

2. Plaintiff was formerly employed by Defendant in the position of Senior Technician/Trade Show Manager. During the course of his employment, Plaintiff regularly worked more than forty (40) hours per week, but was not properly compensated for his work.

3. Plaintiff was not paid an overtime premium calculated at 1.5 times his regular rate of pay for each hour worked in excess of forty (40) hours in a work week as required by the FLSA and PMWA.

4. Plaintiff brings this action as a representative action under the FLSA, PMWA, and WPCL for monetary damages, to seek redress for Defendant's willful, unlawful, and improper conduct.

JURISDICTION AND VENUE

5. Paragraphs 1 through 4 are hereby incorporated by reference as though the same were fully set forth at length herein.

6. This Court has jurisdiction over this action pursuant to 29 U.S.C. § 216(b), which provides, in relevant part, that suit under the FLSA "may be maintained against any employer . . . in any Federal or State court of competent jurisdiction." See 29 U.S.C. § 216(b).

7. This Court also has federal question jurisdiction over this action pursuant to 28 U.S.C. § 1331.

8. This Court has supplemental jurisdiction over Plaintiff's state law claims because those claims arise out of the same nucleus of operative facts as the FLSA claims.

9. The venue in this district is proper pursuant to 28 U.S.C. § 1391(b), as the Defendant resides in this judicial district, doing business therein, and the unlawful practices of which Plaintiff is complaining were committed in the Commonwealth of Pennsylvania.

10. Plaintiff Jim Fries currently resides at 23 Joshua Drive, Richboro, PA 18954.

11. Defendant B&R Moll, Inc. maintains a principal place of business located at 744 Nina Way, Warminster, PA 18974.

12. Defendant is a “private employer” and covered by the FLSA. Defendant employs and produces goods and services for commerce.

13. Plaintiff was employed by Defendant during all relevant times hereto and as such, is an employee entitled to the FLSA’s protections. See 29 U.S.C. § 203(e).

FLSA COLLECTIVE ACTION ALLEGATIONS

14. Paragraphs 1 through 13 are hereby incorporated by reference as though the same were fully set forth at length herein.

15. This action is brought as a collective action to recover unpaid compensation and overtime compensation, liquidated damages, unlawfully withheld wages, statutory penalties and damages owed to Plaintiff and all similarly situated current and former employees of Defendant.

16. Pursuant to 29 U.S.C. § 216(b) of the FLSA, Plaintiff brings this action individually and on behalf of all other similarly situated persons presently or formerly employed by Defendant in the position of Senior Technician/Trade Show Manager, or in positions with similar job duties who were subject to Defendant’s unlawful pay practices and policies described herein, and who worked for Defendant at any point in the three (3) years preceding the date the instant action was initiated (the members of the putative class are hereinafter referred to as the “Class Plaintiffs”).

17. Plaintiff estimates that there are at least four (4) other similarly situated Class Plaintiffs who either are working or worked for Defendant and were unlawfully denied overtime compensation for hours worked in excess of forty (40) hours in a workweek. The precise number of employees can be easily ascertained by Defendant. These employees can be

identified and located using Defendant's payroll and personnel records. Potential Class Plaintiffs may be informed of the pendency of this Collective Action by direct mail and/or publication.

18. Pursuant to 29 U.S.C. § 216(b), this action is properly maintained as a collective action because all the class members are similarly situated. Plaintiff and other similarly situated employees were similarly misclassified as exempt for overtime purposes and not paid an overtime premium for hours worked in excess of forty (40) hours in a workweek, had the same job classification and job duties, and were subject to the same uniform policies, business practices and operating procedures. Further, Defendant's willful policies and practices which are discussed more fully in this Collective and Class Action Complaint, whereby Defendant failed to pay Plaintiff and Class Plaintiffs an overtime premium for all hours worked over forty (40) hours in a work week, has affected Plaintiff and the Class Plaintiffs in the same fashion.

19. Defendant willfully and unlawfully misclassified Plaintiff and Class Plaintiffs as "exempt" under the FLSA and willfully and improperly failed to pay Plaintiff and Class Plaintiffs overtime compensation in accordance with the FLSA. Plaintiff and Class Plaintiffs are not exempt from receiving overtime benefits.

20. Plaintiff will request the Court to authorize notice to all current and former similarly situated employees employed by Defendant, informing them of the pendency of this action and their right to "opt-in" to this lawsuit pursuant to 29 U.S.C. § 216(b), for the purpose of seeking unpaid compensation, overtime compensation, and liquidated damages under the FLSA.

CLASS ACTION ALLEGATIONS

21. Paragraphs 1 through 20 are hereby incorporated by reference as though the same were fully set forth at length herein.

22. Plaintiff brings this action individually, and on behalf of the following state-wide class of similarly situated individuals, pursuant to Rule 23 of the Federal Rule of Civil Procedure:

All persons presently or formerly employed by Defendant during the last three (3) years in the position of Senior Technician/Trade Show Manager or in positions with similar job duties who were denied overtime compensation for work performed in excess of forty (40) hours in a work week.

23. The members of the class are so numerous that joinder of all members is impractical. Class members may be informed of the pendency of this Class Action by direct mail.

24. Pursuant to Federal Rule of Civil Procedure 23 (a)(2), there are questions of law and fact common to the Class, including, but not limited to:

- a. Whether Plaintiff and the Class are entitled to overtime compensation for services rendered in excess of forty (40) hours per week under the PMWA;
- b. Whether Plaintiff and the Class worked in excess of forty (40) hours per week;
- c. Whether Plaintiff and the Class have suffered and are entitled to damages, and, if so, in what amount;
- d. Whether Defendant failed to pay Plaintiff and the Class wages and overtime wages in the period when said wages became due and owing in violation of the WPCL; and
- e. Whether Plaintiff and the Class are entitled to liquidated damages under the WPCL.

25. Plaintiff's claims are typical of the claims of the Class members. Plaintiff is a former employee of Defendant, employed in the position of Senior Technician/Trade Show

Manager, who has suffered similar injuries as those suffered by the Class members as a result of Defendant's failure to pay wages and overtime compensation. Defendant's conduct of violating the PMWA and WPCL has affected Plaintiff and the Class in the exact same way.

26. Plaintiff will fairly and adequately represent and protect the interests of the Class. Plaintiff is similarly situated to the Class and has no conflict with the Class members.

27. Plaintiff is committed to pursuing this action and has retained competent counsel experienced in class and collective action litigation.

28. Pursuant to Rules 23(b)(1), (b)(2) and/or 23(b)(3) of the Federal Rules of Civil Procedure, this action is properly maintained as a class action because:

a. the prosecution of separate actions by or against individual members of the Class would create a risk of inconsistent or varying adjudication with respect to individual members of the Class that would establish incompatible standards of conduct for Defendants;

b. Defendant, by failing to pay overtime compensation when it is due and owing in violation of the PMWA and WPCL, has acted or refused to act on grounds generally applicable to the Class, thereby making equitable relief appropriate with respect to the Class as a whole; and

c. the common question of law and fact set forth above applicable to the Class predominate over any questions affecting only individual members and a class action is superior to other available methods for the fair and efficient adjudication of this case, especially with respect to considerations of consistency, economy, efficiency, fairness and equity, as compared to other available methods for the fair and efficient adjudication of the controversy.

29. A Class Action is also superior to other available means for the fair and efficient adjudication of this controversy because individual joinder of the parties is impractical. Class

Action treatment will allow a large number of similarly situated persons to prosecute their common claims in a single forum simultaneously, efficiently and without unnecessary duplication of effort and expense if these claims were brought individually.

30. Additionally, as the damages suffered by each Class member may be relatively small, the expense and burden of individual litigation would make it difficult for the Class members to bring individual claims.

31. The presentation of separate actions by individual Class members could create a risk of inconsistent and varying adjudications, establish incompatible standards of conduct for Defendant, and/or substantially impair or impede the ability of the Class to protect their interests.

FACTUAL BACKGROUND

32. Paragraphs 1 through 31 are hereby incorporated by reference as though the same were fully set forth at length herein.

33. In 1981, Plaintiff was hired by Defendant on a full-time basis in the position of Senior Technician/Trade Show Manager.

34. Upon information and belief, Defendant employs or has employed in excess of four (4) other individuals in the position of Senior Technician/Trade Show Manager over the past three (3) years.

35. Plaintiff and Class Plaintiffs' job responsibilities include the timely and proper set-up of folder/glue machines (machines that fold/glue cards, envelopes, etc.) for trade shows, set-up of proper electric supply for trade shows, handle union contracts in the assistance of trade show set-up, and train and/or install machinery sold to customers.

36. Upon information and belief, Plaintiff and Class Plaintiffs participated in at least six (6) trade shows per year. In this regard, Plaintiff regularly traveled throughout the United States to various work sites/trade shows.

37. Plaintiff routinely worked in excess of forty (40) hours per week. On average, Plaintiff worked approximately 50-55 hours per work week.

38. Additionally, Defendant told customers Plaintiff was on-call twenty-four (24) hours per day, seven (7) days a week. Indeed, Plaintiff was “on call” when at work and would often take calls during rest and/or meal periods, and, in addition, Plaintiff accepted calls after business hours into the evening.

39. Plaintiff routinely traveled throughout the United States, at least, two (2) to three (3) times per month. Upon information and belief, Defendant did not compensate Plaintiff for hours spent traveling. Additionally, Plaintiff was often instructed to visit with customers upon arrival and would perform manual labor and training that was not compensated. Upon information and belief, Plaintiff worked fifty-five to sixty (55-60) hours per week when traveling.

40. Upon information and belief, Class Plaintiffs routinely worked in excess of forty (40) hours per week. In this regard, Class Plaintiffs would, on average, work fifty to fifty-five (50-55) hours per work week.

41. Despite working in excess of forty (40) hours per week, Plaintiff and Class Plaintiffs did not receive overtime compensation for hours worked over forty (40) hours per week. Plaintiff and Class Plaintiffs were paid a bi-weekly salary regardless of the number of hours actually worked.

42. Defendant classified Plaintiff and Class Plaintiffs as “exempt” under the FLSA and PMWA and, therefore, determined Plaintiff and Class Plaintiffs were not entitled to overtime compensation.

43. Defendant unlawfully misclassified Plaintiff and Class Plaintiffs as “exempt.” Plaintiff and Class Plaintiffs were/are not exempt from receiving overtime compensation.

44. Plaintiff and Class Plaintiffs did not have the authority to hire and fire other employees employed by Defendant. Thus, Plaintiff and Class Plaintiffs are not exempt from overtime compensation pursuant to the exemption for executive employees under the FLSA.

45. Additionally, Plaintiff and Class Plaintiffs primary job responsibility was to engage in manual work, and since they did not have any independent discretion or authority, they do not qualify for the exemption for administrative employees under the FLSA.

46. Under the FLSA and/or PMWA, there are no other exemptions which could arguably be applicable to Plaintiff and Class Plaintiffs.

47. Accordingly, Plaintiff and Class Plaintiffs were/are, within the meaning of the FLSA and PMWA, non-exempt employees of Defendant.

48. Defendant failed to pay Plaintiff and Class Plaintiffs at a rate of at least one and one half times (1.5) their regular rate of pay for each hour that they worked in excess of forty (40) hours per week.

49. As a result of Defendant’s aforesaid illegal actions, Plaintiff and the Class Plaintiffs have suffered damages.

COUNT I
FAIR LABOR STANDARDS ACT
29 U.S.C. § 201, et seq.
FAILURE TO PAY OVERTIME COMPENSATION

50. Paragraphs 1 through 49 are hereby incorporated by reference as though the same were fully set forth at length herein.

51. Pursuant to Section 206(b) of the FLSA, all employees must be compensated for every hour worked in a workweek.

52. Moreover, Section 207(a)(1) of the FLSA states that employees must be paid overtime, equal to one and one half (1.5) times the employee's regular rate of pay, for all hours worked in excess of forty (40) hours per week.

53. According to the policies and practices of Defendant, Plaintiff and Class Plaintiffs were required to work in excess of forty (40) hours per week. Despite working in excess of forty (40) hours per week, Plaintiff and Class Plaintiffs were denied overtime compensation for compensable work performed in excess of forty (40) hours per week in violation of the FLSA. In fact, Plaintiff and Class Plaintiffs were paid the same bi-weekly salary, regardless of the number of hours actually worked.

54. The foregoing actions of Defendant and the policies and practices of Defendant violate the FLSA.

55. Defendant's actions were willful, not in good faith, and in reckless disregard of clearly applicable FLSA provisions.

56. Defendant is liable to Plaintiff and Class Plaintiffs for actual damages, liquidated damages and other equitable relief, pursuant to 29 U.S.C. § 216(b), as well as reasonable attorney's fees, costs and expenses.

WHEREFORE, Plaintiff prays for the following relief on behalf of himself and Class Plaintiffs:

A. An Order from this Court permitting this litigation to proceed as a collective action pursuant to 29 U.S.C. § 216(b);

B. An Order from the Court ordering Defendant to file with this Court and furnish to the undersigned counsel a list of all names and addresses of all employees who have worked for Defendant during the preceding three (3) years in the position of Senior Technician/Trade Show Manager and/or positions with similar job duties, and authorizing Plaintiff's counsel to issue a notice at the earliest possible time to these individuals, informing them that this action has been filed, of the nature of the action, and of their right to opt-in to this lawsuit if they worked for Defendant during the liability period, but were not paid compensations and/or overtime pay as required by the FLSA;

C. Adjudicating and declaring that Defendant's conduct as set forth herein and above is in violation of the FLSA;

D. Adjudicating and declaring that Defendant violated the FLSA by failing to pay compensation and/or overtime pay to Plaintiff and Class Plaintiffs for compensable hours worked, some of which were in excess of forty (40) hours per week;

E. Awarding Plaintiff and Class Plaintiffs back pay wages and/or overtime wages in an amount consistent with the FLSA;

F. Awarding Plaintiff and Class Plaintiffs liquidated damages in accordance with the FLSA;

G. Awarding Plaintiff reasonable attorney's fees and all costs of this action, to be paid by Defendant, in accordance with the FLSA;

H. Awarding pre and post-judgment interest and court costs as further allowed by law;

I. Granting Plaintiff and Class Plaintiffs leave to add additional Plaintiffs by motion, the filing of written opt-in consent forms, or any other method approved by the Court; and

J. For all additional general and equitable relief to which Plaintiff and Class Plaintiffs may be entitled.

COUNT II
PENNSYLVANIA MINIMUM WAGE ACT OF 1968
43 P.S. §333 et seq.

57. Paragraphs 1 through 56 are hereby incorporated by reference as though the same were fully set forth at length herein.

58. The Pennsylvania Minimum Wage Act provides that employers must pay certain “minimum wages,” including overtime wages, to its employees. See 43 P.S. § 333.113.

59. The Pennsylvania Minimum Wage Act further provides that “employees shall be paid for overtime not less than one and one half times the employee’s regular rate” for hours worked in excess of forty (40) hours in a workweek. See 43 P.S. § 333.113.

60. By its actions alleged above, Defendant has violated the provisions of the Pennsylvania Minimum Wage Act of 1968 by failing to properly pay overtime compensation.

61. As a result of Defendant’s unlawful acts, Plaintiff and the Class Plaintiffs have been deprived of overtime compensation in amounts to be determined at trial, and are entitled to recovery of such amounts, together with interest, costs and attorney’s fees pursuant to Pennsylvania Minimum Wage Act of 1968, 43 P.S. § 333.113.

WHEREFORE, Plaintiff, on behalf of himself and the Class Plaintiffs, prays for judgment against Defendant as follows:

- A. An Order certifying this case as a class action and designating Plaintiff as the representative of the Class and their counsel as class counsel;
- B. An award to Plaintiff and the Class for the amount of unpaid overtime compensation to which they are entitled, including interest thereon, and penalties subject to proof;
- C. An award to Plaintiff and the Class of reasonable attorney's fees and costs pursuant to the Pennsylvania Minimum Wage Act; and
- D. An award to Plaintiff and the Class for any other damages available to them under applicable Pennsylvania law, and all such other relief as this Court may deem proper.

COUNT III
PENNSYLVANIA WAGE PAYMENT AND COLLECTION LAW
43 Pa. Con. Stat. § 260.1

62. Paragraphs 1 through 61 are hereby incorporated by reference as though the same were more fully set forth at length herein.

63. The foregoing actions and/or omissions of Defendant constitute violations of the Pennsylvania Wage Payment and Collection Law, 43 Pa. Con Stat. § 260.1 *et seq.*

WHEREFORE, Plaintiff prays for relief on behalf of himself and the Class to the fullest extent permitted by law including, but not limited to, unpaid wages and liquidated damages, and the award of any and all damages Plaintiff and the Class are entitled to under applicable law.

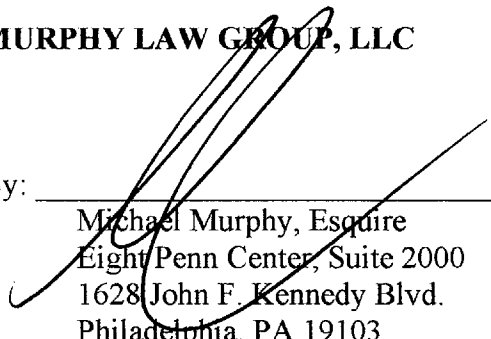
JURY DEMAND

Plaintiff hereby demands a trial by jury as to all issues so triable.

Respectfully submitted,

MURPHY LAW GROUP, LLC

By: _____


Michael Murphy, Esquire
Eight Penn Center, Suite 2000
1628 John F. Kennedy Blvd.
Philadelphia, PA 19103
TEL: 267-273-1054
FAX: 215-525-0210
murphy@phillyemploymentlawyer.com
Attorneys for Plaintiff

September 21, 2017

DEMAND TO PRESERVE EVIDENCE

The Defendant is hereby demanded to preserve all physical and electronic information pertaining in any way to Plaintiff's and the Class Plaintiffs' employment, to their potential claims and their claims to damages, to any defenses to same, including, but not limited to, electronic data storage, employment files, files, memos, job descriptions, text messages, e-mails, spread sheets, images, cache memory, payroll records, paystubs, time records, time sheets and any other information and/or data which may be relevant to any claim or defense in this litigation.

CIVIL COVER SHEET

17-0-4238

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

Jim Fries

DEFENDANTS

B&R Moll, Inc.

17 4238

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

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)

(c) Attorneys (Firm Name, Address, and Telephone Number) Michael Murphy, Esq., Murphy Law Group, LLC, Eight Penn Center, Suite 2000, 1628 John F. Kennedy Blvd., Philadelphia, PA 19103: (267) 273-1054

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
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 columns: CONTRACT, REAL PROPERTY, CIVIL RIGHTS, TORTS, PRISONER PETITIONS, HABES CORPUS, 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): FLSA, 29 U.S.C. § 201, et seq., PMWA, 43 P.S. § 333, et seq., & WPCL, 43 Pa. Con. Stat. § 260.1, et seq. Brief description of cause: failure to pay overtime compensation

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

SEP 21 2017

DATE SIGNATURE OF ATTORNEY OF RECORD

09/21/2017

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

FOR THE EASTERN DISTRICT OF PENNSYLVANIA — DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

ER

Address of Plaintiff: 23 Joshua Drive, Richboro, PA 18954

Address of Defendant: 744 Nina Way, Warminster, PA 18974

Place of Accident, Incident or Transaction: 744 Nina Way, Warminster, PA 18974

(Use Reverse Side For Additional Space)

Does this civil action involve a nongovernmental corporate party with any parent corporation and any publicly held corporation owning 10% or more of its stock?

(Attach two copies of the Disclosure Statement Form in accordance with Fed.R.Civ.P. 7.1(a))

Yes No

Does this case involve multidistrict litigation possibilities?

Yes No

RELATED CASE, IF ANY:

Case Number: _____ Judge _____ Date Terminated: _____

Civil cases are deemed related when yes is answered to any of the following questions:

- 1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?
2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?
3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action in this court?
4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual?

CIVIL: (Place check in ONE CATEGORY ONLY)

A. Federal Question Cases:

- 1. Indemnity Contract, Marine Contract, and All Other Contracts
2. FELA
3. Jones Act-Personal Injury
4. Antitrust
5. Patent
6. Labor-Management Relations
7. Civil Rights
8. Habeas Corpus
9. Securities Act(s) Cases
10. Social Security Review Cases
11. All other Federal Question Cases (Please specify) Fair Labor Standards Act

B. Diversity Jurisdiction Cases:

- 1. Insurance Contract and Other Contracts
2. Airplane Personal Injury
3. Assault, Defamation
4. Marine Personal Injury
5. Motor Vehicle Personal Injury
6. Other Personal Injury (Please specify)
7. Products Liability
8. Products Liability — Asbestos
9. All other Diversity Cases

(Please specify)

ARBITRATION CERTIFICATION

(Check Appropriate Category)

I, Michael Murphy, Esq., counsel of record do hereby certify:

X Pursuant to Local Civil Rule 53.2, Section 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs;

Relief other than monetary damages is sought.

DATE: 09/21/2017

Michael Murphy, Esq.

Attorney-at-Law

91262

Attorney I.D.#

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: 09/21/2017

Michael Murphy, Esq.

Attorney-at-Law

91262

Attorney I.D.#

SEP 21 2017

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA
CASE MANAGEMENT TRACK DESIGNATION FORM



Jim Fries
v.
B&R Moll, Inc.

:
:
:
:
:

CIVIL ACTION

NO. 17 4238

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:

- (a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255.
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits.
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2.
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos.
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.)
- (f) Standard Management – Cases that do not fall into any one of the other tracks.

9/21/2017	Michael Murphy, Esq.	Plaintiff, Jim Fries
Date	Attorney-at-law	Attorney for
(267) 273-1054	(215) 525-0210	murphy@phillyemploymentlawyer.com
Telephone	FAX Number	E-Mail Address

SEP 21 2017

ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [B&R Moll Hit with Trade Show Manager's Unpaid Overtime Lawsuit](#)
