

**UNITED STATES DISTRICT COURT  
OF NORTH DAKOTA  
WESTERN DIVISION**

**CASE NO.:**

BERNARD GREGORY AND  
CLINTON PERRY, on behalf of  
themselves and all others similarly  
situated,

Plaintiffs,

vs.

CREEK OILFIELD SERVICES, LLC,

Defendant.

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**COMPLAINT**  
*{Jury Trial Demanded}*

Plaintiffs, BERNARD GREGORY AND CLINTON PERRY, on behalf of themselves and all others similarly situated, by and through counsel, hereby set forth this Representative Action Complaint for Violation of the Fair Labor Standards Act as follows:

**NATURE OF THE COMPLAINT**

1. Plaintiffs, BERNARD GREGORY AND CLINTON PERRY, bring this action against Defendant, CREEK OILFIELD SERVICES, LLC (Hereinafter “Defendant”) for unpaid overtime wages and related penalties. Plaintiffs allege, on behalf of themselves and all other similarly situated employees of Defendant, that Defendant failed and refused to pay Plaintiffs, and all others similarly situated, the proper overtime pay for time worked in violation of the Fair Labor Standards Act (“FLSA”), 29 U.S.C. § 201, Et. Seq.

2. Plaintiffs seek declaratory relief, unpaid overtime pay, liquidated and/or other damages as permitted by applicable law, and attorney's fees, costs, and expenses incurred in this action.

3. At all times relevant hereto, Defendant had an illegal practice and policy in violation of the FLSA of underpaying Plaintiffs their hourly and overtime wages. Defendant routinely required Plaintiffs, and all other similarly situated employees, to work off the clock hours, for which they were not compensated, in violation of the FLSA.

### **JURISDICTION AND VENUE**

4. This Court has original federal question jurisdiction pursuant to 28 U.S.C. § 1331 because this case is brought under the Fair Labor Standards Act (FLSA), 29 U.S.C. § 201, *et seq.*

5. The District of North Dakota has personal jurisdiction over Defendant because it is doing business in North Dakota and in this judicial District.

6. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b) because Defendant resides in this district and a substantial part of the events giving rise to the claim occurred in this District.

#### **A. Plaintiffs**

##### **Named Plaintiffs**

7. Plaintiff, BERNARD GREGORY, is a resident of Watford City, North Dakota. Defendant employed Plaintiff as a driver from on or about December 20, 2016 to the present. Plaintiff's Consent to Join is attached as "Exhibit A."

8. Plaintiff, CLINTON PERRY, is a resident of Gretna, Louisiana. Defendant employed Plaintiff as a fueler tech from on or about June 19, 2017 through on or about August 23, 2017. Plaintiff's Consent to Join is attached as "Exhibit B."

9. At all relevant times, Plaintiffs were employees of Defendant for FLSA purposes.

### **Representative Action Members**

10. The putative members of the representative action are those current and former employees of Defendant who are similarly situated to Plaintiffs; i.e., those hourly compensated employees who were required to work off the clock and not compensated for those hours.

### **B. Defendant**

11. Defendant, CREEK OILFIELD SERVICES, LLC is a limited liability company organized under the laws of the State of North Dakota and conducts business in said state.

12. Upon information and belief, Defendant employed or employs the Named Plaintiffs and the putative members in the representative action.

### **REPRESENTATIVE ACTION ALLEGATIONS**

13. Plaintiffs bring this Complaint as a collective action pursuant to the FLSA, 29 U.S.C. § 216(b), on behalf of all persons who were, are, or will be employed by Defendants as non-exempt hourly employees who have been required to routinely work off the clock and have not been compensated their overtime premium rates for all hours worked in excess of 40 hours per week.

14. This Complaint may be brought and maintained as an "opt-in" collective action, pursuant to 29 U.S.C. § 216(b), for all claims asserted by the Representative Plaintiffs because their claims are similar to the claims of the putative plaintiffs of the representative action.

15. The names and addresses of the putative members of this representative action are available from Defendant. To the extent required by law, notice will be provided to said individuals via First Class Mail and/or by the use of techniques and a form of notice similar to those customarily used in representative actions.

#### **FACTUAL BACKGROUND**

16. Defendant is an oilfield services company that provides fracing and fueling services to its clients in the oil and gas industry.

17. Up until the present, Defendant employed Plaintiffs and other similarly situated employees to perform fracing and fueling operations for the benefit of Defendant's customers.

18. Defendant maintains locations throughout North Dakota.

19. Defendant failed or refused to pay Plaintiffs and other similarly situated employees overtime pay for all hours worked in excess of 40 hours per week. Specifically, for the duration of their employment with Defendants, Plaintiff and other similarly situated employees were required to work off the clock without any compensation. Off-the-clock work included, but was not limited to, attending daily safety meetings, loading and unloading equipment to and from work vehicles, and transporting other co-workers to job sites.

20. Plaintiffs estimate that they worked an average of 5 to 10 hours off the clock every week.

21. Management directed and/or was aware of employees not being properly compensated for all hours worked in excess of 40 hours per week and therefore willfully violated the FLSA.

22. Plaintiffs are personally aware of many other employees employed by Defendant who were required to work off the clock and who were not paid their proper overtime pay for all hours worked in excess of 40 hours per week; however, said employees are reluctant to come forward in fear of losing their jobs.

**VIOLATION OF THE FAIR LABOR STANDARDS ACT**

23. Plaintiffs, BERNARD GREGORY AND CLINTON PERRY, on behalf of themselves and all other similarly situated employees of Defendant, reallege and incorporate herein the allegations contained in Paragraphs 1 through 22 as if they were set forth fully herein.

24. At all relevant times, Defendant has been and continues to be an "employer" engaged in the interstate "commerce" and/or in the production of "goods" for "commerce" (i.e. tortilla baking and distribution business) within the meaning of the FLSA, 29 U.S.C. § 203. At all relevant times, Defendant has employed and/or continues to employ "employee[s]," including Plaintiffs and each of the putative members of the FLSA representative action who themselves handled goods that had travelled in interstate "commerce." At all times, Defendant has had gross operating revenues in excess of \$500,000.00 per annum.

25. The FLSA requires each covered employer, such as Defendant, to

compensate Plaintiffs, as well as other laborers, for all hours worked in excess of 40 hours per week at time and a half of the employee's regular rate of pay.

26. Plaintiffs and the putative members of the FLSA representative action are not exempt from the right to receive the appropriate overtime pay under the FLSA and in fact work overtime hours for which an overtime premium was not paid.

27. As a result of Defendant's failure to compensate its employees, including Plaintiffs BERNARD GREGORY AND CLINTON PERRY and all similarly situated employees at the overtime rate of pay for all hours worked in excess of 40 hours per week, including those hours worked off the clock. Defendant has violated—and continues to violate—the FLSA, 29 U.S.C. § 207(a)(1).

#### **PRAYER FOR RELIEF**

28. Designation of this action as a collective action on behalf of the proposed members of the FLSA representative action and prompt issuance of notice pursuant to 29 U.S.C. § 216(b) to all similarly situated members of the FLSA opt-in class apprising them of the pendency of this action and permitting them to assert timely FLSA claims in this action by filing individual consents to join/sue pursuant to 29 U.S.C. § 216(b);

29. Designation of Plaintiffs, BERNARD GREGORY AND CLINTON PERRY, as Representative Plaintiffs of the putative members of the FLSA representative action;

30. A declaratory judgment that the practices complained of herein are unlawful under the FLSA;

31. An award of damages, including liquidated damages, to be paid by Defendant;

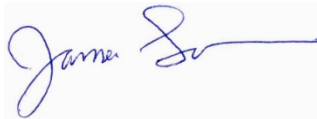
32. Costs and expenses of this action incurred herein, including reasonable attorneys' fees and expert fees; Pre-Judgment and Post-Judgment interest, as provided by law; and

33. Any and all such other and further legal and equitable relief as this Court deems necessary, just, and proper.

**DEMAND FOR JURY TRIAL**

Plaintiffs, BERNARD GREGORY AND CLINTON PERRY, on behalf of themselves and all others similarly situated, hereby demand a jury trial on all causes of action and claims with respect to which they and all members of the proposed representative action have a right to jury trial.

Goldberg & Loren, P.A.  
3523 45<sup>th</sup> Street, Suite 100  
Fargo, North Dakota 58104  
Main Phone: (954) 585-4878  
Facsimile: (954) 585-4886  
E-Mail: JLoren@goldbergloren.com

A handwritten signature in blue ink, appearing to read "James Loren", is written over a light gray rectangular background.

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James M. Loren, Esquire  
FL Bar No.: 55409

**CONSENT TO JOIN PURSUANT TO 29 U.S.C. §216(b)**

Name: BERNARD GREGORY

1. I hereby consent and agree and opt-in to become a plaintiff in the lawsuit brought under the Fair Labor Standards Act of 1938, as amended, 29 U.S.C. § 201, *et seq.*, to recover unpaid overtime and/or minimum wage compensation from my X current /      former employer.

2. I hereby agree to be bound by any adjudication of this action by the Court, whether it is favorable or unfavorable. I further agree to be bound by any collective action settlement herein approved by my attorneys and approved by this Court as fair, adequate, and reasonable.

3. I intend to pursue my claim individually, unless and until the Court certifies this case as a collective action. I agree to serve as a class representative if the court approves. If someone else serves as a class representative, then I designate the class representatives as my agents to make decisions on my behalf concerning the litigation, the manner of conducting the litigation, the entering of an agreement with the Plaintiff's counsel concerning attorney's fees and costs, and all other matters pertaining to this lawsuit.

4. In the event the case is certified and then decertified, I authorize Plaintiffs' counsel to use this Consent Form to re-file my claims in a separate or related action against my employer.

5. I hereby designate the Law Offices of Goldberg & Loren, P.A. to represent me in this action.

Date: 8/25/17

Bernard C. Gregory  
Signature



**CONSENT TO JOIN PURSUANT TO 29 U.S.C. §216(b)**

Name: CLINTON PERRY

1. I hereby consent and agree and opt-in to become a plaintiff in the lawsuit brought under the Fair Labor Standards Act of 1938, as amended, 29 U.S.C. § 201, *et seq.*, to recover unpaid overtime and/or minimum wage compensation from my     current /   X  former employer.

2. I hereby agree to be bound by any adjudication of this action by the Court, whether it is favorable or unfavorable. I further agree to be bound by any collective action settlement herein approved by my attorneys and approved by this Court as fair, adequate, and reasonable.

3. I intend to pursue my claim individually, unless and until the Court certifies this case as a collective action. I agree to serve as a class representative if the court approves. If someone else serves as a class representative, then I designate the class representatives as my agents to make decisions on my behalf concerning the litigation, the manner of conducting the litigation, the entering of an agreement with the Plaintiff's counsel concerning attorney's fees and costs, and all other matters pertaining to this lawsuit.

4. In the event the case is certified and then decertified, I authorize Plaintiffs' counsel to use this Consent Form to re-file my claims in a separate or related action against my employer.

5. I hereby designate the Law Offices of Goldberg & Loren, P.A. to represent me in this action.

Date: \_\_\_\_\_

  
Clinton Perry (Sep 11, 2017)

\_\_\_\_\_  
Signature

### 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. 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 THE REVERSE OF THIS FORM.)

|  |   |
|--|---|
| <b>I. (a) PLAINTIFF</b><br><br>BERNARD GREGORY AND CLINTON PERRY<br><br>(b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF<br>(EXCEPT IN U.S. PLAINTIFF CASES)<br><b>MCKENZIE</b> | <b>DEFENDANT</b><br><br>CREEK OILFILED SERVICES, LLC<br><br>COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT<br>(IN U.S. PLAINTIFF CASES ONLY)<br>NOTE: IN LAND CONDEMNATION CASES USE THE LOCATION OF THE TRACT OF LAND INVOLVED<br><b>BURLEIGH</b> |
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| <b>(C) ATTORNEYS (FIRM NAME, ADDRESS AND TELEPHONE NUMBER)</b><br><b>GOLDBERG &amp; LOREN, P.A.</b><br><b>100 S. PINE ISLAND RD, SUITE # 132</b><br><b>PLANTATION, FLORIDA 33324</b><br><b>Tel. (954) 585-4878</b> | <b>ATTORNEYS (IF KNOWN)</b><br><br> |
|--|-------------------------------------|

|  |   |   |   |  |         |                       |   |   |   |                          |   |   |   |   |   |                |   |
|--|---|---|---|--|---------|-----------------------|---|---|---|--------------------------|---|---|---|---|---|----------------|---|
| <b>II. BASIS OF JURISDICTION</b> (PLACE AN X IN ONE BOX ONLY)<br><br><input type="checkbox"/> 1 U.S. Government Plaintiff<br><input type="checkbox"/> 2 U.S. Government Defendant<br><input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)<br><input type="checkbox"/> 4 Diversity (Indicates Citizenship of Parties in Item III) | <b>III. CITIZENSHIP OF PRINCIPAL PARTIES</b> (PLACE AN X IN ONE BOX FOR PLAINTIFF AND ONE BOX FOR DEFENDANT)<br>(FOR DIVERSITY CASES ONLY) ONE BOX FOR PLAINTIFF AND ONE BOX FOR DEFENDANT<br><table style="width: 100%; border: none;"> <tr> <td style="border: none;"></td> <td style="border: none; text-align: center;">PTF DEF</td> <td style="border: none;"></td> <td style="border: none; text-align: center;">PTF DEF</td> </tr> <tr> <td style="border: none;">Citizen of This State</td> <td style="border: none; text-align: center;"><input type="checkbox"/> 1 <input type="checkbox"/> 1</td> <td style="border: none;">Incorporated or Principal Place of Business in This State</td> <td style="border: none; text-align: center;"><input type="checkbox"/> 4 <input type="checkbox"/> 4</td> </tr> <tr> <td style="border: none;">Citizen of Another State</td> <td style="border: none; text-align: center;"><input type="checkbox"/> 2 <input type="checkbox"/> 2</td> <td style="border: none;">Incorporated and Principal Place of Business in Another State</td> <td style="border: none; text-align: center;"><input type="checkbox"/> 5 <input type="checkbox"/> 5</td> </tr> <tr> <td style="border: none;">Citizen or Subject of a Foreign Country</td> <td style="border: none; text-align: center;"><input type="checkbox"/> 3 <input type="checkbox"/> 3</td> <td style="border: none;">Foreign Nation</td> <td style="border: none; text-align: center;"><input type="checkbox"/> 6 <input type="checkbox"/> 6</td> </tr> </table> |   | 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 |
|  | PTF DEF   |   | PTF DEF   |  |         |                       |   |   |   |                          |   |   |   |   |   |                |   |
| Citizen of This State  | <input type="checkbox"/> 1 <input type="checkbox"/> 1   | Incorporated or Principal Place of Business in This State     | <input type="checkbox"/> 4 <input type="checkbox"/> 4 |  |         |                       |   |   |   |                          |   |   |   |   |   |                |   |
| Citizen of Another State   | <input type="checkbox"/> 2 <input type="checkbox"/> 2   | Incorporated and Principal Place of Business in Another State | <input type="checkbox"/> 5 <input type="checkbox"/> 5 |  |         |                       |   |   |   |                          |   |   |   |   |   |                |   |
| Citizen or Subject of a Foreign Country  | <input type="checkbox"/> 3 <input type="checkbox"/> 3   | Foreign Nation  | <input type="checkbox"/> 6 <input type="checkbox"/> 6 |  |         |                       |   |   |   |                          |   |   |   |   |   |                |   |

| IV. NATURE OF SUIT (PLACE AN X IN ONE BOX ONLY)   |   |   |  |  |  |
|---|---|---|--|--|--|
| CONTRACT  | TORT  | FORFEITURE/PENALTY  | BANKRUPTCY   | LABOR  | OTHER STATUTES   |
| <input type="checkbox"/> 110 Insurance<br><input type="checkbox"/> 120 Marine<br><input type="checkbox"/> 130 Miller Act<br><input type="checkbox"/> 140 Negotiable Instrument<br><input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment<br><input type="checkbox"/> 151 Medicare Act<br><input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans)<br><input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits<br><input type="checkbox"/> 160 Stockholders Suits<br><input type="checkbox"/> 190 Other Contract<br><input type="checkbox"/> 195 Contract Product Liab. | <b>PERSONAL INJURY</b><br><input type="checkbox"/> 310 Airplane<br><input type="checkbox"/> 315 Airplane Product Liability<br><input type="checkbox"/> 320 Assault, Libel & Slander<br><input type="checkbox"/> 330 Federal Employers' Liability<br><input type="checkbox"/> 340 Marine<br><input type="checkbox"/> 345 Marine Product Liability<br><input type="checkbox"/> 350 Motor Vehicle<br><input type="checkbox"/> 355 Motor Vehicle<br>Product Liability<br><input type="checkbox"/> 360 Other Personal Injury | <input type="checkbox"/> 362 Personal Injury—Med. Malpractice<br><input type="checkbox"/> 365 Personal Injury—Product Liability<br><input type="checkbox"/> 368 Asbestos Personal Injury Product Liability<br><b>PERSONAL PROPERTY</b><br><input type="checkbox"/> 370 Other Fraud<br><input type="checkbox"/> 371 Truth in Lending<br><input type="checkbox"/> 380 Other Personal Property Damage<br><input type="checkbox"/> 385 Property Damage<br>Product Liability | <input type="checkbox"/> 610 Agriculture<br><input type="checkbox"/> 620 Other Food & Drug<br><input type="checkbox"/> 625 Drug-Related Seizure of Prop. 21 USC 881<br><input type="checkbox"/> 630 Liquor Laws<br><input type="checkbox"/> 640 R.R. & Truck<br><input type="checkbox"/> 650 Airline Regs<br><input type="checkbox"/> 660 Occupational Safety/Health<br><input type="checkbox"/> 690 Other | <input type="checkbox"/> 422 Appeal 28 USC 158<br><input type="checkbox"/> 423 Withdrawal 28 USC 157<br><b>PROPERTY RIGHTS</b><br><input type="checkbox"/> 820 Copyrights<br><input type="checkbox"/> 830 Patent<br><input type="checkbox"/> 840 Trademark<br><b>SOCIAL SECURITY</b><br><input type="checkbox"/> 861 HIA (13958)<br><input type="checkbox"/> 862 Black Lung (923)<br><input type="checkbox"/> 863 DIWC/DIWW (405(g))<br><input type="checkbox"/> 864 SSID Title XVI<br><input type="checkbox"/> 865 RSI (405(g)) | <input type="checkbox"/> 400 State Reapportionment<br><input type="checkbox"/> 410 Antitrust<br><input type="checkbox"/> 430 Banks and Banking<br><input type="checkbox"/> 450 Commerce/ICC Rates<br><input type="checkbox"/> 460 Deportation<br><input type="checkbox"/> 470 Racketeer Influenced & Corrupt Organization<br><input type="checkbox"/> 810 Selective Service<br><input type="checkbox"/> 850 Securities/Commodity/Exchange<br><input type="checkbox"/> 875 Customer Challenge 12 USC 3410<br><input type="checkbox"/> 891 Agricultural Acts<br><input type="checkbox"/> 892 Econ. Stabilization Act<br><input type="checkbox"/> 893 Environmental Matters<br><input type="checkbox"/> 894 Energy Allocation Act<br><input type="checkbox"/> 895 Freedom of Information Act<br><input type="checkbox"/> 900 Appeal of Fee Determ. Equal Access/Justice<br><input type="checkbox"/> 950 Const. of State Statute<br><input type="checkbox"/> 890 Other Statutory Actions |
| <b>REAL PROPERTY</b><br><input type="checkbox"/> 210 Land Condemnation<br><input type="checkbox"/> 220 Foreclosure<br><input type="checkbox"/> 230 Rent, Lease & Eject.<br><input type="checkbox"/> 240 Torts to Land<br><input type="checkbox"/> 245 Tort Product Liability<br><input type="checkbox"/> 290 All Other Real Prop.   | <b>CIVIL RIGHTS</b><br><input type="checkbox"/> 441 Voting<br><input type="checkbox"/> 442 Employment<br><input type="checkbox"/> 443 Housing/Accommodations<br><input type="checkbox"/> 444 Welfare<br><input type="checkbox"/> 440 Other Civil Rights   | <b>PRISONER PETITIONS</b><br><input type="checkbox"/> 510 Motions to Vacate Sentence<br>Habeas Corpus<br><input type="checkbox"/> 530 General<br><input type="checkbox"/> 535 Death Penalty<br><input type="checkbox"/> 540 Mandamus and Other<br><input type="checkbox"/> 550 Other  | <b>LABOR</b><br><input checked="" type="checkbox"/> 710 Fair Labor Standards<br><input type="checkbox"/> 730 Labor/Mgmt.<br><input type="checkbox"/> 730 Labor/Mgmt. Reporting<br><input type="checkbox"/> 740 Railway Labor Act<br><input type="checkbox"/> 790 Other Labor Litigation<br><input type="checkbox"/> 791 Empl. Ret. Inc. Security Act   | <b>FEDERAL TAX SUITS</b><br><input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)<br><input type="checkbox"/> 871 IRS—Third Party 26 USC 7609   |  |

| V. ORIGIN (PLACE AN X IN ONE BOX ONLY)                    |   |  |   |  |   |  |
|---|---|--|---|--|---|--|
| <input checked="" type="checkbox"/> 1 Original Proceeding | <input type="checkbox"/> 2 Removed from State Court | <input type="checkbox"/> 3 Remanded from Appellate Court | <input type="checkbox"/> 4 Reinstated or Reopened | <input type="checkbox"/> 5 Transferred from another district | <input type="checkbox"/> 6 Multidistrict Litigation | <input type="checkbox"/> 7 Appeal to District Judge from Magistrate Judgment |

|                            |  |
|----------------------------|--|
| <b>VI. CAUSE OF ACTION</b> | Cite the U.S. Civil Statute under which you are filing (Do not Cite jurisdictional Statutes unless diversity)<br>29 USC § 201 Et Seq <b>Brief Description of Cause</b> unpaid overtime |
|----------------------------|--|

|                                    |  |                  |   |
|------------------------------------|--|------------------|---|
| <b>VII. REQUESTED IN COMPLAINT</b> | CHECK IF THIS IS A <b>CLASS ACTION</b><br><input type="checkbox"/> UNDER F.R.C.P. 23 | <b>DEMAND \$</b> | CHECK YES only if demanded in complaint:<br><b>JURY DEMAND:</b> <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
|------------------------------------|--|------------------|---|

|  |                    |              |                   |
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| <b>VIII. RELATED CASE(S) IF ANY</b> None | (See instructions) | <b>JUDGE</b> | <b>DOCKET NO.</b> |
|--|--------------------|--------------|-------------------|

|                                 |                                     |
|---------------------------------|-------------------------------------|
| DATE<br><b>October 16, 2017</b> | SIGNATURE OF ATTORNEY OF RECORD<br> |
|---------------------------------|-------------------------------------|

|                      |               |                    |                              |
|----------------------|---------------|--------------------|------------------------------|
| FOR OFFICE USE ONLY: |               |                    |                              |
| Receipt No. _____    | 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: [Without a Paddle: Creek Oilfield Services Hit with Unpaid Overtime Lawsuit](#)

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