

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION**

**LAMONT ROONEY, *on behalf of
himself and on behalf of all others
similarly situated,***

Plaintiff,

v.

CASE NO.:

GLOBAL SINKHOLE SOLUTIONS INC,

Defendant.

_____ /

COMPLAINT AND DEMAND FOR JURY TRIAL

Plaintiff, LAMONT ROONEY (“Plaintiff”), by and through undersigned counsel, on behalf of himself and on behalf of all others similarly situated, brings this action against Defendant, GLOBAL SINKHOLE SOLUTIONS INC (“Defendant”), and in support of his claims states as follows:

JURISDICTION AND VENUE

1. This is an class and collective action for damages under the Fair Labor Standards Act (“FLSA”), 29 U.S.C. § 201 et seq., for failure to pay overtime wages under 29 U.S.C. § 215(a)(3) and for damages for under the common law of Florida for not paying wages legitimately earned and owed to Plaintiff and all putative class members. This Complaint is filed as a collective action under 29 U.S.C. § 216(b) and as a class action pursuant to Rule 23 of the Fed. R. Civ. Pro.

2. This Court has subject matter jurisdiction under 28 U.S.C. § 1331, 28 U.S.C. § 1367 and 29 U.S.C. § 201 et seq.

3. Venue is proper in the Middle District of Florida, because all of the events giving rise to these claims occurred in Pasco County, Florida.

PARTIES

4. Plaintiff is a resident of Pasco County, Florida.

5. Defendant GLOBAL SINKHOLE SOLUTIONS INC operates a sinkhole stabilization business in, in Dade City, Pasco County, Florida.

GENERAL ALLEGATIONS

6. Plaintiff has satisfied all conditions precedent, or they have been waived.

7. Plaintiff has hired the undersigned attorneys and agreed to pay them a fee.

8. Plaintiff requests a jury trial for all issues so triable.

9. At all times material hereto, Named Plaintiff LAMONT ROONEY was employed by Defendant as a laborer.

10. The putative FLSA Collective Class of similarly situated employees consists of all other employed by Defendant within the last three years. These similarly situated persons will be referred to as “Members of the Class” or “the Class.”

11. At all times material hereto, Plaintiff and the putative FLSA Collective Class Members were “engaged in the production of goods” for commerce within the meaning of Sections 6 and 7 of the FLSA, and as such were subject to the individual coverage of the FLSA.

12. At all times material hereto, Plaintiff and Members of the putative FLSA Collective Class Members were “employees” of Defendant GLOBAL SINKHOLE SOLUTIONS INC within the meaning of the FLSA.

13. At all times material hereto, Defendant GLOBAL SINKHOLE SOLUTIONS INC was an “employer” within the meaning of the FLSA, 29 U.S.C. § 203(d).

14. Defendant GLOBAL SINKHOLE SOLUTIONS INC continues to be an “employer” within the meaning of the FLSA.

15. At all times material hereto, Defendant GLOBAL SINKHOLE SOLUTIONS INC was and continues to be an enterprise covered by the FLSA, as defined under 29 U.S.C. §§ 203(r) and 203(s).

16. At all times relevant to this action, Defendant GLOBAL SINKHOLE SOLUTIONS INC engaged in interstate commerce within the meaning of the FLSA, 29 U.S.C. § 203(s).

17. At all times relevant to this action, the annual gross sales volume of Defendant GLOBAL SINKHOLE SOLUTIONS INC exceeded \$500,000 per year.

18. At all times material hereto, the work performed by Plaintiff and members of the putative FLSA Collective Class was directly essential to the business performed by Defendant.

FACTS

19. Named Plaintiff LAMONT ROONEY began working for Defendant as a laborer in August 2016, and he worked in this capacity until March 2018.

20. In exchange for Plaintiff’s services, Defendant agreed to pay Plaintiff an hourly wage.

21. At various times material hereto, Plaintiff, the putative FLSA Collective Class Members, and the putative Florida Unpaid Wages Class Members, worked hours in excess of forty (40) hours within a work week for Defendant, and they were entitled to be compensated for these overtime hours at a rate equal to one and one-half times their individual regular hourly rates.

22. Defendant failed to pay Plaintiff and the members of the putative FLSA Collective Class an overtime premium for all of the overtime hours that they worked, in violation of the FLSA.

23. Defendant failed to pay Plaintiff and members of the putative Florida Unpaid Wages Class all wages that they earned in violation of Florida law.

24. Plaintiff's unpaid commissions constitute "wages" under Florida common law, as well as under Fla. Stat. § 448.08. *See also, Gulf Solar, Inc. v. Westfall*, 447 So. 2d 363, 367 (Fla. 2d DCA 1984).

25. Specifically, beginning on or about August 2017 until approximately March 2018, Defendant required Plaintiff, the putative FLSA Collective Class Members, and the putative Florida Unpaid Wages Class Members to work without a lunch break.

26. However even though Defendant required its laborers to work without a lunch break, it still deducted time from their paychecks as though they had taken a lunch break.

27. By failing to accurately record, report, and/or preserve records of hours worked by Plaintiff and Members of the putative FLSA Collective Class, Defendant has failed to make, keep, and preserve records with respect to each of its employees in a

manner sufficient to determine their wages, hours, and other conditions of employment, including Defendant's employment practices, in violation of the FLSA, 29 U.S.C. § 201 et seq.

28. Defendant's actions were willful, and showed reckless disregard for the provisions of the FLSA.

COLLECTIVE ACTION ALLEGATIONS

29. Plaintiff brings this case as an "opt-in" collective action on behalf of similarly situated employees of Defendant (the "FLSA Collective Class") pursuant to 29 U.S.C. § 216(b). The FLSA Collective Class is composed of all laborers whom Defendant failed to compensate for all overtime hours worked in accordance with the FLSA.

30. Therefore, Notice is properly sent to:

All Defendant's employees whom Defendant failed to compensate for all of the overtime hours that they worked during the three years preceding this filing of this Complaint to the present (hereinafter referred to as the "FLSA Collective Class").

31. The total number and identities of the FLSA Collective Class Members may be determined from the records of Defendant, and the FLSA Collective Class may easily and quickly be notified of the pendency of this action.

32. Plaintiff is similar to the FLSA Collective Class because he and the FLSA Collective Class have been unlawfully denied full payment of their overtime wages as mandated by the FLSA.

33. Plaintiff's experience with Defendant's payroll practices is typical of the experiences of the FLSA Collective Class.

34. Defendant's failure to pay all overtime wages due at the rates required by the personal circumstances of the named Plaintiff or of the FLSA Collective Class is common to the FLSA Collective Class.

35. Overall, Plaintiff's experience as a laborer who worked for Defendant is typical of that of the FLSA Collective Class.

36. Specific job titles or job duties of the FLSA Collective Class do not prevent collective treatment.

37. Although the issues of damages can be individual in character, there remains a common nucleus of operative facts concerning Defendant's liability under the FLSA in this case.

RULE 23 REQUIREMENTS

38. Plaintiff, on behalf of himself and all those similarly situated asserts a Fed. R. Civ. P. 23 class claim against Defendant defined as follows:

All of Defendant's employees in the United States who were employed by Defendant and were denied their full wages within five years of the filing of this complaint through the date of final judgment in this action (hereinafter referred to as the "Florida Unpaid Wages Class").

39. This action is uniquely appropriate as a class action pursuant to Rule 23 (b)(2), Fed. R. Civ. P. because Plaintiff seeks declaratory, injunctive, and monetary relief for the entire Class, the entitlement to which will turn on the extent Defendants underpaid the promised commissions to Class Members. Under these circumstances, the prosecution of separate actions by individual Class Members against the Defendants would create a risk of inconsistent or varying adjudications with respect to individual members of the Class which would in turn establish incompatible standards of conduct for the Defendant.

This action is also appropriate for class certification under Rule 23(b)(3) because the questions of law and fact common to the Plaintiff and the Class far more than predominate over issues affecting individual members of the Class and resolution of these issues within a class action is the superior method to achieve fair and efficient adjudication of this controversy.

40. **Numerosity**: The persons in the Florida Unpaid Wages Class identified herein are so numerous that joinder of all members is impracticable. Although the precise number of such persons is unknown, and the facts on which the calculation of that number are presently within the sole control of the Defendant, upon information and belief, there are between 500 and 1,000 members of the Florida Unpaid Wages Class during the Florida Class Period.

41. **Typicality**: The claims of Plaintiff are typical of the claims of the Florida Unpaid Wages Class Members, and a class action is superior to other available methods of fair and efficient adjudication of the controversy particularly in the context of wage and hour litigation where an individual plaintiff lacks the financial resources to vigorously prosecute a lawsuit against a corporate defendant.

42. **Adequacy**: Plaintiff will fairly and adequately protect the interests of the Florida Unpaid Wages, and has retained counsel experienced in complex class action litigation.

43. **Commonality**: Common questions of law and fact exist as to all members of the putative Florida Unpaid Wages Class Members, and predominate over any

questions solely affecting individual members of the putative class. These common questions include, but are not limited to:

- (a) Whether Defendant failed to pay Plaintiff all wages owed to Plaintiff;
- (b) Whether Plaintiff's unpaid overtime constitutes "wages" under Florida common law;
- (c) The proper measure of statutory damages; and
- (d) The proper form of injunctive and declaratory relief.
- (e) What proof of hours worked is sufficient where employers fail in their duty to maintain time records;
- (f) Whether the Defendant are liable for all damages claimed hereunder, including but not limited to, costs, disbursements and attorney's fees; and
- (g) Whether the Defendant should be enjoined from such further violations of Florida law.

44. Application of this policy or practice does/did not depend on the personal circumstances of Plaintiff or those joining this lawsuit. Rather, the same policy or practice which resulted in the non-payment of minimum wages to Plaintiff applied and continues to apply to all class members.

45. This case is also maintainable as a class action because Defendant have acted or refused to act on grounds that apply generally to the putative Florida Class, so that final injunctive relief or corresponding declaratory relief is appropriate with respect to the Class as a whole.

46. **Fair and Adequate Representation of the Class.** The named Plaintiff has a true stake in this case and will fairly and adequately represent, protect and prosecute

the interests of each Class Member and likewise has the willingness and capacity to do so. The named Plaintiff is capable of fairly representing itself and the Class Members who have been similarly impacted. Furthermore Plaintiff has engaged competent counsel knowledgeable in the areas of employment law and class action litigation. Plaintiff has no interests actually or potentially adverse to those of the putative Class Members. By vigorous prosecution of the individual claims, the named Plaintiff will also ensure the same degree of prosecution of the commonly held claims of the Class Members.

47. Plaintiff intends to send notice to all members of the Putative Class to the extent required by Rule 23 of the Federal Rules of Civil Procedure. The names and addresses of the Putative Class members are readily available from Defendant's records.

COUNT I – FLSA OVERTIME VIOLATIONS

48. Plaintiff realleges and readopts the allegations of Paragraphs 1 through 47 of this Complaint, as fully set forth herein.

49. Plaintiff brings this action on behalf of himself and all other similarly situated employees in accordance with 29 U.S.C. § 216(b). Plaintiff anticipates that as this case proceeds, other individuals will sign consent forms and join this collective action as plaintiffs.

50. During the statutory period, Plaintiff and the Class worked overtime hours while employed by Defendant, and they were not properly compensated for all of these hours under the FLSA.

51. Defendant failed to compensate Plaintiff and the Class for all of the overtime hours that Plaintiff and the Class worked.

52. The Members of the Class are similarly situated because they were all employed as laborers by Defendant, were compensated in the same manner, and were all subject to Defendant's common policy and practice of failing to pay its employees for all of the overtime hours that they worked in accordance with the FLSA.

53. This reckless practice violates the provisions of the FLSA, specifically 29 U.S.C. § 207(a)(1). As a result, Plaintiff and the Members of the Class who have opted into this action are each entitled to an amount equal to their unpaid overtime wages as liquidated damages.

54. All of the foregoing conduct, as alleged, constitutes a willful violation of the FLSA, within the meaning of 29 U.S.C. § 255(a).

55. As a result of the foregoing, Plaintiff and the Class have suffered damages.

WHEREFORE, Plaintiff and all similarly situated employees who join this collective action demand:

- (a) Designation of this action as a collective action on behalf of the Plaintiff and the prospective Class that he seeks to represent, in accordance with the FLSA;
- (b) Prompt issuance of notice pursuant to 29 U.S.C. § 216(b) to all similarly situated members of the FLSA putative class, apprising them of the pendency of this action and permitting them to assert timely FLSA claims in this action by filing individual consent to sue forms pursuant to 29 U.S.C. § 216(b);

- (c) Equitable tolling of the statute of limitations from the date of the filing of this complaint until the expiration of the deadline for filing consent to sue forms under 29 U.S.C. § 216(b);
- (d) Leave to add additional plaintiffs by motion, the filing of written consent forms, or any other method approved by this Court;
- (e) Judgment against Defendant for an amount equal to the unpaid overtime wages of Plaintiff and of opt-in Members of the Class at the applicable overtime rate;
- (f) A declaratory judgment stating that the practices complained of herein are unlawful under the FLSA;
- (g) Judgment against Defendant for an amount equal to the unpaid back wages of Plaintiff and of opt-in Members of the Class at the applicable overtime rate as liquidated damages;
- (h) Judgment against Defendant, stating that its violations of the FLSA were willful;
- (i) To the extent liquidated damages are not awarded, an award of prejudgment interest;
- (j) All costs and attorney's fees incurred in prosecuting these claims;
and
- (k) For such further relief as this Court deems just and equitable.

COUNT I
UNPAID WAGES UNDER FLORIDA COMMON LAW

56. Plaintiff realleges and readopts the allegations of Paragraphs 1 through

47 of this Complaint, as fully set forth herein.

57. During the relevant time periods, Plaintiff and the putative Florida Unpaid Wages Class Members worked for the Defendant and Defendant promised to pay Plaintiff and the putative class members all wages owed.

58. Defendant failed to compensate Plaintiff and the putative Florida Unpaid Wages Class all “wages” owed to them, As a result of the foregoing, Plaintiff and the putative Rule 23 class members have suffered monetary damages and damage to their professional reputational.

59. The number of Defendant’s employees who were subjected to precisely the same pay scheme which exceeds 40 people. While the precise number is unknown, the exact number is easily calculable with records Defendant keeps in the ordinary course of business.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff and the putative class members demand the following relief:

- (a) A jury trial on all issues so triable;
- (b) That process issues and that this Court take jurisdiction over the case;
- (c) Judgment against Defendant for an amount equal to Plaintiff’s unpaid back wages;
- (d) All costs and attorney’s fees incurred in prosecuting these claims, pursuant to Fla. Stat. §448.08; and
- (e) For such further relief as the Court deems just and equitable.

JURY TRIAL DEMAND

Plaintiff demands trial by jury as to all issues so triable.

Dated this 1st day of May, 2018.

Respectfully submitted,



LUIS A. CABASSA

Florida Bar Number: 0053643

WENZEL FENTON CABASSA, P.A.

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Facsimile: 813-229-8712

Email: lcabassa@wfclaw.com

Email: twells@wfclaw.com

Attorneys for Plaintiff

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.)

<p>I. (a) PLAINTIFFS LAMONT ROONEY</p> <p>(b) County of Residence of First Listed Plaintiff Pasco <i>(EXCEPT IN U.S. PLAINTIFF CASES)</i></p> <p>(c) Attorneys <i>(Firm Name, Address, and Telephone Number)</i> Luis A. Cabassa, Wenzel Fenton Cabassa, PA, 1110 N. Florida Ave., Suite 300, Tampa, FL 33602, 813-224-0431</p>	<p>DEFENDANTS GLOBAL SINKHOLE SOLUTIONS INC.</p> <p>County of Residence of First Listed Defendant Pasco <i>(IN U.S. PLAINTIFF CASES ONLY)</i></p> <p>NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.</p> <p>Attorneys <i>(If Known)</i></p>
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<p>II. BASIS OF JURISDICTION <i>(Place an "X" in One Box Only)</i></p> <p><input type="checkbox"/> 1 U.S. Government Plaintiff</p> <p><input checked="" type="checkbox"/> 3 Federal Question <i>(U.S. Government Not a Party)</i></p> <p><input type="checkbox"/> 2 U.S. Government Defendant</p> <p><input type="checkbox"/> 4 Diversity <i>(Indicate Citizenship of Parties in Item III)</i></p>	<p>III. CITIZENSHIP OF PRINCIPAL PARTIES <i>(Place an "X" in One Box for Plaintiff and One Box for Defendant)</i></p> <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td></td> <td style="text-align: center;">PTF</td> <td style="text-align: center;">DEF</td> <td></td> <td style="text-align: center;">PTF</td> <td style="text-align: center;">DEF</td> </tr> <tr> <td>Citizen of This State</td> <td style="text-align: center;"><input type="checkbox"/> 1</td> <td style="text-align: center;"><input type="checkbox"/> 1</td> <td>Incorporated or Principal Place of Business In This State</td> <td style="text-align: center;"><input type="checkbox"/> 4</td> <td style="text-align: center;"><input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td style="text-align: center;"><input type="checkbox"/> 2</td> <td style="text-align: center;"><input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business In Another State</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> </tr> </table>		PTF	DEF		PTF	DEF	Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4	Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6
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IV. NATURE OF SUIT *(Place an "X" in One Box Only)* Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<p>PERSONAL INJURY</p> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<p>PERSONAL INJURY</p> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <p>PERSONAL PROPERTY</p> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157
			<p>LABOR</p> <input checked="" type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act	<p>PROPERTY RIGHTS</p> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark
			<p>SOCIAL SECURITY</p> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<p>REAL PROPERTY</p> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<p>CIVIL RIGHTS</p> <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<p>PRISONER PETITIONS</p> <p>Habeas Corpus:</p> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <p>Other:</p> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement	<p>FEDERAL TAX SUITS</p> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	

V. ORIGIN *(Place an "X" in One Box Only)*

1 Original Proceeding 2 Removed from State Court 3 Remanded from Appellate Court 4 Reinstated or Reopened 5 Transferred from Another District *(specify)* 6 Multidistrict Litigation - Transfer 8 Multidistrict Litigation - Direct File

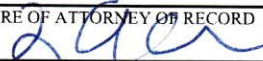
VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing *(Do not cite jurisdictional statutes unless diversity):*
Fair Labor Standards Act (FLSA), 29 U.S.C. Statue 201

Brief description of cause:
Fair Labor Standards Act

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

VIII. RELATED CASE(S) IF ANY *(See instructions):* JUDGE _____ DOCKET NUMBER _____

DATE: **5-1-18** SIGNATURE OF ATTORNEY OF RECORD: 

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Global Sinkhole Solutions Pegged with Wage and Hour Complaint](#)
