

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

JANEIRO GARCIA, for himself and on
behalf of those similarly situated,

Plaintiff,

vs.

Case No.:

ITALKRAFT LLC, a Florida Limited
Liability Company; MICHAEL
PFEIFFER CARPENTRY, INC., a
Florida Profit Corporation; MICHAEL
PFEIFFER, Individually,

Defendants.

COMPLAINT AND DEMAND FOR JURY TRIAL

Plaintiff, JANEIRO GARCIA, (“Plaintiff”), for himself and on behalf of those similarly situated, hereby files this Complaint against Defendants, ITALKRAFT LLC, (“ITALKRAFT”), a Florida Limited Liability Company; MICHAEL PFEIFFER CARPENTRY, INC., (“MPC”), a Florida Profit Corporation; MICHAEL PFEIFFER, Individually, (“PFEIFFER”) (collectively “Defendants”), and states as follows:

JURISDICTION

1. Jurisdiction in this Court is proper as the claims are brought pursuant to the Fair Labor Standards Act, as amended (29 U.S.C. §201, et seq.) (“FLSA”) to obtain a judgment against Defendants as to liability, recover unpaid wages, liquidated damages, and reasonable attorneys’ fees and costs.

2. The jurisdiction of the Court over this controversy is proper pursuant to 28 U.S.C. §1331, as Plaintiff's claims arise under 29 U.S.C. §216(b).

3. Venue in this Court is proper, as the acts and omissions alleged in this Complaint took place in this judicial district, and Defendants reside and regularly conduct business in this judicial district.

PARTIES

4. At all times material to this action, Plaintiff was a resident of Miami Dade County, Florida.

5. At all times material to this action, ITALKRAFT LLC was, and continues to be, a Florida Limited Liability Company. Further, at all times material hereto, ITALKRAFT LLC was, and continues to be, engaged in business in Florida, with a principal place of business in Miami Dade County, Florida.

6. At all times material to this action, MICHAEL PFEIFFER CARPENTRY, INC. was, and continues to be, a Florida Profit Corporation. Further, at all times material hereto, MICHAEL PFEIFFER CARPENTRY, INC was, and continues to be, engaged in business in Florida, with a principal place of business in Miami Dade County, Florida.

7. At all times relevant hereto, ITALKRAFT and MPC, were Plaintiff's "joint employer," for the purposes of FLSA coverage, pursuant to 29 C.F.R. §825.106, because: (i) There was an arrangement between them to share employees' services or to interchange employees; (ii) Each of them acted directly or indirectly in the interest of each other in relation to Plaintiff; or, (iii) They were not and are not completely

disassociated with respect to the Plaintiff's employment, and shared control of Plaintiff, directly or indirectly, because each of them was under common control with each other.

8. ITALKRAFT and MPC are currently listed with the Florida Department of State, Division of Corporations, as "Active" businesses. See Corporation search results for ITALKRAFT and MPC attached hereto as Exhibits A and B, respectively.

9. Based on information and belief, at all times material hereto, Defendant PFEIFFER was an individual resident of the State of Florida, Broward County.

10. At all times material hereto, Defendant PFEIFFER was President and Manager of MPC, and regularly exercised the authority to: (a) hire and fire employees of MPC; (b) determine the work schedules for the employees of MPC; and (c) control the finances and operations of MPC.

11. Defendant PFEIFFER is an individual employer as defined by 29 U.S.C. §201, et seq., in that he acted, directly or indirectly, in the interests of MPC, towards Plaintiff.

12. At all times material to this action, Plaintiff was an "employee" of Defendants within the meaning of the FLSA.

13. At all times material to this action, Defendants were Plaintiff's "employers" within the meaning of the FLSA.

14. Defendants were, and continue to be, "employers" within the meaning of the FLSA.

15. At all times material to this action, Defendant ITALKRAFT was, and continues to be, an "enterprise engaged in commerce" and/or an enterprise engaged in

the “production of goods for commerce” within the meaning of the FLSA.

16. At all times material to this action, Defendant MPC, was, and continues to be, an “enterprise engaged in commerce” and an enterprise engaged in the “handling, selling, or otherwise working on goods and materials that have been moved in or produced for commerce by any person” within the meaning of the FLSA.

17. Based upon information and belief, the annual gross revenue of Defendant ITALKRAFT was in excess of \$500,000.00 per annum during the relevant time periods

18. Based upon information and belief, the annual gross revenue of Defendant MPC was in excess of \$500,000.00 per annum during the relevant time periods.

19. At all times material to this action, Defendants had two (2) or more employees handling, selling, or otherwise working on goods or materials that had been moved in or produced for commerce such as Italian made cabinets, tools, computers, vehicles, and telephones.

20. At all times material hereto, the work performed by the Plaintiff was directly essential to the business performed by Defendants.

STATEMENT OF FACTS

21. In or about March or April 2015, Defendants hired Plaintiff to work as a non-exempt hourly-paid installer for Defendants’ residential and commercial Italian cabinetry business for kitchen, bath, and closet installation services.

22. Plaintiff’s job duties included, but were not limited to, installing kitchen

cabinets, bath furniture, and closets.

23. Plaintiff's work and other installers' work was directly supervised by PFEIFFER and MPC, but was for the benefit of ITALKRAFT, installing ITALKRAFT Products.

24. ITALKRAFT paid MPC and PFEIFFER for the work performed by Plaintiff and other installers.

25. Plaintiff and other installers wore ITALKRAFT uniforms when installing ITALKRAFT Products.

26. Plaintiff's and other installers' paycheck come from MPC, which received the funds to pay Plaintiff and other installers from ITALKRAFT.

27. At various times material hereto, Plaintiff worked for Defendants in excess of forty (40) hours within a workweek.

28. From at least March 2015, through sometime in November 2017, Defendants failed to compensate Plaintiff at a rate of one and one-half times Plaintiff's regular rate for all hours worked in excess of forty (40) hours in a single workweek.

29. Specifically, Plaintiff was only paid his regular hourly rate for recorded overtime hours, and was not paid at all for approximately five hours worked each week which were not recorded.

30. ITALKRAFT directly controlled the payment and non-payment of overtime compensation to Plaintiff and other installers.

31. As ITALKRAFT was responsible for changing the pay policy in November 2017 to require payment of proper overtime compensation to installers.

32. Plaintiff and other installers should be compensated at the rate of one and one-half times their regular rate for all hours that Plaintiff worked in excess of forty (40) hours per workweek, as required by the FLSA.

33. Upon information and belief, the majority of Plaintiff's pay and time records are in the possession of Defendants.

34. The additional persons who may become Plaintiffs in this action also "worked" for Defendants as installers, worked under the same terms and conditions, and pursuant to the policies, practices, and procedures applicable to Plaintiff, and were denied proper overtime compensation for all overtime hours due to these policies, practices and procedures.

35. In November 2017, Defendants at ITALKRAFT's direction, changed their pay policies, and began requiring payment of overtime premium for overtime hours, and accurately recording time.

36. Defendants have violated Title 29 U.S.C. §207 from at least March or April 2015, through the date in November 2017 when they changed their policies regarding overtime and time recording, in that:

- a. Plaintiff, and other installers, worked in excess of forty (40) hours in one or more workweeks for the period of employment with Defendants; and
- b. No payments or provisions for payment have been made by Defendants to properly compensate Plaintiff, and other installers, at the statutory rate of one and one-half times their regular rate for

all hours worked in excess of forty (40) hours per workweek, as provided by the FLSA due to the policies and practices described above.

37. Defendants' failure and/or refusal to properly compensate Plaintiff, and other installers, at the rates and amounts required by the FLSA was willful, as Defendants knew or with reasonable diligence should have known that they were required to pay for all overtime hours, and to pay a premium for overtime hours, but chose not to pay Plaintiff or other installers at an overtime rate for all of his overtime hours, and also did not pay for more overtime hours at all.

38. Defendants failed and/or refused to properly disclose or apprise Plaintiff of his rights under the FLSA.

COUNT I
RECOVERY OF OVERTIME COMPENSATION

39. Plaintiff re-alleges paragraphs 1 through 38 of the Complaint, as if fully set forth herein.

40. From at least Plaintiff's hire in March or April 2015, and continuing through the date in November 2017 when they changed their policies, Plaintiff and other installers worked in excess of forty (40) hours in one or more workweeks for which they were not compensated at the statutory rate of one and one-half times their regular rate of pay.

41. Plaintiff was, and is, entitled to be paid at the statutory rate of one and one-half times Plaintiff's regular rate of pay for all hours worked in excess of forty (40) hours in a workweek.

42. Other installers were, and are, entitled to be paid at the statutory rate of one and one-half times their regular rate of pay for all hours worked in excess of forty (40) hours in a workweek.

43. Defendants failed to properly disclose or apprise Plaintiff of Plaintiff's rights under the FLSA.

44. Defendants' actions were willful and/or showed reckless disregard for the provisions of the FLSA, as evidenced by their failure to compensate Plaintiff, and those similarly situated, at the statutory rate of one and one-half times their regular rate of pay for the hours worked in excess of forty (40) hours per workweek when they knew, or with reasonable diligence should have known, such was, and is, due.

45. Due to the intentional, willful, and unlawful acts of Defendants, Plaintiff, and those similarly situated, suffered, and continue to suffer, damages and lost compensation for certain hours worked over forty (40) hours in a workweek, plus liquidated damages.

46. Based upon information and belief, other installers and former installers of Defendants were not paid proper overtime for hours worked in excess of forty (40) in one or more workweeks because Defendants have failed to properly pay Plaintiff proper overtime wages at time and one-half of the lawful regular rate of pay for such hours, pursuant to a policy, plan or decision equally applicable to similarly situated employees.

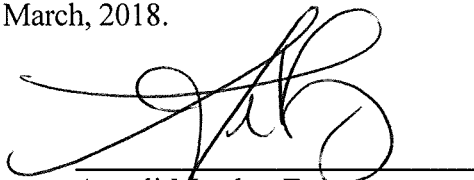
47. Plaintiff is entitled to an award of reasonable attorneys' fees and costs pursuant to 29 U.S.C. §216(b).

WHEREFORE, Plaintiff, for himself and on behalf of those similarly situated, requests conditional certification; pursuant to Section 216(b) of the FLSA, of a collective of installers who worked over 40 hours in one or more workweeks, an order permitting Notice to all potential class members; entry of judgment in Plaintiff's favor and against Defendants for actual and liquidated damages, as well as costs, expenses and attorneys' fees and such other relief deemed proper by this Court.

JURY DEMAND

Plaintiff demands trial by jury on all issues so triable as a matter of right by jury.

Respectfully submitted this 15th day of March, 2018.



Angeli Murthy, Esq.
Florida Bar No.: 088758
amurthy@forthepeople.com
Morgan & Morgan, P.A.
600 North Pine Island Road
Suite 400
Plantation, Florida 33324
Telephone: (954) 318-0268
Facsimile: (954) 327-3016
Trial Attorneys for Plaintiff

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

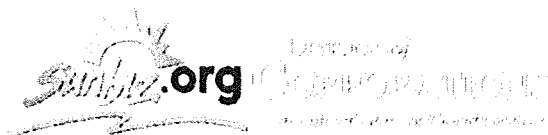
Authority For Civil Cover Sheet

The JS 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 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. 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 Rule 8(a), F.R.Cv.P., 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.
 United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.
 United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
 Federal question. (3) This refers to suits under 28 U.S.C. 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.
 Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 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 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.
 Original Proceedings. (1) Cases which originate in the United States district courts.
 Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441. When the petition for removal is granted, check this box.
 Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
 Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
 Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
 Multidistrict Litigation. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407. When this box is checked, do not check (5) above.
- 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 Rule 23, F.R.Cv.P.
 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 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

Date and Attorney Signature. Date and sign the civil cover sheet.

EXHIBIT “A”



Department of State / Division of Corporations / Search Records / Detail By Document Number /

Detail by Entity Name

Florida Limited Liability Company

ITALKRAFT LLC

Filing Information

Document Number	L11000002662
FEI/EIN Number	27-4529485
Date Filed	01/06/2011
Effective Date	01/05/2011
State	FL
Status	ACTIVE

Principal Address

2900 NW 77 COURT
MIAMI, FL 33122

Changed: 04/11/2012

Mailing Address

P.O. Box 527204
MIAMI, FL 33152

Changed: 01/09/2017

Registered Agent Name & Address

Xakoustis, Alexandros
2900 NW 77 COURT
MIAMI, FL 33122

Name Changed: 03/23/2016

Address Changed: 03/23/2016

Authorized Person(s) Detail

Name & Address

Title MGRM

XAKOUSTIS, ALEXANDROS
2900 NW 77 COURT
MIAMI, FL 33122

Title Authorized Member

Lens, Dirk J
2900 NW 77 COURT
MIAMI, FL 33122

Title Authorized Member

Gutierrez, Raul J
2900 NW 77 COURT
MIAMI, FL 33122

Annual Reports

Report Year	Filed Date
2016	03/23/2016
2017	01/09/2017
2018	01/16/2018

Document Images

01/16/2018 -- ANNUAL REPORT	View image in PDF format
01/09/2017 -- ANNUAL REPORT	View image in PDF format
03/23/2016 -- ANNUAL REPORT	View image in PDF format
04/20/2015 -- ANNUAL REPORT	View image in PDF format
04/28/2014 -- ANNUAL REPORT	View image in PDF format
03/22/2013 -- ANNUAL REPORT	View image in PDF format
04/11/2012 -- ANNUAL REPORT	View image in PDF format
01/06/2011 -- Florida Limited Liability	View image in PDF format

EXHIBIT “B”



[Department of State](#) / [Division of Corporations](#) / [Search Records](#) / [Detail By Document Number](#) /

Detail by Entity Name

Florida Profit Corporation
MICHAEL PFEIFFER CARPENTRY, INC.

Filing Information

Document Number	P01000003245
FEI/EIN Number	65-1066621
Date Filed	01/09/2001
State	FL
Status	ACTIVE
Last Event	AMENDMENT
Event Date Filed	07/28/2017
Event Effective Date	NONE

Principal Address

13811 SW 52ND PLACE
SOUTHWEST RANCHES, FL 33330

Changed: 04/13/2017

Mailing Address

13811 SW 52ND PLACE
SOUTHWEST RANCHES, FL 33330

Changed: 04/13/2017

Registered Agent Name & Address

NOFIL, JOSEPH PA
8217 W ATLANTIC BLVD
CORAL SPRINGS, FL 33071

Name Changed: 04/17/2013

Address Changed: 04/17/2013

Officer/Director Detail

Name & Address

Title PTSD

PFEIFFER, MICHAEL
13811 SW 52ND PLACE
SOUTHWEST RANCHES, FL 33330

Annual Reports

Report Year	Filed Date
2015	03/11/2015
2016	03/11/2016
2017	04/13/2017

Document Images

04/13/2017 -- ANNUAL REPORT	View image in PDF format
03/11/2016 -- ANNUAL REPORT	View image in PDF format
03/11/2015 -- ANNUAL REPORT	View image in PDF format
03/28/2014 -- ANNUAL REPORT	View image in PDF format
04/17/2013 -- ANNUAL REPORT	View image in PDF format
01/24/2012 -- ANNUAL REPORT	View image in PDF format
03/29/2011 -- ANNUAL REPORT	View image in PDF format
08/19/2010 -- Amendment	View image in PDF format
04/06/2010 -- ANNUAL REPORT	View image in PDF format
04/04/2009 -- ANNUAL REPORT	View image in PDF format
04/29/2008 -- ANNUAL REPORT	View image in PDF format
02/26/2007 -- ANNUAL REPORT	View image in PDF format
03/30/2006 -- ANNUAL REPORT	View image in PDF format
03/07/2005 -- ANNUAL REPORT	View image in PDF format
04/12/2004 -- ANNUAL REPORT	View image in PDF format
03/03/2003 -- ANNUAL REPORT	View image in PDF format
05/02/2002 -- ANNUAL REPORT	View image in PDF format
01/09/2001 -- Domestic Profit	View image in PDF format

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT
for the
Southern District of Florida

JANEIRO GARCIA, for himself and on
behalf of those similarly situated,

Plaintiff(s)

v.

ITALKRAFT LLC, a Florida Limited Liability Company;
MICHAEL PFEIFFER CARPENTRY, INC., a Florida
Profit Corporation; MICHAEL PFEIFFER, Individually,

Defendant(s)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) ITALKRAFT LLC
c/o , Alexandros Xakoustis, Registered Agent
2900 NW 77 Court
Miami, FL 33122

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you
are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ.
P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of
the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney,
whose name and address are:

Angeli Murthy, Esquire
Morgan & Morgan, P.A.
600 N. Pine Island Road
Suite 400
Plantation, FL 33324

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint.
You also must file your answer or motion with the court.

CLERK OF COURT

Date:

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. _____

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____
was received by me on *(date)* _____.

I personally served the summons on the individual at *(place)* _____
_____ on *(date)* _____; or

I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____, and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* _____, who is
designated by law to accept service of process on behalf of *(name of organization)* _____
_____ on *(date)* _____; or

I returned the summons unexecuted because _____; or

Other *(specify)*: _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. _____

PROOF OF SERVICE

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_____ on *(date)* _____; or

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_____, a person of suitable age and discretion who resides there,
on *(date)* _____, and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* _____, who is
designated by law to accept service of process on behalf of *(name of organization)* _____
_____ on *(date)* _____; or

I returned the summons unexecuted because _____; or

Other *(specify)*: _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

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UNITED STATES DISTRICT COURT
for the
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JANEIRO GARCIA, for himself and on
behalf of those similarly situated,
Plaintiff(s)

v.

ITALKRAFT LLC, a Florida Limited Liability Company;
MICHAEL PFEIFFER CARPENTRY, INC., a Florida
Profit Corporation; MICHAEL PFEIFFER, Individually,
Defendant(s)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) MICHAEL PFEIFFER
13811 SW 52nd Place
Southwest Ranches, FL 33330

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you
are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ.
P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of
the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney,
whose name and address are:

Angeli Murthy, Esquire
Morgan & Morgan, P.A.
600 N. Pine Island Road
Suite 400
Plantation, FL 33324

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint.
You also must file your answer or motion with the court.

CLERK OF COURT

Date:

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. _____

PROOF OF SERVICE

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was received by me on *(date)* _____.

I personally served the summons on the individual at *(place)* _____
_____ on *(date)* _____; or

I left the summons at the individual's residence or usual place of abode with *(name)* _____
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on *(date)* _____, and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* _____, who is
designated by law to accept service of process on behalf of *(name of organization)* _____
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Other *(specify)*: _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Italkraft, Michael Pfeiffer Carpentry Facing Unpaid Overtime Allegations](#)
