

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

REUBEN HARRIS, individually and on
behalf of others similarly situated,

Plaintiff,

vs.

PITCH PERFECT SOLUTIONS LLC and
BORIS SHVARTS

Defendants.

CLASS AND COLLECTIVE ACTION
COMPLAINT

Jury Trial Demanded

Civil Case No.:

CLASS AND COLLECTIVE ACTION COMPLAINT

Plaintiff Reuben Harris (“Plaintiff”), individually and on behalf of all others similarly situated, by and through his attorneys alleges upon personal knowledge as to his own acts and experiences, and upon information and belief as to all other matters, as follows:

INTRODUCTION

1. This is a collective action on behalf of Plaintiff and all others similarly situated who work for Defendants Pitch Perfect Solutions, LLC (“Pitch Perfect”) and Boris Shvarts (“Shvarts”) as hourly-paid, non-exempt call center employees and are unlawfully denied overtime compensation in violation of the Fair Labor Standards Act (“FLSA”), 29 U.S.C. § 201 *et seq.*

2. Plaintiff brings this action individually and on behalf of all other similarly situated hourly-paid, non-exempt employees who elect to opt in pursuant to the FLSA, 29 U.S.C. § 216(b), to recover unpaid overtime compensation unlawfully withheld by Defendants, liquidated damages as provided by 29 U.S.C. § 216(b), and reasonable attorneys’ fees and costs.

3. Defendants violate the FLSA through unlawful timekeeping and payroll practices for hourly-paid, non-exempt employees, including:

- a. Failing to record and pay for all compensable work time;
 - b. Failing to pay employees overtime compensation for all hours worked in excess of forty (40) in a workweek;
 - c. Failing to calculate overtime premiums using the correct regular rate of pay; and
 - d. Retaliating against Plaintiff for complaining about unpaid wages, unpaid overtime, withheld incentive compensation, and the legality of Defendants' pay practices.
4. Defendants' retaliatory conduct is pled on an individual basis only, and Plaintiff asserts his retaliation claim solely on his own behalf.
5. Plaintiff brings this action pursuant to 29 U.S.C. § 216(b) of the FLSA, individually and on behalf of a putative "FLSA Collective," defined as:

All hourly-paid, non-exempt call center employees employed by Defendants in the United States or any other place covered by the FLSA at any time within the three (3) years preceding the filing of this action through the date of final judgment.

JURISDICTION AND VENUE

6. This Court has subject-matter jurisdiction over Plaintiff's claims pursuant to 28 U.S.C. § 1331 because Plaintiff's claims arise under the FLSA, 29 U.S.C. § 201 *et seq.*
7. This Court has personal jurisdiction over Defendant Pitch Perfect Solutions, LLC because it is domiciled in the State of Delaware.
8. This Court has personal jurisdiction over Defendant Boris Shvarts because, at all relevant times, he acted directly or indirectly in the interest of Defendant Pitch Perfect Solutions, LLC in relation to Plaintiff and other employees, including by authorizing and implementing the timekeeping and pay practices challenged in this action.
9. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b)(1) because Defendant Pitch Perfect Solutions, LLC resides in this District.

PARTIES

Defendant

10. Defendant Pitch Perfect Solutions, LLC is a limited liability company organized under the laws of the State of Delaware, with a registered office located at 8 The Green, Suite A, Dover, Delaware 19901, and it employs Plaintiff and other similarly situated employees within the meaning of the FLSA.

11. Defendant Boris Shvarts is an individual who, at all relevant times, acted directly in the interest of Pitch Perfect Solutions, LLC in relation to Plaintiff and other employees, including with respect to scheduling, compensation, payroll, and discipline, and he qualifies as an employer under the FLSA.

Plaintiff

12. Plaintiff Harris is an individual who resides in Hillsborough County, Florida.

13. Plaintiff has been employed by Defendants as an hourly-paid, non-exempt call center employee since approximately June 2022 and is currently employed by Defendants in that position.

FACTUAL ALLEGATIONS¹

14. Defendants are “employers” within the meaning of the FLSA, 29 U.S.C. § 203.

15. Defendants operate an enterprise engaged in commerce or in the production of goods for commerce within the meaning of the FLSA.

16. Defendants operate an enterprise that had two or more employees handling, selling, or otherwise working on goods or materials that had been moved in or produced for commerce.

¹ The allegations in this Complaint, unless otherwise specified, refer to the time period of three years prior to the filing of this action through the date of judgment.

17. Defendants operate an enterprise with an annual gross volume of sales made or business done in excess of \$500,000.

18. Hourly-paid, non-exempt call center employees engage in commerce and are just subject to individual coverage under the FLSA.

Pitch Perfect's Pay Practices

19. Defendants operate a call center business that uses hourly-paid, non-exempt call center employees to perform customer outreach, sales-related communications, and related support work.

20. Defendants control employees' schedules, work requirements, and performance expectations through management direction and work rules.

21. Defendants do not use a timekeeping system that records all hours worked. Instead, Defendants record and pay only certain system time, including time when employees are logged into Defendants' dialing and communications systems in management-defined paid statuses.

22. Defendants require hourly-paid, non-exempt call center employees to perform work outside that recorded system time, and Defendants do not consistently record or pay for that additional required work.

23. For example, Defendants require employees to attend daily pre-shift meetings at approximately 8:30 a.m., before the start of employees' credited paid time, and Defendants do not record and pay employees for that meeting time.

24. Defendants also require employees to perform additional compensable work beyond live call handling, including coaching, training, administrative tasks, and related support work.

25. This required work commonly occurs outside recorded paid system time, including during breaks, after the scheduled end of shifts, and on weekends.

26. Plaintiff regularly worked a schedule that generally ran approximately 9:00 a.m. to 7:00 p.m., Monday through Friday, and he also worked Saturdays.

27. Because Defendants fail to record all required work time, hourly-paid, non-exempt call center employees are not paid for all hours worked in workweeks when they perform required pre-shift, break-time, post-shift, and weekend work.

28. During at least one workweek within the applicable statute of limitations period, Plaintiff worked more than forty (40) hours performing required work for Defendants. Because Defendants did not record and pay for all required work performed outside Defendants' credited paid system time, Defendants failed to pay Plaintiff all overtime compensation owed under the FLSA.

29. Defendants' timekeeping and payroll practices cause employees' paid time to understate their total compensable hours worked.

30. Defendants also pay non-discretionary incentive compensation, including commissions and bonuses, and in workweeks where employees earn such incentives and work overtime, Defendants fail to include all such compensation in the regular rate used to calculate overtime premiums paid to hourly-paid, non-exempt call center employees.

31. As a result of Defendants' common practices, hourly-paid, non-exempt call center employees are denied wages for all hours worked, including overtime compensation owed under the FLSA.

Defendants' Retaliation Against Plaintiff

32. Plaintiff raised complaints to Defendants regarding pay practices, including unpaid wages, unpaid overtime, withheld incentive compensation, requests to correct pay, and the legality of Defendants' pay practices.

33. Defendants, including Shvarts, were aware of Plaintiff's complaints.

34. After Plaintiff raised these complaints, Defendants took adverse actions affecting Plaintiff's compensation and earnings, including reducing Plaintiff's hourly rate and withholding, reducing, or denying Plaintiff's earned incentive compensation.

35. Defendants took these adverse actions because Plaintiff engaged in protected activity by complaining about wages and pay practices.

Conclusion and Willfulness

36. As a result of Defendants' timekeeping practices, employees perform pre-shift, break-time, post-shift, and weekend work that is not fully recorded or paid, including in workweeks exceeding forty (40) hours.

37. Defendants' timekeeping and payroll practices are willful because Defendants direct and control the work and the records used to determine pay and nevertheless maintain practices that fail to ensure employees are paid all wages owed.

COLLECTIVE ACTION ALLEGATIONS

38. Plaintiff re-alleges and incorporates all previous paragraphs herein.

39. Plaintiff's retaliation claim is asserted individually and is not asserted on behalf of the FLSA Collective.

40. Plaintiff brings this action pursuant to 29 U.S.C. § 216(b) of the FLSA on his own behalf and on behalf of the FLSA Collective defined above with respect to the wage-and-hour claims only.

41. Plaintiff and other members of the FLSA Collective regularly worked more than forty (40) hours in a workweek as suffered or permitted by Defendants.

42. Defendants subjected Plaintiff and other members of the FLSA Collective to uniform and unlawful timekeeping and payroll practices that resulted in employees not being paid for all hours worked and not receiving all overtime compensation required by the FLSA.

43. These unlawful practices arise from common, centralized timekeeping and payroll practices applied to hourly call center employees, not discretionary decisions unique to individual employees.

44. Defendants failed to pay Plaintiff and other members of the FLSA Collective overtime compensation at a rate not less than one and one-half (1.5) times their regular rate of pay for all hours worked in excess of forty (40) in a workweek, as required by the FLSA.

45. As a result of Defendants' unlawful practices, in many workweeks Plaintiff and other members of the FLSA Collective worked more than forty (40) hours but were not paid all overtime compensation at the required premium rate.

46. Defendants' conduct and practices were willful and not undertaken in good faith. Defendants knew, or recklessly disregarded, that their timekeeping and payroll practices resulted in employees not being paid proper overtime compensation under the FLSA.

47. Plaintiff and other members of the FLSA Collective were subjected to the same common unlawful policies and practices that violated the FLSA.

48. With respect to the claims set forth herein, a collective action under the FLSA is appropriate because Plaintiff and the members of the FLSA Collective are similarly situated within the meaning of 29 U.S.C. § 216(b).

49. Plaintiff and the FLSA Collective members are similarly situated because they were all hourly-paid, non-exempt call center employees who were subject to the same or similar timekeeping and payroll practices, and their claims arise from the same factual and legal theories.

50. Defendants maintained policies and practices that resulted in hourly-paid, non-exempt employees not being paid for compensable work time, including required work performed outside credited paid time.

51. Defendants' common timekeeping and payroll practices also resulted in overtime underpayment through the failure to calculate overtime premiums using the correct regular rate in workweeks where non-discretionary incentive compensation was earned.

52. Plaintiff estimates that the FLSA Collective consists of numerous similarly situated hourly-paid employees, and the precise number of FLSA Collective members is readily ascertainable from Defendants' payroll and personnel records.

COUNT I
(Individual and 29 U.S.C. § 216(b) Collective Action Claims)
Violation of the Fair Labor Standards Act, 29 U.S.C. § 201 *et seq.*
Failure to Pay Overtime Wages

53. Plaintiff re-alleges and incorporates all previous paragraphs herein.

54. 29 U.S.C. § 207(a)(1) provides:

[N]o employer shall employ any of his employees who in any workweek is engaged in commerce or in the production of goods for commerce, or is employed in an enterprise engaged in commerce or in the production of goods for commerce, for a workweek longer than forty hours unless such employee receives compensation for his employment in excess of the hours above specified at a rate not less than one and one-half times the regular rate at which he is employed.

55. Plaintiff and members of the FLSA Collective worked over forty (40) hours in one or more workweeks for Defendants.

56. As a result of the policies and practices alleged herein, Defendants failed to pay Plaintiff and members of the FLSA Collective for all overtime compensation owed for hours worked in excess of forty (40) in a workweek.

57. As a further result of the policies and practices alleged herein, Defendants failed to calculate overtime compensation using the correct regular rate of pay in workweeks where employees earned non-discretionary commissions, bonuses, or other incentive compensation.

58. Defendants' conduct and practices, as described herein, were willful, intentional, unreasonable, arbitrary, and in bad faith.

59. Because Defendants willfully violated the FLSA, the three (3)-year statute of limitations applies pursuant to 29 U.S.C. § 255(a).

60. As a result of Defendants' unlawful practices, Plaintiff and members of the FLSA Collective are entitled to recover unpaid overtime compensation, an additional equal amount as liquidated damages, reasonable attorneys' fees, costs, and other relief pursuant to 29 U.S.C. § 216(b).

COUNT II
(Individual Claim Only)
Violation of the Fair Labor Standards Act, 29 U.S.C. § 201 et seq.
Retaliation

61. Plaintiff re-alleges and incorporates all previous paragraphs herein.

62. 29 U.S.C. § 215(a)(3) provides:

It is unlawful to discharge or in any other manner discriminate against any employee because such employee has filed any complaint or instituted or caused to be instituted any proceeding under or related to this Act, or has testified or is about to testify in any such proceeding, or has served or is about to serve on an industry committee.

63. Plaintiff engaged in protected activity by complaining to Defendants about unpaid wages, unpaid overtime, and Defendants' pay practices.

64. Defendants were aware of Plaintiff's protected activity.

65. After Plaintiff engaged in protected activity, Defendants took adverse actions affecting Plaintiff's compensation and earnings, including reducing Plaintiff's pay rate and withholding, reducing, or denying Plaintiff's earned incentive compensation.

66. Defendants took these adverse actions because of Plaintiff's protected activity.

67. As a direct result of Defendants' retaliatory conduct, Plaintiff suffered economic harm, including lost wages and lost incentive compensation.

68. Defendants' actions constitute unlawful retaliation in violation of the FLSA, 29 U.S.C. § 215(a)(3), and Plaintiff is entitled to relief under 29 U.S.C. § 216(b), including lost wages and other lost remuneration, liquidated damages, equitable relief, attorneys' fees, costs, and such other relief as the Court deems just and proper.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff, individually and on behalf of the FLSA Collective, respectfully requests that the Court enter judgment in favor of Plaintiff and against Defendants and grant the following relief:

A. Certification of this action as a collective action under 29 U.S.C. § 216(b) on behalf of the FLSA Collective and authorization of notice to similarly situated employees with respect to Plaintiff's wage-and-hour claims only;

B. A declaratory judgment that Defendants' policies and practices violate the FLSA, 29 U.S.C. § 201 *et seq.*;

C. An award of unpaid overtime compensation and other damages resulting from Defendants' wage violations to Plaintiff and the FLSA Collective, and an award of lost wages and other damages resulting from Defendants' retaliatory conduct to Plaintiff individually, in amounts to be determined at trial;

D. An award of liquidated damages to Plaintiff and the members of the FLSA Collective pursuant to 29 U.S.C. § 216(b) on the wage-and-hour claims, and any liquidated damages or other relief available to Plaintiff individually on his retaliation claim;

E. Appropriate equitable and injunctive relief to remedy Defendants' unlawful retaliation as to Plaintiff individually, including relief designed to prevent future retaliation under the FLSA;

F. Pre-judgment and post-judgment interest as permitted by law;

G. An award of reasonable attorneys' fees and costs incurred in this action pursuant to 29 U.S.C. § 216(b);

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

JURY DEMAND

Plaintiff, individually and on behalf of all others similarly situated, by and through his attorneys, hereby demand a trial by jury pursuant to Rule 38 of the Federal Rules of Civil Procedure and the court rules and statutes made and provided with respect to the above entitled cause.

Dated: March 4, 2026

By: */s/ Ronald S. Gellert*

Ronald S. Gellert (DE 4259)
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and

Nicholas Conlon (to be admitted *pro hac vice*)
Michael Rinderman (to be admitted *pro hac vice*)
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Counsel for Plaintiff

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

REUBEN HARRIS, individually and on behalf of others
similarly situated,

Plaintiff,

vs.

PITCH PERFECT SOLUTIONS LLC and BORIS
SHVARTS

Defendant(s).

CONSENT TO SUE

I consent to the filing of this form in, and to join and become a plaintiff in the above-captioned collective action lawsuit, to pursue my claim, while working in the position(s) of hourly-paid, non-exempt call center employee for the Defendants PITCH PERFECT LLC and BORIS SHVARTS at any time within the period of three (3) years preceding the filing of this action through the date of final judgment. I understand that this lawsuit seeks unpaid overtime wages, liquidated damages, attorneys' fees, costs, and other relief available under the Fair Labor Standards Act. I further consent to bringing these claims on a collective and/or class basis with other current/former employees of Defendant(s), to be represented by Brown, LLC, and to be bound by any settlement of this action or adjudication by the Court.

Signed: Reuben Harris Dated: 02/10/2026

Name: Reuben Harris

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
 REUBEN HARRIS, individually and on behalf of others similarly situated

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

(c) Attorneys (Firm Name, Address, and Telephone Number)
 Ronald S. Gellert, Gellert Seitz Busenkell & Brown LLC 1201 N. Orange St., Ste 300 Wilmington, DE 19801, (302) 425-5806

DEFENDANTS
 PITCH PERFECT SOLUTIONS LLC and BORIS SHVARTS

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 (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <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 <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY	CIVIL RIGHTS	PRISONER PETITIONS	LABOR	FEDERAL TAX SUITS
<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	<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	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"/> 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	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609
IMMIGRATION				
<input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions				

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):
Fair Labor Standards Act ("FLSA"), 29 U.S.C. § 201, et seq., and attendant regulations

Brief description of cause:
Claims for unpaid wages, unpaid overtime, and unlawful retaliation under the FLSA

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: 03/04/2026 SIGNATURE OF ATTORNEY OF RECORD: /s/ Ronald S. Gellert (DE 4259)

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____