

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

JOSE GONZALEZ GOMEZ,)
 ADRIAN MARGARITO LOPEZ-ARENAS)
 ALEJANDRO NAVAEZ-USCANGA)
 ALFONSO FAVELA-HERRERA)
 ALFREDO ALFONSO SANCHEZ-VALDEZ)
 ANTONIO LOPEZ-HERNANDEZ)
 ANTONIO MARTINEZ-MARTINEZ)
 CLAUDIO REY SALAS-LOPEZ)
 DAVID PALMA-MARTINEZ)
 FIDEL MEDRANO-RENTERIA)
 GERARDO JOEL QUINONES-VARGAS)
 J. ASCENCION ADAME-GUERRERO)
 JAVIER DIODONEY-CARABALLO)
 JESUS SALVADOR HERNANDEZ-DEVORA)
 JOEL QUINONES-MEDINA)
 JORGE PALMA-MARTINEZ)
 JOSE LUIS MARTINEZ-MEDRANO)
 JUAN CARLOS GALAVIZ-GARCIA)
 JUAN JOSE GALINDO-GARCIA II)
 JUAN JOSE MARTINEZ-MEDRANO)
 LEONEL QUINONES-VARGAS)
 LUIS ARRIETA-BRAVO)
 MARCO ANTONIO RODRIGUEZ)
 MIGUEL ANGEL ROCHA-GUTIERREZ)
 NOE BAZALDUA-SANCHEZ)
 RAMON ENRIQUE AVILA-VILLA)
 RICARDO ANTONIO RIQUELME-HERNANDEZ)
 SERGIO LOZANO-CORONADO)
 TOMAS FAVELA-RODRIGUEZ)
 VICTOR JOSE ANGEL CHAIREZ-CENISEROS)
 AARON JACOB WILLIS)
 ABRAHAM DE JESUS BARRERA)
 ADAMS DEIVI ORTIZ-GARCIA)
 ALEXIS SANTIAGO-LOPEZ)
 ANAIS ESPERANZA GARCIA-MORALES)
 ANDRES EDUVIGE LIRIANO-DEVORA)
 ANGEL BAEZ)
 ANGEL F. HERNANDEZ-NIEVES)
 ANGEL L. TORRES-COTTO)

Case No. _____

ANGEL LUIS ORTIZ-PEREZ)
ANTONIO ("TONY") SANTANA-ARCE)
APOLINAR TRINIDAD-DELOSSANTOS)
ARNALDO JARED PENA-DELGADO)
ATCEN JOEL CORSINO)
AUSTIN TYLER BLACK)
CARLOS MARTINEZ-REYES)
CARLOS ALFREDO REYES-VILLEGAS)
CARLOS DANIEL SANCHEZ-ALVAREZ)
CARLOS M. SUSTAITA, JR.)
CESAR AUGUSTO ROMEU-FLORES)
CHARLES NELSON)
CHRISTOPHER MICHAEL JONES)
CHRISTOPHER MICHAEL SMITH)
CIPRIANO ISLAS)
CLAUDIA BEATRIZPERAZA)
DAN ELVIS RAMIREZ-MARRERO)
DAVID RODRIGUEZ BRACERO)
DEVON J. WHITMORE)
EDWIN OMAR VARGAS RESTO)
EDWIN EDUARDO CARDENAS-PERALES)
EDY SIKLER)
ELLIS D. COX)
ERICK ZAYAS-MORALES)
ETHAN M. JOHNSON)
FABIAN DELGADO-GONZALEZ)
FABIAN QUEZADA-AVILA)
FERNANDO FLORES-CARDENAS)
FRANCISCO JAVIER HERNANDEZ)
FREDERICK TYRONE-WHITBY)
GREGORIO HERNANDEZ)
HERMINIO SEGARRA)
IRVING JOEL COLLAZO-MERCADO)
IVAN CORTES-DOMINGUEZ)
JAM CARLOS SANTIAGO-MALDONADO)
JEFFREY CHARLESSCHELBAR)
JELFRY ALEJANDRO BARIAS)
JESSE MICHAEL CARPENTER)
JOHNNY CRUZ-LUNA)
JONATHAN RIOS-ARGUETA)
JONATHANRIVERA-BONILLA)
JORGE LUIS AYALA-SANTANA)
JOSE A. PINEDA MEJIA)

JOSE AGUSTIN PEREZ-ARROYO)
JOSE ALBERTO GONZALEZ-GOMEZ)
JOSE ANTONIO VARGAS-GUZMAN)
JOSE E. MARTINEZ ROQUE)
JOSE JUAN ARCHILLA)
JOSHUA ISAAC ORTIZ-LUNA)
JOSUE IRIZARRY-PEREZ)
JUAN CARLOS RODRIGUEZ)
JULIO JOSUE VERGARA-MARTINEZ)
JUNIOR JOSE GRIMONT-YANEZ)
JUSTO A. VILLARREAL)
KELVIN SOTO-SOTO)
KELVIN DAVID RESTO-MONTANEZ)
KEVIN REY-ANCHONDO)
KEVIN ANTONIO GUEVARA-CORDERO)
LIZZETH JACQUELINE BLANCO)
LORENZO MELGAREJO-GAMEZ)
LUIS TROCHE-PINTO)
LUIS ALBERTO ORELLANO-RODRIGUEZ)
LUIS DANIEL DELGADO-RIVERA)
LUIS ENRIQUE RODRIGUEZ)
LUIS O. VERGARA-MARTINEZ)
MANUEL MALDONADO-RODRIGUEZ)
MARCELINO ESTRADA)
MARLIS C. MORALES-MOLINA)
MARTIN FRANCISCO VARELA II)
MATTHEW ANDREW BLACK)
MERWEEN R. MARRERO-RODRIGUEZ)
MICHAEL SANCHEZ-MOLINA)
MITSON TOM)
NICOLAS QUEZADA-AVILA)
OCTAVIO RODRIGUEZ)
RAYMUNDO SILVA-QUINONEZ)
REICHY ERAM)
REUEL TIRADO-ORTIZ)
ROGELIO MORALES-ROBLES)
RUBEN GAMINO CRUZ)
SALVADOR JOSEPH VILLARREAL)
SAMUEL ANTONIOMOLINA-LOPEZ)
SERGIO ROMAN RODRIGUEZ)
SONIA LOPEZ-LUIS)
STEPHANE BLAKE HARMON)
STEVEN J. HOLDEN)

THOMAS EDWARD PONDS)
TYRONE ALVIN SCOTT EL)
ZACHARY PAULEY)
MICHAEL ARCHILLA)
ANDRES SANTANDER-ESPINOZA)
MARCOS XAVIER PAGAN-SANTIAGO)
GUILLERMO A. SUAREZ)
JUAN JOSE PALMA-MARTINEZ)
Individually and all other persons similarly situated)
Plaintiffs,)
v.)
)
EPIC LANDSCAPE PRODUCTIONS, L.C.)
SERVE: John A. Constant, Registered Agent)
17755 Mission Road)
Stilwell, KS 66085)
Defendant.)

COMPLAINT

Class and Collective Action Claims

133 Plaintiffs, who were previously employed or are currently employed by Defendant Epic Landscape Productions, L.C. (“Defendant” or “Epic”), hereby set forth this representative action for violations of the Fair Labor Standards Act (“FLSA”) under §216(b) and Wage-Related Class Claims Pursuant to Fed. R. Civ. P. 23 as follows:

PRELIMINARY STATEMENT

1. Plaintiffs, on behalf of themselves and all others similarly situated, bring this action against Defendant for overtime compensation, and related penalties and damages. It is Defendant’s practice and policy to willfully fail and refuse to pay all overtime compensation due and owing to Plaintiffs, and all other similarly situated employees, and doing so is in direct violation of the FLSA, 29 U.S.C. § 201 *et seq.*

2. Defendant’s pay practices and policies are in direct violation of the FLSA and Wage-Related Class Claims Pursuant to Fed. R. Civ. P. 23, and therefore Plaintiffs, on behalf of

themselves and all others similarly situated, seek declaratory relief; overtime premiums for all overtime work required, suffered, or permitted by Defendant; liquidated and/or other damages as permitted by applicable law; and attorneys' fees, costs, and expenses incurred in this action.

PARTIES

3. Jose Gonzalez Gomez is currently employed by Epic and primarily works out of its Kansas location.

4. Adrian Margarito Lopez-Arenas was employed by Epic and primarily worked out of its Kansas location.

5. Alejandro Navaez-Uscanga is currently employed by Epic and primarily works out of its Kansas location.

6. Alfonso Favela-Herrera is currently employed by Epic and primarily works out of its Kansas location.

7. Alfredo Alfonso Sanchez-Valdez is currently employed by Epic and primarily works out of its Kansas location.

8. Antonio Lopez-Hernandez was employed by Epic and primarily worked out of its Kansas location.

9. Antonio Martinez-Martinez was employed by Epic and primarily worked out of its Kansas location.

10. Claudio Rey Salas-Lopez is currently employed by Epic and primarily works out of its Missouri location.

11. David Palma-Martinez was employed by Epic and primarily worked out of its Kansas location.

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