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10 **UNITED STATES DISTRICT COURT**  
11 **SOUTHERN DISTRICT OF CALIFORNIA**

<p>12 <b>Roxanne Gonzalez, Individually</b> 13 <b>and on Behalf of All Others</b> 14 <b>Similarly Situated,</b></p> <p>15 <b>Plaintiff,</b></p> <p>16</p> <p>17 <b>v.</b></p> <p>18 <b>Grand Celebration Cruises, LLC,</b></p> <p>19 <b>Defendant.</b></p>	<p>Case No.: <u>'17CV0644 GPC WVG</u></p> <p><b><u>CLASS ACTION</u></b></p> <p><b>CLASS ACTION COMPLAINT</b> <b>FOR DAMAGES AND</b> <b>INJUNCTIVE RELIEF</b> <b>PURSUANT TO THE</b> <b>TELEPHONE CONSUMER</b> <b>PROTECTION ACT, 47 U.S.C. §</b> <b>227 ET SEQ.</b></p> <p><b>Jury Trial Demanded</b></p>
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20 **INTRODUCTION**

- 21
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- 23
- 24
- 25 1. Roxanne Gonzalez (referred to as “ Plaintiff”), brings this class action for
- 26 damages, injunctive relief, and any other available legal or equitable
- 27 remedies, resulting from the illegal actions of Grand Celebration Cruises,
- 28 LLC (referred to as “Defendant”), in negligently, knowingly, and/or willfully



1 contacting Plaintiff on Plaintiff's cellular telephones, in violation of the  
2 Telephone Consumer Protection Act, 47 U.S.C. § 227, et seq., ("TCPA"),  
3 thereby invading Plaintiff's privacy. Plaintiff alleges as follows upon  
4 personal knowledge as to herself and her own acts and experiences, and, as to  
5 all other matters, upon information and belief, including investigation  
6 conducted by her attorneys.

7 2. The TCPA was designed to prevent calls and messages like the one described  
8 within this complaint, and to protect the privacy of citizens like Plaintiff.  
9 "Voluminous consumer complaints about abuses of telephone technology –  
10 for example, computerized calls dispatched to private homes – prompted  
11 Congress to pass the TCPA." *Mims v. Arrow Fin. Servs., LLC*, 132 S. Ct. 740,  
12 744 (2012).

13 3. In enacting the TCPA, Congress intended to give consumers a choice as to  
14 how creditors and telemarketers may call them, and made specific findings  
15 that "[t]echnologies that might allow consumers to avoid receiving such calls  
16 are not universally available, are costly, are unlikely to be enforced, or place  
17 an inordinate burden on the consumer." TCPA, Pub.L. No. 102-243, § 11.  
18 Toward this end, Congress found that:

19 Banning such automated or prerecorded telephone calls to the  
20 home, except when the receiving party consents to receiving the  
21 call or when such calls are necessary in an emergency situation  
22 affecting the health and safety of the consumer, is the only  
23 effective means of protecting telephone consumers from this  
24 nuisance and privacy invasion.

25 *Id.* at § 12; *see also, Martin v. Leading Edge Recovery Solutions, LLC*, 2012  
26 WL 3292838, at \*4 (N.D. Ill. Aug. 10, 2012) (citing Congressional finding  
27 on TCPA's purpose).

28 4. Congress also specifically found that "the evidence presented to the Congress  
indicates that automated or prerecorded calls are a nuisance and an invasion

1 of privacy, regardless of the type of call [...]” *Id.* At §§ 12-13. *See also,*  
2 *Mims*, 132 S. Ct. at 744.

- 3 5. As Judge Easterbrook of the Seventh Circuit explained in a TCPA case  
4 regarding calls to a non-debtor similar to this one:

5 The Telephone Consumer Protection Act [...] is well known for its  
6 provisions limiting junk-fax transmissions. A less litigated part of  
7 the Act curtails the use of automated dialers and prerecorded  
8 messages to cell phones, whose subscribers often are billed by the  
9 minute as soon as the call is answered – and routing a call to  
10 voicemail counts as answering the call. An automated call to a  
landline phone can be an annoyance; an automated call to a cell  
phone adds expense to annoyance.

11 *Soppet v. Enhanced Recovery Co., LLC*, 679 F.3d 637, 638 (7<sup>th</sup> Cir. 2012).

### 12 **JURISDICTION AND VENUE**

- 13
- 14 6. Jurisdiction is proper under 47 U.S.C §227(b); *Mims v. Arrow Fin. Servs.,*  
15 *LLC*, 132 S.Ct. 740 (2012), because Plaintiff alleges violations of federal law.
- 16 7. Venue is proper in the United States District Court for the Southern District of  
17 California pursuant to 18 U.S.C. § 1391(b) and 1441(a) because even though  
18 Plaintiff lives in Los Angeles, CA, the events giving rise to Plaintiff’s causes  
19 of action against Defendant occurred in the State of California within the  
20 Southern District of California and Defendant conducts business in the area of  
21 San Diego, California. Plaintiff was physically in San Diego County when  
22 she received both telephone calls from Defendant.

### 23 **PARTIES**

- 24
- 25 8. Plaintiff is, and at all times mentioned herein was, an individual citizen and  
26 resident of the County of Los Angeles, in the State of California, who  
27 received the telephone calls which are subject of this complaint, while she  
28 was physically in the County of San Diego.

1 9. Plaintiff is informed and believes, and thereon alleges, that Defendant is, and  
2 at all times mentioned herein was, an individual and a “person,” as defined by  
3 47 U.S.C. § 153 (39).

4 10. Plaintiff is informed and believes, and thereon alleges, that Defendant is a  
5 Florida Limited Liability Company, with offices in Orlando, Florida and  
6 Winter Park, Florida. Plaintiff is informed and believes, and thereon alleges,  
7 that at all relevant times, Defendant conducted business in the State of  
8 California and in the County of San Diego, and within this judicial district.

9  
10 **FACTUAL ALLEGATIONS**

11 11. At all times relevant, Plaintiff was a citizen of the State of California.  
12 Plaintiff is, and at all times mentioned herein was, a “person” as defined by 47  
13 U.S.C § 153 (39).

14 12. Defendant is, and at all times mentioned herein was, a “person” as defined by  
15 47 U.S.C. §153 (39).

16 13. Sometime prior to January 1, 2013, Ms. Gonzalez was assigned, and became  
17 the owner of, a cellular telephone number from her wireless provider.

18 14. On or about March 23, 2017, at 4:52 PM, Ms. Gonzalez received a call on her  
19 cellular telephone from Defendant, in which Defendant utilized an automatic  
20 telephone dialing system (“ATDS”) as defined by 47 U.S.C. § 227(a)(1),  
21 using an “artificial or prerecorded voice” as prohibited by 47 U.S.C. § 227(b)  
22 (1)(A).

23 15. The call to Ms. Gonzalez’s cellular telephone number, (323) XXX-2619, from  
24 Defendant, came from phone number: (323) 743-8543.

25 16. Plaintiff answered the call and was greeted by an artificial voice or pre-  
26 recorded girl, who initially sounded like a real person. The artificial voice  
27 asked Plaintiff three questions to “prequalify” her for a free cruise. During  
28



1 the conversation it became clear to Plaintiff that she was speaking to a  
2 machine or a voice recognition system.

3 17. After Plaintiff answered the questions she was transferred to a real person  
4 who identified himself as “Jacob.” Plaintiff asked Jacob the company name  
5 and she was told “Grand Celebration Cruises.” Plaintiff then asked Jacob for  
6 a callback number and he would not provide a number.

7 18. Defendant called Plaintiff again on March 23, 2017 at 5:52 PM. This call  
8 came from (323) 627-0662. Plaintiff did not answer this call.

9 19. Based on information and belief, Plaintiff alleges that both calls came from  
10 Grand Celebration Cruises, LLC. Plaintiff was never informed of any third  
11 party making the calls on behalf of Defendant.

12 20. The calls to Plaintiff were for marketing purposes as Defendant was trying to  
13 sell Plaintiff a cruise vacation. Plaintiff has no business relationship with  
14 Defendant.

15 21. The ATDS used by Defendant has the capacity to store or produce telephone  
16 numbers to be called, using a random or sequential number generator.

17 22. The ATDS used by Defendant also has the capacity to, and does, call  
18 telephone numbers from a list of databases of telephone numbers  
19 automatically and without human intervention.

20 23. The telephone number Defendant called was assigned to a cellular telephone  
21 service for which Plaintiff incurred a charge for incoming calls pursuant to 47  
22 U.S.C. § 227 (b)(1).

23 24. Plaintiff at no time provided “prior express consent,” written or otherwise, for  
24 Defendant to place telephone calls to Plaintiff’s cellular telephone with an  
25 artificial or prerecorded voice utilizing an ATDS as proscribed under 47  
26 U.S.C. § 227(b)(1)(A).



1 25. Plaintiff had not provided her cellular telephone number to Defendant.  
2 Plaintiff was not a customer of Defendant. Plaintiff had no “established  
3 business relationship” with Defendant, as defined by 47 U.S.C. § 227 (a)(2).

4 26. These telephone calls made by Defendant were in violation of 47 U.S.C. §  
5 227(b)(1).

## 6 7 **STANDING**

8 27. Standing is proper under Article III of the Constitution of the United States of  
9 America because Plaintiff’s claims state:

- 10 a. a valid injury in fact;  
11 b. which is traceable to the conduct of Defendant ;  
12 c. and is likely to be redressed by a favorable judicial decision.

13 See, *Spokeo, Inc. v. Robins*, 578 U.S. \_\_\_\_ (2016) at 6, and *Lujan v.*  
14 *Defenders of Wildlife*, 504 U.S. 555 at 560.

15 28. In order to meet the standard laid out in *Spokeo* and *Lujan*, Plaintiff must  
16 clearly allege facts demonstrating all three prongs above.

### 17 **A. The “Injury in Fact” Prong**

18 29. Plaintiff’s injury in fact must be both “concrete” and “particularized” in order  
19 to satisfy the requirements of Article III of the Constitution, as laid out in  
20 *Spokeo (Id.)*.

21 30. For an injury to be “concrete” it must be a *de facto* injury, meaning that it  
22 actually exists. *Soppet v. Enhanced Recovery Co., LLC*, 679 F.3d 637, 638  
23 (7<sup>th</sup> Cir. 2012). In the present case, Plaintiff was called on her cellular phone  
24 by Defendant, who utilized an ATDS and a pre-recorded voice or artificial  
25 voice paired with a voice recognition system. Such calls are a nuisance, an  
26 invasion of privacy, and an expense to Plaintiff. All three of these injuries are  
27 concrete and *de facto*.  
28

1 31. For an injury to be “particularized” means that the injury must “affect the  
2 Plaintiff in a personal and individual way.” *Spokeo, Inc. v. Robins*, 578 U.S.  
3 \_\_\_\_ (2016) at 7. In the instant case, it was Plaintiff’s phone that was called  
4 and it was Plaintiff herself who answered the calls. It was Plaintiff’s  
5 personal privacy and peace that was invaded by Defendant’s call and  
6 prerecorded message, that was delivered using an ATDS. Finally, Plaintiff  
7 alone is responsible to pay the bill on her cellular phone. All of these injuries  
8 are particularized and specific to Plaintiff, and will be the same injuries  
9 suffered by each member of the putative class.

10  
11 **B. *The “Traceable to the Conduct of Defendant” Prong***

12 32. The second prong required to establish standing at the pleadings phase is that  
13 Plaintiff must allege facts to show that her injuries are traceable to the  
14 conduct of Defendant(s).

15 33. In the instant case, this prong is met simply by the fact that the message was  
16 delivered to Plaintiff’s cellular phone directly by Defendant, or by  
17 Defendant’s agent at the direction of Defendant.

18  
19 **C. *The “Injury is Likely to be Redressed by a Favorable Judicial Opinion”***  
20 ***Prong***

21 34. The third prong to establish standing at the pleadings phase requires Plaintiff  
22 to allege facts to show that the injury is likely to be redressed by a favorable  
23 judicial opinion.

24 35. In the present case, Plaintiff’s Prayers for Relief include a request for  
25 damages for each call made by Defendant, as authorized by statute in 47  
26 U.S.C. § 227. The statutory damages were set by Congress and specifically  
27 redress the financial damages suffered by Plaintiff and the members of the  
28 putative class.

1 36. Furthermore, Plaintiff’s Prayers for Relief request injunctive relief to restrain  
2 Defendant from the alleged abusive practices in the future. The award of  
3 monetary damages and the order for injunctive relief redress the injuries of  
4 the past, and prevent further injury in the future.

5 37. Because all standing requirements of Article III of the U.S. Constitution have  
6 been met, as laid out in *Spokeo, Inc. v. Robins*, 578 U.S. \_\_\_\_ (2016), Plaintiff  
7 has standing to sue Defendant on the stated claims.

8  
9 **CLASS ACTION ALLEGATIONS**

10 38. Plaintiff brings this action on behalf of herself and on behalf of all others  
11 similarly situated (“the Class”).

12 39. Plaintiff represents, and is a member of, the Class, consisting of:

13  
14 a. All persons within the United States who had or have a number  
15 assigned to a cellular telephone service, who received at least one  
16 telephone call using an ATDS and/or an artificial or prerecorded voice  
17 from Grand Celebration Cruises, LLC, or their agents calling on behalf  
18 of Grand Celebration Cruises, LLC, between the date of filing this  
19 action and the four years preceding, where such calls were placed for  
20 the purpose of marketing, to non-customers of Grand Celebration  
21 Cruises, LLC, at the time of the calls.

22  
23 40. Defendant and their employees or agents are excluded from the Class.  
24 Plaintiff does not know the number of members in the Class, but believes the  
25 Class members number in the thousands, if not more. Thus, this matter  
26 should be certified as a Class action to assist in the expeditious litigation of  
27 this matter.  
28





1 41. Plaintiff and members of the Class were harmed by the acts of Defendant in  
2 at least the following ways: Defendant illegally contacted Plaintiff and the  
3 Class members via their cellular telephones thereby causing Plaintiff and the  
4 Class members to incur certain cellular telephone charges or reduce cellular  
5 telephone time for which Plaintiff and the Class members previously paid, by  
6 having to retrieve or administer messages left by Defendant or her agents,  
7 during those illegal calls, and invading the privacy of said Plaintiff and the  
8 Class members. Plaintiff and the Class members were damaged thereby.

9 42. This suit seeks only damages and injunctive relief for recovery of economic  
10 injury on behalf of the Class and it expressly is not intended to request any  
11 recovery for personal injury and claims related thereto. Plaintiff reserves the  
12 right to expand the Class definition to seek recovery on behalf of additional  
13 persons as warranted as facts are learned in further investigation and  
14 discovery.

15 43. The joinder of the Class members is impractical and the disposition of their  
16 claims in the Class action will provide substantial benefits both to the parties  
17 and to the Court. The Class can be identified through Defendant's records  
18 and/or Defendant's agent's records.

19 44. There is a well-defined community of interest in the questions of law and fact  
20 involved affecting the parties to be represented. The questions of law and fact  
21 to the Class predominate over questions which may affect individual Class  
22 members, including the following:

- 23 i. Whether, within the four years prior to the filing of the  
24 Complaint, Defendant made any call(s) (other than a call made  
25 for emergency purposes or made with the prior express consent  
26 of the called party) to the Class members using any ATDS or an  
27 artificial or prerecorded voice to any telephone number assigned  
28 to a cellular telephone service;

- 1 ii. Whether Defendant called non-customers of Defendant for
- 2 marketing purposes;
- 3 iii. Whether Plaintiff and the Class members were damaged thereby,
- 4 and the extent of damages for such violation(s); and
- 5 iv. Whether Defendant should be enjoined from engaging in such
- 6 conduct in the future.

7 45. As a person who received calls from Defendant in which Defendant used an  
8 ATDS or an artificial or prerecorded voice, without Plaintiff's prior express  
9 consent, Plaintiff is asserting claims that are typical of the Class. Plaintiff  
10 will fairly and adequately represent and protect the interests of the Class in  
11 that Plaintiff has no interests antagonistic to any member of the Class.

12 46. Plaintiff and the members of the Class have all suffered irreparable harm as a  
13 result of the Defendant's unlawful and wrongful conduct. Absent a class  
14 action, the Class will continue to face the potential for irreparable harm. In  
15 addition, these violations of law will be allowed to proceed without remedy  
16 and Defendant will likely continue such illegal conduct. The size of Class  
17 member's individual claims causes, few, if any, Class members to be able to  
18 afford to seek legal redress for the wrongs complained of herein.

19 47. Plaintiff has retained counsel experienced in handling class action claims and  
20 claims involving violations of the Telephone Consumer Protection Act.

21 48. A class action is a superior method for the fair and efficient adjudication of  
22 this controversy. Class-wide damages are essential to induce Defendant to  
23 comply with federal and California law. The interest of Class members in  
24 individually controlling the prosecution of separate claims against Defendant  
25 is small because the maximum statutory damages in an individual action for  
26 violation of privacy are minimal. Management of these claims is likely to  
27 present significantly fewer difficulties than those that would be presented in  
28 numerous individual claims.

1 49. Defendant has acted on grounds generally applicable to the Class, thereby  
2 making appropriate final injunctive relief and corresponding declaratory relief  
3 with respect to the Class as a whole.

4  
5 **FIRST CAUSE OF ACTION:**  
6 **NEGLIGENT VIOLATIONS OF THE TELEPHONE CONSUMER**  
7 **PROTECTION ACT 47 U.S.C. § 227 ET SEQ.**

8 50. Plaintiff incorporates by reference all of the above paragraphs of this  
9 Complaint as though fully stated herein.

10 51. The foregoing acts and omissions of Defendant constitutes multiple negligent  
11 violations of the TCPA, including but not limited to each and every one of the  
12 above-cited provisions of 47 U.S.C. § 227 et seq.

13 52. As a result of Defendant's negligent violations of 47 U.S.C. § 227 et seq.,  
14 Plaintiff and the Class are entitled to an award of \$500.00 in statutory  
15 damages, for each and every violation, pursuant to 47 U.S.C. § 227(b)(3)(B).

16 53. Plaintiff and the Class are also entitled to and seek injunctive relief  
17 prohibiting such conduct in the future.

18  
19 **SECOND CAUSE OF ACTION:**  
20 **KNOWING AND/OR WILLFUL VIOLATIONS OF THE TELEPHONE**  
21 **CONSUMER PROTECTION ACT 47 U.S.C. § 227 ET SEQ.**

22 54. Plaintiff incorporates by reference all of the above paragraphs of this  
23 Complaint as though fully stated herein.

24 55. The foregoing acts and omissions of Defendant constitute multiple knowing  
25 and/or willful violations of the TCPA, including but not limited to each and  
26 every one of the above-cited provisions of 47 U.S.C. § 227 et seq.

27 56. As a result of Defendant's knowing and/or willful violations of 47 U.S.C. §  
28 227 et seq., Plaintiff and each of the Class are entitled to treble damages, as

1 provided by statute, up to \$1,500.00, for each and every violation, pursuant to  
2 47 U.S.C. § 227(b)(3)(B) and 47 U.S.C. § 227(b)(3)(C).

3 57. Plaintiff and the Class are also entitled to and seek injunctive relief  
4 prohibiting such conduct in the future.

5  
6 **PRAYER FOR RELIEF**

7 58. Wherefore, Plaintiff respectfully requests the Court grant Plaintiff and the  
8 Class members the following relief against Defendant :

9  
10 **FIRST CAUSE OF ACTION FOR NEGLIGENT VIOLATION OF**  
11 **THE TCPA, 47 U.S.C. § 227 ET SEQ.**

12 59. As a result of Defendant's negligent violations of 47 U.S.C. § 227(b)(1),  
13 Plaintiff seeks for herself and each Class member \$500.00 in statutory  
14 damages, for each and every violation, pursuant to 47 U.S.C. § 227(b)(3)(B).

15 60. Pursuant to 47 U.S.C. § 227(b)(3)(A), injunctive relief prohibiting such  
16 conduct in the future.

17 61. Any other relief the Court may deem just and proper.

18 **SECOND CAUSE OF ACTION FOR KNOWING AND/OR WILLFUL**  
19 **VIOLATION**  
20 **OF THE TCPA, 47 U.S.C. § 227 ET SEQ.**

21 62. As a result of Defendant's willful and/or knowing violations of 47 U.S.C. §  
22 227(b)(1), Plaintiff seeks for herself and each Class member treble damages,  
23 as provided by statute, up to \$1,500.00 for each and every violation, pursuant  
24 to 47 U.S.C. § 227(b)(3)(B) and 47 U.S.C. § 227(b)(3)(C).

25 63. Pursuant to 47 U.S.C. § 227(b)(3)(A), injunctive relief prohibiting such  
26 conduct in the future.

27 64. Any other relief the Court may deem just and proper.



**TRIAL BY JURY**

65. Pursuant to the seventh amendment to the Constitution of the United States of America, Plaintiff is entitled to, and demands, a trial by jury.

Respectfully submitted,

Date: March 29, 2017

**HYDE & SWIGART**

By: s/Kevin Lemieux.  
Kevin Lemieux  
Attorneys for Plaintiff

**Other Attorneys of Record, besides caption page:**

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CIVIL COVER SHEET

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.

I. (a) PLAINTIFFS
Roxanne Gonzalez, Individually and on behalf of all others similarly situated
(b) County of Residence of First Listed Plaintiff
(c) Attorneys (Firm Name, Address, and Telephone Number)
Kevin Lemieux, Esq., Hyde & Swigart 619-233-7770
2221Camino Del Rio S., Ste. 101, San Diego, CA 92108

DEFENDANTS
Grand Celebration Cruises, LLC
County of Residence of First Listed Defendant
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
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
PTF DEF
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)
CONTRACT
PERSONAL INJURY
FORFEITURE/PENALTY
LABOR
IMMIGRATION
BANKRUPTCY
PROPERTY RIGHTS
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
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):
47 U.S.C. § 227 et seq. ("TCPA")
Brief description of cause:
Defendant violated Telephone Consumer Protection Act

VII. REQUESTED IN COMPLAINT:
CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.
DEMAND \$ 5,000,000.00
CHECK YES only if demanded in complaint:
JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY
(See instructions):
JUDGE
DOCKET NUMBER

DATE 03/30/2017
SIGNATURE OF ATTORNEY OF RECORD s/ Kevin Lemieux

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: [Buffalo's Café Operators Hit with Unpaid Wage Lawsuit](#)

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