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8 *Attorneys for Plaintiff and*
9 *the Putative Class*

10 **UNITED STATES DISTRICT COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**
12 **SAN FRANCISCO DIVISION**

13 ROBERT CHURCHILL, on behalf of
14 himself and all others similarly situated,

15 Plaintiff,

16 v.

17 GATHERAPP, INC., a Delaware
18 corporation,

19 Defendant.

Case No.

CLASS ACTION

COMPLAINT

JURY TRIAL DEMANDED

**1. Violations of the Telephone Consumer
Protection Act, § 227, et seq.**

1 **INTRODUCTION**

2 Plaintiff Robert Churchill (“Churchill” or “Plaintiff”), individually and on behalf of all
3 others similarly situated, by and through his undersigned counsel, hereby file this Class Action
4 Complaint, alleging against Defendant GatherApp, Inc. (“Defendant” or “GatherApp”) as follows:

5 **I. NATURE OF THE ACTION**

6 1. This case arises out of Defendant’s unlawful practice of sending Plaintiff Churchill
7 text (SMS) messages without his consent, in violation of the Telephone Consumer Protection Act
8 (“TCPA”), 47 U.S.C. § 227, *et seq.*

9 2. When a person downloads Defendant’s Gather mobile application from Apple’s
10 App Store or Google’s Play Store, Defendant automatically harvests the data in the downloader’s
11 contacts list without consent and then sends text messages without consent to each person in the
12 downloader’s contacts lists, inviting these contacts to download the Gather app.

13 3. Defendant’s conduct constitutes a knowing, willful, and intentional invasion of
14 privacy to Plaintiff and putative Class members.

15 **II. THE PARTIES**

16 4. Plaintiff Robert Churchill is, and at all relevant times was, a citizen and resident of
17 the County of Sacramento, State of California. He is, and at all times relevant was, a “person” as
18 defined by 47 U.S.C. § 153 (39).

19 5. Defendant GatherApp, Inc. is a California corporation with its principal place of
20 business located at 301 Bryant St #201, San Francisco, CA 94107. Defendant is the developer and
21 distributor of a mobile application (iOS and Android) called Gather.

22 **III. JURISDICTION AND VENUE**

23 6. **Jurisdiction.** This Court has personal jurisdiction over Defendant because (a) a
24 substantial portion of the wrongdoing alleged herein took place in this state, (b) Defendant is a
25 Delaware corporation registered with the California Secretary of State, is authorized to do business
26 here, has sufficient minimum contacts with this state, and/or otherwise intentionally avails itself of
27 the markets in this state through the promotion, marketing, and sale of products and services in
28 this state, to render the exercise of jurisdiction by this Court permissible under traditional notions

1 of fair play and substantial justice.

2 7. This Court has subject matter jurisdiction pursuant to 28 U.S.C. § 1331.

3 8. Venue is proper in this District under 28 U.S.C. § 1391(b). Defendant resides in
4 this district.

5 9. **Intradistrict Assignment.** Under L.R. 3-2(d), this case should be assigned to the
6 San Francisco Division or Oakland Division.

7 **IV. FACTUAL ALLEGATIONS**

8 **A. The TCPA**

9 10. The purpose of the TCPA is to protect consumers from unwanted calls and text
10 messages, such as those Defendant sent to Plaintiff.

11 11. Under the FCC's July 10, 2015 Order (the "2015 FCC Order") (Rules and
12 Regulations Implementing the Telephone Consumer Protection Act of 1991; American
13 Association of Healthcare Administrative Management, Petition for Expedited Declaratory Ruling
14 and Exemption; et al, Federal Communications Commission, 30 FCC Rcd. 7961 (July 10, 2015)),
15 companies wishing to place certain call or text messages must obtain prior express written
16 consent.

17 12. The 2015 FCC Order also clarified that telephone calls and text messages have the
18 same protections under FCC rules, and that text messages are "calls" for purposes of the TCPA.

19 13. When soliciting consent, the consumer consent to receive solicitations must be
20 unambiguous, meaning the consumer must receive a "clear and conspicuous disclosure:" (1) that
21 s/he will receive future calls or text messages that deliver auto-dialed and/or pre-recorded
22 telemarketing messages; and, (2) that consent is not a condition of purchase.

23 14. Marketers must disclose the following: "By participating, you consent to receive
24 text messages sent through an automatic telephone dialing system."

25 15. The elements of a cause of action under the TCPA are: (1) the defendant called a
26 cellular telephone; (2) using an automatic telephone dialing system; (3) without the recipient's
27 prior express consent and/or after the recipient had withdrawn consent.

28 16. A consumer may recover \$500 in statutory damages for each violation of the

1 TCPA, and \$1,500 for violations that proved to be willful.

2 17. The 2015 FCC Order also requires companies to keep consent records for four (4)
3 years.

4 **B. Defendant's data-mining and text messaging practices**

5 18. On information and belief, Defendant does the following:

6 19. When a smart phone user downloads the Gather mobile app, Defendant
7 automatically and, without user knowledge or consent, scans the contents of the user's contacts
8 list.

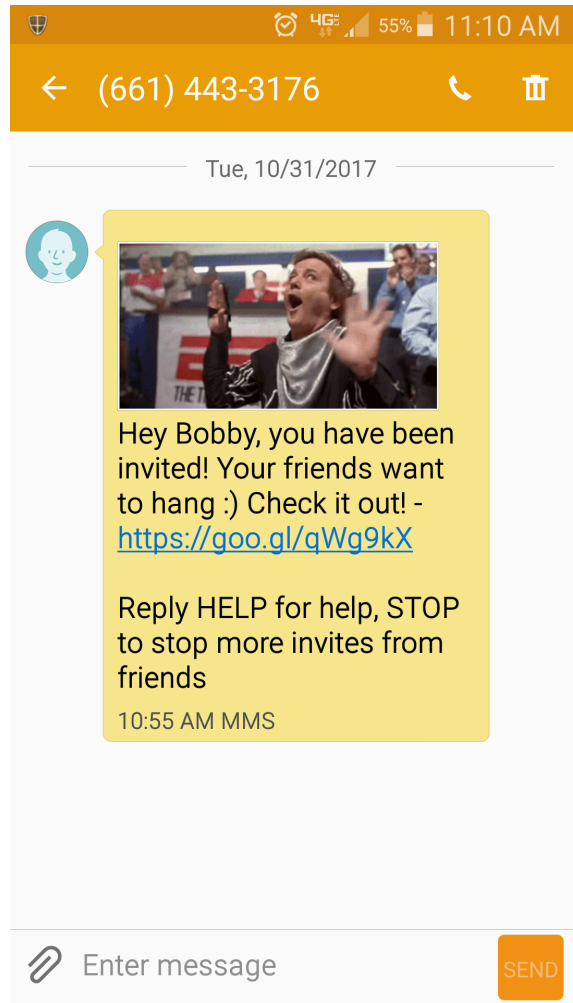
9 20. Defendant then automatically and, without user knowledge or consent, sends text
10 messages to all of the persons in the user's contact list, urging those contacts to download the
11 Gather mobile app.

12 21. Users have no ability to stop Defendant from mining the data on their phones or
13 sending text messages to their contacts.

14 **C. Plaintiff Churchill's Experience with Defendant**

15 22. On October 31, 2017, out of the blue, Plaintiff Churchill received a text message
16 from the phone number 661-443-3176 that stated in full: "Hey Bobby, you have been invited!
17 Your friends want to hang :) Check it out! – <https://goo.gl/qWg9kX> Reply HELP for help, STOP
18 to stop invites from more friends[.]” The message also included a gif:
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23. On information and belief, the phone number 661-443-3176 is controlled by Defendant.

24. The link included in the text message leads to gatherwith.us, which is a website controlled by Defendant.

25. Other than including Plaintiff Churchill's nickname, Bobby, which was likely scraped from someone's contacts list by a computer system, there is nothing personal about the content of the text message. Specifically, the text does not mention the name of the "friend" that apparently wants "to hang."

26. On information and belief, the text message Plaintiff Churchill received from Defendant is similar to or the same as thousands of messages placed to the putative Class Members.

1 27. On information and belief, Plaintiff and the putative Class Members' phone
2 numbers were entered into and stored in a dialing database.

3 28. On information and belief, Defendant utilized equipment with the capacity to call
4 random, sequential, and/or pre-programmed phone numbers in order to send text messages to
5 Plaintiff and putative Class Members.

6 29. On information and belief, Defendant sent thousands of similar text messages to
7 individuals whose numbers had also been uploaded into the database.

8 30. Plaintiff Churchill had no relationship with GatherApp and did not know why he
9 received a message purporting to be from GatherApp. Plaintiff had not provided his phone number
10 to GatherApp.

11 31. Defendant did not make the requisite disclosures to Plaintiff regarding use of an
12 ATDS and did not obtain Plaintiff's prior express written consent to receive text messages for any
13 purpose.

14 32. Despite not obtaining prior express written consent or making the requisite
15 disclosures, Defendant sent one (1) or more text messages ("calls" in FCC parlance) to Plaintiff
16 Churchill inviting Plaintiff to download Gather. On information and belief, Defendant used an
17 ATDS to send text messages without prior express written consent to Plaintiff Churchill.

18 33. The message Plaintiff Churchill received was not merely informational, but rather
19 also included advertising.

20 34. The message appears to be a form, impersonal, generic messages sent *en masse*.

21 35. Defendant intentionally sent this message to Plaintiff Churchill in order to advertise
22 the availability of its mobile app.

23 36. Plaintiff Churchill received this message in violation of the TCPA.

24 37. The text message invaded Plaintiff Churchill's privacy.

25 38. Defendant's conduct of sending text messages containing advertising to Plaintiff
26 Churchill and TCPA Class Members without consent and without providing the required
27 disclosures as described herein was intentional and willful.
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1 **V. CLASS DEFINITION AND CLASS ALLEGATIONS**

2 39. Plaintiff Churchill brings this action as a class action pursuant to Fed. R. Civ. P.
3 23(b)(2) & (b)(3) on behalf of himself, on behalf of all others similarly situated, and as a member
4 of the “TCPA Class,” defined as follows:

5 All persons in the United States of America to whom Defendant has placed any
6 pre-recorded voice calls or sent any automated commercial text message without
7 obtaining prior express written consent and/or for whom Defendant has no record
8 of providing the required disclosures between October 16, 2013 and the date of
9 class certification of this action.

10 40. Excluded from the Class are: (i) Defendant, its assigns, successors, and legal
11 representatives; (ii) any entities in which Defendant has controlling interests; (iii) federal, state,
12 and/or local governments, including, but not limited to, their departments, agencies, divisions,
13 bureaus, boards, sections, groups, counsels, and/or subdivisions; (iv) all persons presently in
14 bankruptcy proceedings or who obtained a bankruptcy discharge in the last three years; (v) any
15 judicial officer presiding over this matter and person within the third degree of consanguinity to
16 such judicial officer; (vi) all lawyers of record in this matter or any matters with which this matter
17 gets consolidated; (vii) all persons who received a pre-recorded phone call or an automated text
18 message from Defendant as a result of investigative work by any lawyer in this matter or any
19 matters with which this matter gets consolidated.

20 41. Plaintiff reserves the right to amend or otherwise alter the class definition presented
21 to the Court at the appropriate time, or to propose or eliminate sub-classes, in response to facts
22 learned through discovery, legal arguments advanced by Defendant, or otherwise.

23 42. **Numerosity**: Members of the Class are so numerous that joinder of all members is
24 impracticable. While the exact number of Class members is presently unknown, and can only be
25 ascertained through appropriate discovery, Plaintiff believes that Class members number in the
26 thousands of persons, if not more.

27 43. **Common Questions Predominate**: Common questions of law and fact exist as to
28 all members of the Class. These questions predominate over any questions affecting only
individual class members. Thus, proof of a common set of facts will establish the right of each
Class member to recover. Questions of law and fact common to each Class member include,

1 among others:

- 2 a. Whether Defendant has a policy of obtaining express written consent prior
- 3 to sending text messages to consumers;
- 4 b. If so, whether Defendant enforces such a policy;
- 5 c. Whether Defendant has a policy of providing the disclosures required by the
- 6 FCC concerning the use of ATDS to consumers prior to sending text messages to
- 7 consumers;
- 8 d. If so, whether Defendant enforces said policy;
- 9 e. Whether Defendant sends text messages to consumers;
- 10 f. Whether Defendant places phone calls to consumers;
- 11 g. Whether Defendant's conduct, as alleged herein, violates the TCPA;
- 12 h. Whether Defendant scans the content of users' contacts lists;

13 44. This action is properly maintainable as a class action for the reasons set forth
14 below.

15 45. **Typicality:** Plaintiff Churchill's claims are typical of the claims of the members of
16 the TCPA Class he seeks to represent because Plaintiff Churchill, like the TCPA Class members,
17 received text messages from Defendant without providing prior express consent or receiving the
18 required disclosures from Defendant. Defendant's practices were and are uniformly directed to all
19 consumers. Plaintiff Churchill and the TCPA Class sustained similar injuries arising out of
20 Defendant's conduct in violation of federal law. Plaintiff and the members of the TCPA Class he
21 represents sustained the same types of damages and losses. Plaintiff's claims arise from the same
22 practices and course of conduct that give rise to the claims of the Class members and are based on
23 the same legal theories.

24 46. **Adequacy:** Plaintiff is an adequate representative of the Class he seeks to represent
25 because his interests do not conflict with the interests of the Class members Plaintiff seeks to
26 represent. Plaintiff has retained highly competent counsel experienced in complex class action
27 litigation, and Plaintiff intends to prosecute this action vigorously. Plaintiff and Plaintiff's counsel
28 have the necessary financial resources to adequately and vigorously litigate this class action, and

1 the interests of members of the Class will be fairly and adequately protected by Plaintiff and his
2 counsel.

3 47. **Superiority and Substantial Benefit:** The class action is superior to other
4 available means for the fair and efficient adjudication of Plaintiff's and the Class members'
5 claims. The damages suffered by each individual Class member are limited and prescribed by law.
6 Damages of such magnitude are small given the burden and expense of individual prosecution of
7 the complex and extensive litigation necessitated by Defendant's conduct. Further, it would be
8 virtually impossible for the Class members to redress the wrongs done to them on an individual
9 basis. Even if members of the Class themselves could afford such individual litigation, the court
10 system could not. Individualized litigation increases the delay and expense to all parties and the
11 court system, due to the complex legal and factual issues of the case. By contrast, the class-action
12 device presents far fewer management difficulties, and provides the benefit of single adjudication,
13 economy of scale, and comprehensive supervision by a single court.

14 48. Certification of this class action is appropriate under Fed. R. Civ. P. 23(b)(2) &
15 (b)(3) because the questions of law or fact common to the respective members of the Class
16 predominate over questions of law or fact affecting only individual members. Certification is also
17 appropriate because Defendant has acted or refused to act on grounds generally applicable to the
18 Class, thereby making appropriate final injunctive or equitable relief with respect to the Class as a
19 whole.

20 49. Certification of Plaintiff's claims for class-wide treatment is also appropriate
21 because Plaintiff can prove the elements of his claims on a class-wide basis using the same
22 evidence as would be used to prove those elements in individual actions alleging the same claims.

23 50. Plaintiff and Plaintiff's counsel are unaware of any difficulties that are likely to be
24 encountered in the management of this action that would preclude its maintenance as a class
25 action.

VI. CAUSES OF ACTION

COUNT I

Telephone Consumer Protection Act, 47 U.S.C. §§ 227, et seq.

51. Plaintiff Churchill re-alleges and incorporates by reference the allegations contained in the preceding paragraphs of this complaint, as though fully set forth herein.

52. Defendant sent commercial text messages (“calls” in FCC parlance) to the mobile cellular telephones of Plaintiff Churchill and the TCPA Class.

53. On information and belief, Defendant used an ATDS to send commercial text messages to the mobile cellular telephones of Plaintiff Churchill and the TCPA Class.

54. Defendant did not obtain express written consent prior to sending commercial text messages to Plaintiff Churchill or the TCPA Class.

55. Defendant did not provide to Plaintiff Churchill or the TCPA Class the disclosures required by the FCC concerning the use of an ATDS.

56. Plaintiff Churchill and the TCPA Class are entitled to, and seek, awards of \$500.00 in statutory damages for each and every violation, pursuant to 47 U.S.C. § 227(b)(3)(B).

57. Plaintiff Churchill and the TCPA Class are entitled to, and seek, awards of \$1,500.00 in statutory damages for each and every violation because Plaintiff Churchill alleges Defendant’s conduct was and is willful, pursuant to 47 U.S.C. § 227(b)(3)(C).

58. Plaintiff Churchill and the TCPA Class are entitled to, and seek, injunctive relief prohibiting such conduct in the future.

59. Plaintiff Churchill and the TCPA Class are also entitled to recover reasonable attorneys’ fees and costs.

PRAYER FOR RELIEF

A. For an order certifying this case as a class action and appointing Plaintiff and his counsel to represent the Class;

B. For an order awarding, as appropriate, monetary damages to Plaintiff Churchill and the TCPA Class for Defendant’s knowing and willful violations of the TCPA;

C. For an order enjoining Defendant from engaging in the conduct alleged herein;

- 1 D. For an order awarding attorneys' fees and costs;
- 2 E. For an order awarding pre-and post-judgment interest; and
- 3 F. For such other and further relief as the Court deems just and proper.

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5 DATED: November 15, 2017

KAMBERLAW LLP

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By: s/ Michael Aschenbrener
Michael Aschenbrener
Attorney for Plaintiff and the Putative Class

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JURY DEMAND

Plaintiff, Individually and on behalf of All Others Similarly Situated, hereby demands that this matter be tried by jury.

DATED: November 15, 2017

KAMBERLAW LLP

By: s/ Michael Aschenbrener
Michael Aschenbrener
Attorneys for Plaintiff and the Putative Class

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

Robert Churchill

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

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

Michael Aschenbrener, KamberLaw LLP
401 Center St, Suite 111, Healdsburg, CA 95448 (212) 920-3072

DEFENDANTS
GatherApp, Inc.

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)

Orrick, Herrington & Sutcliffe LLP
777 South Figueroa St, Ste 3200, Los Angeles, CA 90017

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)

Table with columns for Plaintiff (PTF) and Defendant (DEF) citizenship: 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)

Large table with categories: CONTRACT, REAL PROPERTY, TORTS, CIVIL RIGHTS, PRISONER PETITIONS, HABEAS CORPUS, OTHER, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES.

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

- 1 Original Proceeding
2 Removed from State Court
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, Telephone Consumer Protection Act ("TCPA")

Brief description of cause:
Text messages sent in violation of TCPA

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, Fed. R. Civ. P. DEMAND \$ 9,999.00

CHECK YES only if demanded in complaint: JURY DEMAND: X Yes No

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

JUDGE Orrick (WHO) DOCKET NUMBER 3:17-cv-03132-WHO

IX. DIVISIONAL ASSIGNMENT (Civil Local Rule 3-2)

(Place an "X" in One Box Only) X SAN FRANCISCO/OAKLAND SAN JOSE EUREKA-MCKINLEYVILLE

DATE 11/15/2017

SIGNATURE OF ATTORNEY OF RECORD

s/ Michael Aschenbrener

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: [GatherApp Pegged with TCPA Lawsuit Over Automated Text Messages Allegedly Sent to Users' Contacts](#)
