

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION**

1. TIFFANY STUART)	
)	
2. STEPHANIE ADAMS)	
)	
3. ALYSSA BABCOCK)	
)	
4. MEGAN BEATTY)	
)	
5. CHRISTINE CHERRY CIFELLI)	
)	
6. LAUREN COLLINS)	
)	
7. MADALYN DUBINSKY)	
)	
8. MADISON GRAY)	Civil Action No. <u>2:20-cv-499</u>
)	
9. MELANIE GRAY)	JURY TRIAL DEMANDED
)	
10. JOSEPH HOOFLONG)	
)	
11. LAUREL LAPP)	
)	
12. THOMAS SASSO)	
)	
13. BRYAN SPRUILL)	
)	
14. ANDREA VAHEY)	
)	
Plaintiffs,)	
)	
v.)	
)	
CITY OF PORTSMOUTH, VIRGINIA)	
)	
Defendant.)	

COMPLAINT

INTRODUCTION

Plaintiffs, by and through their counsel, respectfully submit their complaint against Portsmouth, Virginia, and state as follows:

PARTIES

1. The Plaintiffs are current and former employees of the Defendant, City of Portsmouth, Virginia (“Defendant” or “City”), who bring this action under the Fair Labor Standards Act (“FLSA”) and the Virginia Gap Pay Act (“VGPA”) against Defendant, on behalf of themselves and other similarly situated employees, because of Defendant’s unlawful deprivation of Plaintiffs’ rights to overtime compensation.

2. Defendant operates Portsmouth Fire, Rescue, and Emergency Services, the department responsible for emergency medical responses, fire fighting, and other emergency services.

3. At all times material herein, Defendant has employed the Plaintiffs in the position of Paramedic in the Portsmouth Fire, Rescue and Emergency Services. The exact dates of the Plaintiffs’ employment are in the custody and control of the Defendant and the Defendant knows specifically what dates each of the Plaintiffs has been a Paramedic during the recovery period.

4. The Plaintiffs bring this action for a declaratory judgment under 28 U.S.C. § 2201 for backpay compensation, liquidated damages, attorneys’ fees and costs, and other relief available under the FLSA, as amended, 29 U.S.C. § 201, *et seq.*, and the VGPA, Va. Code § 9.1-700 *et. seq.*

5. The Plaintiffs who are identified in the caption of the Complaint have given their written consent to be party Plaintiffs in this action, pursuant to 29 U.S.C. § 216(b). Such written consents are appended to this Complaint as Exhibit A.

6. At all times material herein, all Plaintiffs have been “employees” within the meaning of the FLSA, 29 U.S.C. § 203(e)(1) and have been “fire protection employees” within the meaning of the VGPA, Va. Code § 9.1–700.

7. Defendant is a municipal corporation under the laws of the Commonwealth of Virginia, with the power to sue and be sued in its own name, and, at all times material herein, Defendant has been a “public agency” and “employer” within the meaning of the FLSA, 29 U.S.C. § 203(x), 203(d). Defendant is, and was at all times material hereto, an employer within the meaning of Virginia Code Section 9.1-700 *et seq.* Defendant has a principal office and place of business located within the United States District Court for the Eastern District of Virginia, at the Portsmouth City Hall, 801 Crawford Street, Portsmouth, VA 23704.

JURISDICTION AND VENUE

8. This Court has subject matter jurisdiction over Plaintiffs’ FLSA action pursuant to 28 U.S.C. § 1331 and 29 U.S.C. § 216(b). The Court has supplemental jurisdiction over Plaintiffs’ Virginia law claim pursuant to 28 U.S.C. § 1367.

9. A substantial part of the events giving rise to Plaintiffs’ claims occurred in this District. The unpaid wages sought in this action were earned in this District. Venue is proper in this District pursuant to 28 U.S.C. § 1391.

FACTS

10. In the time period of October 6, 2017, through the present, as well as before, the Plaintiffs have worked for the Defendant. Specifically, the County employs or has employed Plaintiffs as “Paramedics” in Portsmouth Fire, Rescue and Emergency Services.

11. Within the last three years, while assigned to the position of Paramedic, Plaintiffs’ primary job duty has been, and remains, to provide emergency medical and trauma-related

assistance to the sick and injured. To that end, Plaintiffs and other similarly situated employees have diligently executed their job duties on behalf of their employer and the citizens of Portsmouth, Virginia, responding to emergency calls, and treating critical and traumatic injuries, among other duties critical to public health and safety. Plaintiffs are single-role Paramedics.

12. During the relevant time, while working as Paramedics on behalf of Defendant, the Plaintiffs and other similarly situated employees have been assigned to work and in fact did work a regular repeating schedule over a 14-day period. During the first week of the schedule, Plaintiffs have been scheduled to work three 12-hour shifts (totaling 36 hours) and during the second week of the schedule, Plaintiffs have been scheduled to work four 12-hour shifts (totaling 48 hours).

13. As a result of this shift schedule, Plaintiffs and other similarly situated employees are regularly scheduled to work either 36 hours or 48 hours each week. Each repeating two-week cycle has included one week with 36 hours of regularly scheduled work and one week with 48 hours of regularly scheduled work. The 36-hour scheduled week is referred to as the “short” workweek, whereas the 48-hour scheduled week is referred to as the “long” workweek.

14. During all relevant times, Defendant has purported to use a 40-hour overtime threshold pursuant to 29 U.S.C. § 207(a) for determining Plaintiffs’ and other similarly situated employees’ overtime compensation under the FLSA.

15. During all relevant times, Defendant has not provided overtime compensation at a rate of one and one-half-times the regular rate for hours worked during the long work period when Plaintiffs and other similarly situated employees worked over 40 hours.

16. During all relevant times, Defendant has not counted the hours in which Plaintiffs and other similarly situated employees were in a paid leave status toward the 40-hour overtime threshold.

17. At all relevant times, the Plaintiffs and other similarly situated employees have worked additional overtime and/or unscheduled overtime. The exact work periods in which this occurred can be determined by looking at the Plaintiffs' payroll records, which are in the possession, custody, and control of Defendant.

18. Due to the regularly repeating schedules, as well as additional overtime shifts or unscheduled overtime work, Plaintiffs and other similarly situated employees have regularly worked, and continue to regularly work in excess of 40 hours in a week. At all relevant times, Defendant has failed to pay the Plaintiffs and other similarly situated employees overtime pay at the rate of one and one-half times their regular rate of pay for all hours of work performed when the Plaintiffs have worked in excess of 40 hours in a week.

19. If Plaintiffs take leave and then work additional, unscheduled hours of work, Defendant compensates Plaintiffs with only straight time compensation instead of time-and-a-half overtime compensation for all unscheduled work hours, regardless of whether the hours are in excess of 40 in a workweek.

20. If Plaintiffs works additional, unscheduled hours during a short workweek, the Defendant does not pay Plaintiffs at time-and-a-half their regular rate of pay for the hours between 36 and 40.

21. During a long work week, where the Plaintiffs are scheduled to work 48 hours, if Plaintiffs take paid leave, Defendant does not consider the leave hours to be hours of work and

does not compensate Plaintiffs with overtime for the regularly scheduled work hours above 40 in the workweek.

22. Defendant's actions in refusing to provide Plaintiffs and other similarly situated employees the rights and protections provided under the FLSA and VGPA are willful in that Defendant showed a reckless disregard for the FLSA and the VGPA. For example, Defendant knowingly accepted the benefit of Plaintiffs' regularly scheduled and unscheduled overtime from at least October 6, 2017, without compensating Plaintiffs and other similarly situated employees at the lawful overtime rate.

COUNT I
VIOLATION OF SECTION 207(a) OF THE FAIR LABOR STANDARDS ACT

23. Plaintiffs re-allege, and incorporate by reference herein, paragraphs 1 through 22 of this Complaint.

24. During the times that Plaintiffs and other similarly situated employees have worked in excess of 40 hours in a workweek, Defendant has failed to provide Plaintiffs and other similarly situated employees overtime pay at the rate of one and one-half times their regular rates of pay for all hours Plaintiffs and other similarly situated employees have worked in excess of the hourly standards set forth under 29 U.S.C. § 207(a).

25. Specifically, if Plaintiffs take paid leave and then work additional, unscheduled hours of work within the same workweek, Defendant compensates Plaintiffs with only straight time compensation instead of time-and-a-half overtime compensation for the unscheduled hours, regardless of whether the actual hours worked, exclusive of paid leave, exceed 40 hours in a work week.

26. By failing to pay the Plaintiffs and other employees similarly situated the overtime pay required under the law, the Defendant has violated and is continuing to violate the

provisions of the FLSA in a manner that is unreasonable, willful, and in bad faith. As a result, at all times material herein, the Plaintiffs have been unlawfully deprived of overtime compensation and other relief for the maximum period allowed under the law.

27. As a result of the Defendant's willful, unreasonable, and bad faith violations of the FLSA, there have become due and owing to the Plaintiffs an amount that has not yet been precisely determined. The employment and work records for the Plaintiffs (including time and attendance records) are in the exclusive possession, custody, and control of the Defendant and the Plaintiffs are unable to state at this time the exact amount owing to them. Defendant is under a duty imposed under the FLSA, 29 U.S.C. § 211(c), and various other statutory and regulatory provisions, to maintain and preserve payroll and other employment records with respect to the Plaintiffs and other employees similarly situated from which the amount of Defendant's liability can be ascertained.

28. Pursuant to 29 U.S.C. § 216(b), Plaintiffs are entitled to recover liquidated damages in an amount equal to their backpay damages for Defendant's failure to pay overtime compensation.

29. Plaintiffs are entitled to recover attorneys' fees and costs under 29 U.S.C. § 216(b).

COUNT 2 VIOLATION OF THE VIRGINIA GAP PAY ACT

30. Plaintiffs re-allege, and incorporate by reference herein, paragraphs 1 through 29 of this Complaint.

31. Defendant has failed to provide the Plaintiffs and other similarly situated employees with the rights and protections provided under the VGPA, Virginia Code Section 9.1-700 *et seq.*

32. A fire protection employee is defined as “a paid firefighter, emergency medical services provider, or hazardous materials worker who is (i) trained in fire suppression and has the legal authority and responsibility to engage in fire suppression and is employed by a fire department of an employer *or* (ii) engaged in the prevention, control, or extinguishment of fires *or* response to emergency situations where life, property, or the environment is at risk. Va. Code § 9.1–700 (emphasis supplied).

33. Plaintiffs and other similarly situated employees are employed by Defendant as emergency medical services providers and respond to emergency situations where life, property, or the environment is at risk. Thus, Plaintiffs are fire protection employees under Va. Code § 9.1–700, *et. seq.*

34. Va. Code Section 9.1-703 requires that "For purposes of computing fire protection or law-enforcement employees' entitlement to overtime compensation, all hours that an employee works or is in a paid status during his regularly scheduled work hours shall be counted as hours of work."

35. Defendant has failed to treat all paid leave hours as hours of work for purposes of computing the Plaintiffs' entitlement to overtime. During a long work week, where the Plaintiffs are scheduled to work 48 hours, if Plaintiffs take paid leave, Defendant does not consider the leave hours to be hours of work and does not compensate Plaintiffs with overtime for the regularly scheduled work hours above 40 in the workweek.

36. In addition, Section 9.1-701 requires, *inter alia*, that Defendant pay time and one-half for all hours of work between a Plaintiff's regularly scheduled hours (e.g., 36 hours in a workweek), and the hourly maximum set forth in the FLSA (e.g., 40 hours in a workweek). Defendant has failed to pay Plaintiffs at a rate of one and one-half times the employee's regular

rate of pay for all hours of work between the employee's regularly scheduled hours of work and the FLSA maximum when the Plaintiffs work additional hours.

37. By failing to pay the Plaintiffs and other employees similarly situated the overtime pay required under state law, the Defendant has violated and is continuing to violate, in a willful, unreasonable, and bad faith manner, the provisions of the VGPA. As a result, at all times material herein, the Plaintiffs have been unlawfully deprived of overtime compensation and other relief for the maximum period allowed under the law.

38. As a result of the Defendant's willful, unreasonable, and bad faith violations of state law, there have become due and owing to the Plaintiffs an amount that has not yet been precisely determined. The employment and work records for the Plaintiffs (including time and attendance records) are in the exclusive possession, custody, and control of the Defendant and the Plaintiffs are unable to state at this time the exact amount owing to them.

39. Pursuant to Va. Code Ann. § 9.1-704(A), the Plaintiffs are entitled to recover liquidated damages in an amount equal to their back pay damages for the Defendant's failure to pay overtime compensation.

40. Pursuant to Va. Code Ann. § 9.1-704(B), the Plaintiffs are entitled to recover attorneys' fees and costs.

DEMAND FOR A JURY TRIAL

Pursuant to Rule 38 of the Federal Rules of Civil Procedure and applicable law, all Plaintiffs hereby demand that their claims be tried before a jury.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully pray that this Court:

- (a) Enter judgment declaring that the Defendant has willfully and wrongfully violated its statutory obligations under federal and state law and deprived each of the Plaintiffs of his/her rights;
- (b) Order a complete and accurate accounting of all the unpaid compensation to which the Plaintiffs are entitled;
- (c) Award Plaintiffs compensatory relief in the form of unpaid compensation and liquidated damages equal to their unpaid compensation;
- (d) Award Plaintiffs interest on their unpaid compensation;
- (e) Award Plaintiffs their reasonable attorneys' fees to be paid by the Defendant, and the costs associated with bringing this action; and
- (f) Grant such other relief as may be just and proper.

DATE: October 6, 2020

Respectfully submitted,

/s/ T. Reid Coploff
T. Reid Coploff (VA Bar No. 78388)
McGILLIVARY STEELE ELKIN LLP
1101 Vermont Avenue, N.W.
Suite 1000
Washington, DC 20005
Phone: (202) 833-8855
trc@mselaborlaw.com

Counsel for Plaintiffs

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

Stuart, Tiffany et. al. (See Attachment A)

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

(c) Attorneys (Firm Name, Address, and Telephone Number)

T. Reid Coploff, McGillivray Steele Elkin LLP
1101 Vermont Ave., NW, Suite 1000
Washington, D.C., 20005

DEFENDANTS

City of Portsmouth, Virginia

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	PERSONAL INJURY	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 375 False Claims Act
<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 690 Other	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 376 Qui Tam (31 USC 3729(a))
<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 315 Airplane Product Liability		PROPERTY RIGHTS	<input type="checkbox"/> 400 State Reapportionment
<input type="checkbox"/> 140 Negotiable Instrument	<input type="checkbox"/> 320 Assault, Libel & Slander		<input type="checkbox"/> 820 Copyrights	<input type="checkbox"/> 410 Antitrust
<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 330 Federal Employers' Liability		<input type="checkbox"/> 830 Patent	<input type="checkbox"/> 430 Banks and Banking
<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 340 Marine		<input type="checkbox"/> 835 Patent - Abbreviated New Drug Application	<input type="checkbox"/> 450 Commerce
<input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans)	<input type="checkbox"/> 345 Marine Product Liability		<input type="checkbox"/> 840 Trademark	<input type="checkbox"/> 460 Deportation
<input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits	PERSONAL PROPERTY	LABOR	<input type="checkbox"/> 880 Defend Trade Secrets Act of 2016	<input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations
<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 350 Motor Vehicle	<input checked="" type="checkbox"/> 710 Fair Labor Standards Act	SOCIAL SECURITY	<input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692)
<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 355 Motor Vehicle Product Liability	<input type="checkbox"/> 720 Labor/Management Relations	<input type="checkbox"/> 861 HIA (1395ff)	<input type="checkbox"/> 485 Telephone Consumer Protection Act
<input type="checkbox"/> 195 Contract Product Liability	<input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 740 Railway Labor Act	<input type="checkbox"/> 862 Black Lung (923)	<input type="checkbox"/> 490 Cable/Sat TV
<input type="checkbox"/> 196 Franchise	<input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<input type="checkbox"/> 751 Family and Medical Leave Act	<input type="checkbox"/> 863 DIWC/DIWW (405(g))	<input type="checkbox"/> 850 Securities/Commodities/Exchange
		<input type="checkbox"/> 790 Other Labor Litigation	<input type="checkbox"/> 864 SSID Title XVI	<input type="checkbox"/> 890 Other Statutory Actions
REAL PROPERTY	CIVIL RIGHTS	<input type="checkbox"/> 791 Employee Retirement Income Security Act	<input type="checkbox"/> 865 RSI (405(g))	<input type="checkbox"/> 891 Agricultural Acts
<input type="checkbox"/> 210 Land Condemnation	<input type="checkbox"/> 440 Other Civil Rights	IMMIGRATION	FEDERAL TAX SUITS	<input type="checkbox"/> 893 Environmental Matters
<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 441 Voting	<input type="checkbox"/> 462 Naturalization Application	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)	<input type="checkbox"/> 895 Freedom of Information Act
<input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 442 Employment	<input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 896 Arbitration
<input type="checkbox"/> 240 Torts to Land	<input type="checkbox"/> 443 Housing/Accommodations			<input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision
<input type="checkbox"/> 245 Tort Product Liability	<input type="checkbox"/> 445 Amer. w/Disabilities - Employment			<input type="checkbox"/> 950 Constitutionality of State Statutes
<input type="checkbox"/> 290 All Other Real Property	<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			

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):
FLSA, 29 U.S.C. § 201 et. seq. and Virginia Gap Pay Act, Va. Code § 9.1-700 et. seq.Brief description of cause:
Defendant's failure to pay overtime.

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

SIGNATURE OF ATTORNEY OF RECORD

Oct 6, 2020

FOR OFFICE USE ONLY

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

ATTACHMENT A TO CIVIL COVER SHEET

I(a): Plaintiffs:

Adams, Stephanie, M

Babcock, Alyssa, M

Beatty, Megan, C

Cherry Cifelli, Christie, L

Collins, Lauren, A

Dubinsky, Madalyn, E

Gray, Madison, S

Gray, Melanie, A

Hooflong, Joseph, E

Lapp, Laurel, J

Sasso, Thomas, T

Spruill, Bryan, T

Vahey, Andrea, L

EXHIBIT A

**CONSENT TO SUE
REQUEST TO BECOME PARTY-PLAINTIFF
PORTSMOUTH SINGLE ROLE PARAMEDICS' OVERTIME PAY**

I hereby consent to become a party plaintiff in an action to recover overtime wages and other relief under Virginia state law and the Fair Labor Standards Act.

NAME ADAMS STEPHANIE MARIE
Last Name First Middle

HOME ADDRESS 1206 RIVERS ARCH
Apartment/Unit

CHARLOTTON VA 23314 ISLE OF WIGHT
City State Zip Code County

SIGNATURE



**CONSENT TO SUE
REQUEST TO BECOME PARTY-PLAINTIFF
PORTSMOUTH SINGLE ROLE PARAMEDICS' OVERTIME PAY**

I hereby consent to become a party plaintiff in an action to recover overtime wages and other relief under Virginia state law and the Fair Labor Standards Act.

NAME BABCOCK ALYSSA MICHELE
Last Name First Middle

HOME ADDRESS 609 BRIAR CT
Apartment/Unit

VIRGINIA BEACH VA 23452
City State Zip Code County

SIGNATURE



**CONSENT TO SUE
REQUEST TO BECOME PARTY-PLAINTIFF
PORTSMOUTH SINGLE ROLE PARAMEDICS' OVERTIME PAY**

I hereby consent to become a party plaintiff in an action to recover overtime wages and other relief under Virginia state law and the Fair Labor Standards Act.

NAME Beatty Megan Catherine
Last Name First Middle

HOME ADDRESS 416 116th st Apt B
Apartment/Unit

Virginia Beach VA 23451
City State Zip Code County

SIGNATURE Megan C. Beatty

**CONSENT TO SUE
REQUEST TO BECOME PARTY-PLAINTIFF
PORTSMOUTH SINGLE ROLE PARAMEDICS' OVERTIME PAY**

I hereby consent to become a party plaintiff in an action to recover overtime wages and other relief under Virginia state law and the Fair Labor Standards Act.

NAME Cherry Cifelli Christie Lynn
Last Name First Middle

HOME ADDRESS 1804 Olympic Drive
Apartment/Unit

Va. Beach Va. 23453
City State Zip Code County

SIGNATURE Christie Cifelli

**CONSENT TO SUE
REQUEST TO BECOME PARTY-PLAINTIFF
PORTSMOUTH SINGLE ROLE PARAMEDICS' OVERTIME PAY**

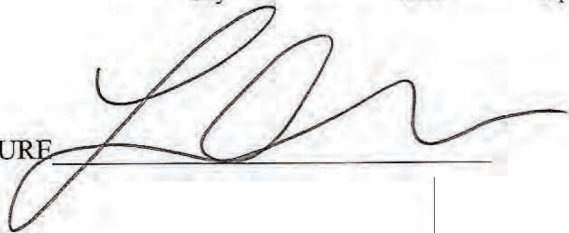
I hereby consent to become a party plaintiff in an action to recover overtime wages and other relief under Virginia state law and the Fair Labor Standards Act.

NAME COLLINS LAUREN ASHLEY
Last Name First Middle

HOME ADDRESS 2932 VENUS ST
Apartment/Unit

VA BEACH VA 23452
City State Zip Code County

SIGNATURE




**CONSENT TO SUE
REQUEST TO BECOME PARTY-PLAINTIFF
PORTSMOUTH SINGLE ROLE PARAMEDICS' OVERTIME PAY**

I hereby consent to become a party plaintiff in an action to recover overtime wages and other relief under Virginia state law and the Fair Labor Standards Act.

NAME Dubinsky Madalyn Elizabeth
Last Name First Middle

HOME ADDRESS 2501 Raeford Court
Apartment/Unit

virginia Beach VA 23456
City State Zip Code County

SIGNATURE madalyn 

**CONSENT TO SUE
REQUEST TO BECOME PARTY-PLAINTIFF
PORTSMOUTH SINGLE ROLE PARAMEDICS' OVERTIME PAY**

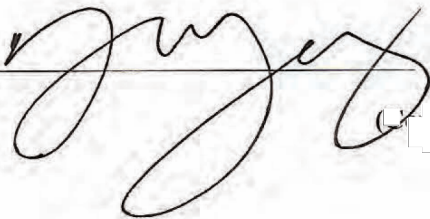
I hereby consent to become a party plaintiff in an action to recover overtime wages and other relief under Virginia state law and the Fair Labor Standards Act.

NAME Gray Madison Shepherd
Last Name First Middle

HOME ADDRESS 330 W. Brambleton Ave #307
City State Zip Code Apartment/Unit

Norfolk Va 23510 United States
City State Zip Code County

SIGNATURE



**CONSENT TO SUE
REQUEST TO BECOME PARTY-PLAINTIFF
PORTSMOUTH SINGLE ROLE PARAMEDICS' OVERTIME PAY**

I hereby consent to become a party plaintiff in an action to recover overtime wages and other relief under Virginia state law and the Fair Labor Standards Act.

NAME Gray Melanie Anne
Last Name First Middle

HOME ADDRESS 805 Canterbury Lane
Apartment/Unit
Smithfield, Va 23430 Isle of Wight
City State Zip Code County

SIGNATURE Melanie A. Gray

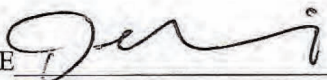
**CONSENT TO SUE
REQUEST TO BECOME PARTY-PLAINTIFF
PORTSMOUTH SINGLE ROLE PARAMEDICS' OVERTIME PAY**

I hereby consent to become a party plaintiff in an action to recover overtime wages and other relief under Virginia state law and the Fair Labor Standards Act.

NAME HOEFLONG JOSEFA E
Last Name First Middle

HOME ADDRESS 504 DELHAM RD
Apartment/Unit

PORTSMOUTH VA 23701
City State Zip Code County

SIGNATURE 

**CONSENT TO SUE
REQUEST TO BECOME PARTY-PLAINTIFF
PORTSMOUTH SINGLE ROLE PARAMEDICS' OVERTIME PAY**

I hereby consent to become a party plaintiff in an action to recover overtime wages and other relief under Virginia state law and the Fair Labor Standards Act.

NAME Lapp Laurel Seanne
Last Name First Middle

HOME ADDRESS 417 Waterwheel CRES
Apartment/Unit

Suffolk VA 23434
City State Zip Code County

SIGNATURE 

**CONSENT TO SUE
REQUEST TO BECOME PARTY-PLAINTIFF
PORTSMOUTH SINGLE ROLE PARAMEDICS' OVERTIME PAY**

I hereby consent to become a party plaintiff in an action to recover overtime wages and other relief under Virginia state law and the Fair Labor Standards Act.

NAME Sasso Thomas Todd
Last Name First Middle

HOME ADDRESS 904 Lela Lane
Apartment/Unit

Chesapeake VA 23322
City State Zip Code County

SIGNATURE 

**CONSENT TO SUE
REQUEST TO BECOME PARTY-PLAINTIFF
PORTSMOUTH SINGLE ROLE PARAMEDICS' OVERTIME PAY**

I hereby consent to become a party plaintiff in an action to recover overtime wages and other relief under Virginia state law and the Fair Labor Standards Act.

NAME Spruill Bryan Thomas
Last Name First Middle

HOME ADDRESS 615 Pine Bend
Apartment/Unit
Chesapeake VA 23320 USA
City State Zip Code County

SIGNATURE 

**CONSENT TO SUE
REQUEST TO BECOME PARTY-PLAINTIFF
PORTSMOUTH SINGLE ROLE PARAMEDICS' OVERTIME PAY**

I hereby consent to become a party plaintiff in an action to recover overtime wages and other relief under Virginia state law and the Fair Labor Standards Act.

NAME Stuart Tiffany Elizabeth
Last Name First Middle
HOME ADDRESS 901 Hollywood Dr.
Apartment/Unit
Chesapeake VA 23320
City State Zip Code County

SIGNATURE Tiffany Stuart

**CONSENT TO SUE
REQUEST TO BECOME PARTY-PLAINTIFF
PORTSMOUTH SINGLE ROLE PARAMEDICS' OVERTIME PAY**

I hereby consent to become a party plaintiff in an action to recover overtime wages and other relief under Virginia state law and the Fair Labor Standards Act.

NAME VAHEY ANDREA LYNETTE
Last Name First Middle

HOME ADDRESS 5408 ORION AVE
Apartment/Unit

NORFOLK VA 23502
City State Zip Code County

SIGNATURE

