

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

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT ARKANSAS

OCT 16 2018

JAMES W. MCCORMACK, CLERK
By: *[Signature]* DEP. CLERK
PLAINTIFF

**SHEQUITA DANIELS, Individually and
On Behalf of Others Similarly Situated**

vs.

No. 4:18-cv-*771-SWW*

**SNSA, INC., FARHANA ALI,
KNM HOLDINGS, LLC, KHALID KHAN,
and NASRULLAH MANJI**

DEFENDANTS

This case assigned to District Judge *[Signature]*
and to Magistrate Judge *[Signature]*

ORIGINAL COMPLAINT—CLASS AND COLLECTIVE ACTION

COMES NOW Plaintiff Shequita Daniels, individually and on behalf of all others similarly situated, by and through her attorneys Chris Burks and Josh Sanford of Sanford Law Firm, PLLC, and for her Original Complaint—Class and Collective Action against Defendant SNSA, Inc., Farhana Ali, KNM Holdings, LLC, KHALID KHAN and NASRUHLLAH MANJI (hereinafter collectively “Defendant”), does hereby state and allege as follows:

I. PRELIMINARY STATEMENTS

1. Plaintiff, individually and on behalf of all others similarly situated, brings this action under the Fair Labor Standards Act, 29 U.S.C. § 201, *et seq.* (“FLSA”), and the Arkansas Minimum Wage Act, Ark. Code Ann. § 11-4-201, *et seq.* (“AMWA”), for declaratory judgment, monetary damages, liquidated damages, prejudgment interest, civil penalties and costs, including reasonable attorneys’ fees as a result of Defendant’s failure to pay Plaintiff and all others

similarly situated overtime compensation for all hours that Plaintiff and all others similarly situated worked in excess of forty (40) per workweek.

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

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 supplemental jurisdiction over Plaintiff's AMWA claims pursuant to 28 U.S.C. § 1367(a).

5. 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

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

7. Plaintiff is a resident and citizen of Pulaski County.

8. From approximately January of 2017 until approximately June of 2017, Plaintiff was an hourly-paid employee at Defendant's restaurant in North Little Rock, Arkansas.

9. At all times material herein, Plaintiff and those similarly situated to Plaintiff have been entitled to the rights, protections and benefits provided under the FLSA and the AMWA.

10. Separate Defendant SNSA, Inc., is a Missouri, for-profit corporation, operating Church's Chicken franchised restaurants in the State of Arkansas.

11. Separate Defendant SNSA, Inc.'s registered agent for service of process is Farhana Ali, 8397, West Melrose Drive, Lenexa, Kansas 66214.

12. Separate Defendant Farhana Ali is a citizen and resident of the state of Kansas.

13. Separate Defendants SNSA, Inc., and Farhana Ali's annual gross volume of sales made or business done was not less than \$500,000.00 (exclusive of exercise taxes at the retail level that are separately stated) during each of the three calendar years preceding the filing of this complaint.

14. During each of the three years preceding the filing of this Complaint, Separate Defendant SNSA, Inc., and Farhana Ali employed at least two individuals who were engaged in interstate commerce or in the production of goods for interstate commerce, or had employees handling, selling, or otherwise working on goods or materials that had been moved in or produced for

commerce by any person, including goods or materials typically used in the fast food industry.

15. Separate Defendants SNSA, Inc., and Farhana Ali have more than four employees.

16. Separate Defendants SNSA, Inc., and Farhana Ali are an “employer” within the meanings set forth in the FLSA and AMWA, and were, at all times relevant to the allegations in this Complaint, Plaintiff’s employer, as well as the employer of the members of the class and collective.

17. Separate Defendant SNSA, Inc., and Farhana Ali 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.

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

19. Separate Defendant KMN Holdings, LLC, is a Texas limited liability company, operating Church’s Chicken franchised restaurants in the State of Arkansas.

20. Separate Defendant KMN Holdings, LLC’s registered agent for service of process is Nasrullah Manji, 3350 McCue Road, Suite 2401, Houston, Texas 77056.

21. Separate Defendant Nasrullah Manji is a citizen and resident of the State of Texas.

22. Separate Defendant Khalid Khan is a citizen and resident of the State of Texas.

23. Separate Defendant KMN Holdings, LLC, Nasrullah Manji and Khalid Khan's annual gross volume of sales made or business done was not less than \$500,000.00 (exclusive of exercise taxes at the retail level that are separately stated) during each of the three calendar years preceding the filing of this complaint.

24. During each of the three years preceding the filing of this Complaint, Separate Defendants KMN Holdings, LLC, Nasrullah Manji and Khalid Khan employed at least two individuals who were engaged in interstate commerce or in the production of goods for interstate commerce, or had employees handling, selling, or otherwise working on goods or materials that had been moved in or produced for commerce by any person, including goods or materials typically used in the fast food industry.

25. Separate Defendants KMN Holdings, LLC, Nasrullah Manji and Khalid Khan's have more than four employees.

26. Separate Defendants KMN Holdings, LLC, Nasrullah Manji and Khalid Khan's are an "employer" within the meanings set forth in the FLSA and AMWA, and were, at all times relevant to the allegations in this Complaint, Plaintiff's employer, as well as the employer of the members of the class and collective.

27. Separate Defendants KMN Holdings, LLC, Nasrullah Manji and Khalid Kan 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.

28. As a result of this unified operation, control and management, through shared employees and ownership with the authority to establish wages and wage policy, operated as a single enterprise. Separate Defendants KMN Holdings, LLC, Nasrullah Manji and Khalid Khan operated as a single enterprise.

IV. FACTUAL ALLEGATIONS

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

30. Defendant owns and operates a Church's Chicken restaurant in North Little Rock, Arkansas.

31. Plaintiff's claims involve Defendant's violation of the FLSA and AMWA failing to properly calculate and pay overtime wages for hours worked over forty per week.

32. Plaintiff began her employment with Defendant as a cashier and was later promoted to shift leader.

33. During the period relevant to this lawsuit, Defendant classified Plaintiff and those similarly situated as hourly employees non-exempt from the overtime requirements of the FLSA and the AMWA.

34. During the period relevant to this lawsuit, Defendant paid Plaintiff and those similarly situated an hourly rate.

35. Plaintiff and other hourly employees worked more than forty (40) hours per week on a regular basis within the three years prior to the filing of Plaintiff's Complaint.

36. For example, Plaintiff sometimes worked for Defendant fourteen hours per day for seven days each week, resulting in significant amounts of overtime.

37. Defendant does not pay Plaintiff and other hourly employees overtime wages at a rate of one and one-half times their regular rates of pay for hours worked over forty per week, but rather pays overtime wages in a lesser amount.

38. For example, Plaintiff earned an hourly rate of \$8.50 while working for Defendant, which should have resulted in an overtime wage rate of \$12.75 per hour, but instead Defendant paid Plaintiff \$9.50 per hour for each hour worked in excess of forty hours per week.

39. As a direct result of Defendant's policies, even though Plaintiff and other hourly-paid employees worked more than forty (40) hours in many weeks that they worked for Defendant during time period relevant to this Complaint, they were not properly compensated for all of their overtime hours worked.

40. Upon information and belief, prior to Defendant owning and operating the Church's Chicken restaurant (hereinafter the "restaurant") where

Plaintiff worked, the restaurant was owned and operated by another company, referred to herein as “Defendant’s predecessor.”

41. Upon information and belief, Plaintiff worked at the restaurant prior to the time it was transferred to Defendant and continued working at the restaurant after it was transferred to Defendant.

42. Upon information and belief, the restaurant was sold and transferred to Defendant during Plaintiff’s employment at the restaurant.

43. Upon information and belief, after the sale of the restaurant, the restaurant continued to have the same business model, employees, equipment, and facilities, and continued to provide the same services to the same clients as Defendant’s predecessor.

44. Upon information and belief, Defendant knew about Defendant’s predecessor’s practices of not paying employees, including Plaintiff, pursuant to the requirements of the FLSA and AMWA, yet despite this information, Defendant continued the same pay practices as Defendant’s predecessor.

45. Upon information and belief, Defendant is able to provide adequate relief to Plaintiff under the FLSA and AMWA and the overall equities support the imposition of successor liability on Defendant.

46. Defendant should be liable for the FLSA and AMWA violations of their predecessor because Defendant stood in the shoes of Defendant’s predecessor, wholly adopting and continuing the business model and practices of Defendant’s predecessor.

47. Plaintiff's job duties and pay as described herein were the same under Defendant as under Defendant's predecessor.

V. REPRESENTATIVE ACTION ALLEGATIONS

A. FLSA § 216(b) Class

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

49. Plaintiff brings her 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), on behalf of all persons who were, are or will be employed by Defendant as similarly situated employees at any time within the applicable statute of limitations period, who are entitled to payment of the following types of damages:

A. Overtime premiums for all hours worked for Defendant in excess of forty (40) hours in any week; and

B. Liquidated damages and attorney's fees.

50. Plaintiff proposes a collective class under the FLSA, which may be defined as follows: All persons who were, are, or will be employed by Defendant as hourly employees at Defendant's restaurant at any time within the applicable statute of limitations period.

51. In conformity with the requirements of FLSA Section 16(b), Plaintiff will file her written Consent to Join this lawsuit.

52. 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), except as set forth herein below.

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

A. They were classified by Defendant as non-exempt from the minimum wage and overtime requirements of the FLSA; and

B. They were subject to Defendant's common policy of failing to pay full overtime premiums as required by the FLSA.

54. Plaintiff is unable to state the exact number of potential members of the FLSA Class but believe that the class exceeds forty (40) persons.

55. Defendant can readily identify the members of the hourly Section 16(b) class, which encompasses all hourly employees of Defendant's restaurant within the three-year period preceding the filing of Plaintiff's Original Complaint.

56. The names and physical and mailing addresses of the FLSA collective action plaintiffs are available from Defendant, and a Court-approved Notice should be provided to the FLSA collective action plaintiffs via text message, email and first-class mail 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.

B. AMWA Rule 23 Classes

57. 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.

58. Plaintiff proposes to represent a class of persons, which may be defined as follows: All persons who were, are, or will be employed by Defendant as similarly situated hourly-paid employees at Defendant's restaurant within Arkansas at any time within the applicable statute of limitations period

59. Upon information and belief, Defendant has employed more than fifty (50) hourly employees within Arkansas within the last three (3) years. Therefore, the proposed AMWA Class is so numerous that joinder of all members is impracticable.

60. Common questions of law and fact relate to all of the proposed AMWA Class members, such as:

A. Whether Defendant had an unlawful policy of calculating overtime wages at a rate less than that required by the AMWA; and

B. Whether Defendant paid the members of the proposed class one and one-half times their regular wages for all hours worked over forty (40) in each week in accordance with the AMWA.

61. The above common questions of law and fact for the class predominate over any questions affecting only the individual named Plaintiff, and a class action is superior to other available methods for fairly and efficiently adjudicating the claims of the members of both AMWA Classes.

62. 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-exempt 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.

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

64. Concentrating the litigation in this forum is highly desirable because Defendant has a significant presence in the Eastern District of Arkansas and because Plaintiff and all proposed Rule 23 class members work or worked within Arkansas.

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

66. Plaintiff’s claim is typical of the claims of the proposed AMWA class in that Plaintiff worked as an hourly employee for Defendant and experienced the same violations of the AMWA that all other class members suffered.

67. Plaintiff and her counsel will fairly and adequately protect the interests of the classes.

68. 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.

69. Plaintiff has consented in writing to the association of additional counsel.

70. Prosecution of separate actions by individual members of the proposed classes 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 Defendant.

VI. FIRST CAUSE OF ACTION

(Individual Claim for Violation of the FLSA)

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

72. Plaintiff asserts this claim for damages and declaratory relief pursuant to the FLSA, 29 U.S.C. § 201, *et seq.*

73. At all relevant times, Defendant was Plaintiff's "employer" within the meaning of the FLSA, 29 U.S.C. § 203.

74. At all relevant times, Defendant has been, and continues to be, an enterprise engaged in commerce within the meaning of the FLSA, 29 U.S.C. § 203.

75. 29 U.S.C. §§ 206 and 207 require any enterprise engaged in commerce to pay all employees a minimum wage for all hours worked up to forty (40) in one week and to pay time and a half of 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.

76. During the period relevant to this lawsuit, Defendant classified Plaintiff as non-exempt from the overtime requirements of the FLSA.

77. Despite the entitlement of Plaintiff to minimum wage and overtime payments under the FLSA, Defendant failed to pay Plaintiff an overtime rate of one and one-half times her regular rate of pay for all hours worked over forty (40) in each one-week period.

78. Defendant's failure to properly pay overtime wages to Plaintiff stems from Defendant's act of failing to properly calculate overtime wages.

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

80. By reason of the unlawful acts alleged herein, Defendant is liable to Plaintiff for monetary damages, liquidated damages, and costs, including reasonable attorneys' fees, for all violations that occurred within the three (3) years prior to the filing of this Complaint.

VII. SECOND CAUSE OF ACTION

(Individual Claim for Violation of the AMWA)

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

82. Plaintiff asserts this claim for damages and declaratory relief pursuant to the AMWA, Arkansas Code Annotated §§ 11-4-201 *et seq.*

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

84. Arkansas Code Annotated §§ 11-4-210 and 211 require employers to pay all employees a minimum wage for all hours worked up to forty in one week and to pay one and one-half times regular wages for all hours worked over forty hours in a week, unless an employee meets the exemption requirements of 29 U.S.C. § 213 and accompanying Department of Labor regulations.

85. During the period relevant to this lawsuit, Defendant classified Plaintiff as non-exempt from the overtime requirements of the AMWA.

86. Despite the entitlement of Plaintiff to minimum wage and overtime payments under the AMWA, Defendant failed to pay Plaintiff an overtime rate of one and one-half times her regular rate of pay for all hours worked over forty (40) in each one-week period.

87. Defendant's failure to properly pay overtime wages to Plaintiff stems from Defendant's act failing to properly calculate overtime wages.

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

89. By reason of the unlawful acts alleged herein, Defendant is liable to Plaintiff for monetary damages, liquidated damages, and costs, including reasonable attorneys' fees, for all violations that occurred within the three (3) years prior to the filing of this Complaint pursuant to Arkansas Code Annotated § 11-4-218.

VIII. THIRD CAUSE OF ACTION

(Collective Action Claim for Violation of the FLSA)

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

91. Plaintiff, individually and on behalf of all others similarly situated, asserts this claim for damages and declaratory relief pursuant to the FLSA, 29 U.S.C. § 201, *et seq.*

92. At all relevant times, Defendant has been, and continues to be, an “employer” of Plaintiff and all those similarly situated within the meaning of the FLSA, 29 U.S.C. § 203.

93. During the period relevant to this lawsuit, Defendant classified Plaintiff and all similarly situated members of the FLSA class as non-exempt from the overtime requirements of the FLSA.

94. Despite the entitlement of Plaintiff and those similarly situated to minimum wage and overtime payments under the FLSA, Defendant failed to pay Plaintiff and all those similarly situated an overtime rate of one and one-half times their regular rates of pay for all hours worked over forty (40) in each one-week period.

95. Because these employees are similarly situated to Plaintiff, and are owed overtime for the same reasons, the proposed FLSA class may be properly defined as follows:

All hourly workers within the past three years.

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

97. By reason of the unlawful acts alleged herein, Defendant is liable to Plaintiff and all those similarly situated for monetary damages, liquidated damages, and costs, including reasonable attorneys' fees, for all violations that occurred within the three (3) years prior to the filing of this Complaint.

98. Alternatively, should the Court find that Defendant 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.

IX. FOURTH CAUSE OF ACTION

(Class Action Claim for Violation of the AMWA)

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

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

101. At all relevant times, Defendant has been, and continues to be, an "employer" of Plaintiff and the members of the proposed class within the meaning of the AMWA, Ark. Code Ann. § 11-4-203(4).

102. Arkansas Code Annotated §§ 11-4-210 and 211 require employers to pay all employees a minimum wage for all hours worked up to forty (40) in one week and to pay one and one-half times regular wages for all hours worked over

forty (40) hours in a week, unless an employee meets the exemption requirements of 29 U.S.C. § 213 and accompanying Department of Labor regulations.

103. During the period relevant to this lawsuit, Defendant classified Plaintiff and all similarly situated members of the AMWA class as non-exempt from the overtime requirements of the AMWA.

104. Despite the entitlement of Plaintiff and those similarly situated to minimum wage and overtime payments under the AMWA, Defendant failed to pay Plaintiff and all those similarly situated an overtime rate of one and one-half times their regular rates of pay for all hours worked over forty (40) in each one-week period.

105. Because these employees are similarly situated to Plaintiff, and are owed overtime for the same reasons, the proposed AMWA class may be properly defined as follows:

All hourly Arkansas workers within the past three years.

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

107. By reason of the unlawful acts alleged herein, Defendant is liable to Plaintiff and the proposed class for monetary damages, liquidated damages, costs, and a reasonable attorney's fee provided by the AMWA for all violations which occurred within the three (3) years prior to the filing of this Complaint, plus periods of equitable tolling.

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

X. PRAYER FOR RELIEF

WHEREFORE, premises considered, Plaintiff Shequita Daniels, individually and on behalf of all others similarly situated, respectfully prays as follows:

A. That Defendant be summoned to appear and answer this Complaint;

B. That Defendant be required to account to Plaintiff, the class members, and the Court for all of the hours worked by Plaintiff and the class members and all monies paid to them;

C. For orders regarding certification of and notice to the proposed collective action members;

D. A declaratory judgment that Defendant's 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.*;

E. A declaratory judgment that Defendant's practices alleged herein violate the Arkansas Minimum Wage Act, Ark. Code Ann. § 11-4-201, *et seq.* and the related regulations;

F. Judgment for damages for all unpaid overtime compensation owed to Plaintiff and the proposed class members 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. § 11-4-201, *et seq.* and the related 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 owed to Plaintiff and the proposed class members during the applicable statutory period;

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. For a reasonable attorneys' fee, costs, and pre-judgment interest;
and

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

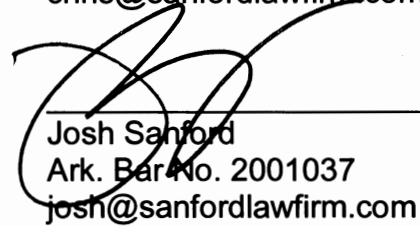
Respectfully submitted,

**SHEQUITA DANIELS,
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



Chris Burks
Ark. Bar No. 2010207
chris@sanfordlawfirm.com



Josh Sanford
Ark. Bar No. 2001037
josh@sanfordlawfirm.com

JS 44 (Rev. 06/17)

CIVIL COVER SHEET

4:18cv771-SWW

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
 SHEQUITA DANIELS, Individually and on Behalf of All Others Similarly Situated
(b) County of Residence of First Listed Plaintiff Pulaski
 (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
 SNSA, INC., FARHANA ALI, KMN Holdings, LLC, NASRULLAH MANJI and KHALID KHAN
 County of Residence of First Listed Defendant _____
 (IN U.S. PLAINTIFF CASES ONLY)
 NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.
 Attorneys (If Known)

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

1 U.S. Government Plaintiff
 3 Federal Question (U.S. Government Not a Party)
 2 U.S. Government Defendant
 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

	PTF	DEF		PTF	DEF
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6

IV. NATURE OF SUIT (Place an "X" in One Box Only) [Click here for: Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	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	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other 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 IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark 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	<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 Acts <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

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 USC 201
 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: 10/16/2018 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: [Ex-Employee of Church's Chicken Restaurant Files Unpaid Overtime Suit in Arkansas](#)
