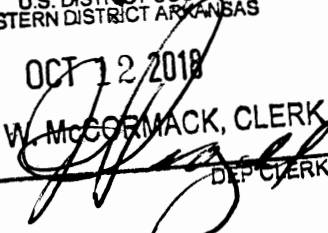


IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF ARKANSAS  
WESTERN DIVISION

**FILED**  
U.S. DISTRICT COURT  
EASTERN DISTRICT ARKANSAS

OCT 12 2018

JAMES W. MCCORMACK, CLERK  
By:  DEP. CLERK

**PLAINTIFF**

**BYRON BUTLER, Individually  
and on Behalf of All Others  
Similarly Situated**

vs.



No. 4:18-cv-460-KGB

**KANIS ESTATES, LLC, and  
LEONARD FALCONE**

**DEFENDANTS**

**ORIGINAL COMPLAINT—CLASS AND COLLECTIVE ACTION**

COMES NOW Plaintiff Byron Butler (“Plaintiff”), individually and on behalf of all others similarly situated, by and through his attorneys Chris Burks and Josh Sanford of the Sanford Law Firm, PLLC, and for his Original Complaint—Class and Collective Action against Defendants Kanis Estates, LLC, and Leonard Falcone (collectively “Defendants”), he does hereby state and allege as follows:

This case assigned to District Judge   
and to Magistrate Judge 

**I.**  
**INTRODUCTION**

1. This is a class and collective action for unpaid overtime wages owed to Plaintiff and all other hourly-paid employees of Defendants. Defendants owned and operated a Dunkin’ Donuts franchise location in Pulaski County, located at 10721 Kanis Road, Little Rock, Arkansas 72211.

2. Plaintiff, individually and on behalf of all other hourly-paid employees, brings this action under the Fair Labor Standards Act, 29 U.S.C. § 201 *et seq.* (the “FLSA”), and the Arkansas Minimum Wage Act, Ark. Code Ann. § 11-4-201 *et seq.* (the “AMWA”), for

declaratory judgment, monetary damages, liquidated damages, prejudgment interest, and costs, including a reasonable attorney's fee, within the applicable statutory limitations period, as a result of Defendants' failure to pay Plaintiff and all others similarly situated lawful overtime wages as required by the FLSA and AMWA.

3. Upon information and belief, for at least three (3) years prior to the filing of this Complaint, Defendants have willfully and intentionally committed violations of the FLSA and the AMWA as described, *infra*.

## **II.** **JURISDICTION AND VENUE**

4. The United States District Court for the Eastern District of Arkansas has subject matter jurisdiction over this suit under the provisions of 28 U.S.C. § 1331 because this suit raises federal questions under the FLSA.

5. This Complaint also alleges AMWA violations, which arise out of the same set of operative facts as the federal cause of action herein alleged; accordingly, this state cause of action would be expected to be tried with the federal claim in a single judicial proceeding. This Court has supplemental jurisdiction over Plaintiff's AMWA claims pursuant to 28 U.S.C. § 1367(a).

6. The acts complained of herein were committed and had their principal effect against Plaintiff within the Western Division of the Eastern District of Arkansas. Therefore, venue is proper within this District pursuant to 28 U.S.C. § 1391.

## **III.** **THE PARTIES**

7. Plaintiff repeats and re-alleges all the preceding paragraphs of this Complaint as if fully set forth in this section.

8. Plaintiff is a citizen and resident of Faulkner County.

9. Plaintiff worked for Defendants during the three (3) years preceding the filing of this Complaint.

10. At all times material hereto, Plaintiff and all others similarly situated have been entitled to the rights, protection and benefits provided under the FLSA and AMWA.

11. Defendant Kanis Estates, LLC (“Kanis Estates”), is a domestic limited liability company that owned and operated a franchise location in Little Rock under the “Dunkin’ Donuts” trademarks.

12. Defendant Kanis Estates’ registered agent for service of process is Len Falcone, and the agent’s address is 111 South McKinley Street, Suite 4402, Little Rock, Arkansas 72205.

13. Upon reasonable information and belief, Defendant Leonard Falcone (“Falcone”) is an individual and resident of Pulaski County.

14. Defendant Falcone is the owner, member, and officer of Kanis Estates.

15. Defendants, together d/b/a Dunkin’ Donuts, acted jointly as the employer of Plaintiff and the proposed collective and class members and are and have been engaged in interstate commerce as that term is defined under the FLSA and AMWA.

16. Defendant Falcone, individually in his role as an operating employer of Kanis Estates, had the power to hire and fire Plaintiff, supervise Plaintiff’s work and determine Plaintiff’s work schedule, duties and tasks, and made decisions regarding Plaintiff’s pay, or lack thereof.

17. Defendant Kanis Estates was at all times relevant hereto operated as a single joint enterprise by Defendant Falcone, in that the entity established as Kanis

Estates was operated as an alter ego of Falcone, with profits and losses being comingled and with centralized policies, particularly regarding pay, being applied to all employees.

18. Together, Defendant Falcone and the entity he jointly operated, Kanis Estates, established the pay policy that affected Plaintiff, determined the hours worked by Plaintiff, and the manner in which Plaintiff performed his job duties.

19. Defendants have unified operational control and management, as well as control over employees, including shared power to supervise, hire and fire, establish wages and wage policies, and set schedules for their employees through unified management.

20. As a result of this unified operation, control and management, through shared employees and ownership with the authority to establish wages and wage policy, Defendants operated as a single enterprise.

21. Defendants were at all times relevant to this lawsuit Plaintiff's employer within the meaning of the FLSA, 29 U.S.C. § 203(d), and the Arkansas Minimum Wage Act, A.C.A. § 11-4-203.

#### **IV. FACTUAL ALLEGATIONS**

22. Plaintiff repeats and re-alleges all the preceding paragraphs of this Complaint as if fully set forth in this section.

23. Plaintiff was an hourly-paid employee for Defendants at Dunkin' Donuts during and within the three (3) years preceding the filing of this Complaint.

24. Defendants directly hired Plaintiff and other hourly-paid employees, controlled their work schedules, duties, protocols, applications, assignments and employment conditions, and kept at least some records regarding their employment.

25. Plaintiff's and other hourly-paid employees' job duties included operating kitchen equipment, operating cash tills and credit card processing equipment, serving food items to customers, and cleaning the restaurant location.

26. Plaintiff and other hourly-paid employees regularly used and handled goods made in and intended for use in interstate commerce to engage in their job duties as the restaurant service industry, due to the services rendered, is inherently a cornerstone of interstate commerce as it facilitates interstate travelers.

27. Plaintiff and other hourly-paid employees regularly worked in excess of forty (40) hours each week.

28. It was Defendants' commonly applied policy to not pay Plaintiff and other hourly-paid employees a lawful overtime premium for all hours worked over forty (40) in a given week. In fact, Plaintiff and other hourly-paid employees were not paid for any wages for time worked in excess of forty (40) hours per week.

29. When Plaintiff and other hourly-paid employees would work more than forty (40) hours in a week, Defendants would modify their payroll records to remove hours or even days from employees' time entries.

30. Defendants did not pay Plaintiff and other hourly-paid employees a lawful overtime premium of one and one half (1.5) times their regular rate for all time worked in excess of forty (40) hours in one or more weeks during the period of time relevant to this lawsuit.

31. Defendants Kanis Estates and Falcone were each an "employer" within the meaning of the FLSA and the AMWA, and were, at all times relevant to the allegations in this Complaint, Plaintiff's employer under the FLSA and the AMWA.

32. Plaintiff was Defendants' employee within the meaning of the FLSA and the AMWA at all times relevant to the allegations in this Complaint.

33. At all relevant times, Defendants knew or should have known of the requirements of the FLSA and the AMWA to pay Plaintiff and other hourly-paid employees one and one-half (1.5) times their regular rate for all hours worked over forty (40) per week.

**V.**  
**REPRESENTATIVE ACTION ALLEGATIONS**

**A. FLSA § 216(b) Collective**

34. Plaintiff repeats and re-alleges all previous paragraphs of this Complaint as though fully set forth herein.

35. Plaintiff brings his claims for relief for violation of the FLSA as a collective action pursuant to Section 16(b) of the FLSA, 29 U.S.C. § 216(b).

36. Plaintiff brings his FLSA claims on behalf of all hourly-paid employees of Defendants at any time within the applicable statute of limitations period, who are entitled to payment of the following types of damages:

A. A lawful overtime premium for all time worked for Defendants in excess of forty (40) hours in each workweek;

B. Liquidated damages; and,

C. Attorneys' fees and costs.

37. In conformity with the requirements of FLSA Section 16(b), Plaintiff has attached hereto as Exhibit "A" his written Consent to Join this lawsuit.

38. The relevant time period dates back three years from the date on which Plaintiff's Original Complaint—Class and Collective Action was filed herein and continues

forward through the date of judgment pursuant to 29 U.S.C. § 255(a).

39. The members of the proposed FLSA Collective are similarly situated in that they share these traits:

A. They were subject to Defendants' common policy of not paying a lawful overtime rate for time worked in excess of forty (40) hours per week;

B. They performed the same or similar job duties; and,

C. They were paid hourly.

40. Plaintiff is unable to state the exact number of the potential members of the FLSA Collective but believes that the group exceeds forty (40) persons.

41. In the modern era, most working-class Americans have become increasingly reliant on electronic means of communication, such as email and, most particularly, text messages, and generally use them more often in their daily lives than traditional U.S. Mail.

42. Defendants can readily identify the members of the Section 16(b) Collective. The names, email addresses, cell phone numbers, and physical and mailing addresses of the FLSA collective action plaintiffs are available from Defendants, and a Court-approved Notice should be provided to the FLSA collective action plaintiffs via first class mail, email and text message to their last known physical and electronic mailing addresses and cell phone numbers as soon as possible, together with other documents and information descriptive of Plaintiff's FLSA claim.

43. At all relevant times, Defendants directly hired members of the collective to work in a restaurant, paid them wages, controlled their work schedules, duties, protocols, applications, assignments and employment conditions, and kept at least some records

regarding their employment.

44. At all relevant times, each member of the collective regularly engaged in interstate commerce or handled, sold, or otherwise worked with goods or materials that had been moved in or produced for interstate commerce.

**B. AMWA Rule 23 Class**

45. Plaintiff, individually and on behalf of all other hourly-paid employees of Defendants within the State of Arkansas, brings this claim for relief for violation of the AMWA as a class action pursuant to Rule 23 of the Federal Rules of Civil Procedure.

46. Plaintiff proposes to represent the class of hourly-paid employees who are/were employed by Defendants within the relevant time period within the State of Arkansas.

47. The class is so numerous that joinder of all members is impractical. While the exact number and identities of class members are unknown at this time, and can only be ascertained through appropriate discovery, Plaintiff believes that over forty (40) class members have worked for Defendants without appropriate pay, as described herein, throughout the applicable statutory period within the State of Arkansas.

48. This litigation is properly brought as a class action because of the existence of questions of fact and law common to the members of the proposed class which predominate over any questions affecting only individual members, including:

A. Whether Defendants satisfied their obligation to pay Plaintiff and others similarly situated a proper and lawful overtime rate for all hours worked in excess of forty (40) in each workweek.

49. The class members have no interest in individually controlling the



prosecution of separate actions because the policy of the AMWA provides a bright-line rule for protecting all non-exempt employees as a class. To wit: "It is declared to be the public policy of the State of Arkansas to establish minimum wages for workers in order to safeguard their health, efficiency, and general well-being and to protect them as well as their employers from the effects of serious and unfair competition resulting from wage levels detrimental to their health, efficiency, and well-being." Ark. Code Ann. § 11-4-202.

50. This litigation is properly brought as a class action because Plaintiff's claims are typical of the claims of the members of the proposed class, in that Plaintiff and others similarly situated were denied their wages as a result of Defendants' uniform policy of editing time records to reflect less time worked than in reality and for not paying a lawful overtime premium to Plaintiff and others similarly situated for all time worked in excess of forty (40) per workweek. These are the predominant issues that pertain to the claims of Plaintiff and of others similarly situated.

51. At the time of the filing of this Complaint, neither Plaintiff nor Plaintiff's counsel knows of any litigation already begun by any members of the proposed class concerning the allegations in this Complaint.

52. Concentrating the litigation in this forum is highly desirable because Defendants operated a facility in or are based in the Eastern District of Arkansas and because Plaintiff and all proposed class members work or worked in Arkansas.

53. No difficulties are likely to be encountered in the management of this class action.

54. The claims of Plaintiff are typical of the claims of the proposed class in that Plaintiff worked as an hourly-paid employee for Defendants and experienced the same violations of the AMWA that all other class members suffered.

55. Plaintiff and his counsel will fairly and adequately protect the interests of the class.

56. Plaintiff's counsel is competent to litigate Rule 23 class actions and other complex litigation matters, including wage and hour cases like this one, and to the extent, if any, that they find that they are not, they are able and willing to associate additional counsel.

57. Prosecution of separate actions by individual members of the proposed class would create the risk of inconsistent or varying adjudications with respect to individual members of the proposed class that would establish incompatible standards of conduct for Defendants.

58. Plaintiff and the members of the putative class have suffered, and will continue to suffer, irreparable damage from Defendants' illegal policy, practice, and custom regarding pay for tipped servers.

**VI.**  
**FIRST CLAIM FOR RELIEF**  
**(Collective Action Claim for Violation of the FLSA)**

59. Plaintiff repeats and re-alleges all previous paragraphs of this Complaint as though fully set forth herein.

60. This is a collective action filed on behalf of all hourly-paid employees of Defendants within the three (3) years preceding the filing of this Complaint to recover monetary damages owed by Defendants to Plaintiff and members of the putative

collective for unpaid overtime compensation for all the hours they worked in excess of forty (40) each week.

61. Plaintiff brings this action on behalf of himself and all other similarly situated employees, former and present, who were and/or are affected by Defendants' willful and intentional violations of the FLSA.

62. At all relevant times, Plaintiff and all similarly situated employees have been entitled to the rights, protection and benefits provided by the FLSA.

63. At all relevant times, Plaintiff and all similarly situated employees have been "employees" of Defendants, as defined by 29 U.S.C. § 203(e).

64. Defendant failed to pay Plaintiff and all similarly situated hourly-paid employees a proper overtime rate for all time worked in excess of forty (40) hours per week, despite their entitlement thereto.

65. Because these employees are similarly situated to Plaintiff, and are owed minimum wage and overtime compensation for the same reasons, the proposed collective is properly defined as follows:

**All hourly-paid employees within the past three years.**

66. Defendants' conduct and practice, as described above, has been and is willful, intentional, unreasonable, arbitrary and in bad faith.

67. By reason of the unlawful acts alleged herein, Defendants are liable to Plaintiff and all those similarly situated for, and Plaintiff and all those similarly situated seek, unpaid overtime wages, liquidated damages, pre-judgment interest, civil penalties and costs, including a reasonable attorney's fee, as provided by the FLSA.

68. Alternatively, should the Court find that Defendants acted in good faith in failing to pay Plaintiff and all those similarly situated as provided by the FLSA, Plaintiff and all those similarly situated are entitled to an award of prejudgment interest at the applicable legal rate.

**VII.**  
**SECOND CLAIM FOR RELIEF**  
**(Class Action Claim for Violations of AMWA)**

69. Plaintiff repeats and re-alleges all previous paragraphs of this Complaint as though fully set forth herein.

70. Plaintiff, individually and on behalf of the proposed class, asserts this claim for damages and declaratory relief pursuant to the AMWA, Ark. Code Ann. § 11-4-201 *et seq.*

71. At all relevant times, Plaintiff and all similarly situated employees have been entitled to the rights, protection, and benefits provided by the AMWA.

72. At all relevant times, Plaintiff and all similarly situated employees have been “employees” of Defendants, as defined by Ark. Code Ann. § 11-4-203(3).

73. At all relevant times, Defendants were an “employer” of Plaintiff and all other similarly situated employees, as defined by Ark. Code Ann. § 11-4-203(4).

74. Defendants failed to pay Plaintiff and other similarly situated employees a lawful overtime rate for all hours worked over forty (40) per week.

75. Plaintiff proposes to represent the AMWA liability class of individuals defined as follows:

**All hourly-paid employees in Arkansas within the past three years.**

76. Defendants’ conduct and practice, as described above, has been and is

willful, intentional, unreasonable, arbitrary and in bad faith.

77. By reason of the unlawful acts alleged herein, Defendants are liable to Plaintiff and the class members for monetary damages, liquidated damages and costs, including reasonable attorney's fees as provided by the AMWA for all violations that occurred beginning at least three (3) years preceding the filing of this Complaint, plus periods of equitable tolling.

78. Defendants have not acted in good faith nor with reasonable grounds to believe their actions and omissions were not a violation of the AMWA, and, as a result thereof, Plaintiff and the class members are entitled to recover an award of liquidated damages in an amount equal to the amount of unpaid overtime wages described above pursuant to Ark. Code Ann. § 11-4-218.

79. Alternatively, should the Court find that Defendants acted in good faith in failing to pay Plaintiff and the class members as provided by the AMWA, they are entitled to an award of prejudgment interest at the applicable legal rate.

**VIII.**  
**THIRD CLAIM FOR RELIEF**  
**(Individual Claim for Violation of the FLSA)**

80. Plaintiff repeats and re-alleges all previous paragraphs of this Complaint as though fully set forth herein.

81. At all relevant times, Plaintiff has been entitled to the rights, protection, and benefits provided by the FLSA.

82. At all relevant times, Plaintiff has been an "employee" of Defendants as defined by 29 U.S.C. § 203(e).

83. At all relevant time, Defendants were jointly Plaintiff's "employer" as defined

by 29 U.S.C. § 203(d).

84. 29 U.S.C. §§ 206 and 207 require any enterprise engaged in commerce to pay all employees one and one-half (1.5) times their regular wages for all hours worked over forty (40) hours in a week, unless an employee meets certain exemption requirements of 29 U.S.C. § 213 and all accompanying Department of Labor regulations.

85. Defendants failed to pay Plaintiff a proper and lawful overtime rate for all time worked in excess of forty (40) hours per week, despite his entitlement thereto.

86. Defendants' conduct and practices, as described above, were willful, intentional, unreasonable, arbitrary and in bad faith.

87. By reason of the unlawful acts alleged herein, Defendants are liable to Plaintiff for, and Plaintiff seeks, unpaid overtime wages, liquidated damages, prejudgment interest, civil penalties and costs, including a reasonable attorney's fee, as provided by the FLSA.

88. Alternatively, should the Court find that Defendants acted in good faith in failing to pay Plaintiff as provided by the FLSA, Plaintiff is entitled to an award of prejudgment interest at the applicable legal rate.

**IX.**  
**FOURTH CLAIM FOR RELIEF**  
**(Individual Claim for Violation of AMWA)**

89. Plaintiff repeats and re-alleges all previous paragraphs of this Complaint as though fully set forth herein.

90. At all relevant times, Plaintiff has been entitled to the rights, protection, and benefits provided by the AMWA.

91. At all relevant times, Plaintiff has been an "employee" of Defendants, as

defined by Ark. Code Ann. § 11-4-203(3).

92. At all relevant times, Defendants were an “employer” of Plaintiff as defined by Ark. Code Ann. § 11-4-203(4).

93. Defendants failed to pay Plaintiff the overtime wages required under the AMWA for all time worked in excess of forty (40) hours per week.

94. Defendants’ conduct and practice, as described above, has been and is willful, intentional, unreasonable, arbitrary and in bad faith.

95. By reason of the unlawful acts alleged herein, Defendants are liable to Plaintiff for monetary damages, liquidated damages and costs, including reasonable attorney’s fees provided by the AMWA for all violations which occurred beginning at least three (3) years preceding the filing of this Complaint, plus periods of equitable tolling.

96. Defendants have not acted in good faith nor with reasonable grounds to believe their actions and omissions were not a violation of the AMWA, and, as a result thereof, Plaintiff is entitled to recover an award of liquidated damages in an amount equal to the amount of unpaid overtime wages described above pursuant to Ark. Code Ann. § 11-4-218.

97. Alternatively, should the Court find that Defendants acted in good faith in failing to pay Plaintiff as provided by the AMWA, she is entitled to an award of prejudgment interest at the applicable legal rate.

**X.**  
**PRAYER FOR RELIEF**

WHEREFORE, premises considered, Plaintiff Byron Butler, individually and on behalf of all others similarly situated, respectfully requests this Court grant the following relief:

- a) That each Defendant be summoned to appear and answer herein;
- b) That Defendants be required to account to Plaintiff, the collective and class members, and the Court for all of the hours worked by Plaintiff and the collective and class members and all monies paid to them;
- c) A declaratory judgment that Defendants' practices alleged herein violate the Fair Labor Standards Act, 29 U.S.C. §201 *et seq.*, and attendant regulations at 29 C.F.R. § 516 *et seq.*;
- d) A declaratory judgment that Defendants' practices alleged herein violate the Arkansas Minimum Wage Act, Ark. Code Ann. § 11-4-201 *et seq.*, and the related regulations;
- e) Certification of, and proper notice to, together with an opportunity to participate in the litigation, all qualifying current and former employees;
- f) Judgment for damages for all unpaid overtime compensation under the Fair Labor Standards Act, 29 U.S.C. § 201 *et seq.*, and attendant regulations at 29 C.F.R. § 516 *et seq.*;
- g) Judgment for damages for all unpaid overtime compensation under the Arkansas Minimum Wage Act, Ark. Code Ann. § 11-4-20, *et seq.*, and attendant regulations;
- h) Judgment for liquidated damages pursuant to the Fair Labor Standards Act, 29 U.S.C. §201 *et seq.*, and attendant regulations at 29 C.F.R. §516 *et seq.*, in an amount equal to all unpaid overtime compensation from a period of three (3) years prior to this lawsuit through the date of trial owed to Plaintiff and members of the class and collective;
- i) Judgment for liquidated damages pursuant to the Arkansas Minimum Wage



Act, Ark. Code Ann. § 11-4-201 *et seq.*, and the relating regulations

- j) An order directing Defendants to pay Plaintiff and members of the collective and class pre-judgment interest, a reasonable attorney's fee and all costs connected with this action; and
- k) Such other and further relief as this Court may deem necessary, just and proper.

Respectfully submitted,


**BYRON BUTLER, Individually and on  
Behalf of All Others Similarly  
Situated, PLAINTIFF**

SANFORD LAW FIRM, PLLC  
One Financial Center  
650 South Shackleford, Suite 411  
Little Rock, Arkansas 72211  
Telephone: (501) 221-0088  
Facsimile: (888) 787-2040



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Chris Burks  
Ark Bar No. 2010207  
[chris@sanfordlawfirm.com](mailto:chris@sanfordlawfirm.com)



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Josh Sanford  
Ark. Bar No. 2001037  
[josh@sanfordlawfirm.com](mailto:josh@sanfordlawfirm.com)

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.)

4:18cv760-KGB

I. (a) PLAINTIFFS

BYRON BUTLER, Individually and on Behalf of All Others Similarly Situated

(b) County of Residence of First Listed Plaintiff Faulkner (EXCEPT IN U.S. PLAINTIFF CASES)

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

Josh Sanford; SANFORD LAW FIRM, PLLC; One Financial Center, 650 South Shackleford, Suite 411, Little Rock, Arkansas 72211; 501-221-0088; josh@sanfordlawfirm.com

DEFENDANTS

KANIS ESTATES, LLC, and LEONARD FALCONE

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, 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)

- Citizen of This State, Citizen of Another State, Citizen or Subject of a Foreign Country, PTF DEF, 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)

Click here for: Nature of Suit Code Descriptions.

Table with 5 columns: CONTRACT, REAL PROPERTY, TORTS, CIVIL RIGHTS, PRISONER PETITIONS, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES. Includes various legal categories like Insurance, Personal Injury, Real Estate, etc.

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. 201, et seq.

Brief description of cause: Unpaid Overtime Violations

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

10/12/2018

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: [Dunkin' Donuts Workers Paid No Wages for Overtime Hours, Lawsuit Claims](#)

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