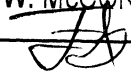


FILED
U.S. DISTRICT COURT
EASTERN DISTRICT ARKANSAS

JUN 06 2017

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

JAMES W. McCORMACK, CLERK
By:  DEP CLERK

**CRAIG COATES, Individually and
on Behalf of Others Similarly Situated**

PLAINTIFF

vs.

No. 4:17-cv- 372-JLH

This case assigned to District Judge Holmes
and to Magistrate Judge Kolpe

DASSAULT FALCON JET CORP.;
DASSAULT AIRCRAFT SERVICES CORP.

DEFENDANTS

ORIGINAL COMPLAINT—COLLECTIVE ACTION

COMES NOW Plaintiff Craig Coates (“Plaintiff”), individually and on behalf of all others similarly situated, by and through his attorneys Chris Burks and Josh Sanford of Sanford Law Firm, PLLC, and for his Original Complaint—Collective Action (“Complaint”), he does hereby state and allege as follows:

I. PRELIMINARY STATEMENTS

1. This is an action brought by Plaintiff, individually and on behalf of all others similarly situated, against Defendants Dassault Falcon Jet Corp., and Dassault Aircraft Services Corp. (collectively “Defendant”), for violations of the overtime provisions of 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”).

2. Plaintiff, individually and on behalf of all others similarly situated, seeks declaratory judgment; monetary damages; liquidated damages; prejudgment interest; costs; and a reasonable attorney’s fee, as a result of Defendant’s policy and practice of failing to pay Plaintiff and other similarly situated individuals proper overtime

compensation under the FLSA and under the AMWA within the applicable statutory limitations period.

II. JURISDICTION AND VENUE

3. 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.

4. 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 pendent jurisdiction over Plaintiff's AMWA claim pursuant to 28 U.S.C. § 1367(a).

5. A substantial part of the acts complained of herein were committed and had their principal effect against Plaintiff, individually and on behalf of all others similarly situated, 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

6. Plaintiff is an individual and resident of Saline County.

7. Defendant Dassault Falcon Jet Corp. is a foreign for-profit corporation registered to do business in the State of Arkansas.

8. Defendant Dassault Falcon Jet Corp.'s principal place of business is 200 Riser Road, Little Ferry, New Jersey 07643.

9. Defendant Dassault Falcon Jet Corp. maintains a website at: <http://www.dassaultfalcon.com>.

10. Defendant Dassault Falcon Jet Corp. manufactures airplanes and airplane components related to the air transportation business.

11. Defendant Dassault Falcon Jet Corp.'s services include installation, finishing, placement and assembly of airplane components at 3801 East 10th Street, Little Rock, Arkansas 72202.

12. The registered agent of Defendant Dassault Falcon Jet Corp is The United States Corporation Company at 300 South Spring St., Little Rock, Arkansas 72201.

13. Defendant Dassault Aircraft Services Corp. is a foreign for-profit corporation registered to do business in the State of Arkansas.

14. Defendant Dassault Aircraft Services Corp.'s services include inspection, maintenance and repair of airplane components at 3801 East 10th Street, Little Rock, Arkansas 72202.

15. Defendant Dassault Aircraft Services Corp. maintains a website at: <http://www.dassaultfalcon.com/en/CustomerService/worldwide-presence/Pages/Dassault-Aircraft-Services-LittleRock.aspx>

16. Defendant Dassault Aircraft Services Corp. "operates a 'one-stop-shop' for all inspection, maintenance, modification, completion and repair needs." at 3801 East 10th Street, Little Rock, Arkansas 72202.

17. Defendant Dassault Aircraft Services Corp's services include installation, replacement and assembly of airplane components.

18. The registered agent of Defendant Dassault Aircraft Services Corp is The United States Corporation Company at 300 South Spring Street, Little Rock, Arkansas 72201.

19. Defendant Dassault Falcon Jet Corp. and Defendant Dassault Aircraft Services Corp. are part of the same “Falcon operation” in one “Dassault facility” in Little Rock.¹

IV. FACTUAL ALLEGATIONS

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

21. To provide its services related to installation, replacement, repair or maintenance of airplane components, Defendant hires individuals including Plaintiff (referred to herein as “Team Leaders”).

22. The duties of a Team Leader employee for Defendant is to work with front-line employees (operators, painters, finishers, mechanics, cabinet makers and technicians) in service bays and install or replace aircraft components, most often interior cabinetry components, and repair and service the same component units.

23. Fifty or more individuals worked as Team Leader employees for Defendant within the three years preceding the filing of the Original Complaint.

24. At all relevant times, Plaintiff and all other Team Leader employees handled goods, including, but not limited to, hand tools, painting tools, finishing equipment, or cabinetry, that had been moved in interstate commerce.

25. For each of the three calendar years preceding the filing of the Original Complaint in this case, Defendant’s annual gross volume of sales made or business done

¹ “Dassault Falcon’s expansive facility in Little Rock, Arkansas, is the site of two strategic Falcon operations: the main Completion Center for all Falcon jets worldwide, and the company-owned Service Center, which is dedicated solely to Falcon customers.” <http://www.dassaultfalcon.com/en/CustomerService/worldwide-presence/Pages/Dassault-Aircraft-Services-LittleRock.aspx> June 6, 2017.

was not less than \$500,000.00 (exclusive of excise taxes at the retail level that are separately stated).

26. At all times relevant to this Complaint, Defendant employed more than four employees.

27. At all relevant times, Defendant was Plaintiff's employer and is and has been engaged in interstate commerce as that term is defined under the FLSA.

28. At all relevant times, Defendant was an employer to other Team Leader employees and is and has been engaged in interstate commerce as that term is defined under the FLSA.

29. At all relevant times, Defendant was Plaintiff's employer under the AMWA.

30. At all relevant times, Defendant was an employer to other Team Leader employees under the AMWA.

31. Defendant directly hired Plaintiff and other Team Leader employees, paid them wages and benefits, controlled their work schedules, duties, protocols, applications, assignments and employment conditions, and kept at least some records regarding their employment.

32. Plaintiff performed the duties of a Team Leader employee for Defendant from approximately 2004 to May of 2017.

33. Defendants paid Plaintiff an hourly rate in exchange for his services as a Team Leader employee.

34. Defendants paid all other Team Leader employees an hourly rate in exchange for their services as Team Leader employees.

35. As a Team Leader employee for Defendant, Plaintiff was required to clock-in and clock-out each day, and to use physical labor to work with sanders, buffers, sprayers and other mechanical machines and equipment.

36. Plaintiff regularly worked more than forty hours per week.

37. Other Team Leaders employees regularly worked more than forty hours per week.

38. Defendant did not pay Plaintiff an overtime premium of one and-one-half times his regular rate of pay for any hours that he worked over forty per week.

V. FLSA § 216(b) SIMILARLY SITUATED ALLEGATIONS

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

40. Defendant did not pay any other Team Leader employees an overtime premium of one and-one-half times his regular rate of pay for any hours for any hours that they worked over forty per week.

41. Defendant knew or should have known of their obligation to pay Plaintiff and other Team Leader employees one and one-half times their regular rate for all hours worked over forty per week.

42. Plaintiff and the other Team Leader employees are similarly situated in that they worked for Defendant, performed the same job duties, were paid a base hourly rate, were required to work more than forty hours per week, were not paid overtime at a rate of one and one-half times their regular rate, and regularly worked more than forty hours per week.

43. Plaintiff knows that other Team Leader employees exist and are similarly situated to Plaintiff because Plaintiff has worked for Defendant for over 13 years and worked on a range of jobs for Defendant touching all of Defendant's operations in the Little Rock facility.

44. Plaintiff regularly met with Supervisors and Managers of other operators, painters, finishers, mechanics, cabinet makers and technicians as a part of project management meetings.

45. Other Team Leaders were in these project management meetings.

46. Through these regular project management meetings, Plaintiff has learned that all other Team Leaders are paid the same as Plaintiff and have the same job duties relevant to this matter.

47. Other Team Leaders have expressed an interest in joining this matter to Plaintiff.

VI. LEGAL ALLEGATIONS

A. Individual Allegations under the FLSA

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

49. 29 U.S.C. § 207 requires employers to pay employees one and one-half times the employee's regular rate for all hours that the employee works in excess of forty (40) per week. 29 U.S.C.S. § 207 (LEXIS 2013).

50. Defendant violated the Fair Labor Standards Act by not paying Plaintiff and other similarly-situated employees one and one-half times the employee's regular rate when calculating their overtime pay.

51. Defendant's conduct and practice, as described above, has been and is willful, intentional, unreasonable, arbitrary and in bad faith.

52. By reason of the unlawful acts alleged herein, Defendant is liable to Plaintiff for, and Plaintiff seeks, unpaid overtime wages, liquidated damages, pre-judgment interest, civil penalties and costs, including reasonable attorney's fees as provided by the FLSA.

B. FLSA § 216(b) Representative Action Allegations

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

54. Plaintiff brings this collective action on behalf of all Team Leaders employed by Defendant to recover monetary damages owed by Defendant to Plaintiff and members of the putative Classes for all the overtime compensation for all the hours he and they worked in excess of forty (40) each week.

55. Plaintiff brings this action on behalf of himself individually *and* all other similarly situated employees, former and present, who were and/or are affected by Defendant's willful and intentional violation of the FLSA.

56. In the past three years, Defendant has employed over fifty Team Leaders.

57. Like Plaintiff, these Team Leaders regularly worked more than 40 hours in a week.

58. Defendant failed to pay these workers at the proper overtime rate. Because these employees are similarly situated to Plaintiff, and are owed overtime for the same reasons, the opt-in class is properly defined as:

**All Hourly Team Leaders, or Similar Positions, Employed
By Defendant Within The Past Three Years and Paid an Overtime Rate
for Hours Worked in Excess of Forty (40) Hours Per Week.**

C. Individual Allegations Under the AMWA

59. Plaintiff repeats and re-alleges all previous paragraphs of this Complaint as though fully incorporated in this section.

60. Plaintiff asserts this claim for damages and declaratory relief pursuant to the AMWA, Arkansas Code Annotated §§ 11-4-203(4).

61. At all relevant times, Defendant was Plaintiff's "employer" within the meaning of the AMWA, Ark. Code Ann. § 11-4-203(4).

62. Defendant failed to pay Plaintiff all overtime wages owed, as required under the AMWA.

63. Defendant's failure to pay Plaintiff overtime of and one-half his regular rate of pay resulted in a failure to pay Plaintiff full and complete overtime during weeks in which Plaintiff worked more than forty hours.

64. Defendant's conduct and practices, as described above, were willful, intentional, unreasonable, arbitrary and in bad faith.

65. By reason of the unlawful acts alleged herein, Defendant is liable to Plaintiff for monetary damages, liquidated damages, costs, and a reasonable attorney's fee provided by the AMWA for all violations which occurred beginning at least three (3) years preceding the filing of Plaintiff's initial complaint, plus periods of equitable tolling.

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

D. Class Allegations Under the AMWA

67. Plaintiff repeats and re-alleges all previous paragraphs of this Complaint as though fully incorporated in this section.

68. Plaintiff, individually and on behalf of all others similarly situated who were employed by Defendant 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.

69. Plaintiff proposes to represent a liability class of individuals defined as follows:

**All Hourly Team Leaders, or Similar Positions, Employed
By Defendant in Arkansas Within The Past Three Years and Paid an Overtime
Rate for Hours Worked in Excess of Forty (40) Hours Per Week.**

70. Upon information and belief, there are between 50 and 100 persons in the proposed class. Therefore, the proposed class is so numerous that joinder of all members is impracticable.

71. Common questions of law and fact relate to all of the proposed liability class members, such as these:

- i. Whether Defendant's policy of failing to properly pay overtime-rate wages to members of the proposed class who worked in excess of forty (40) hours per week was unlawful under the AMWA; and
- ii. Whether, as a result of Defendant's failure to lawfully calculate Plaintiff's overtime pay, Defendant paid members of the proposed class one and one-half times their regular wages for hours worked over forty (40) in each week in accordance with the AMWA.

72. The above common questions of law and fact predominate over any questions affecting only Plaintiff, and a class action is superior to other available methods for fairly and efficiently adjudicating the controversy.

73. 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. To that end, all non-exempted employees must be paid for time worked over forty (40) hours per week at a rate of one and one-half times their regular rate. Ark. Code Ann. § 11-4-211.

74. At the time of the filing of this Complaint, neither Plaintiff nor Plaintiff’s counsel know of any litigation already begun by any members of the proposed class concerning the allegations in this complaint.

75. No undue or extraordinary difficulties are likely to be encountered in the management of this class action.

76. The claims of Plaintiff are typical of the claims of the proposed liability class in that Plaintiff and all others in the proposed liability class will claim that they were not paid one and one-half times their regular rate of pay for hours worked in excess of forty per week.

77. Plaintiff and his counsel will fairly and adequately protect the interest of the class.

78. Plaintiff’s counsel are competent to litigate Rule 23 class actions and other complex litigation matters, including wage and hour cases like this one.

VII. EQUITABLE TOLLING

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

80. The applicable statute of limitations for Plaintiff's FLSA cause of action should be tolled because strict application of the statute of limitations would be inequitable.

81. Defendant, as an employer with a duty to comply with the FLSA and the means to do so, were and had at all relevant times been in a far superior position than Plaintiff to understand the FLSA and apply it appropriately, and Defendants should not be permitted to benefit from this imbalance of power by the passage of time.

82. Further, FLSA regulations require that all employers display posters advising employees of their minimum wage and overtime pay rights. 29 C.F.R. § 516.4.

83. An employer's failure to post required FLSA notices regarding minimum wage and overtime provisions can toll the statute of limitations. United States v. Sabhnani, 566 F. Supp. 2d 139 (E.D.N.Y. 2008); Henchy v. City of Absecon, 148 F. Supp. 2d 435, 439 (D.N.J. 2001); Kamens v. Summit Stainless, Inc., 586 F. Supp. 324, 328 (E.D. Penn. 1984).

84. Defendant failed to post all appropriate notices regarding the FLSA.

VIII. PRAYER FOR RELIEF

WHEREFORE, premises considered, Plaintiff Craig Coates, individually and on behalf of all others similarly situated, respectfully prays that Defendant be summoned to appear and to answer herein and for declaratory relief and damages as follows:

A. Certification of classes pursuant to the FLSA and the Arkansas Rules of Civil Procedure, with all attendant notices to class members, and proper procedures, all as set forth above and as to be explained more full by motion practice;

B. A declaratory judgment that Defendants' practices alleged herein violate the FLSA, the AMWA, and their relating regulations;

C. Judgment for damages for all unpaid overtime compensation under the FLSA, the AMWA, and their relating regulations;

D. Judgment for liquidated damages pursuant to the FLSA, the AMWA, and their relating regulations;

E. An order directing Defendant to pay Plaintiff and other similarly situated employees prejudgment interest, a reasonable attorney's fee and all costs connected with this action; and

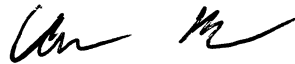
F. Such other and further relief as this Court may deem necessary, just and proper.

Respectfully submitted,

**CRAIG COATES, Individually
and on Behalf of All Others
Similarly Situated, PLAINTIFF**


SANFORD LAW FIRM, PLLC
ONE FINANCIAL CENTER
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By:



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and



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josh@sanfordlawfirm.com

JS 44 (Rev. 11/15)

CIVIL COVER SHEET 4:17-cv-372-JLH

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
 CRAIG COATES, Individually and On Behalf of Those Similarly Situated

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

(c) Attorneys (Firm Name, Address, and Telephone Number)
 Josh Sanford and Chris Burks, SANFORD LAW FIRM, PLLC, One Financial Center, 650 South Shackleford, Suite 411, Little Rock, Arkansas 72211; 501-221-0088; josh@sanfordlawfirm.com

DEFENDANTS
 DASSAULT FALCON JET CORP.; DASSAULT AIRCRAFT SERVICES CORP.

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)

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	PERSONAL INJURY <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	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157	<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
<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	CIVIL RIGHTS <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	LABOR <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	PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark	
	PRISONER PETITIONS Habeas Corpus: <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 Other: <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	SOCIAL SECURITY <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))	FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	
		IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions		

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

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
29 USC 201 et seq.

Brief description of cause:
FLSA Violation: Unpaid Overtime

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: 06/06/2017 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: [Dassault Falcon Jet Corp., One Other Clawed with Overtime Pay Lawsuit](#)
