

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE**

DAVID M. WHITE; and XAVIER )  
ALLMON, on behalf of themselves and )  
all other similarly situated employees, )

Plaintiffs, )

v. )

REEDER CHEVROLET, INC.; )  
QUINLAN MOTORS, INC.; and )  
QUINLAN MOTORS, LLC, )

Defendants. )

Case No. 3:17-cv-00107  
Jury Demanded

**COLLECTIVE ACTION COMPLAINT**

Plaintiffs, by and through counsel, on behalf of themselves and other current and former employees of Defendants, Reeder Chevrolet, Inc., Quinlan Motors, Inc., and Quinlan Motors, LLC (collectively, “Reeder Chevrolet”), who are similarly situated, aver as follows:

**Nature of Action**

1. For at least three years preceding the filing of this action, Reeder Chevrolet has maintained a corporate policy of refusing to pay its lube technicians overtime compensation in violation of Section 7 of the Fair Labor Standards Act of 1938 (“FLSA”), as amended, 29 U.S.C. § 207(a).

2. Plaintiffs bring this action, pursuant to 29 U.S.C. § 216(b), on behalf of themselves and other similarly situated employees for whom Reeder Chevrolet has willfully misclassified as exempt from overtime compensation and/or failed to properly pay overtime wages.

### Jurisdiction and Venue

3. This Court has jurisdiction over Plaintiffs' claims pursuant to 28 U.S.C. § 1331 and 29 U.S.C. § 216(b).

4. Venue is proper in this judicial district pursuant to 28 U.S.C. § 1391(b)(1) and (2), because Reeder Chevrolet is headquartered in this judicial district and a substantial part of the events or omissions giving rise to this action occurred in this judicial district.

### Parties

5. Defendant Reeder Chevrolet, Inc. is a Tennessee corporation with its principal place of business located at 4301 Clinton Highway, Knoxville, TN 37912-5625. Defendant may be served with process through its registered agent, James Quinlan, at the above address.

6. Defendant Quinlan Motors, Inc., is a Tennessee corporation with its principal place of business located at 4301 Clinton Highway, Knoxville, TN 37912-5625. Defendant may be served with process through its registered agent, James Quinlan, at the above address.

7. Defendant Quinlan Motors, LLC, is a Tennessee limited liability company with its principal place of business located at 4301 Clinton Highway, Knoxville, TN 37912-5625. Defendant may be served with process through its registered agent, James Quinlan, at the above address.

8. Defendants, individually and collectively, are "employers" within the meaning of the FLSA, 29 U.S.C. § 203(d).

9. Defendants are an enterprise engaged in commerce or in the production of goods for commerce within the meaning of the FLSA, 29 U.S.C. §§ 203(r) and (s).

10. Plaintiffs are current and former employees of Reeder Chevrolet.

11. Plaintiffs are “employees” within the meaning of the FLSA, 29 U.S.C. § 203(e).

12. Written consents to join this collective action signed by Plaintiffs herein are attached hereto as Exhibit 1 (White) and 2 (Allmon). Additional consents to join will be filed on behalf of other similarly situated employees.

#### Facts

13. Defendants own and operate a GM/Chevrolet dealership, with a sales department, a finance department, a parts department, and a service department

14. Defendants’ service department employs only highly trained and certified mechanics, who perform warranty repairs and manufacturer-recommended maintenance on vehicles sold by the dealership. Upon information and belief, Defendant properly classifies these service department mechanics as ‘exempt’ from the FLSA’s overtime pay requirements.

15. However, in addition to the service department, and separate from it, Defendant also maintains what it calls a “Quick Lube Center,” which strictly performs maintenance work consisting of oil and oil filter changes and tire rotations.

16. The employees working in the Quick Lube Center are called “Lube Technicians.”

17. Defendants knowingly and willfully misclassify Lube Technicians as ‘exempt’ from the FLSA’s overtime pay requirements.

18. Upon information and belief, Defendants have employed upwards of 30 current and former full-time Lube Technicians over the past three years.

19. Defendants pay Lube Technicians on an hourly basis of around \$11.00 per hour, but refuses to pay overtime wages.

20. Lube Technicians report to a Quick Lube Manager and are not within the same chain-of-command as Defendants’ service department Technicians.

21. Lube Technicians are not allowed to perform any hands-on repairs or maintenance beyond rotating tires and performing oil and oil filter changes.

22. Further, when the Quick Lube Center is slow, and between customers, Defendant expects its Lube Technicians to be sweeping, stocking, mopping, and cleaning tools and other purely manual tasks.

23. Lube Technicians regularly work 50 hour-plus work weeks.

24. Plaintiff, David M. White, worked for Defendant as a Lube Technician from approximately May 18, 2015 to July 13, 2016.

25. Plaintiff, Xavier Allmon, worked for Defendant as a Lube Technician from approximately May 2015 to September 2016.

26. Over the course of their employment as Lube Technicians, Mr. White and Mr. Allmon, together with similarly situated employees, worked well in excess of 40 hours per week, and did not receive overtime compensation during their employment in violation of the FLSA's overtime pay requirements.

#### Putative Class

27. Plaintiffs White and Allmon bring this action for violation of the FLSA as a collective action, pursuant to Section 16(b) of the FLSA, 29 U.S.C. § 216(b), on behalf of the following class:

All individuals who are or will be employed by Reeder Chevrolet as Lube Technicians during the period beginning three years prior to the date of commencement of this action through the date of judgment in this action, and who were paid on either an hourly, and who did not receive all overtime compensation due for hours worked in excess of forty (40) per week.

28. Defendants are liable for their failure to pay Plaintiffs and members of the putative class for all hours worked and time and one-half for hours in excess of forty (40) at their regular rate.

29. Plaintiffs and all similarly situated employees who elect to participate in this action seek unpaid compensation, and equal amount of liquated damages, and/or prejudgment interest, attorneys' fees, and costs pursuant to 29 U.S.C. § 216(b).

Count I  
(Violation of the Fair Labor Standards Act)

30. Plaintiffs incorporate by reference the allegations asserted in Paragraphs 1-29.

31. Reeder Chevrolet willfully violated the FLSA by misclassifying Plaintiffs as exempt employees, and a 3-year statute of limitations applies to such violations, pursuant to 29 U.S.C. § 255.

32. At all relevant times, Reeder Chevrolet has been, and continues to be, an "employer" engaged in interstate "commerce" within the meaning of the FLSA, 29 U.S.C. § 203.

33. At all relevant times, Reeder Chevrolet has employed, and continues to employ, "employee[s]," including the Plaintiffs, and each of the members of the prospective FLSA Class, that have been, and continue to be, engaged in interstate "commerce" within the meaning of the FLSA, 29 U.S.C. § 203.

34. At all relevant times, Defendants had gross operating revenues in excess of \$500,000.

35. Reeder Chevrolet has willfully and intentionally engaged in a widespread pattern and practice of violating provisions of the FLSA by misclassifying Plaintiffs and similarly situated employees as "exempt" employees, and thereby failing and refusing to pay them the hourly wage compensation as required by law and in accordance with § 206 and § 207 of the FLSA.

36. Plaintiffs and members of the proposed class are not employed in a bona fide

executive, administrative, or a professional capacity pursuant to 29 U.S.C. § 213(a)(1) and corresponding regulations.

37. Plaintiffs and members of the proposed class are not subject to any other exemptions set forth in the FLSA or regulations.

38. As a result of Reeder Chevrolet's violations of the FLSA, Plaintiffs, as well as all others similarly situated, have suffered damages by being denied overtime wages in accordance with § 206 and § 207 of the FLSA.

39. Reeder Chevrolet has not made a good faith effort to comply with the FLSA with respect to its compensation of Plaintiffs and other similarly situated present and former employees.

40. As a result of Reeder Chevrolet's unlawful acts, Plaintiffs and all similarly situated current and former employees have been deprived of overtime compensation in amounts to be determined at trial, and are entitled to recovery of such amounts, liquidated damages, prejudgment interests, attorneys' fees, costs, and other compensation pursuant to § 216(b) of the FLSA.

#### Prayer for Relief

WHEREFORE, Plaintiffs, and all those similarly situated, collectively request that this Court:

1. Issue an Order certifying this action as a collective action under the FLSA and designate the above Plaintiffs as representatives of all those similarly situated under the FLSA collective action;

2. At the earliest possible time, issue notice of this collective action, or allow Plaintiffs to do so, to all persons who have at any time since the three years immediately preceding the filing of this suit, up through and including the date of this Court's issuance

of court-supervised notice, been employed by Reeder Chevrolet. Such notice shall inform them that this civil action has been filed, of the nature of the action, and of their right to join this lawsuit if they believe they were denied proper wages.

3. Award Plaintiffs and all those similarly situated actual damages for unpaid wages and liquidated damages equal in amount to the unpaid compensation found due to Plaintiffs and the class as provided by the FLSA, 29 U.S.C. § 216(b).

4. Award Plaintiffs and all those similarly situated pre- and post-judgment interest at the statutory rate as provided by the FLSA, U.S.C. § 216(b).

5. Award Plaintiffs and all those similarly situated attorneys' fees, costs, and disbursements as provided by the FLSA, 29 U.S.C. § 216(b).

6. Award Plaintiffs and all those similarly situated further legal and equitable relief as this Court deems necessary, just, and proper.

**Jury Demanded**

Plaintiffs hereby demand a trial by jury on all issues so triable.

Respectfully submitted,

/s/ Richard E. Collins  
Richard Everett Collins (TN Bar # 024368)

COLLINS & DOOLAN, PLLC  
422 S. Gay St., Suite 301  
Knoxville, TN 37902  
(865) 247-0434  
richard@collinsdoolan.com

*Attorneys for Plaintiffs*

CONSENT TO JOIN LAWSUIT

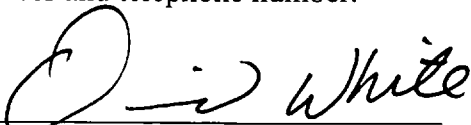
I hereby give written consent under section 216(b) of the Fair Labor Standards Act to become a party plaintiff and to join the collective action lawsuit filed against (or contemplated to be filed against) **Reeder Chevrolet**, specifically Quinlan Motors, Inc. d/b/a Reeder Chevrolet, including its agents and owners, in the United States District Court for the Eastern District of Tennessee. I agree that Plaintiffs' attorney Richard E. Collins will represent my interests in this case.

Furthermore, I (please check one box)

do give

do not give

the class representatives, **David M. White and Xavier M. Allmon**, agency authority to make decisions on my behalf concerning the method and manner of conducting this litigation, the entering of an agreement with counsel concerning attorneys' fees and costs, and all other matters pertaining to this lawsuit. I agree to keep Plaintiffs' counsel informed as to my correct mailing address and telephone number.

  
Signature

July 25 2016  
Date

Full Name: David Matthew White Phone: (865) 258-5060

Address: 220 Monday Road Lot #413 Corryton TN 37721

E-Mail: Bigdwhite82@gmail.com

Please return this signed form to:

Collins & Doolan, PLLC  
422 S. Gay Street, Suite 301  
Knoxville, TN 37902



## CONSENT TO JOIN LAWSUIT

I hereby give written consent under section 216(b) of the Fair Labor Standards Act to become a party plaintiff and to join the collective action lawsuit filed against (or contemplated to be filed against) **Reeder Chevrolet**, specifically Quinlan Motors, Inc. d/b/a Reeder Chevrolet, including its agents and owners, in the United States District Court for the Eastern District of Tennessee. I agree that Plaintiffs' attorney Richard E. Collins will represent my interests in this case.

Furthermore, I (please check one box)

do give

do not give

the class representatives, **David M. White and Xavier M. Allmon**, agency authority to make decisions on my behalf concerning the method and manner of conducting this litigation, the entering of an agreement with counsel concerning attorneys' fees and costs, and all other matters pertaining to this lawsuit. I agree to keep Plaintiffs' counsel informed as to my correct mailing address and telephone number.

  
\_\_\_\_\_  
Signature

7/25/16  
Date

Full Name: Xavier Allmon Phone: 865-208-0188

Address: 244 Hillside Rd.

E-Mail: Xvralison@yahoo.com

Please return this signed form to:

Collins & Doolan, PLLC  
422 S. Gay Street, Suite 301  
Knoxville, TN 37902

# CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

### I. (a) PLAINTIFFS

DAVID M. WHITE and XAVIER ALLMON, on behalf of themselves and other similarly situated employees

(b) County of Residence of First Listed Plaintiff \_\_\_\_\_

(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Richard E. Collins, Collins & Doolan, PLLC, 422 S. Gay Street, Suite 301, Knoxville, TN 37902, (865) 409-4416, richard@collinsdoolan.com

### DEFENDANTS

REEDER CHEVROLET, INC.; QUINLAN MOTORS, INC.; and QUINLAN MOTORS, LLC

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.

Attorneys (If Known)

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

- 1 U.S. Government Plaintiff
- 3 Federal Question (U.S. Government Not a Party)
- 2 U.S. Government Defendant
- 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)

	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

### 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	<b>PERSONAL INJURY</b> <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	<b>PERSONAL INJURY</b> <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 <b>PERSONAL PROPERTY</b> <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 <b>LABOR</b> <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 <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <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)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<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
REAL PROPERTY	CIVIL RIGHTS	PRISONER PETITIONS			
<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	<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	<b>Habeas Corpus:</b> <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 <b>Other:</b> <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			

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

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

### VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):  
29 U.S.C. 207(a)

Brief description of cause:  
Collective Action - Violations of FLSA Overtime Provisions

### 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 03/24/2017 SIGNATURE OF ATTORNEY OF RECORD

/s/Richard E. Collins

FOR OFFICE USE ONLY

RECEIPT # \_\_\_\_\_

## INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

### Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading 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. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
- (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
- (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.  
 United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.  
 United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.  
 Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.  
 Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- V. Origin.** Place an "X" in one of the seven boxes.  
 Original Proceedings. (1) Cases which originate in the United States district courts.  
 Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441. When the petition for removal is granted, check this box.  
 Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.  
 Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.  
 Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.  
 Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.  
 Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.  
**PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7.** Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.  
 Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.  
 Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

**Date and Attorney Signature.** Date and sign the civil cover sheet.

UNITED STATES DISTRICT COURT

for the

Eastern District of Tennessee

DAVID M. WHITE; XAVIER ALLMON, on behalf of themselves and other similarly situated employees,

Plaintiff(s)

v.

REEDER CHEVROLET, INC.; QUINLAN MOTORS, INC.; and QUINLAN MOTORS, LLC

Defendant(s)

Civil Action No. 3:17-cv-00107

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) REEDER CHEVROLET, INC.
c/o James Quinlan
4301 Clinton Highway
Knoxville, TN 37912-5625

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: Richard E. Collins, Collins & Doolan, PLLC, 422 S. Gay Street, Suite 301, Knoxville, TN 37902, (865) 409-4416, richard@collinsdoolan.com

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date:

Signature of Clerk or Deputy Clerk

Civil Action No. 3:17-cv-00107

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* \_\_\_\_\_  
was received by me on *(date)* \_\_\_\_\_.

I personally served the summons on the individual at *(place)* \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_; or

I left the summons at the individual's residence or usual place of abode with *(name)* \_\_\_\_\_  
\_\_\_\_\_, a person of suitable age and discretion who resides there,  
on *(date)* \_\_\_\_\_, and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* \_\_\_\_\_, who is  
designated by law to accept service of process on behalf of *(name of organization)* \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_; or

I returned the summons unexecuted because \_\_\_\_\_; or

Other *(specify)*:

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ \_\_\_\_\_ 0.00 \_\_\_\_\_.

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc:

UNITED STATES DISTRICT COURT

for the

Eastern District of Tennessee

DAVID M. WHITE; XAVIER ALLMON, on behalf of themselves and other similarly situated employees,

Plaintiff(s)

v.

REEDER CHEVROLET, INC.; QUINLAN MOTORS, INC.; and QUINLAN MOTORS, LLC

Defendant(s)

Civil Action No. 3:17-cv-00107

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) QUINLAN MOTORS, INC.
c/o James Quinlan
4301 Clinton Highway
Knoxville, TN 37912-5625

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: Richard E. Collins, Collins & Doolan, PLLC, 422 S. Gay Street, Suite 301, Knoxville, TN 37902, (865) 409-4416, richard@collinsdoolan.com

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date:

Signature of Clerk or Deputy Clerk

Civil Action No. 3:17-cv-00107

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* \_\_\_\_\_  
was received by me on *(date)* \_\_\_\_\_ .

I personally served the summons on the individual at *(place)* \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_ ; or

I left the summons at the individual's residence or usual place of abode with *(name)* \_\_\_\_\_  
\_\_\_\_\_, a person of suitable age and discretion who resides there,  
on *(date)* \_\_\_\_\_ , and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* \_\_\_\_\_ , who is  
designated by law to accept service of process on behalf of *(name of organization)* \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_ ; or

I returned the summons unexecuted because \_\_\_\_\_ ; or

Other *(specify)*:

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ \_\_\_\_\_ 0.00 .

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc:

UNITED STATES DISTRICT COURT

for the

Eastern District of Tennessee

DAVID M. WHITE; XAVIER ALLMON, on behalf of themselves and other similarly situated employees,

Plaintiff(s)

v.

REEDER CHEVROLET, INC.; QUINLAN MOTORS, INC.; and QUINLAN MOTORS, LLC

Defendant(s)

Civil Action No. 3:17-cv-00107

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) QUINLAN MOTORS, LLC
c/o James Quinlan
4301 Clinton Highway
Knoxville, TN 37912-5625

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: Richard E. Collins, Collins & Doolan, PLLC, 422 S. Gay Street, Suite 301, Knoxville, TN 37902, (865) 409-4416, richard@collinsdoolan.com

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date:

Signature of Clerk or Deputy Clerk



Civil Action No. 3:17-cv-00107

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* \_\_\_\_\_  
was received by me on *(date)* \_\_\_\_\_ .

I personally served the summons on the individual at *(place)* \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_ ; or

I left the summons at the individual's residence or usual place of abode with *(name)* \_\_\_\_\_  
\_\_\_\_\_, a person of suitable age and discretion who resides there,  
on *(date)* \_\_\_\_\_ , and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* \_\_\_\_\_ , who is  
designated by law to accept service of process on behalf of *(name of organization)* \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_ ; or

I returned the summons unexecuted because \_\_\_\_\_ ; or

Other *(specify)*:

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ \_\_\_\_\_ 0.00 .

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc:

# ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Reeder Chevrolet, Quinlan Motors Hit with Unpaid Overtime Action](#)

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