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*Attorneys for Plaintiff,*  
Gregory Angell

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

**GREGORY ANGELL,  
INDIVIDUALLY AND ON  
BEHALF OF ALL OTHERS  
SIMILARLY SITUATED,**

Plaintiff,

v.

**DOORDASH, INC.,**

Defendant.

**Case No.:**

**CLASS ACTION**

**COMPLAINT FOR DAMAGES  
PURSUANT TO THE TELEPHONE  
CONSUMER PROTECTION ACT,  
47 U.S.C. § 227, ET SEQ.**

**JURY TRIAL DEMANDED**

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**INTRODUCTION**

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1. GREGORY ANGELL (“Plaintiff”) brings this Class Action Complaint for damages, injunctive relief, and any other available legal or equitable remedies, resulting from the illegal actions of DOORDASH, INC. (“Defendant”), in negligently or intentionally contacting Plaintiff on Plaintiff’s cellular telephone, in violation of the Telephone Consumer Protection Act, 47 U.S.C. § 227 et seq., (“TCPA”), thereby invading Plaintiff’s privacy. Plaintiff alleges as follows upon personal knowledge as to himself and his own acts and experiences, and, as to all other matters, upon information and belief, including investigation conducted by their attorneys.
2. The TCPA was designed to prevent calls and messages like the ones described within this complaint, and to protect the privacy of citizens like Plaintiff. “Voluminous consumer complaints about abuses of telephone technology – for example, computerized calls dispatched to private homes – prompted Congress to pass the TCPA.” *Mims v. Arrow Fin. Servs., LLC*, 132 S. Ct. 740, 744 (2012).
3. In enacting the TCPA, Congress intended to give consumers a choice as to how creditors and telemarketers may call them, and made specific findings that “[t]echnologies that might allow consumers to avoid receiving such calls are not universally available, are costly, are unlikely to be enforced, or place an inordinate burden on the consumer. TCPA, Pub.L. No. 102–243, § 11. Toward this end, Congress found that

[b]anning such automated or prerecorded telephone calls to the home, except when the receiving party consents to receiving the call or when such calls are necessary in an emergency situation affecting the health and safety of the consumer, is the only effective means of protecting telephone consumers from this nuisance and privacy invasion.

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1 *Id.* at § 12; see also *Martin v. Leading Edge Recovery Solutions, LLC*, 2012 WL  
 2 3292838, at\* 4 (N.D.Ill. Aug. 10, 2012) (citing Congressional findings on TCPA’s  
 3 purpose).

4 4. Congress also specifically found that “the evidence presented to the  
 5 Congress indicates that automated or prerecorded calls are a nuisance and an  
 6 invasion of privacy, regardless of the type of call....” *Id.* at §§ 12-13. See  
 7 also, *Mims*, 132 S. Ct. at 744.

8 5. As Judge Easterbrook of the Seventh Circuit recently explained in a TCPA  
 9 case regarding calls to a non-debtor similar to this one:

10 The Telephone Consumer Protection Act ... is well known for  
 11 its provisions limiting junk-fax transmissions. A less-litigated  
 12 part of the Act curtails the use of automated dialers and  
 13 prerecorded messages to cell phones, whose subscribers often  
 14 are billed by the minute as soon as the call is answered—and  
 15 routing a call to voicemail counts as answering the call. An  
 automated call to a landline phone can be an annoyance; an  
 automated call to a cell phone adds expense to annoyance.

16 *Soppet v. Enhanced Recovery Co., LLC*, 679 F.3d 637, 638 (7th Cir. 2012).

17 **JURISDICTION AND VENUE**

18 6. This Court has federal question jurisdiction because this case arises out of  
 19 violation of federal law. 47 U.S.C. §227(b); *Mims v. Arrow Fin. Servs., LLC*,  
 20 132 S. Ct. 740 (2012).

21 7. Venue is proper pursuant to 28 U.S.C. § 1391 for the following reasons: (i)  
 22 Plaintiff resides in the County of Alameda, State of California which is  
 23 within this judicial district; (ii) the conduct complained of herein occurred  
 24 within this judicial district; and, (iii) Defendant conducted business within  
 25 this judicial district at all times relevant.

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**PARTIES**

- 1
- 2 8. Plaintiff is, and at all times mentioned herein was, a citizen and resident of
- 3 the County of Alameda, State of California. Plaintiff is, and at all times
- 4 mentioned herein was, a “person” as defined by 47 U.S.C. § 227(a)(2)(A).
- 5 9. Defendant is an online marketplace connection company and is a “person”
- 6 as defined by 47 U.S.C. § 227(a)(2)(A). Defendant’s State of Information
- 7 and principal place of business are in the State of Delaware.

**FACTUAL ALLEGATIONS**

- 8
- 9 10. Plaintiff alleges that at all times relevant herein Defendant conducted
- 10 business in the State of California, County of Alameda, and within this
- 11 judicial district.
- 12 11. Plaintiff filled out an online form to become a driver/employee of
- 13 Defendant.
- 14 12. Beginning on or about October 11, 2016, Plaintiff began receiving text
- 15 messages from Defendant on Plaintiff’s cellular telephone. Said text
- 16 messages invited Plaintiff to complete his DoorDash driver profile and
- 17 provided a link to access the incomplete profile.
- 18 13. Plaintiff opted out of becoming a driver/employee for the Defendant and
- 19 Plaintiff sent the following text message to Defendant at 1:41 p.m. on
- 20 October 20, 2016:

21 **STOP**

- 22 14. Defendant replied to Plaintiff at 3:39 p.m. on October 20, 2016 with the
- 23 following text message:
- 24 You have successfully been unsubscribed. You will not receive any more
- 25 messages from this number.
- 26 15. Shortly thereafter Defendant sent Plaintiff at least four more text messages.
- 27 16. Plaintiff also sent emails to Defendant requesting that Defendant no longer
- 28 contact Plaintiff.

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1 17. Defendant used a “telephone facsimile machine”, as defined by 47 U.S.C. §  
2 227(a)(3) to send the text messages to Plaintiff as prohibited by 47 U.S.C. §  
3 227(b)(1)(C).

4 18. These telephone communications constituted unsolicited advertisements as  
5 defined by 47 U.S.C. § 227(a)(5).

6 19. Plaintiff has never been in an “established business relationship” with  
7 Defendant as defined by 47 U.S.C. § 227(a)(2).

8 20. Defendant lacked “prior express consent” to contact Plaintiff on Plaintiff’s  
9 cellular telephone as described herein.

10 21. To date, Plaintiff has received approximately twelve text messages on  
11 Plaintiff’s cellular telephone from Defendant.

12 22. These telephone communications by Defendant, or its agent, violated 47  
13 U.S.C. § 227(b)(1)(C).

14 **CLASS ACTION ALLEGATIONS**

15 23. Plaintiff brings this action on behalf of himself and on behalf of all others  
16 similarly situated (“the Class”).

17 24. Plaintiff represents, and is a member of the Class, consisting of all persons  
18 within the United States who received any text message from Defendant or  
19 their agent/s and/or employee/s to said person’s cellular telephone made  
20 through the use of any telephone facsimile machine, which text message was  
21 sent after Plaintiff requested sender to not send future unsolicited  
22 advertisements.

23 25. Defendant and its employees or agents are excluded from the Class.  
24 Plaintiff does not know the number of members in the Class, but believes the  
25 Class members number in the hundreds of thousands, if not more. Thus, this  
26 matter should be certified as a Class action to assist in the expeditious  
27 litigation of this matter.  
28

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1 26. Plaintiff and members of the Class were harmed by the acts of Defendant in  
2 at least the following ways: Defendants, either directly or through its agents,  
3 illegally contacted Plaintiff and the Class members via their cellular  
4 telephones by using a telephone facsimile machine, thereby causing Plaintiff  
5 and the Class members to reduce cellular telephone time for which Plaintiff  
6 and the Class members previously paid, and invading the privacy of said  
7 Plaintiff and the Class members. Plaintiff and the Class members were  
8 damaged thereby.

9 27. This suit seeks only damages and injunctive relief for recovery of economic  
10 injury on behalf of the Class, and it expressly is not intended to request any  
11 recovery for personal injury and claims related thereto. Plaintiff reserves the  
12 right to expand the Class definition to seek recovery on behalf of additional  
13 persons as warranted as facts are learned in further investigation and  
14 discovery.

15 28. The joinder of the Class members is impractical and the disposition of their  
16 claims in the Class action will provide substantial benefits both to the parties  
17 and to the court. The Class can be identified through Defendants' records or  
18 Defendants' agents' records.

19 29. There is a well-defined community of interest in the questions of law and  
20 fact involved affecting the parties to be represented. The questions of law  
21 and fact to the Class predominate over questions which may affect  
22 individual Class members, including the following:

- 23 a) Whether, prior to the filing of this Complaint, Defendant or its agents  
24 initiated any telephonic communications to the Class (other than a  
25 message made with the prior express consent of the called party) to a  
26 Class member using any SMS texting system to any telephone number  
27 assigned to a cellular phone service;

- 1           b) Whether Defendant can meet its burden of showing it obtained prior
- 2           express consent (i.e., consent that is clearly and unmistakably stated);
- 3           c) Whether Defendant’s conduct was knowing and/or willful;
- 4           d) Whether Plaintiff revoked consent;
- 5           e) Whether Defendant has a method of revoking consent;
- 6           f) Whether Plaintiff and the Class members were damaged thereby, and
- 7           the extent of damages for such violation; and
- 8           g) Whether Defendants and its agents should be enjoined from engaging
- 9           in such conduct in the future.

10       30. As a person that received at least one telephonic communication from  
11       Defendant’s telephone facsimile machine without Plaintiff’s prior express  
12       consent, Plaintiff is asserting claims that are typical of the Class. Plaintiff  
13       will fairly and adequately represent and protect the interests of the Class in  
14       that Plaintiff has no interests antagonistic to any member of the Class.

15       31. Plaintiff and the members of the Class have all suffered irreparable harm as  
16       a result of the Defendants’ unlawful and wrongful conduct. Absent a class  
17       action, the Class will continue to face the potential for irreparable harm. In  
18       addition, these violations of law will be allowed to proceed without remedy  
19       and Defendants will likely continue such illegal conduct. Because of the  
20       size of the individual Class member’s claims, few, if any, Class members  
21       could afford to seek legal redress for the wrongs complained of herein.

22       32. Plaintiff has retained counsel experienced in handling class action claims  
23       and claims involving violations of the Telephone Consumer Protection Act.

24       33. A class action is a superior method for the fair and efficient adjudication of  
25       this controversy. Class-wide damages are essential to induce Defendants to  
26       comply with federal and California law. The interest of Class members in  
27       individually controlling the prosecution of separate claims against  
28       Defendants is small because the maximum statutory damages in an

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1 individual action for violation of privacy are minimal. Management of these  
2 claims is likely to present significantly fewer difficulties than those  
3 presented in many class claims.

4 34. Defendant has acted on grounds generally applicable to the Class, thereby  
5 making appropriate final injunctive relief and corresponding declaratory  
6 relief with respect to the Class as a whole.

7 **FIRST CAUSE OF ACTION**

8 **NEGLIGENT VIOLATIONS OF THE TELEPHONE CONSUMER PROTECTION ACT**

9 **47 U.S.C. § 227 ET SEQ.**

10 35. Plaintiff incorporates by reference all of the above paragraphs of this  
11 Complaint as though fully stated herein.

12 36. The foregoing acts and omissions of Defendant constitutes numerous and  
13 multiple negligent violations of the TCPA, including but not limited to each  
14 and every one of the above-cited provisions of 47 U.S.C. § 227 et seq.

15 37. As a result of Defendant's negligent violations of 47 U.S.C. § 227 et seq,  
16 Plaintiff and The Class are entitled to an award of \$500.00 in statutory  
17 damages, for each and every violation, pursuant to 47 U.S.C. § 227(b)(3)(B).

18 38. Plaintiff and the Class are also entitled to and seek injunctive relief  
19 prohibiting such conduct in the future.

20 **SECOND CAUSE OF ACTION**

21 **KNOWING AND/OR WILLFUL VIOLATIONS OF THE**

22 **TELEPHONE CONSUMER PROTECTION ACT**

23 **47 U.S.C. § 227 ET SEQ.**

24 39. Plaintiff incorporates by reference all of the above paragraphs of this  
25 Complaint as though fully stated herein.  
26  
27  
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1 40. The foregoing acts and omissions of Defendant constitutes numerous and  
2 multiple knowing and/or willful violations of the TCPA, including but not  
3 limited to each and every one of the above-cited provisions of 47 U.S.C. §  
4 227 et seq.

5 41. As a result of Defendant’s knowing and/or willful violations of 47 U.S.C. §  
6 227 et seq, Plaintiff and The Class are entitled to an award of \$1,500.00 in  
7 statutory damages, for each and every violation, pursuant to 47 U.S.C. §  
8 227(b)(3)(B) and 47 U.S.C. § 227(b)(3)(C).

9 42. Plaintiff and the Class are also entitled to and seek injunctive relief  
10 prohibiting such conduct in the future.

11 **PRAYER FOR RELIEF**

12 **WHEREFORE**, Plaintiff and The Class Members pray for judgment as follows:

- 13 • Certifying the Class as requested herein;
- 14 • Providing such further relief as may be just and proper.

15 In addition, Plaintiff and The Class Members pray for further judgment as  
16 follows:

17 **FIRST CAUSE OF ACTION FOR NEGLIGENT VIOLATION OF**  
18 **THE TCPA, 47 U.S.C. § 227 ET SEQ.**

- 19 • As a result of Defendant’s negligent violations of 47 U.S.C. § 227(b)(1),  
20 Plaintiff seeks for himself and each Class member \$500.00 in statutory  
21 damages, for each and every violation, pursuant to 47 U.S.C. §  
22 227(b)(3)(B).
- 23 • Pursuant to 47 U.S.C. § 227(b)(3)(A), injunctive relief prohibiting such  
24 conduct in the future.
- 25 • Any other relief the Court may deem just and proper.

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**SECOND CAUSE OF ACTION FOR KNOWING/WILLFUL VIOLATION OF  
THE TCPA, 47 U.S.C. § 227 ET SEQ.**

- As a result of Defendant’s knowing and/or willful violations of 47 U.S.C. § 227(b)(1), Plaintiff seeks for himself and each Class member \$1,500.00 in statutory damages, for each and every violation, pursuant to 47 U.S.C. § 227(b)(3)(B).
- Pursuant to 47 U.S.C. § 227(b)(3)(A), injunctive relief prohibiting such conduct in the future.
- Any other relief the Court may deem just and proper.

**TRIAL BY JURY**

43. Pursuant to the seventh amendment to the Constitution of the United States of America, Plaintiff is entitled to, and demands, a trial by jury.

Dated: March 19, 2017

Respectfully submitted,

**KAZEROUNI LAW GROUP, APC**

By:         /s Matthew M. Loker          
MATTHEW M. LOKER, ESQ.  
ATTORNEY FOR PLAINTIFF

CIVIL COVER SHEET

The JS-CAND 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 in its original form by the Judicial Conference of the United States in September 1974, is required for the Clerk of Court to initiate the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS
GREGORY ANGELL, et al.,
(b) County of Residence of First Listed Plaintiff Alameda
(c) Attorneys (Firm Name, Address, and Telephone Number)
KAZEROUNI LAW GROUP, APC
245 Fischer Ave., D1, Costa Mesa, California 92626
Telephone: (800) 400-6808; Facsimile: (800) 520-5523

DEFENDANTS
DOORDASH, INC.,
County of Residence of First Listed Defendant
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
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)
PTF DEF
Citizen of This State
Citizen of Another State
Citizen or Subject of a Foreign Country
Incorporated or Principal Place of Business In This State
Incorporated and Principal Place of Business In Another State
Foreign Nation

IV. NATURE OF SUIT (Place an "X" in One Box Only)
CONTRACT: 110 Insurance, 120 Marine, 130 Miller Act, 140 Negotiable Instrument, 150 Recovery of Overpayment Of Veteran's Benefits, 151 Medicare Act, 152 Recovery of Defaulted Student Loans, 153 Recovery of Overpayment of Veteran's Benefits, 160 Stockholders' Suits, 190 Other Contract, 195 Contract Product Liability, 196 Franchise
REAL PROPERTY: 210 Land Condemnation, 220 Foreclosure, 230 Rent Lease & Ejectment, 240 Torts to Land, 245 Tort Product Liability, 290 All Other Real Property
PERSONAL INJURY: 310 Airplane, 315 Airplane Product Liability, 320 Assault, Libel & Slander, 330 Federal Employers' Liability, 340 Marine, 345 Marine Product Liability, 350 Motor Vehicle, 355 Motor Vehicle Product Liability, 360 Other Personal Injury, 362 Personal Injury - Medical Malpractice
PERSONAL INJURY: 365 Personal Injury - Product Liability, 367 Health Care/Pharmaceutical Personal Injury Product Liability, 368 Asbestos Personal Injury Product Liability, 370 Other Fraud, 371 Truth in Lending, 380 Other Personal Property Damage, 385 Property Damage Product Liability
PRISONER PETITIONS: Habeas Corpus: 463 Alien Detainee, 510 Motions to Vacate Sentence, 530 General, 535 Death Penalty; Other: 540 Mandamus & Other, 550 Civil Rights, 555 Prison Condition, 560 Civil Detainee-Conditions of Confinement
FORFEITURE/PENALTY: 625 Drug Related Seizure of Property 21 USC § 881, 690 Other
LABOR: 710 Fair Labor Standards Act, 720 Labor/Management Relations, 740 Railway Labor Act, 751 Family and Medical Leave Act, 790 Other Labor Litigation, 791 Employee Retirement Income Security Act
IMMIGRATION: 462 Naturalization Application, 465 Other Immigration Actions
BANKRUPTCY: 422 Appeal 28 USC § 158, 423 Withdrawal 28 USC § 157
PROPERTY RIGHTS: 820 Copyrights, 830 Patent, 840 Trademark
SOCIAL SECURITY: 861 HIA (1395ff), 862 Black Lung (923), 863 DIWC/DIWW (405(g)), 864 SSID Title XVI, 865 RSI (405(g))
FEDERAL TAX SUITS: 870 Taxes (U.S. Plaintiff or Defendant), 871 IRS-Third Party 26 USC § 7609
OTHER STATUTES: 375 False Claims Act, 376 Qui Tam (31 USC § 3729(a)), 400 State Reapportionment, 410 Antitrust, 430 Banks and Banking, 450 Commerce, 460 Deportation, 470 Racketeer Influenced and Corrupt Organizations, 480 Consumer Credit, 490 Cable/Sat TV, 850 Securities/Commodities/Exchange, 890 Other Statutory Actions, 891 Agricultural Acts, 893 Environmental Matters, 895 Freedom of Information Act, 896 Arbitration, 899 Administrative Procedure Act/Review or Appeal of Agency Decision, 950 Constitutionality of State Statutes

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):
47 U.S.C. § 227
Brief description of cause:
Violations of the Telephone Consumer Protection Act

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

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

IX. DIVISIONAL ASSIGNMENT (Civil Local Rule 3-2)
(Place an "X" in One Box Only)
SAN FRANCISCO/OAKLAND
SAN JOSE
EUREKA-MCKINLEYVILLE

DATE: March 19, 2017
SIGNATURE OF ATTORNEY OF RECORD: /s/ Matthew M. Loker

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

**Authority For Civil Cover Sheet.** The JS-CAND 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 in its original form by the Judicial Conference of the United States in September 1974, is required for the Clerk of Court to initiate 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 Federal Rule of Civil Procedure 8(a), 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.
- (1) United States plaintiff. Jurisdiction based on 28 USC §§ 1345 and 1348. Suits by agencies and officers of the United States are included here.
  - (2) United States defendant. When the plaintiff is suing the United States, its officers or agencies, place an “X” in this box.
  - (3) Federal question. This refers to suits under 28 USC § 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.
  - (4) Diversity of citizenship. This refers to suits under 28 USC § 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-CAND 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 the nature of suit cannot be determined, be sure the cause of action, in Section VI below, is sufficient to enable the deputy clerk or the statistical clerk(s) in the Administrative Office to determine the nature of suit. If the cause fits more than one nature of suit, select the most definitive.
- V. Origin.** Place an “X” in one of the six boxes.
- (1) Original Proceedings. Cases originating in the United States district courts.
  - (2) Removed from State Court. Proceedings initiated in state courts may be removed to the district courts under Title 28 USC § 1441. When the petition for removal is granted, check this box.
  - (3) Remanded from Appellate Court. Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
  - (4) Reinstated or Reopened. Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
  - (5) Transferred from Another District. For cases transferred under Title 28 USC § 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
  - (6) Multidistrict Litigation Transfer. Check this box when a multidistrict case is transferred into the district under authority of Title 28 USC § 1407. When this box is checked, do not check (5) above.
  - (8) Multidistrict Litigation Direct File. Check this box when a multidistrict litigation case is filed in the same district as the Master MDL docket. Please note that there is no 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 Federal Rule of Civil Procedure 23. 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-CAND 44 is used to identify related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.
- IX. Divisional Assignment.** If the Nature of Suit is under Property Rights or Prisoner Petitions or the matter is a Securities Class Action, leave this section blank. For all other cases, identify the divisional venue according to Civil Local Rule 3-2: “the county in which a substantial part of the events or omissions which give rise to the claim occurred or in which a substantial part of the property that is the subject of the action is situated.”
- Date and Attorney Signature.** Date and sign the civil cover sheet.

# ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Class Action Claims Job Application Sparked Unwanted DoorDash Texts](#)

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