

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

JESUS MATA, individually and on behalf of
similarly situated persons,

Plaintiff,

v.

**STA MANAGEMENT, LLC d/b/a “Domino’s
Pizza” et al.**,

Defendants.

Case No. 5-19-cv-11662

Hon. Nancy G. Edmunds

NOTICE OF PENDENCY OF MINIMUM WAGE LAWSUIT

TO: ALL CURRENT AND FORMER DELIVERY DRIVERS EMPLOYED
FROM JUNE 5, 2016 TO THE PRESENT BY THE FOLLOWING ENTITIES:

STA Management, LLC
Northwest Professionals, LLC
Farmington Pizza, LLC
Novi Town Pizza, LLC
Detroit Pizza 1027, LLC
Birmingham STA, LLC
Grosse Pointe Pizza 1034, LLC
East Warren Pizza, LLC
Canton City Pizza, LLC
Plymouth Pizza, LLC
Downtown STA, LLC
Southfield STA, LLC
Jackson STA, LLC
Sterling Heights STA, LLC
Lathrup STA, LLC
Auburn Hills STA, LLC
Mexican Town Pizza, LLC
Brighton STA, LLC
Oceola Pizza, LLC
Highland Pizza, LLC
Utica Pizza, LLC
Kentwood Pizza, LLC
New Baltimore Pizza, LLC
Macomb Pizza, LLC
Division Pizza, LLC
E Pointe Pizza, LLC
St. Clair Pizza, LLC

Benstein Pizza, LLC
Caledonia Pizza, LLC
Sparta Pizza, LLC
Flint Pizza 1151, LLC
Pierson Pizza, LLC
Ballanger Pizza, LLC
Court Street Pizza, LLC
Harper Pizza, LLC
Oxford Pizza 1170, LLC
Dally’s Pizza, LLC
Elizabeth Lake Pizza, LLC
Haggerty Pizza, LLC
Washington Pizza, LLC
Lincoln Park Pizza, LLC
Eleven Mile Pizza, LLC
Oak Park Pizza, LLC
Taylor Pizza, LLC
Fort Gratiot Pizza, LLC
Saginaw 1217, LLC
Saginaw 1247, LLC
North Hollander 1253, LLC
Jenison STA, LLC
Holland 1260, LLC
Grand Rapids 1261, LLC
Grand Rapids 1262, LLC
Grand Rapids 1263, LLC
Luxor Pizza, LLC

The purpose of this Notice is to inform you of a collective action in which you are potentially “similarly situated” to the Named Plaintiff, to advise you of how your rights may be affected by this action, and to inform you of the procedure to make a claim if you choose to do so.

I. DESCRIPTION OF THE ACTION

The lawsuit alleges Defendants have under-reimbursed delivery drivers’ automobile expenses and other costs to such an extent that it diminishes the employees’ wages beneath the federal minimum wage under the Fair Labor Standards Act (“FLSA”). 29 U.S.C. § 201 *et seq.* Plaintiff seeks recovery in the form of payment from Defendants for unpaid wages and an additional equal amount as liquidated damages, as well as attorneys’ fees and costs.

The action was filed on June 5, 2019 against Defendants STA Management, LLC and now alleges claims against STA Management, LLC and all Domino’s franchises in Michigan related to STA Management, LLC.

Defendants deny Plaintiff’s allegations and maintain that these employees were paid above the minimum wage and do not have claims under the FLSA or state law. The Court has not made any decision on the merits of these claims or the Defenses.

II. PERSONS ELIGIBLE TO RECEIVE THIS NOTICE

The United States District Court for the Eastern District of Michigan has ordered that FLSA Notice be distributed to: “All individuals who delivered pizza and other food items for any of the Defendants using their own vehicles at any time since June 5, 2016 (the “FLSA Collective”).”

Defendants in this matter have identified you as a current or former delivery driver who may have a claim in this lawsuit. You may choose to make a claim in this action by returning the attached “Plaintiff Consent Form” to Plaintiff’s Counsel, listed in Section VII below, for filing with the Court.

The Plaintiff Consent Form must be received by Plaintiff’s Counsel on or before January 20, 2022.

III. EFFECT OF JOINING OR NOT JOINING THIS ACTION

If you choose to join this lawsuit, you and Defendants will be bound by any ruling, judgment or settlement, whether favorable or unfavorable. If you do not join this lawsuit, you are free to take action on your own or do nothing at all.

If you file a “Plaintiff Consent Form,” your continued right to participate in this lawsuit may depend upon a later decision by the Court that you and the Named Plaintiff are “similarly situated” in accordance with applicable laws and that it is appropriate for this case to proceed as a collective action under the FLSA.

IV. STATUTE OF LIMITATIONS

The FLSA has a maximum statute of limitations of three years. If you choose to join this lawsuit, you may be able to recover money damages if you were improperly denied the minimum wage for time you worked within three years of the date you file your Plaintiff Consent Form. If you choose not to join in this lawsuit or file your own action, some or all of your potential claims may later be barred by the applicable statute of limitations.

V. NO RETALIATION PERMITTED

The law prohibits retaliation against employees for exercising their rights under the FLSA. Therefore, Defendants are prohibited from firing you or retaliating against you in any other manner because you choose to participate in this lawsuit.

VI. YOUR LEGAL REPRESENTATION IF YOU JOIN

If you choose to participate in this lawsuit by filing the attached Plaintiff Consent Form, your interests will be represented by Plaintiff's Counsel:

David M. Blanchard
BLANCHARD WALKER PLLC.
221 N Main St., Suite 300
Ann Arbor, MI 48104
(734) 929 4313

J. Forester
FORESTER HAYNIE PLLC
400 North St. Paul Street, Suite 700
Dallas, TX 75201
(214) 210-2100

The attorneys are being paid on a contingency fee and/or statutory basis, which means that if there is no recovery, there will be no attorneys' fees. You will not have to pay the attorneys out of your own pocket.

THIS NOTICE AND ITS CONTENT HAS BEEN AUTHORIZED BY THE UNITED STATES DISTRICT COURT, EASTERN DISTRICT OF MICHIGAN, THE HONORABLE JUDGE NANCY G. EDMUNDS. THE COURT HAS MADE NO DECISION IN THIS CASE ABOUT THE MERITS OF PLAINTIFF'S CLAIMS OR OF DEFENDANTS' DEFENSES.
