

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

Case No. 1:18-CV-23416

**ERLANDE SAINT-SIMON, and other
similarly situated employees,**

Plaintiff(s),

v.

SUNTRUST BANK,

Defendant.

DEFENDANT’S NOTICE OF REMOVAL

PLEASE TAKE NOTICE that, pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant SunTrust Bank (hereinafter “Defendant”), removes this action from the Circuit Court for the Eleventh Judicial Circuit, in and for Miami-Dade County, Florida to the United States District Court for the Southern District of Florida, Miami Division. As grounds for removal and for no other purpose, Defendant states:

1. On or about July 24, 2018, Plaintiff Erlande Saint-Simon (“Plaintiff”) commenced an action in the Circuit Court for the Eleventh Judicial Circuit, in and for Miami-Dade County, Florida, captioned *Erlande Saint-Simon, and other similarly situated employees v. SunTrust Bank*, Case No. 2018-024927-CA-01 (the “State Court Action”).

2. Defendant was served with the Summons and Complaint in the State Court Action on August 3, 2018.

3. Defendant is filing this Notice of Removal within thirty (30) days after service of the Summons and Complaint. The date on or before which Defendant is required by law to remove

this action is September 4, 2018. Therefore, this Notice of Removal is timely filed under the provisions of 28 U.S.C. § 1446(b).

4. The Circuit Court for the Eleventh Judicial Circuit, in and for Miami-Dade County, Florida is located within the Southern District of Florida. Thus, venue is proper in this Court because it is the “district and division embracing the place where such [state court] action is pending.” 28 U.S.C. §1441(a).

5. In accordance with 28 U.S.C. §1446(a) a copy of the entire court file in the State Court Action, including all pleadings and papers that have been filed and served on Defendant in the State Court Action, is attached to this Notice as Exhibit 1. Plaintiff has not served upon Defendant any other process, pleadings, or orders.

6. Promptly upon filing this Notice of Removal, Defendant will give written notice to Plaintiff’s counsel and will file a copy of this Notice of Removal with the Circuit Court for the Eleventh Judicial Circuit in and for Miami-Dade County, Florida, as required by 28 U.S.C. §1446(d). Attached to this Notice as Exhibit 2 is a copy of the Notice of Defendant’s Notice of Removal to Federal Court which is being filed in the Circuit Court for the Eleventh Judicial Circuit in and for Miami-Dade County, Florida.

**This Court Has Original Federal Question Jurisdiction
Over Plaintiff’s Complaint**

7. This Court has original jurisdiction over Plaintiff’s Complaint because it alleges violation under the Fair Labor Standards Act of 1938, as amended 29 U.S.C. § 201, *et seq*, 29 U.S.C. §§ 203 (r) and 203 (s), 29 U.S.C. § 207, and 29 U.S.C. § 216 (b). Pursuant to 28 U.S.C. § 1441(a), “[A]ny civil action brought in a State court of which the district courts of the United States have original jurisdiction, may be removed by the defendant or the defendants, to the district court of the United States for the district and division embracing the place where such action is

pending.”

WHEREFORE, Defendant hereby gives notice pursuant to 28 U.S.C. § 1446 of the removal of this action from the Circuit Court for the Eleventh Judicial Circuit in and for Miami-Dade County, Florida, to the United States District Court for the Southern District of Florida, Miami Division, and request that all further proceedings be conducted in this Court as provided by law.

Respectfully submitted this 23rd day of August 2018.

s/ Andrew Froman

Andrew Froman, Esq.

Florida Bar No.: 19429

FISHER & PHILLIPS LLP

101 East Kennedy Blvd., Ste. 2350

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Telephone: (813) 769-7500

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afroman@fisherphillips.com

Caryn Diamond Shaw, Esq.

Florida Bar No.: 52056

FISHER & PHILLIPS LLP

200 South Orange Avenue, Ste. 1100

Orlando, Florida 32801

Telephone: (407) 541-0888

Facsimile: (407) 541-0887

cshaw@fisherphillips.com

Attorneys for SunTrust

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that on this 23rd day of August 2018, the foregoing DEFENDANTS' NOTICE OF REMOVAL was served via CM/ECF Notification and electronic mail, upon the following:

Jason S. Remer, Esq.
Brody Shulman, Esq.
Remer & Georges-Pierre, PLLC
44 West Flagler St, STE 2200
Miami, FL 33130
Office: 305-416-5000
Fax: 305-416-5005
jremer@rgpattorneys.com
bshulman@rgpattorneys.com

s/ Andrew Froman _____
Attorney

SERVICE LIST

**United States District Court – Southern District of Florida
Erlande Saint-Simon v. SunTrust Bank
Case No. 1:18-CV-23416**

<p>Jason S. Remer, Esq. Brody Shulman, Esq. Remer & Georges-Pierre, PLLC 44 West Flagler St, STE 2200 Miami, FL 33130 Office: 305-416-5000 Fax: 305-416-5005 jremer@rgpattorneys.com bshulman@rgpattorneys.com</p> <p><i>Attorneys for Plaintiff</i></p>	<p>Andrew Froman, Esq. Florida Bar No.: 19429 FISHER & PHILLIPS LLP 101 East Kennedy Blvd., Ste. 2350 Tampa, FL 33602 Telephone: (813) 769-7500 Facsimile: (813) 769-7501 afroman@fisherphillips.com</p> <p>Caryn Diamond Shaw, Esq. Florida Bar No.: 52056 FISHER & PHILLIPS LLP 200 South Orange Avenue, Ste. 1100 Orlando, Florida 32801 Telephone: (407) 541-0888 Facsimile: (407) 541-0887 cshaw@fisherphillips.com</p> <p><i>Attorneys for Defendant</i></p>
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CIVIL COVER SHEET

JS 44 (Rev. 06/17) FLSD Revised 06/01/2017

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.) NOTICE: Attorneys MUST Indicate All Re-filed Cases Below.

I. (a) PLAINTIFFS ERLANDE SAINT-SIMON, and others similarly situated

DEFENDANTS SUNTRUST BANK

(b) County of Residence of First Listed Plaintiff Miami-Dade (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, and Telephone Number) Remer & Goerges-Pierre, PLLC; 44 West Flagler St, STE 2200, Miami, FL 33130; 305-416-5000

Attorneys (If Known) Fisher & Phillips LLP; 101 E. Kennedy Blvd., Suite 2350, Tampa, FL 33602; 813-769-7500

(d) Check County Where Action Arose: [X] MIAMI-DADE [] MONROE [] BROWARD [] PALM BEACH [] MARTIN [] ST. LUCIE [] INDIAN RIVER [] OKEECHOBEE [] HIGHLANDS

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- 1 U.S. Government Plaintiff [X] 3 Federal Question (U.S. Government Not a Party)
2 U.S. Government Defendant [] 4 Diversity (Indicate Citizenship of Parties in Item III)

- Citizen of This State PTF [] DEF []
Citizen of Another State PTF [] DEF []
Citizen or Subject of a Foreign Country PTF [] DEF []
Incorporated or Principal Place of Business In This State PTF [] DEF []
Incorporated and Principal Place of Business In Another State PTF [] DEF []
Foreign Nation PTF [] DEF []

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions

Grid of categories for Nature of Suit: CONTRACT, REAL PROPERTY, TORTS, CIVIL RIGHTS, PRISONER PETITIONS, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES.

V. ORIGIN

(Place an "X" in One Box Only)

- 1 Original Proceeding []
2 Removed from State Court [X]
3 Re-filed (See VI below) []
4 Reinstated or Reopened []
5 Transferred from another district (specify) []
6 Multidistrict Litigation Transfer []
7 Appeal to District Judge from Magistrate Judgment []
8 Multidistrict Litigation - Direct File []
9 Remanded from Appellate Court []

VI. RELATED/ RE-FILED CASE(S)

(See instructions): a) Re-filed Case [] YES [X] NO

b) Related Cases [] YES [X] NO

JUDGE:

DOCKET NUMBER:

VII. 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): 29 U.S.C. § 201 - Plaintiff alleges violation of Fair Labor Standard Act

LENGTH OF TRIAL via 4 days estimated (for both sides to try entire case)

VIII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 []

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: [X] Yes [] No

ABOVE INFORMATION IS TRUE & CORRECT TO THE BEST OF MY KNOWLEDGE

DATE

SIGNATURE OF ATTORNEY OF RECORD

8/23/2018

[Handwritten Signature]

FOR OFFICE USE ONLY RECEIPT #

AMOUNT

IFP

JUDGE

MAG JUDGE

FORM 1.997. CIVIL COVER SHEET

The civil cover sheet and the information contained in it neither replace nor supplement the filing and service of pleadings or other documents as required by law. This form must be filed by the plaintiff or petitioner for the use of the Clerk of Court for the purpose of reporting judicial workload data pursuant to section 25.075, Florida Statutes. (See instructions for completion.)

I. CASE STYLE

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT,
IN AND FOR MIAMI-DADE COUNTY, FLORIDA

Case No.: _____
Judge: _____

ERLANDE SAINT-SIMON

Plaintiff

vs.

SUNTRUST BANK

Defendant

II. TYPE OF CASE

- Condominium
- Contracts and indebtedness
- Eminent domain
- Auto negligence
- Negligence – other
 - Business governance
 - Business torts
 - Environmental/Toxic tort
 - Third party indemnification
 - Construction defect
 - Mass tort
 - Negligent security
 - Nursing home negligence
 - Premises liability – commercial
 - Premises liability – residential
- Products liability
- Real Property/Mortgage foreclosure
 - Commercial foreclosure \$0 - \$50,000
 - Commercial foreclosure \$50,001 - \$249,999
 - Commercial foreclosure \$250,000 or more
 - Homestead residential foreclosure \$0 – 50,000
 - Homestead residential foreclosure \$50,001 - \$249,999
 - Homestead residential foreclosure \$250,000 or more
 - Non-homestead residential foreclosure \$0 - \$50,000
 - Non-homestead residential foreclosure \$50,001 - \$249,999

- Non-homestead residential foreclosure \$250,00 or more
- Other real property actions \$0 - \$50,000
- Other real property actions \$50,001 - \$249,999
- Other real property actions \$250,000 or more
- Professional malpractice
 - Malpractice – business
 - Malpractice – medical
 - Malpractice – other professional
- Other
 - Antitrust/Trade Regulation
 - Business Transaction
 - Circuit Civil - Not Applicable
 - Constitutional challenge-statute or ordinance
 - Constitutional challenge-proposed amendment
 - Corporate Trusts
 - Discrimination-employment or other
 - Insurance claims
 - Intellectual property
 - Libel/Slander
 - Shareholder derivative action
 - Securities litigation
 - Trade secrets
 - Trust litigation

COMPLEX BUSINESS COURT

This action is appropriate for assignment to Complex Business Court as delineated and mandated by the Administrative Order. Yes No

III. REMEDIES SOUGHT (check all that apply):

- Monetary;
- Non-monetary declaratory or injunctive relief;
- Punitive

IV. NUMBER OF CAUSES OF ACTION: ()
(Specify)

1

V. IS THIS CASE A CLASS ACTION LAWSUIT?

- Yes
- No

VI. HAS NOTICE OF ANY KNOWN RELATED CASE BEEN FILED?

- No
- Yes – If “yes” list all related cases by name, case number and court:

VII. IS JURY TRIAL DEMANDED IN COMPLAINT?

- Yes
- No

I CERTIFY that the information I have provided in this cover sheet is accurate to the best of my knowledge and belief, and that I have read and will comply with the requirements of Florida Rule of Judicial Administration 2.425.

Signature s/ Jason S Remer FL Bar No.: 165580
Attorney or party

(Bar number, if attorney)

Jason S Remer 07/24/2018
(Type or print name)

Date

**IN THE CIRCUIT COURT OF THE 11th JUDICIAL CIRCUIT
IN AND FOR MIAMI-DADE COUNTY, FLORIDA**

CASE NO. _____

ERLANDE SAINT-SIMON and other similarly
situated employees,

Plaintiff(s),

vs.

SUNTRUST BANK,

Defendant.

_____ /

COMPLAINT

(OPT-IN PURSUANT TO 29 U.S.C § 216(B))

COMES NOW Plaintiff, **ERLANDE SAINT-SIMON** (“Plaintiff”), on behalf of himself and other employees and former employees similarly situated, by and through undersigned counsel, files this Complaint against Defendant **SUNTRUST BANK** (“Defendant”) and states as follows:

JURISDICTION

1. This is an action by the Plaintiff and other similarly-situated individuals for damages exceeding \$15,000.00 excluding attorneys’ fees or costs pursuant to the Fair Labor Standards Act, as amended (29 U.S.C. §201, et seq., hereinafter called the “FLSA”) to recover unpaid overtime wage compensation, an additional equal amount as liquidated damages, and reasonable attorneys’ fees and costs.
2. The jurisdiction of the Court over this controversy is based upon 29 U.S.C. §216(b).

3. Plaintiff was at all times relevant to this action, and continues to be, a resident Miami Dade County Florida, within the jurisdiction of this Honorable Court. Plaintiff is a covered employee for purposes of the FLSA.
4. Defendant **SUNTRUST BANK** conducts extensive business in Miami Dade County, Florida, Plaintiff worked for Defendant in Miami Dade County, Florida, and at all times material hereto was and is engaged in interstate commerce.
5. Venue is proper in Miami Dade because all of the actions that form the basis of this Complaint occurred within Miami Dade County and payment was due in Miami Dade County.
6. All conditions precedent for the filing of this action before this Court have been previously met, including the exhaustion of all pertinent administrative procedures and remedies.

FACTUAL ALLEGATIONS COMMON TO ALL COUNTS

7. Plaintiff was employed with Defendants as a non-exempt teller from approximately March 24, 2008 through February 2017. The relevant time period for Plaintiff's unpaid wage claims stem from July 2015 until February 2017.
8. Plaintiff, at all material times, worked for Defendants in a non-exempt capacity.
9. During the relevant time period, Plaintiff was paid an hourly rate between \$18.22 and \$19.26.
10. During the relevant time period, Plaintiff worked approximately four (4) to seven (7) hours of overtime per week without proper time and a half pay for all overtime hours worked.

11. Plaintiff now seeks time and a half wages for each overtime hour worked during the relevant time period that remains unpaid.
12. The above, incomplete payments from Defendant to Plaintiff failed to adequately compensate Plaintiff at the proper, statutory wages set by the Fair Labor Standards Act.

COUNT I
Federal Wage & Hour Federal Statutory Violation Against
SUNTRUST BANK

13. This action is brought by Plaintiff and other similarly-situated individuals to recover from Defendant SUNTRUST BANK unpaid overtime compensation, as well as an additional amount as liquidated damages, costs, and reasonable attorney's fees under the provisions of 29 U.S.C. § 201 *et seq.*, and specifically under the provisions of 29 U.S.C. § 207.
14. 29 U.S.C. § 207 (a)(1) states, " No employer shall employ any of his employees... for a work week longer than 40 hours unless such employee receives compensation for his employment in excess of the hours above-specified at a rate not less than one and a half times the regular rate at which he is employed."
15. Jurisdiction is conferred on this Court by Title 29 U.S.C. § 216(b).
16. At all times pertinent to this Complaint, Defendant SUNTRUST BANK operated as an organization which sells and/or markets its services and/or goods to customers from throughout the United States and also provides its services for goods sold and transported from across state lines of other states, and the Defendant SUNTRUST BANK obtains and solicits funds from non-Florida sources, accepts funds from non-Florida sources, uses telephonic transmissions going over state lines to do its business, transmits funds outside the State of Florida, and otherwise regularly engages in interstate commerce, particularly with respect to its employees.

17. Upon information and belief, the annual gross revenue of the Defendant SUNTRUST BANK was at all times material hereto in excess of \$500,000 per annum, and, by virtue of working in interstate commerce, otherwise satisfies the FLSA's coverage requirements.
18. By reason of the foregoing, the Defendant SUNTRUST BANK is and was, during all times hereafter mentioned, an enterprise engaged in commerce or in the production of goods for commerce as defined in §§ 3 (r) and 3(s) of the FLSA, 29 U.S.C. § 203(r) and 203(s). Defendant's business activities involve those to which the Fair Labor Standards Act applies. Plaintiff's work for the Defendant SUNTRUST BANK likewise affects interstate commerce.
19. Plaintiff seeks to recover for unpaid wages accumulated from the date of hire.
20. Defendant SUNTRUST BANK knew and/or showed reckless disregard of the provisions of the FLSA concerning the payment of overtime wages as required by the Fair Labor Standards Act and remain owing Plaintiff these unpaid overtime wages since the commencement of Plaintiff's employment with Defendant SUNTRUST BANK as set forth above. As such, Plaintiff is entitled to recover double damages.
21. Defendant SUNTRUST BANK never posted any notice, as required by the Fair Labor Standards Act and Federal Law, to inform employees of their federal rights to overtime wage payments.

WHEREFORE, Plaintiff respectfully prays for the following relief against Defendant SUNTRUST BANK:

- A. Adjudge and decree that Defendant SUNTRUST BANK has violated the FLSA and has done so willfully, intentionally and with reckless disregard for Plaintiff's rights;

- B. Award Plaintiff actual damages in the amount shown to be due for unpaid overtime compensation related to hours worked in excess of forty (40) weekly, with interest;
- C. Award Plaintiff an equal amount in double damages/liquidated damages;
- D. Award Plaintiff the costs of this action, together with a reasonable attorneys' fees;
- E. Grant Plaintiff such additional relief as the Court deems just and proper under the circumstances; and
- F. Grant Plaintiff trial by jury.

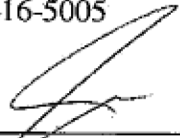
JURY DEMAND

Plaintiff demands trial by jury of all issues triable as of right by jury.

Dated: 7-20-18

Respectfully submitted,


REMER & GEORGES-PIERRE, PLLC
44 West Flagler Street
Suite 2200
Miami, FL 33130
Telephone: (305)416-5000
Facsimile: (305)416-5005

By: 

Jason S. Remer, Esq.
Fla. Bar No.: 0165580
Brody M. Shulman, Esq.
Fla. Bar No.: 092044

NOTICE OF CONSENT TO BE A PARTY PLAINTIFF AND/OR JOIN

I, ERLANDE SAINT-SIMON hereby consent, in accordance with 29 U.S.C. §216(b) of the Fair Labor Standards Act, to become a party plaintiff in this action against my employer, SunTrust, and to be represented by the attorneys of REMER & GEORGES-PIERRE, PLLC, Courthouse Tower, 44 West Flagler Street, Suite 2200, Miami, Florida 33130.

Sign Name:  Date: 5/7/18

Print Name: ERLANDE SAINT-SIMON

**IN THE CIRCUIT COURT OF THE 11th JUDICIAL CIRCUIT
IN AND FOR MIAMI-DADE COUNTY, FLORIDA**

CASE NO. 2018-024927-GA-01

ERLANDE SAINT-SIMON and other similarly
situated employees,

Plaintiff(s),
vs.

SUNTRUST BANK,

Defendant.

_____ /

SUMMONS IN A CIVIL CASE

TO: SUNTRUST BANK

CORPORATION SERVICE COMPANY
1201 HAYS STREET
TALLAHASSEE, FL 32301

YOU ARE HEREBY SUMMONED and required to serve upon PLAINTIFF'S ATTORNEY

JASON S. REMER, ESQ.
REMER & GEORGES-PIERRE, PLLC.
44 WEST FLAGLER STREET
SUITE 2200
MIAMI, FL 33130

an answer to the complaint which is herewith served upon you, within **20 days** after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You must also file your answer with the Clerk of this Court within a reasonable period of time after service.

CLERK

DATE

(BY) DEPUTY CLERK

IN THE CIRCUIT COURT OF THE 11th JUDICIAL CIRCUIT
IN AND FOR MIAMI-DADE COUNTY, FLORIDA

CASE NO. 2018-024927-GA-01

ERLANDE SAINT-SIMON and other similarly
situated employees,

Plaintiff(s),
vs.

SUNTRUST BANK,

Defendant.

_____ /

SUMMONS IN A CIVIL CASE

TO: SUNTRUST BANK

CORPORATION SERVICE COMPANY
1201 HAYS STREET
TALLAHASSEE, FL 32301

YOU ARE HEREBY SUMMONED and required to serve upon PLAINTIFF'S ATTORNEY

JASON S. REMER, ESQ.
REMER & GEORGES-PIERRE, PLLC.
44 WEST FLAGLER STREET
SUITE 2200
MIAMI, FL 33130

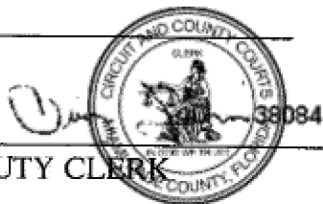
an answer to the complaint which is herewith served upon you, within **20 days** after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You must also file your answer with the Clerk of this Court within a reasonable period of time after service.

7/31/2018

CLERK

DATE

(BY) DEPUTY CLERK



**IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
IN AND FOR MIAMI-DADE COUNTY, FLORIDA
CIRCUIT CIVIL**

**ERLANDE SAINT-SIMON, and other
similarly situated employees,**

Plaintiff(s),

Case No.: 2018-024927-CA-01

v.

SUNTRUST BANK,

Defendant.

DEFENDANT'S NOTICE OF FILING NOTICE OF REMOVAL TO FEDERAL COURT

PLEASE TAKE NOTICE that Defendant, SunTrust Bank (“Defendant”), by and through undersigned counsel, has removed this action from the Circuit Court of the Eleventh Judicial Circuit, in and for Miami-Dade County, Florida, to the United States District Court for the Southern District of Florida, Miami Division. A true and correct copy of the Notice of Removal to federal court is attached hereto as **Exhibit A**.

PLEASE TAKE FURTHER NOTICE that pursuant to 28 U.S.C. §§1331, 1441 and 1446, the filing of Defendant’s Notice of Removal to the District Court, together with the filing of the instant Notice, effects the removal of this action. Accordingly, Defendant requests that this Court take no further action in this case unless it is remanded from federal court.

Respectfully submitted this 23rd day of August 2018.

s/ Andrew Froman
Andrew Froman, Esq.
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Orlando, Florida 32801
Telephone: (407) 541-0888
Facsimile: (407) 541-0887
cshaw@fisherphillips.com

Attorneys for SunTrust

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 23rd day of August 2018, the foregoing was filed electronically with the Clerk of Court's electronic filing system that sent notification upon the following counsel of record:

Jason S. Remer, Esq.
Brody Shulman, Esq.
Remer & Georges-Pierre, PLLC
44 West Flagler St, STE 2200
Miami, FL 33130
Office: 305-416-5000
Fax: 305-416-5005
jrem@rgpattorneys.com
bshulman@rgpattorneys.com

s/ Andrew Froman
Attorney

ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Suntrust Bank Sued by Ex-Teller Over Allegedly Unpaid Overtime Wages](#)
