

because all or substantially all of the events or omissions giving rise to the claims asserted herein took place within the Owensboro Jury Division.

II. PARTIES

A. PLAINTIFF

6. Plaintiff Nathan Tucker is a resident of Greenville, Muhlenberg County, Kentucky. Plaintiff was employed by the Defendant as a Fabricator from sometime in 2014 or 2015 to March 2017. Brewco misclassified Plaintiff as an independent contractor and paid him \$625.00 per week regardless of the number of hours worked until he was reclassified as an hourly, non-exempt employee at and paid a rate of \$15.63 in or around October 2016.

B. DEFENDANT

7. Defendant Mobile Marketing Solutions, Inc. d/b/a Brewco Marketing Group is a Kentucky corporation headquartered in Muhlenberg County at 106 Brewer Drive, Central City, KY 42330. Brewco is an industry leader in experiential marketing, specializing in mobile tours, event marketing, and product sampling. Brewco has manufacturing shops in Central City, KY, Charlotte, NC, and Nashville, TN.

8. During the Relevant Time Periods, Defendant Brewco has been regularly engaged in interstate commerce.

9. During the Relevant Time Periods, Defendant Brewco has been an enterprise within the meaning of § 3(r) and § 3(s)(1) of the FLSA, 29 U.S.C. §§ 203(r) & (s).

10. During the Relevant Time Periods, Defendant Brewco has been an employer within the meaning of the FLSA, 29 U.S.C. §§ 203, 206-07, as well as KY. REV. STAT. ANN. § 337.010

III. THE RELEVANT TIME PERIODS

A. FLSA Claims

11. The FLSA permits plaintiffs to recover unpaid wages and liquidated damages for up to three years prior to the filing of a lawsuit. 29 U.S.C. § 255. Accordingly, the FLSA allegations set forth herein concern the employment of Plaintiff, and similarly situated workers, since three years prior to the filing of this action through the resolution of this litigation.

B. Kentucky State Law Claims

12. The Kentucky statutes governing entitlement to wages and overtime compensation permit plaintiffs to recover unpaid wages and liquidated damages for up to five years prior to the filing of the lawsuit. KY. REV. STAT. ANN. §§ 337.285, 337.385, 413.120. Accordingly, the Kentucky state law allegations set forth herein concern the employment of Plaintiff, and those similarly situated employees he seeks to represent, for five years prior to the filing of this action through the resolution of this litigation.

IV. FACTS

A. Misclassification as an Independent Contractor

13. From sometime in or around the end of 2014 or the beginning of 2015 until in or around October 2016, Plaintiff was employed by the Defendant as a “fabricator” and built displays and mobile marketing equipment in its Central City, Kentucky manufacturing shop.

14. Plaintiff was also required to travel extensively around the country working for Defendant to perform maintenance support, engage in experiential marketing, and provide security.

15. Throughout this time, Defendant classified Plaintiff as an independent contractor and paid him \$625 per week, regardless of the number of hours he worked and including any hours over 40 in a week.

16. Defendant misclassified Plaintiff and other similarly situated workers as independent contractors, even though, based on the economic realities of the relationship, Plaintiff was actually an employee for purposes of the FLSA and KWS coverage.

17. Defendant misclassified Plaintiff as an independent contractor in order to avoid paying overtime pay to its employees as required under the FLSA and KWS.

18. Beginning in or around October 2016 until the end of his employment with Defendant, Plaintiff was classified as a non-exempt employee and given the job title of “laborer.” However, his job duties remained the same as when he was employed as a “fabricator.”

19. During this time period, Defendant paid Plaintiff an hourly rate of approximately \$15.63 per hour.

20. Plaintiff routinely worked more than 40 hours in a workweek throughout his entire tenure with Defendant.

21. Throughout Plaintiff’s employment with Defendant, he clocked in and out using the company’s timeclock at its Central City, Kentucky manufacturing shop unless he was traveling when Defendant did not record his time.

B. Meal Break Violations

22. Defendant required Plaintiff and other similarly situated hourly, non-exempt employees to clock out for one hour per shift, ostensibly for an unpaid meal break.

23. In fact, prominently displayed under the timeclock at the Central City, Kentucky facility where Plaintiff worked was a sign which read: “MUST Clock out for lunch Or 1 hr automatically deducted from timecard” [*sic*].

24. However, on many occasions, Plaintiff and other similarly situated employees were not able to take a lunch break because they were required and/or expected to continue working and therefore were not completely relieved of their duties in order to take a meal break.

25. On these occasions, Plaintiff and similarly situated workers either clocked out and then continued working or the Defendant still deducted one hour from their pay even though they indicated that they were not relieved of their duties by not clocking out.

V. FLSA COLLECTIVE ALLEGATIONS

26. Plaintiff asserts his FLSA misclassification claim pursuant to 29 U.S.C. § 216(b) as a collective action on behalf of the following potential opt-in litigants:

All current and/or former employees of Defendant at any time since five years prior to the filing of this Complaint who were classified as an independent contractor.

(the “Misclassification Collective”).

27. Plaintiff also asserts his FLSA meal period claim pursuant to 29 U.S.C. § 216(b) as a collective action on behalf of the following potential opt-in litigants:

All current and/or former hourly-paid, non-exempt employees of Defendant who had one hour automatically deducted from timecard during a shift when they were required to work through lunch and were not completely relieved of their duties at any time since five years prior to the filing of this Complaint.

(the “Meal Period Collective”).

28. Plaintiff asserts his supplemental KWS misclassification claim and meal period claim on behalf of all members of the Misclassification Collective and Meal Period Collective, respectively, who work or worked for Defendant in Kentucky.

29. Plaintiff seeks to bring these claims on behalf of himself and all members of the Misclassification Collective and Meal Period Collective who opt into this case pursuant to 29 U.S.C. § 216(b).

30. Plaintiff and members of the Misclassification Collective are “similarly situated” as that term is defined in 29 U.S.C. § 216(b) because, *inter alia*, Defendant inappropriately classified them as independent contractors despite controlling virtually every aspect of their employment and

did not pay them overtime for all of the hours above 40 that they worked in a workweek, in violation of the FLSA and KWS.

31. Plaintiff and members of the Meal Period Collective are “similarly situated” as that term is defined in 29 U.S.C. § 216(b) because, *inter alia*, Defendant did not pay them overtime premium pay for all of the hours spent working off the clock during unpaid meal periods above 40 in a workweek, in violation of the FLSA and KWS.

32. Virtually all of the legal and factual issues that will arise in litigating the collective claims are common to Plaintiff and those he seeks to represent. These issues include: (1) whether Defendant exercised sufficient control over Plaintiff and the Misclassification Collective that they were employees under the FLSA and KWS; (2) whether Defendant paid Plaintiff and the Misclassification Collective overtime at one and one-half times their regular rate of pay for hours over 40 in a workweek; (3) whether Plaintiff and the Meal Period Collective were required to work off the clock during unpaid meal periods; and (4) whether Defendant paid Plaintiff and the Meal Period Collective overtime at one and one-half times their regular rate of pay for hours worked over 40 in a week.

VI. CAUSES OF ACTION

A. COUNT I – FLSA OVERTIME CLAIM PURSUANT TO 29 U.S.C. § 216(b)

33. All previous paragraphs are incorporated as though fully set forth herein.

34. Plaintiff asserts this claim pursuant to 29 U.S.C. § 216(b) on behalf of himself and the Misclassification Collective and the Meal Period Collective.

35. The FLSA requires that employees receive overtime premium pay of “not less than one and one-half times” their regular pay rate for hours worked over 40 in a workweek. *See* 29 U.S.C. § 207(a).

36. Plaintiff and members of the Misclassification Collective and the Meal Period Collective are employees entitled to the FLSA's protections.

37. Defendant is an employer covered by the FLSA.

38. Plaintiff and members of the Misclassification Collective and the Meal Period Collective are often scheduled to and routinely do or did work at least 40 hours per week.

39. Defendant has willfully and recklessly violated the FLSA with respect to Plaintiff and members of the Misclassification Collective by failing to pay them the required overtime premium for hours worked over 40 by improperly classifying them as independent contractors in violation of the FLSA.

40. Defendant has willfully and recklessly violated the FLSA with respect to Plaintiff and members of the Meal Period Collective by failing to pay them for time worked, including hours over 40 in a workweek at time-and-a-half, pursuant to Defendant's requirement that non-exempt, hourly-paid employees either clock out for one hour during the middle of their shift or have one hour of pay automatically deducted, even when they were not relieved of their job duties.

**B. COUNT II – SUPPLEMENTAL KWS OVERTIME CLAIM
PURSUANT TO 29 U.S.C. § 216(b)**

41. All previous paragraphs are incorporated as though fully set forth herein.

42. Plaintiff brings this claim as a supplemental claim to his collective FLSA claims on behalf of himself and all members of the Misclassification Collective and the Meal Period Collective defined above who work or worked for Defendant in Kentucky and who opt into this action pursuant to 29 U.S.C. § 216(b).

43. The KWS requires that covered employers pay nonexempt employees overtime in the amount of 1 1/2 times the employee's regular pay rate for hours worked in excess of 40 in a workweek. KY. REV. STAT. § 337.285.

44. Plaintiff and members of the Misclassification Collective and the Meal Period Collective who work or worked for Defendant in Kentucky are employees entitled to the FLSA's protections. Specifically, Plaintiff and members of the Misclassification Collective who work or worked in Kentucky have been misclassified as independent contractors, even though, based on the economic realities of the relationship between them and Defendant set forth in detail above and incorporated by reference here, they are really employees.

45. Defendant is an employer covered by the KWS.

46. Plaintiff and members of the Misclassification Collective and the Meal Period Collective who work or worked for Defendant in Kentucky are often scheduled to and routinely do or did work at least 40 hours per week.

47. Defendant has willfully and recklessly violated the requirements of the KWS with respect to Plaintiff and members of the Misclassification Collective who work or worked in Kentucky by failing to pay them the required overtime premium for hours worked over 40 by improperly classifying them as independent contractors in violation of the KWS.

48. Defendant has willfully and recklessly violated the KWS with respect to Plaintiff and members of the Meal Period Collective who work or worked in Kentucky by failing to pay them for time worked, including hours over 40 in a workweek at time-and-a-half, pursuant to Defendant's requirement that non-exempt, hourly-paid employees either clock out for one hour during the middle of their shift or have one hour of pay automatically deducted, even when they were not relieved of their job duties.

VII. PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for the following relief on behalf of himself and all others similarly situated:

A. An order permitting this litigation to proceed as a collective action pursuant to

29 U.S.C. § 216(b);

B. Prompt notice, pursuant to 29 U.S.C. § 216(b) of this litigation to all potential members of the class and collective action;

C. A finding and declaration that Defendant has violated the FLSA;

D. A finding and declaration that Defendant has violated the KWS.

E. A judgment against Defendant and in favor of Plaintiff and those he seeks to represent, for compensation for all unpaid and underpaid wages that Defendant has failed and refused to pay in violation of the FLSA or under the law;

F. A judgment against Defendant and in favor of Plaintiff and those he seeks to represent, for compensation for all unpaid and underpaid wages that Defendant has failed and refused to pay in violation of the KWS or under the law;

G. A finding that Defendant's wage and hour violations have been willful;

H. Liquidated damages to the fullest extent permitted under the FLSA and under the KWS;

G. Litigation costs, expenses, and Plaintiff's attorneys' fees to the fullest extent permitted under the FLSA, the KWS, and the Federal Rules of Civil Procedure; and,

H. Such other and further relief as this Court deems just and proper.

JURY DEMAND

Plaintiff demands a jury trial as to all claims so triable.

Dated: July 10, 2017

Respectfully submitted,

/s/ David W. Garrison

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**Pro Hac Vice Motion Anticipated*

Attorneys for Plaintiff

JS 44 (Rev. 06/17)

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 NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

NATHAN TUCKER, On Behalf of Himself and All Others Similarly Situated

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

(c) Attorneys (Firm Name, Address, and Telephone Number)
Barrett Johnston Martin & Garrison, LLC, Bank of America Plaza, 414 Union Street, Suite 900, Nashville, TN 37219, (615) 244-2202

DEFENDANTS

MOBILE MARKETING SOLUTIONS, INC. d/b/a BREWCO MARKETING GROUP

County of Residence of First Listed Defendant _____
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff
- 3 Federal Question (U.S. Government Not a Party)
- 2 U.S. Government Defendant
- 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)

	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)

Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input checked="" type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609

V. ORIGIN (Place an "X" in One Box Only)

- 1 Original Proceeding
- 2 Removed from State Court
- 3 Remanded from Appellate Court
- 4 Reinstated or Reopened
- 5 Transferred from Another District (specify)
- 6 Multidistrict Litigation - Transfer
- 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

29 U.S.C. § 201, et seq.

Brief description of cause:

Recovery of unpaid wages under the Fair Labor Standards Act

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$ _____

CHECK YES only if demanded in complaint:
JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE _____

DOCKET NUMBER _____

DATE

07/10/2017

SIGNATURE OF ATTORNEY OF RECORD

/s/ David W. Garrison

FOR OFFICE USE ONLY

RECEIPT # _____

AMOUNT _____

APPLYING IFP _____

JUDGE _____

MAG. JUDGE _____

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 there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- V. Origin.** Place an "X" in one of the seven 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 – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
 Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.
PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7. Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- 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.

ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Brewco Marketing Group Eyed in Employee Misclassification Lawsuit](#)
