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## UNITED STATES DISTRICT COURT DISTRICT OF COLUMBIA

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NANCY MAYER WHITTINGTON, CLERK
U.S. DISTRICT COURT

Lilly Sunshine
10809 Georgia Avenue, Apt. 202

Silver Springs, MD 20902

INDIVIDUALLY AND ON BEHALF OF ALL OTHER! SIMILARLY SITUATED,

Plaintiff,

SHARCON HOSPITALITY OF D.C., INC. d/b/a TRAVELODGE GATEWAY HOTEL

1917 Bladensburg Road NE Washington D.C., 20002

v.

Serve on:
Corporation Service Company,
1090 Vermont Avenue NW,
Washington DC 20005-4905

Defendant.

CASE NUMBER 1:06CV00511

JUDGE: Ellen Segal Huvelle

DECK TYPE: Labor/FRISAL pon-employmen

DATE STAMP: 03/A6720

JURY TRIAL DEMANDED

## ORIGINAL COLLECTIVE ACTION AND CLASS ACTION COMPLAINT

## **SUMMARY OF ALLEGATIONS**

1. This is a Fair Labor Standard Act ("FLSA") case. Defendant Sharcon Hospitality of D.C., Inc. d/b/a Travelodge Gateway Hotel ("Travelodge") did not compensate Plaintiff and other non-exempt hourly employees for all hours worked and did not pay them at one-and-one-half times their hourly rates of pay for all hours worked in excess of forty hours per week. As a result, Travelodge knowingly, willfully, and intentionally violated the FLSA and the laws of the District of Columbia. See 29 U.S.C. §§ 207 et seq.; D.C. Code § 32-1003. Moye therefore brings this collective and class action on behalf of himself and other similarly situated former and current employees of Travelodge to recover unpaid wages and overtime pay, liquated damages, and attorneys' fees.

## UNITED STATES DISTRICT COURT

for the District of Civil Action No. SUMMONS IN A CIVIL ACTION To: (Defendant's name and address) EACH OFT. NEEDS OWN SUMMONS - IF FED. GUT, SEFECT RESPONSE A lawsuit has been filed against you. Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: ATTORNEYS NAME

11 ADORESS

CTY. STATE, ZIP If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court. ANGELA D. CAESAR, CLERK OF COURT

Signature of Clerk or Deputy Clerk