

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

SEBRE MILLER, individually and)
on behalf of all others similarly situated,)

Plaintiff,)

v.)

BRAZILIAN WAX, INC., and)
ANDREIA GUILMET,)

Defendants.)
_____)

CIVIL ACTION FILE NO.:

_____)
JURY TRIAL DEMANDED

COLLECTIVE ACTION COMPLAINT

COMES NOW Plaintiff SEBRE MILLER ("Plaintiff"), by and through her undersigned counsel, and brings this Collective Action Complaint against Defendants BRAZILIAN WAX, INC. ("BWI") and ANDREIA GUILMET ("Guilmet", and, together with BWI, "Defendants"), individually and on behalf of all persons similarly situated, and alleges as follows:

Jurisdiction and Venue

1.

This Court has subject matter jurisdiction under 28 U.S.C. §1331 because this case is brought under the Fair Labor Standards Act, 29 U.S.C. §201, *et seq.* (the "FLSA").

2.

Venue is proper in this judicial district pursuant to 28 U.S.C. §1391(b), as the Defendants reside and conduct business within Cobb County, which is in this Court's Atlanta Division.

Parties

3.

BWI is a Georgia corporation having its principal place of business in Cobb County, Georgia, within the territorial jurisdiction of this Court, and, at all times mentioned in this Complaint, said Defendant employed Plaintiff and other similarly situated individuals.

4.

Guilmet is a resident of the State of Georgia. At all times mentioned in this Complaint, Guilmet was (and she now is) the owner and Chief Executive Officer of BWI.

5.

BWI owns and operates 17 boutiques located in Georgia and Tennessee under the trade name "Brazilian Wax by Andreia" through numerous wholly-owned subsidiaries and/or affiliates.

6.

Plaintiff is a resident of the State of Georgia. Plaintiff was employed as an aesthetician at BWI's boutique located in Athens, Georgia from December 15, 2015 until October 4, 2016.

Factual Allegations

7.

The preceding paragraphs of this Complaint are incorporated by reference as if fully set forth herein.

8.

At all times relevant herein, BWI has operated and controlled an enterprise engaged in interstate commerce with an annual gross volume in excess of \$500,000.00.

9.

At all times relevant herein, Plaintiff and other similarly situated individuals handled goods that have moved in or materially produced for commerce by another person including specifically the Beauty Image wax, waxing cloths, waxing pot, alcohol, oil, gloves and baby powder that were mandated by Defendants.

10.

At all times relevant herein, Guilmet exercised sufficient control over BWI's day-to-day operations, including control over its personnel and employment policies and practices, to be considered an employer of Plaintiff and all other similarly situated individuals under the FLSA.

11.

At all times relevant herein, Defendants were the employers of Plaintiff and all other similarly situated individuals within the meaning of the FLSA.

12.

Defendants have misclassified Plaintiff and other similarly situated individuals as independent contractors, when in reality they were/are employees of Defendants under the applicable legal standards.

13.

At all times relevant herein, Defendants directly or indirectly hired Plaintiff and all other similarly situated employees.

14.

At all times relevant herein, Defendants directly or indirectly controlled Plaintiff and all other similarly situated employees' work schedules.

15.

At all times relevant herein, Defendants directly or indirectly controlled the conditions of Plaintiff's and all other similarly situated employees' employment.

16.

At all times relevant herein, Defendants determined the rate and method of payment of Plaintiff and all other similarly situated employees.

17.

At all times relevant herein, Defendants exercised extensive control over the manner in which Plaintiff and other similarly situated employees performed their jobs and conducted themselves on Defendants' premises, including when and how they were to perform services, what they were allowed to wear, what amounts they could charge or receive for services, and how they could interact with customers.

18.

At all times relevant herein, Defendants maintained control, oversight, and direction over Plaintiff and all other similarly situated employees.

19.

Defendants promulgated and enforced policies affecting the payment of wages for overtime compensation to Plaintiff and all other similarly situated employees.

20.

During the applicable statutory period, Plaintiff and all other similarly situated employees were required by Defendants, and did work, on more than one occasion, in excess 40 hours per week.

21.

Based on the number of hours actually worked, Plaintiff and all other similarly situated employees did not receive the statutory minimum wage.

22.

Defendants failed to compensate Plaintiff and all other similarly situated employees overtime compensation at one and one-half times their regular rates of pay.

23.

Defendants' failure to pay minimum wages to Plaintiff and all other similarly situated employees as alleged herein was willful, intentional and/or lacked good faith.

24.

Defendants' failure to pay overtime compensation to Plaintiff and all other similarly situated employees as alleged herein was willful, intentional and/or lacked good faith.

25.

Upon information and belief, at all times relevant herein, Defendants have failed to keep full and accurate records of Plaintiff's and all other similarly situated employees' hours and wages, in violation of 29 C.F.R. §516.

26.

Defendants' wrongful acts and omissions as alleged herein were not in conformity with or in reliance upon any written administrative regulation, order, ruling, approval, or interpretation by the U.S. Department of Labor, Georgia Department of Labor, or any administrative practice or enforcement policy of such departments.

27.

Defendants' violations of the FLSA as alleged herein were willful, arbitrary, unreasonable and/or in bad faith.

Collective Action Allegations

28.

The preceding paragraphs of this Complaint are incorporated by reference as if fully set forth herein.

29.

Plaintiff brings this action, individually and on behalf of all other similarly situated employees who were misclassified as independent contractors by Defendant and who were not paid at least minimum wage or overtime compensation as required by the FLSA on or after the date that is three years before the filing of this Complaint.

30.

Plaintiff brings this collective action to recover monetary damages owed by Defendants to Plaintiff and members of the putative Collective for all hours worked not compensated at the statutory minimum wage.

31.

Plaintiff brings this collective action to recover monetary damages owed by Defendants to Plaintiff and members of the putative Collective for all overtime hours worked.

32.

Plaintiff brings this claim for relief due to Defendants' intentional violation of the FLSA, as a collective action pursuant to 29 U.S.C. §216(b). The Collective is defined as follows:

All estheticians employed by BWI within the three years preceding the filing of this Complaint.

33.

This action is properly brought as a collective action pursuant to the collective action procedures of the FLSA because Plaintiff and the putative Collective members are similarly situated in that they were all subject to Defendants' commonly applied policies and/or practices of misclassifying them as independent contractors, failing to pay them proper minimum wages, and failing to pay them overtime. Further, all members of the putative Collective have been subjected to Defendants' willful and intentional violation of their statutory obligations to pay minimum wage and overtime compensation at one and one-half times their regular rates of pay for work in excess of 40 hours per week.

**First Claim for Relief
(Individual and Collective Claim for Violations of the FLSA)**

34.

The preceding paragraphs of this Complaint are incorporated by reference as if fully set forth herein.

35.

Plaintiff and all other similarly situated employees were required by Defendants, and did regularly, work in excess of 40 hours per week.

36.

Defendants failed to pay Plaintiff and all other similarly situated employees the applicable statutory minimum wage for all hours worked.

37.

Defendants failed to pay Plaintiff and all other similarly situated employees proper overtime compensation at one and one-half times their regular rates of pay for hours worked in excess of 40 in a work week.

38.

Defendants' commonly-applied policy and practice, as described herein, was willful, intentional, unreasonable, arbitrary and in bad faith.

39.

Because Defendants willfully violated the FLSA as described herein, a three-year statute of limitations applies to such violation pursuant to 29 U.S.C. §255.

40.

The records concerning the number of hours worked by Plaintiff, and compensation she received, are in the exclusive possession and under the sole custody and control of Defendants, and Plaintiff is unable to state at this time the exact amount owing to her. Plaintiff proposes to obtain such information by

appropriate discovery proceedings to be taken promptly in this case, and Plaintiff will then amend her pleadings to set forth the amount due.

41.

As a result of the foregoing, Plaintiff and all other similarly situated employees were illegally deprived of minimum wages and overtime compensation, in such amounts to be determined at trial, and are entitled to recovery of such unpaid amounts, liquidated damages, prejudgment interest, costs, attorney's fees and other compensation pursuant to 29 U.S.C. §216(b).

**Second Claim for Relief
(Individual Claim for Wrongful Termination)**

42.

The preceding paragraphs of this Complaint are incorporated by reference as if fully set forth herein.

43.

Plaintiff voiced concerns to Defendants regarding their unlawful employment policies and practices described herein. Plaintiff specifically complained to the BWI Athens location manager Julie (Inu) of the mandatory schedule applied to Plaintiff while she was classified as an independent contractor. Plaintiff further complained to Andreia Guilmet about mandatory work times. Plaintiff further complained of BWI scheduling clients beyond Plaintiff's scheduled

work time and after the store's scheduled closing. BWI mandated Plaintiff remain despite her "independent contractor" status. Defendants further mandated a rotating schedule for cleaning areas of the store. Plaintiff voiced her concerns regarding the mandatory cleaning requirements and mandatory work times to complete same.

44.

After Defendants received Plaintiff's concerns, Defendants terminated Plaintiff's employment.

45.

Defendants' actions constitute wrongful termination of Plaintiff's employment in violation of the FLSA.

46.

Specifically, Defendants retaliated against Plaintiff and terminated her for opposing Defendants' unlawful, deceitful, dishonest and improper employment policies and practices described herein.

47.

As a result of the intentional, willful and wanton acts of Defendants as described herein, Plaintiff has suffered and will continue to suffer the loss of a better, more productive long-term career with Defendants and the loss of better

wages, bonuses, benefits and other compensation such employment would entail. Plaintiff has also suffered future pecuniary losses, emotional pain and suffering, inconvenience, loss of enjoyment of life, and other non-pecuniary losses. Plaintiff has further experienced severe emotional and physical distress. Plaintiff seeks back pay, front pay, actual damages, liquidated damages, compensatory damages, punitive damages, prejudgment interest, attorney's fees, and costs under this cause of action.

Prayer for Relief

WHEREFORE, Plaintiff SEBRE MILLER, on behalf of herself and all other similarly situated individuals, prays for the following:

(a) A judgment declaring Plaintiff and all other similarly situated individuals as employees of Defendants under the FLSA;

(b) A judgment declaring that Defendants' wage practices alleged herein violate the FLSA;

(c) An order for injunctive relief ordering Defendants to end all illegal wage practices alleged herein pursuant to the FLSA;

(d) An order directing Defendants, at their own expense, to investigate and account for the number of hours actually worked, and compensation received by, Plaintiff and all Collective members for each work week;

(e) Judgment against Defendants, jointly and severally, for damages according to proof, including liquidated damages, and any and all civil penalties available under applicable law;

(f) An order directing Defendants to pay Plaintiff and all collective members prejudgment interest, reasonable attorney's fees and all costs connected with this action;

(g) Incentive awards for Plaintiff;

(h) Certification of the Collective;

(i) Equitable tolling for the Collective; and

(j) Such other and further relief as this Court may deem necessary, just and proper.

WHEREFORE, Plaintiff SEBRE MILLER, individually, prays for the following:

(a) Judgment against Defendants, jointly and severally, for the maximum relief allowed by law, including, but not limited to, back pay, front pay, actual damages, compensatory damages, mental pain and suffering, emotional distress, attorney's fees and costs, punitive damages, prejudgment interest and such other relief as this Court may deem appropriate.

PLAINTIFF REQUESTS A TRIAL BY JURY ON ALL COUNTS SO TRIABLE.

This 18th day of January, 2017.

FORTSON, BENTLEY AND GRIFFIN, P.A.

By: /s/ Bricker S. Daughtry
Bricker S. Daughtry
Georgia Bar No. 663833

By: /s/ Adam B. Land
Adam B. Land
Georgia Bar No. 075641

2500 Daniell's Bridge Road
Building 200, Suite 3A
Athens, GA 30606
706-548-1151
bsd@fbglaw.com
abl@fbglaw.com

Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

SEBRE MILLER, individually and on)
behalf of all others similarly situated,)

Plaintiff,)

v.)

BRAZILIAN WAX, INC., and)
ANDREIA GUILMET,)

Defendants.)

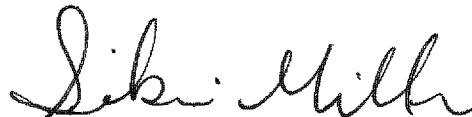
CIVIL ACTION FILE NO.:

JURY TRIAL DEMANDED

**CONSENT TO BECOME A PARTY PLAINTIFF UNDER THE FAIR
LABOR STANDARDS ACT (29 U.S.C. §201, ET SEQ.)**

I, Sebre Miller, a former employee of Brazilian Wax, Inc. consent to become a party Plaintiff in the above captioned action with respect to all cognizable claims for minimum wage and overtime compensation and any other benefits available under the Fair Labor Standards Act and other applicable laws, in accordance with the Representation Agreement executed by the undersigned for such purpose.

This 17 day of January, 2017.



Sebre Miller

JS44 (Rev. 11/16 NDGA)

CIVIL COVER SHEET

The JS44 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 is required for the use of the Clerk of Court for the purpose of initiating the civil docket record. (SEE INSTRUCTIONS ATTACHED)

<p>I. (a) PLAINTIFF(S) Sebre Miller, individually and on behalf of all others similarly situated</p> <p>(b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF <u>Athens-Clarke County</u> <small>(EXCEPT IN U.S. PLAINTIFF CASES)</small></p>	<p>DEFENDANT(S) Brazilian Wax, Inc. and Andreia Guilmet</p> <p>COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT <u>Cobb</u> <small>(IN U.S. PLAINTIFF CASES ONLY)</small></p> <p><small>NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED</small></p>
<p>(c) ATTORNEYS <small>(FIRM NAME, ADDRESS, TELEPHONE NUMBER, AND E-MAIL ADDRESS)</small> Bricker S. Daughtry; Adam B. Land Fortson, Bentley & Griffin, P.A. 2500 Daniell's Bridge Rd. Bldg. 200, Ste 3A Athens, Georgia 30606 (706) 548-1151 bsd@fbglaw.com; abl@fbglaw.com</p>	<p>ATTORNEYS <small>(IF KNOWN)</small></p>

<p>II. BASIS OF JURISDICTION <small>(PLACE AN "X" IN ONE BOX ONLY)</small></p> <p><input type="checkbox"/> 1 U.S. GOVERNMENT PLAINTIFF <input checked="" type="checkbox"/> 3 FEDERAL QUESTION (U.S. GOVERNMENT NOT A PARTY)</p> <p><input type="checkbox"/> 2 U.S. GOVERNMENT DEFENDANT <input type="checkbox"/> 4 DIVERSITY (INDICATE CITIZENSHIP OF PARTIES IN ITEM III)</p>	<p>III. CITIZENSHIP OF PRINCIPAL PARTIES <small>(PLACE AN "X" IN ONE BOX FOR PLAINTIFF AND ONE BOX FOR DEFENDANT) (FOR DIVERSITY CASES ONLY)</small></p> <table style="width:100%; border: none;"> <tr> <td style="text-align: center;"><small>PLF</small></td> <td style="text-align: center;"><small>DEF</small></td> <td style="text-align: center;"><small>PLF</small></td> <td style="text-align: center;"><small>DEF</small></td> <td></td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/> 1</td> <td style="text-align: center;"><input type="checkbox"/> 1</td> <td style="text-align: center;"><input type="checkbox"/> 4</td> <td style="text-align: center;"><input type="checkbox"/> 4</td> <td>INCORPORATED OR PRINCIPAL PLACE OF BUSINESS IN THIS STATE</td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/> 2</td> <td style="text-align: center;"><input type="checkbox"/> 2</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> <td>INCORPORATED AND PRINCIPAL PLACE OF BUSINESS IN ANOTHER STATE</td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> <td>FOREIGN NATION</td> </tr> </table>	<small>PLF</small>	<small>DEF</small>	<small>PLF</small>	<small>DEF</small>		<input type="checkbox"/> 1	<input type="checkbox"/> 1	<input type="checkbox"/> 4	<input type="checkbox"/> 4	INCORPORATED OR PRINCIPAL PLACE OF BUSINESS IN THIS STATE	<input type="checkbox"/> 2	<input type="checkbox"/> 2	<input type="checkbox"/> 5	<input type="checkbox"/> 5	INCORPORATED AND PRINCIPAL PLACE OF BUSINESS IN ANOTHER STATE	<input type="checkbox"/> 3	<input type="checkbox"/> 3	<input type="checkbox"/> 6	<input type="checkbox"/> 6	FOREIGN NATION
<small>PLF</small>	<small>DEF</small>	<small>PLF</small>	<small>DEF</small>																		
<input type="checkbox"/> 1	<input type="checkbox"/> 1	<input type="checkbox"/> 4	<input type="checkbox"/> 4	INCORPORATED OR PRINCIPAL PLACE OF BUSINESS IN THIS STATE																	
<input type="checkbox"/> 2	<input type="checkbox"/> 2	<input type="checkbox"/> 5	<input type="checkbox"/> 5	INCORPORATED AND PRINCIPAL PLACE OF BUSINESS IN ANOTHER STATE																	
<input type="checkbox"/> 3	<input type="checkbox"/> 3	<input type="checkbox"/> 6	<input type="checkbox"/> 6	FOREIGN NATION																	

IV. 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 District) 6 MULTIDISTRICT LITIGATION - TRANSFER 7 APPEAL TO DISTRICT JUDGE FROM MAGISTRATE JUDGE JUDGMENT

8 MULTIDISTRICT LITIGATION - DIRECT FILE

V. CAUSE OF ACTION (CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE A BRIEF STATEMENT OF CAUSE - DO NOT CITE JURISDICTIONAL STATUTES UNLESS DIVERSITY)

Collective Action, Fair Labor Standards Act 29 U.S.C. 201, et seq. and Individual Claim for retaliation in violation of the Fair Labor Standards Act

(IF COMPLEX, CHECK REASON BELOW)

<input type="checkbox"/> 1. Unusually large number of parties.	<input type="checkbox"/> 6. Problems locating or preserving evidence
<input type="checkbox"/> 2. Unusually large number of claims or defenses.	<input type="checkbox"/> 7. Pending parallel investigations or actions by government.
<input type="checkbox"/> 3. Factual issues are exceptionally complex	<input type="checkbox"/> 8. Multiple use of experts.
<input type="checkbox"/> 4. Greater than normal volume of evidence.	<input type="checkbox"/> 9. Need for discovery outside United States boundaries.
<input type="checkbox"/> 5. Extended discovery period is needed.	<input type="checkbox"/> 10. Existence of highly technical issues and proof.

CONTINUED ON REVERSE

FOR OFFICE USE ONLY			
RECEIPT # _____	AMOUNT \$ _____	APPLYING IFP _____	MAG. JUDGE (IFP) _____
JUDGE _____	MAG. JUDGE _____ <small>(Referral)</small>	NATURE OF SUIT _____	CAUSE OF ACTION _____

VI. NATURE OF SUIT (PLACE AN "X" IN ONE BOX ONLY)

CONTRACT - "0" MONTHS DISCOVERY TRACK

- 150 RECOVERY OF OVERPAYMENT & ENFORCEMENT OF JUDGMENT
- 152 RECOVERY OF DEFAULTED STUDENT LOANS (Excl. Veterans)
- 153 RECOVERY OF OVERPAYMENT OF VETERAN'S BENEFITS

CONTRACT - "4" MONTHS DISCOVERY TRACK

- 110 INSURANCE
- 120 MARINE
- 130 MILLER ACT
- 140 NEGOTIABLE INSTRUMENT
- 151 MEDICARE ACT
- 160 STOCKHOLDERS' SUITS
- 190 OTHER CONTRACT
- 195 CONTRACT PRODUCT LIABILITY
- 196 FRANCHISE

REAL PROPERTY - "4" MONTHS DISCOVERY TRACK

- 210 LAND CONDEMNATION
- 220 FORECLOSURE
- 230 RENT LEASE & EJECTMENT
- 240 TORTS TO LAND
- 245 TORT PRODUCT LIABILITY
- 290 ALL OTHER REAL PROPERTY

TORTS - PERSONAL INJURY - "4" MONTHS DISCOVERY TRACK

- 310 AIRPLANE
- 315 AIRPLANE PRODUCT LIABILITY
- 320 ASSAULT, LIBEL & SLANDER
- 330 FEDERAL EMPLOYERS' LIABILITY
- 340 MARINE
- 345 MARINE PRODUCT LIABILITY
- 350 MOTOR VEHICLE
- 355 MOTOR VEHICLE PRODUCT LIABILITY
- 360 OTHER PERSONAL INJURY
- 362 PERSONAL INJURY - MEDICAL MALPRACTICE
- 365 PERSONAL INJURY - PRODUCT LIABILITY
- 367 PERSONAL INJURY - HEALTH CARE/ PHARMACEUTICAL PRODUCT LIABILITY
- 368 ASBESTOS PERSONAL INJURY PRODUCT LIABILITY

TORTS - PERSONAL PROPERTY - "4" MONTHS DISCOVERY TRACK

- 370 OTHER FRAUD
- 371 TRUTH IN LENDING
- 380 OTHER PERSONAL PROPERTY DAMAGE
- 385 PROPERTY DAMAGE PRODUCT LIABILITY

BANKRUPTCY - "0" MONTHS DISCOVERY TRACK

- 422 APPEAL 28 USC 158
- 423 WITHDRAWAL 28 USC 157

CIVIL RIGHTS - "4" MONTHS DISCOVERY TRACK

- 440 OTHER CIVIL RIGHTS
- 441 VOTING
- 442 EMPLOYMENT
- 443 HOUSING/ ACCOMMODATIONS
- 445 AMERICANS with DISABILITIES - Employment
- 446 AMERICANS with DISABILITIES - Other
- 448 EDUCATION

IMMIGRATION - "0" MONTHS DISCOVERY TRACK

- 462 NATURALIZATION APPLICATION
- 465 OTHER IMMIGRATION ACTIONS

PRISONER PETITIONS - "0" MONTHS DISCOVERY TRACK

- 463 HABEAS CORPUS- Alien Detainee
- 519 MOTIONS TO VACATE SENTENCE
- 530 HABEAS CORPUS
- 535 HABEAS CORPUS DEATH PENALTY
- 540 MANDAMUS & OTHER
- 550 CIVIL RIGHTS - Filed Pro se
- 555 PRISON CONDITION(S) - Filed Pro se
- 560 CIVIL DETAINEE: CONDITIONS OF CONFINEMENT

PRISONER PETITIONS - "4" MONTHS DISCOVERY TRACK

- 550 CIVIL RIGHTS - Filed by Counsel
- 555 PRISON CONDITION(S) - Filed by Counsel

FORFEITURE/PENALTY - "4" MONTHS DISCOVERY TRACK

- 625 DRUG RELATED SEIZURE OF PROPERTY 21 USC 881
- 690 OTHER

LABOR - "4" MONTHS DISCOVERY TRACK

- 710 FAIR LABOR STANDARDS ACT
- 720 LABOR/MGMT. RELATIONS
- 740 RAILWAY LABOR ACT
- 751 FAMILY and MEDICAL LEAVE ACT
- 790 OTHER LABOR LITIGATION
- 791 EMPL. RET. INC. SECURITY ACT

PROPERTY RIGHTS - "4" MONTHS DISCOVERY TRACK

- 820 COPYRIGHTS
- 840 TRADEMARK

PROPERTY RIGHTS - "8" MONTHS DISCOVERY TRACK

- 830 PATENT

SOCIAL SECURITY - "0" MONTHS DISCOVERY TRACK

- 861 HIA (1395ff)
- 862 BLACK LUNG (923)
- 863 DIWC (405(g))
- 863 DIWW (405(g))
- 864 SSID TITLE XVI
- 865 RSI (405(g))

FEDERAL TAX SUITS - "4" MONTHS DISCOVERY TRACK

- 870 TAXES (U.S. Plaintiff or Defendant)
- 871 IRS - THIRD PARTY 26 USC 7609

OTHER STATUTES - "4" MONTHS DISCOVERY TRACK

- 375 FALSE CLAIMS ACT
- 376 Qui Tam 31 USC 3729(a)
- 400 STATE REAPPORTIONMENT
- 430 BANKS AND BANKING
- 450 COMMERCE/ICC RATES/ETC.
- 460 DEPORTATION
- 470 RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS
- 480 CONSUMER CREDIT
- 490 CABLE/SATELLITE TV
- 890 OTHER STATUTORY ACTIONS
- 891 AGRICULTURAL ACTS
- 893 ENVIRONMENTAL MATTERS
- 895 FREEDOM OF INFORMATION ACT
- 899 ADMINISTRATIVE PROCEDURES ACT / REVIEW OR APPEAL OF AGENCY DECISION
- 950 CONSTITUTIONALITY OF STATE STATUTES

OTHER STATUTES - "8" MONTHS DISCOVERY TRACK

- 410 ANTI TRUST
- 850 SECURITIES / COMMODITIES / EXCHANGE

OTHER STATUTES - "0" MONTHS DISCOVERY TRACK

- 896 ARBITRATION (Confirm / Vacate / Order / Modify)

*** PLEASE NOTE DISCOVERY TRACK FOR EACH CASE TYPE. SEE LOCAL RULE 26.3**

VII. REQUESTED IN COMPLAINT:

CHECK IF CLASS ACTION UNDER F.R.Civ.P. 23 DEMAND \$ _____

JURY DEMAND YES NO (CHECK YES ONLY IF DEMANDED IN COMPLAINT)

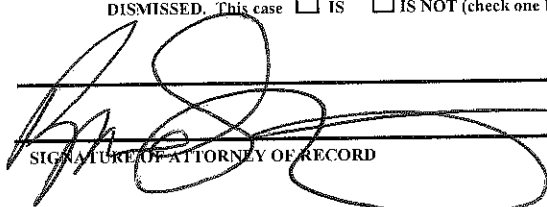
VIII. RELATED/REFILED CASE(S) IF ANY

JUDGE _____ DOCKET NO. _____

CIVIL CASES ARE DEEMED RELATED IF THE PENDING CASE INVOLVES: (CHECK APPROPRIATE BOX)

- 1. PROPERTY INCLUDED IN AN EARLIER NUMBERED PENDING SUIT.
- 2. SAME ISSUE OF FACT OR ARISES OUT OF THE SAME EVENT OR TRANSACTION INCLUDED IN AN EARLIER NUMBERED PENDING SUIT.
- 3. VALIDITY OR INFRINGEMENT OF THE SAME PATENT, COPYRIGHT OR TRADEMARK INCLUDED IN AN EARLIER NUMBERED PENDING SUIT.
- 4. APPEALS ARISING OUT OF THE SAME BANKRUPTCY CASE AND ANY CASE RELATED THERETO WHICH HAVE BEEN DECIDED BY THE SAME BANKRUPTCY JUDGE.
- 5. REPETITIVE CASES FILED BY PRO SE LITIGANTS.
- 6. COMPANION OR RELATED CASE TO CASE(S) BEING SIMULTANEOUSLY FILED (INCLUDE ABBREVIATED STYLE OF OTHER CASE(S)):

7. EITHER SAME OR ALL OF THE PARTIES AND ISSUES IN THIS CASE WERE PREVIOUSLY INVOLVED IN CASE NO. _____, WHICH WAS DISMISSED. This case IS IS NOT (check one box) SUBSTANTIALLY THE SAME CASE.


SIGNATURE OF ATTORNEY OF RECORD

1/17/17
DATE

ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Brazilian Wax, Owner Facing Wage and Hour Class Action](#)
