal Bhatia (“Bhatia”) and Mansi Anand (“Anand”) (collectively “Defendants”) and shows the Court as follows:

***Introduction***

1.

In this FLSA overtime action, Plaintiff Nixon seeks due but unpaid overtime wages under Sections 7 and 16 of the Fair Labor Standards Act (29 U.S.C. § 201 *et seq.*) both on his own behalf and on behalf of other similarly situated employees and former employees of Defendants Action Staffing, Bhatia, and Anand.

2.

Plaintiff asks this Court to certify a collective of similarly situated individuals, to wit, all laborers who worked for Action Staffing ore related enterprises within the three years prior to the filing of this Complaint and who consent in writing to their inclusion in a collective action.

3.

Nixon's Consent to Serve as a Plaintiff Representative in this FLSA action is filed herewith as Exhibit "A".

4.

Nixon requests collective relief because all other Action Staffing laborers were treated in a similar manner with respect to their compensation.

*Jurisdiction and Venue*

5.

This Court has subject matter jurisdiction over the present action under Article III, § 2 of the United States Constitution, FLSA § 16(b), 29 U.S.C. § 216(b), 28 U.S.C. § 1331, because this case arises under the FLSA, a federal statute that affects interstate commerce.

6.

Venue properly lies in the Northern District of Georgia under 28 U.S.C. § 1391 because Action Staffing's principal place of business is located in this judicial district, Nixon resides in this judicial district and a substantial portion of the events giving rise to the claims herein arose in this judicial district.

*The Parties*

7.

Nixon resides in Clayton County, Georgia.

8.

At all times material hereto, Defendants have jointly operated a staffing company whose principal place of business is located at 6185 Buford Highway, E150, Norcross, Georgia 30071.

9.

Action Staffing is a limited liability company organized under the laws of the State of Georgia.

10.

Action Staffing can be served via its registered agent Mansi Anand at 4230 Suwanee Bend Drive, Suwanee, Georgia 30024.

11.

Action Staffing is subject to the personal jurisdiction of this Court.

12.

Bhatia is a resident of Gwinnett County, Georgia.

13.

Bhatia is subject to the personal jurisdiction of this Court.

14.

Bhatia can be served with process at his residence located at 4230 Suwanee Bend Drive, Suwanee, Georgia 30024 or wherever he can be found.

15.

Anand is a resident of Gwinnett County, Georgia.

16.

Anand is the organizer and registered agent of Action Staffing.

17.

Anand is subject to the personal jurisdiction of this Court.

18.

Anand can be served with process at his residence located at 4230 Suwanee Bend Drive, Suwanee, Georgia 30024 or wherever he can be found.

***Enterprise Coverage***

19.

At all times material hereto, Action Staffing has been an “enterprise engaged in commerce or in the production of goods for commerce” as defined in FLSA, § 7(a)(1), 29 U.S.C. § 207(a)(1).

20.

At all times material hereto, two or more employees of Action Staffing, including Nixon, used or handled the following items that moved in interstate commerce that are necessary for performing Action Staffing’s commercial purpose: Foodstuffs, kitchen equipment, chairs, tables, paper products, uniforms, computers, and office equipment.

21.

In 2014, Action Staffing had two or more “employees engaged in commerce” as defined by 29 U.S.C. § 203(s)(1)(A).

22.

In 2015, Action Staffing had two or more “employees engaged in commerce” as defined by 29 U.S.C. § 203(s)(1)(A).

23.

In 2016, Action Staffing had two or more “employees engaged in commerce” as defined by 29 U.S.C. § 203(s)(1)(A).

24.

During 2014, Action Staffing had two or more “employees handling, selling or otherwise working on goods or materials that have been moved in or produced for commerce by any person” as defined in 29 U.S.C. § 203(s)(1)(A).

25.

During 2015, Action Staffing had two or more “employees handling, selling or otherwise working on goods or materials that have been moved in or produced for commerce by any person” as defined in 29 U.S.C. § 203(s)(1)(A).

26.

During 2016, Action Staffing had two or more “employees handling, selling or otherwise working on goods or materials that have been moved in or produced for commerce by any person” as defined in 29 U.S.C. § 203(s)(1)(A).

27.

During 2014, Action Staffing had two or more “employees handling, selling or otherwise working on goods or materials that have been moved in or produced for commerce by any person” as defined in 29 U.S.C. § 203(s)(1)(A).

28.

During 2015, Action Staffing had an annual gross volume of sales made or business done of not less than \$500,000 (exclusive of excise taxes at the retail level that are separately stated) within the meaning of 29 U.S.C. § 203(s)(1)(A).

29.

During 2016, Action Staffing had an annual gross volume of sales made or business done of not less than \$500,000 (exclusive of excise taxes at the retail level that are separately stated) within the meaning of 29 U.S.C. § 203(s)(1)(A).

30.

At all times material hereto, Action Staffing has been an “enterprise engaged in commerce or in the production of goods for commerce” as defined in FLSA § 3(s)(1), 29 U.S.C. § 203(s)(1).

***Statutory Employer Allegations***

31.

Nixon worked for Action Staffing as a laborer from approximately August 24, 2015 through April 2016 (hereinafter “the Relevant Time Period”)

32.

During the Relevant Time Period, Action Staffing was an “employer” of Nixon as defined in FLSA § 3(d), 29 U.S.C. § 203(d).

33.

At all times material hereto Nixon was an “employee” of Action Staffing as defined in the FLSA § 3(e)(1), 29 U.S.C. § 203(e)(1).

34.

Bhatia hired Nixon on behalf of Action Staffing.

35.

At all times material hereto, Bhatia exercised control over the work activities of Nixon.

36.

At all times material hereto, Bhatia was involved in the day-to-day operation of Action Staffing.

37.

At all times material hereto, Action Staffing vested Bhatia with supervisory authority over Nixon.

38.

At all times material hereto, Bhatia exercised supervisory authority over Nixon.

39.

At all times material hereto, Bhatia scheduled Nixon’s working hours or supervised the scheduling of Nixon’s working hours.



40.

At all times material hereto, Bhatia exercised authority and supervision over Nixon's compensation.

41.

At all times material hereto, Bhatia was an "employer" of Nixon as defined in FLSA § 3(d), 29 U.S.C. § 203(d).

42.

At all times material hereto, Nixon was an "employee" of Bhatia as defined in the FLSA § 3(e)(1), 29 U.S.C. § 203(e)(1).

43.

At all times material hereto, Anand exercised control over the work activities of Nixon.

44.

At all times material hereto, Anand was involved in the day-to-day operation of Action Staffing.

45.

At all times material hereto, Action Staffing vested Anand with supervisory authority over Nixon.

46.

At all times material hereto, Anand exercised supervisory authority over Nixon.

47.

At all times material hereto, Anand scheduled Nixon's working hours or supervised the scheduling of Nixon's working hours.

48.

At all times material hereto, Anand exercised authority and supervision over Nixon's compensation.

49.

At all times material hereto, Anand was an "employer" of Nixon as defined in FLSA § 3(d), 29 U.S.C. § 203(d).

50.

At all times material hereto, Nixon was an "employee" of Anand as defined in the FLSA § 3(e)(1), 29 U.S.C. § 203(e)(1).

***Factual Allegations***

51.

During the Relevant Time Period, Nixon was not exempt from the maximum hour requirements of the FLSA by reason of any exemption.

52.

During the Relevant Time Period, Action Staffing did not employ Nixon in a bona fide professional capacity within the meaning of 29 USC § 213 (a).

53.

During the Relevant Time Period, Action Staffing did not employ Nixon in a bona fide administrative capacity within the meaning of 29 USC § 213 (a).

54.

During the Relevant Time Period, Action Staffing did not employ Nixon in a bona fide executive capacity within the meaning of 29 USC § 213 (a).

55.

During the Relevant Time Period, Action Staffing did not employ Nixon in the capacity of an “outside salesman” so as to be exempt from the minimum and maximum hour requirements of 29 USC § 213 (a).

56.

During the Relevant Time Period, Nixon was paid on an hourly basis.

57.

During the Relevant Time Period, Defendants compensated at a rate of \$12.00 per hour.

58.

During the Relevant Time Period, Defendants assigned Nixon to work at the Crown Plaza Hotel located at 4355 Ashford Dunwoody Road, Dunwoody, Georgia 30346.

59.

During the Relevant Time Period, Nixon and all other Action Staffing laborers regularly worked more than 40 hours per week while assigned to work at the Crown Plaza Hotel.

60.

During the Relevant Time Period, Nixon regularly worked 40-45 hours during each work week.

61.

During the Relevant Time Period, Defendants paid Nixon and all other Action Staffing laborers their normal hourly rate, without an overtime premium, for all hours he worked.

62.

During the Relevant Time Period, Defendant Bhatia advised Nixon that Defendants simply did not pay overtime wages.

63.

During the Relevant Time Period, Defendant Bhatia advised Nixon that Defendants did not make payroll tax deductions from employees' pay unless the employee requested those deductions.

64.

During each applicable pay period, Defendants failed to pay their laborers, including Nixon, one-and-one-half times their regular rate for work performed in excess of 40 hours in a single workweek.

**COUNT I — FAILURE TO PAY OVERTIME**

65.

The allegations in all previous paragraphs are incorporated by reference as if fully set out in this paragraph.

66.

During the Relevant Time Period, Nixon was an employee covered by the FLSA and entitled to the overtime protections set forth in FLSA § 7(a), 29 U.S.C. § 207(a).

67.

During his employment with Defendants, Nixon regularly worked in excess of 40 hours each week.

68.

Defendants failed to pay Nixon at one-and-one-half times his regular rate for work in excess of 40 hours in any week during the entire period of his employment.

69.

Nixon is entitled to payment of overtime wages in an amount to be determined at trial, in accordance with FLSA § 16(b), 29 U.S.C. § 216(b).

70.

As a result of the underpayment of overtime compensation as alleged above, Nixon is entitled to liquidated damages in accordance with FLSA § 16(b), 29 U.S.C. § 216(b).

71.

As a result of the underpayment of overtime compensation as alleged above, Nixon is entitled to his litigation costs, including his reasonable attorney's fees, in accordance with FLSA § 16(b); 29 U.S.C. § 216(b).

## **COUNT II – COLLECTIVE ACTION ALLEGATIONS**

72.

The allegations in all previous paragraphs are incorporated by reference as if fully set out in this paragraph.

73.

At all times during the three years prior to the filing of this Complaint, Defendants have violated 29 U.S.C. § 207 by failing to pay overtime wages to all laborers who worked for Action Staffing and other “enterprises” as defined by the FLSA.

74.

At all times during the three years prior to the filing of this Complaint, Defendants have violated 29 U.S.C. § 207 by failing to pay overtime wages to all Action Staffing laborers in the same manner as alleged above with respect to Nixon.

75.

All laborers who have worked for Defendants in all their “enterprises” within the three years prior to the filing of this action are “similarly situated” to Nixon within the meaning of FLSA § 16 (b), 29 U.S.C. § 216(b).

76.

Pursuant to 29 U.S.C. § 201 *et seq.*, Defendants are liable to all individuals similarly situated to Nixon for unpaid overtime wages, attorney’s fees and costs of litigation, and other such equitable and legal relief that this Court finds proper.

77.

On information and belief, Defendants have a number of other corporations that are related enterprises within the meaning of the FLSA including Action Tech Staffing, LLC, Action Hospitality Events, Inc., and Hospitality & Culinary Staffing, LLC.

78.

The proposed collective of individuals similarly situated to Nixon should be defined as “All non-exempt classified individuals who were employed by Action

Staffing Solutions, LLC, or related enterprises, at any time from three years prior to the filing of this lawsuit through the present who have not received overtime premium compensation for hours worked above forty a single workweek.”

79.

All such individuals similarly situated to Nixon would benefit from the issuance of a Court supervised Notice of Present Lawsuit and opportunity to consent in writing to their inclusion as plaintiffs in this lawsuit pursuant to 29 U.S.C. § 216(b).

80.

All such individuals similarly situated to Nixon are known to Defendants, are readily identifiable, and can be located through the records of Defendants.

WHEREFORE, Plaintiff respectfully prays:

1. That Plaintiff's claims be tried before a jury;
2. That Plaintiff be awarded an amount to be determined at trial against Defendants in unpaid overtime wages due under the FLSA, plus an additional like amount in liquidated damages;
3. That Plaintiff be awarded his costs of litigation, including his reasonable attorneys' fees from Defendants;



4. That the Court issue a Notice of Present Lawsuit to all individuals similarly situated to Plaintiff, allowing all such similarly situated individuals to file their written consent to join this action as Plaintiff;
5. For such other and further relief as the Court deems just and proper.

Respectfully submitted,

DELONG CALDWELL BRIDGERS  
FITZPATRICK & BENJAMIN, LLC

/s/Charles R. Bridgers

Charles R. Bridgers  
Ga. Bar No. 080791  
Kevin D. Fitzpatrick, Jr.  
Ga. Bar No. 262375

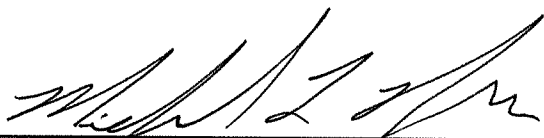
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CONSENT TO BE A PLAINTIFF IN THIS ACTION BROUGHT UNDER THE  
FAIR LABOR STANDARDS ACT (29 U.S.C. §201, ET SEQ.)

By my signature below, I hereby consent to become a Plaintiff in the collective action matter of Nixon, et.al. v. Action Staffing, LLC, et al, for overtime compensation and any other benefits available under the Fair Labor Standards Act and other applicable laws and to be bound by any judgment by the Court or any settlement of this action.

I declare under penalty of perjury that the foregoing is true and correct.

  
Full Signature

October 26, 2016  
Date

Michael L. Nixon  
Type or print name

JS44 (Rev. 1/13 NDGA)

**CIVIL COVER SHEET**

The JS44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form is required for the use of the Clerk of Court for the purpose of initiating the civil docket record. (SEE INSTRUCTIONS ATTACHED)

**I. (a) PLAINTIFF(S)**

MICHAEL NIXON, individually and on behalf of all others similarly situated

**DEFENDANT(S)**

ACTION STAFFING SOLUTIONS, LLC; KAMAL BHATIA; and MANSI ANAND

**(b) COUNTY OF RESIDENCE OF FIRST LISTED**

PLAINTIFF Clayton  
(EXCEPT IN U.S. PLAINTIFF CASES)

**COUNTY OF RESIDENCE OF FIRST LISTED**

DEFENDANT \_\_\_\_\_  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED

**(c) ATTORNEYS** (FIRM NAME, ADDRESS, TELEPHONE NUMBER, AND E-MAIL ADDRESS)

Charles R. Bridgers and Kevin D. Fitzpatrick, Jr.  
DeLong Caldwell Bridgers Fitzpatrick & Benjamin, LLC  
3100 Centennial Tower  
101 Marietta Street, NW  
Atlanta, GA 30303  
(404)979-3150  
charlesbridgers@dcbflegal.com  
kevin.fitzpatrick@dcbflegal.com

**ATTORNEYS** (IF KNOWN)

**II. BASIS OF JURISDICTION**

(PLACE AN "X" IN ONE BOX ONLY)

- 1 U.S. GOVERNMENT PLAINTIFF
- 2 U.S. GOVERNMENT DEFENDANT
- 3 FEDERAL QUESTION (U.S. GOVERNMENT NOT A PARTY)
- 4 DIVERSITY (INDICATE CITIZENSHIP OF PARTIES IN ITEM III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES**

(PLACE AN "X" IN ONE BOX FOR PLAINTIFF AND ONE BOX FOR DEFENDANT) (FOR DIVERSITY CASES ONLY)

- | PLF                        | DEF                        |   | PLF                        | DEF                        |   |
|----------------------------|----------------------------|---|----------------------------|----------------------------|---|
| <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | CITIZEN OF THIS STATE                   | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 | INCORPORATED OR PRINCIPAL PLACE OF BUSINESS IN THIS STATE     |
| <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | CITIZEN OF ANOTHER STATE                | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 | INCORPORATED AND PRINCIPAL PLACE OF BUSINESS IN ANOTHER STATE |
| <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | CITIZEN OR SUBJECT OF A FOREIGN COUNTRY | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 | FOREIGN NATION  |

**IV. ORIGIN**

(PLACE AN "X" IN ONE BOX ONLY)

- 1 ORIGINAL PROCEEDING
- 2 REMOVED FROM STATE COURT
- 3 REMANDED FROM APPELLATE COURT
- 4 REINSTATED OR REOPENED
- 5 TRANSFERRED FROM ANOTHER DISTRICT (Specify District)
- 6 MULTIDISTRICT LITIGATION
- 7 APPEAL TO DISTRICT JUDGE FROM MAGISTRATE JUDGE JUDGMENT

**V. CAUSE OF ACTION**

(CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE A BRIEF STATEMENT OF CAUSE - DO NOT CITE JURISDICTIONAL STATUTES UNLESS DIVERSITY)

Fair Labor Standards Act of 1938 (as amended) (29 U.S.C. § 201 et.seq.)

**(IF COMPLEX, CHECK REASON BELOW)**

- 1. Unusually large number of parties.
- 2. Unusually large number of claims or defenses.
- 3. Factual issues are exceptionally complex
- 4. Greater than normal volume of evidence.
- 5. Extended discovery period is needed.
- 6. Problems locating or preserving evidence
- 7. Pending parallel investigations or actions by government.
- 8. Multiple use of experts.
- 9. Need for discovery outside United States boundaries.
- 10. Existence of highly technical issues and proof.

**CONTINUED ON REVERSE**

**FOR OFFICE USE ONLY**

RECEIPT # \_\_\_\_\_ AMOUNT \$ \_\_\_\_\_ APPLYING IFP \_\_\_\_\_ MAG. JUDGE (IFP) \_\_\_\_\_  
 JUDGE \_\_\_\_\_ MAG. JUDGE \_\_\_\_\_ (Referral) NATURE OF SUIT \_\_\_\_\_ CAUSE OF ACTION \_\_\_\_\_

**VI. NATURE OF SUIT** (PLACE AN "X" IN ONE BOX ONLY)

CONTRACT - "0" MONTHS DISCOVERY TRACK

- 130 RECOVERY OF OVERPAYMENT & ENFORCEMENT OF JUDGMENT
- 152 RECOVERY OF DEFAULTED STUDENT LOANS (Excl. Veterans)
- 153 RECOVERY OF OVERPAYMENT OF VETERAN'S BENEFITS

CONTRACT - "4" MONTHS DISCOVERY TRACK

- 110 INSURANCE
- 120 MARINE
- 130 MILLER ACT
- 140 NEGOTIABLE INSTRUMENT
- 151 MEDICARE ACT
- 160 STOCKHOLDERS' SUITS
- 190 OTHER CONTRACT
- 195 CONTRACT PRODUCT LIABILITY
- 196 FRANCHISE

REAL PROPERTY - "4" MONTHS DISCOVERY TRACK

- 210 LAND CONDEMNATION
- 220 FORECLOSURE
- 230 RENT LEASE & EJECTMENT
- 240 TORTS TO LAND
- 245 TORT PRODUCT LIABILITY
- 290 ALL OTHER REAL PROPERTY

TORTS - PERSONAL INJURY - "4" MONTHS DISCOVERY TRACK

- 310 AIRPLANE
- 315 AIRPLANE PRODUCT LIABILITY
- 320 ASSAULT, LIBEL & SLANDER
- 330 FEDERAL EMPLOYERS' LIABILITY
- 340 MARINE
- 345 MARINE PRODUCT LIABILITY
- 350 MOTOR VEHICLE
- 355 MOTOR VEHICLE PRODUCT LIABILITY
- 360 OTHER PERSONAL INJURY
- 362 PERSONAL INJURY - MEDICAL MALPRACTICE
- 365 PERSONAL INJURY - PRODUCT LIABILITY
- 367 PERSONAL INJURY - HEALTH CARE/ PHARMACEUTICAL PRODUCT LIABILITY
- 368 ASBESTOS PERSONAL INJURY PRODUCT LIABILITY

TORTS - PERSONAL PROPERTY - "4" MONTHS DISCOVERY TRACK

- 370 OTHER FRAUD
- 371 TRUTH IN LENDING
- 380 OTHER PERSONAL PROPERTY DAMAGE
- 385 PROPERTY DAMAGE PRODUCT LIABILITY

BANKRUPTCY - "0" MONTHS DISCOVERY TRACK

- 422 APPEAL 28 USC 158
- 423 WITHDRAWAL 28 USC 157

CIVIL RIGHTS - "4" MONTHS DISCOVERY TRACK

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

IMMIGRATION - "0" MONTHS DISCOVERY TRACK

- 462 NATURALIZATION APPLICATION
- 465 OTHER IMMIGRATION ACTIONS

PRISONER PETITIONS - "0" MONTHS DISCOVERY TRACK

- 463 HABEAS CORPUS- Alien Detainee
- 510 MOTIONS TO VACATE SENTENCE
- 530 HABEAS CORPUS
- 535 HABEAS CORPUS DEATH PENALTY
- 540 MANDAMUS & OTHER
- 550 CIVIL RIGHTS - Filed Pro se
- 555 PRISON CONDITION(S) - Filed Pro se
- 560 CIVIL DETAINEE- CONDITIONS OF CONFINEMENT

PRISONER PETITIONS - "4" MONTHS DISCOVERY TRACK

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

FORFEITURE/PENALTY - "4" MONTHS DISCOVERY TRACK

- 625 DRUG RELATED SEIZURE OF PROPERTY 21 USC 881
- 690 OTHER

LABOR - "4" MONTHS DISCOVERY TRACK

- 710 FAIR LABOR STANDARDS ACT
- 720 LABOR/MGMT. RELATIONS
- 740 RAILWAY LABOR ACT
- 751 FAMILY and MEDICAL LEAVE ACT
- 790 OTHER LABOR LITIGATION
- 791 EMPL. RET. INC. SECURITY ACT

PROPERTY RIGHTS - "4" MONTHS DISCOVERY TRACK

- 820 COPYRIGHTS
- 840 TRADEMARK

PROPERTY RIGHTS - "8" MONTHS DISCOVERY TRACK

- 830 PATENT

SOCIAL SECURITY - "0" MONTHS DISCOVERY TRACK

- 861 HIA (1395(f))
- 862 BLACK LUNG (923)
- 863 DIWC (405(g))
- 863 DIWV (405(g))
- 864 SSD TITLE XVI
- 865 RSI (405(g))

FEDERAL TAX SUITS - "4" MONTHS DISCOVERY TRACK

- 870 TAXES (U.S. Plaintiff or Defendant)
- 871 IRS - THIRD PARTY 26 USC 7609

OTHER STATUTES - "4" MONTHS DISCOVERY TRACK

- 375 FALSE CLAIMS ACT
- 400 STATE REAPPORTIONMENT
- 430 BANKS AND BANKING
- 450 COMMERCE/ICC RATES/ETC.
- 460 DEPORTATION
- 470 RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS
- 480 CONSUMER CREDIT
- 490 CABLE/SATELLITE TV
- 891 AGRICULTURAL ACTS
- 893 ENVIRONMENTAL MATTERS
- 895 FREEDOM OF INFORMATION ACT
- 950 CONSTITUTIONALITY OF STATE STATUTES
- 890 OTHER STATUTORY ACTIONS
- 899 ADMINISTRATIVE PROCEDURES ACT / REVIEW OR APPEAL OF AGENCY DECISION

OTHER STATUTES - "8" MONTHS DISCOVERY TRACK

- 410 ANTITRUST
- 850 SECURITIES / COMMODITIES / EXCHANGE

OTHER STATUTES - "0" MONTHS DISCOVERY TRACK

- 896 ARBITRATION (Confirm / Vacate / Order / Modify)

**\* PLEASE NOTE DISCOVERY TRACK FOR EACH CASE TYPE. SEE LOCAL RULE 26.3**

**VII. REQUESTED IN COMPLAINT:**

CHECK IF CLASS ACTION UNDER F.R.Civ.P. 23 DEMAND \$ \_\_\_\_\_  
 JURY DEMAND  YES  NO (CHECK YES ONLY IF DEMANDED IN COMPLAINT)

**VIII. RELATED/REFILED CASE(S) IF ANY**

JUDGE \_\_\_\_\_ DOCKET NO. \_\_\_\_\_

CIVIL CASES ARE DEEMED RELATED IF THE PENDING CASE INVOLVES: (CHECK APPROPRIATE BOX)

- 1. PROPERTY INCLUDED IN AN EARLIER NUMBERED PENDING SUIT.
- 2. SAME ISSUE OF FACT OR ARISES OUT OF THE SAME EVENT OR TRANSACTION INCLUDED IN AN EARLIER NUMBERED PENDING SUIT.
- 3. VALIDITY OR INFRINGEMENT OF THE SAME PATENT, COPYRIGHT OR TRADEMARK INCLUDED IN AN EARLIER NUMBERED PENDING SUIT.
- 4. APPEALS ARISING OUT OF THE SAME BANKRUPTCY CASE AND ANY CASE RELATED THERETO WHICH HAVE BEEN DECIDED BY THE SAME BANKRUPTCY JUDGE.
- 5. REPETITIVE CASES FILED BY PRO SE LITIGANTS.
- 6. COMPANION OR RELATED CASE TO CASE(S) BEING SIMULTANEOUSLY FILED (INCLUDE ABBREVIATED STYLE OF OTHER CASE(S): \_\_\_\_\_)

7. EITHER SAME OR ALL OF THE PARTIES AND ISSUES IN THIS CASE WERE PREVIOUSLY INVOLVED IN CASE NO. \_\_\_\_\_, WHICH WAS DISMISSED. This case  IS  IS NOT (check one box) SUBSTANTIALLY THE SAME CASE.

  
 SIGNATURE OF ATTORNEY OF RECORD

3/3/2017

DATE

# ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Collective Action Filed Against Action Staffing Solutions, Two Others](#)

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