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**DISTRICT COURT  
CLARK COUNTY, NEVADA**

STARRDANYA ROBERTS, on behalf of  
himself and all others similarly situated,

Plaintiff,

vs.

LAS VEGAS PIZZA LLC d/b/a and a/k/a  
PIZZA HUT; DOES 1 through 50;  
inclusive,

Defendant(s).

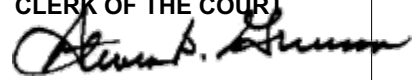
Case No.:  
Dept. No.:

**CLASS ACTION COMPLAINT**

**Arbitration Exemption Claimed: Class  
Action**

- 1) Failure to Pay Overtime in Violation of  
NRS § 608.018 and 608.140;
- 2) Failure to Timely Pay All Wages Due  
and Owing in Violation of NRS §§  
608.020-050 and 608.140; and,
- 3) Injunctive Relief.

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4/3/2023 9:20 AM  
Steven D. Grierson  
CLERK OF THE COURT



CASE NO: A-23-868271-C  
Department 7

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**LIEN REQUESTED PURSUANT TO  
NRS § 608.050**  
**JURY TRIAL DEMANDED**

COMES NOW Plaintiff Starrdanya Roberts (“Plaintiff” or “Roberts”) on behalf of himself and all others similarly situated and alleges the following:

All allegations in the Complaint are based upon information and belief except for those allegations that pertain to the Plaintiff named herein and his counsel. Each allegation in the Complaint either has evidentiary support or is likely to have evidentiary support after a reasonable opportunity for further investigation and discovery.

**JURISDICTION AND VENUE**

1. This Court has original jurisdiction over the state law claims alleged herein because the amount in controversy exceeds \$15,000 and a party seeking to recover unpaid wages has a private right of action pursuant to the Nevada Constitution, Article 15 Section 16, and Nevada Revised Statute (“NRS”) sections 608.050 and 608.140. See *Neville v. Eighth Judicial Dist. Court in & for County of Clark*, 406 P.3d 499, 502 (Nev. 2017); *HG Staffing, LLC, et al. v Second Judicial District Court*, Nevada Supreme Court Case No. 79118 (May 7, 2020).

2. Plaintiff also claims a private cause of action to foreclose a lien against the property owner for wages due pursuant to NRS § 608.050.

3. Plaintiff made a proper demand for wages due pursuant to NRS § 608.140 on March 28, 2023.

4. Venue is proper in this Court because the Defendant named herein maintain a principal place of business or otherwise are found in this judicial district and many of the acts complained of herein occurred in Clark County, Nevada.

5. Plaintiff demands a jury trial on all issues triable by jury herein.

**PARTIES**

1  
2 6. Plaintiff Starrdanya Roberts was at all relevant times a resident of the  
3 State of Nevada and was employed by Defendant as a non-exempt hourly employee  
4 from November 2020 to May 2022.

5 7. Defendant Las Vegas Pizza LLC d/b/a and a/k/a Pizza Hut is a foreign  
6 limited-liability company registered with the Nevada Secretary of State.

7 8. At all times relevant, Defendant Las Vegas Pizza LLC held the fictitious  
8 firm name Pizza Hut with Clark County.

9 9. Defendant Las Vegas Pizza LLC d/b/a and a/k/a Pizza Hut was doing  
10 business in this Judicial District in Clark County, Nevada where the subject incidences  
11 occurred.

12 10. At all times relevant, Defendant Las Vegas Pizza LLC d/b/a and a/k/a Pizza  
13 Hut was Plaintiff's employer.

14 11. The Defendant named herein is the employer of the Plaintiff and all Class  
15 Members alleged herein. The Defendants are employers engaged in commerce under  
16 the provisions of NRS § 608.011. The identity of DOES 1-50 is unknown at the time and  
17 the Complaint will be amended at such time when the identities are known to Plaintiff.  
18 Plaintiff is informed and believes that each Defendant sued herein as DOE is responsible  
19 in some manner for the acts, omissions, or representations alleged herein and any  
20 reference to "Defendant" or "Defendants" herein shall mean "Defendant and each of  
21 them."

**FACTUAL ALLEGATIONS**

22  
23 12. Plaintiff was employed by Defendant as a non-exempt employee from  
24 November 2020 to May 2022.

25 13. Defendant maintains an unlawful policy of not paying all daily overtime to  
26 non-exempt hourly employees who earn 1 ½ times less than the applicable minimum  
27 wage.

28 14. Plaintiff has frequently worked over 8 hours in any 24-hour workday.

1 15. On many occasions, the number of hours he worked in a workday under  
2 Nevada law was over 8 hours in a 24-hour period of time.

3 16. For instance, during the workweek of August 31, 2021, Defendant  
4 scheduled Plaintiff to work and Plaintiff did work over 8 hours in a 24-hour period of time.  
5 See a true and correct copy of Plaintiff's time records attached hereto as Exhibit I.

6 17. But despite having worked more than 8 hours in a 24-hour period of time,  
7 Defendant failed to compensate Plaintiff at 1 ½ times his regular rate of pay for the  
8 overtime hours he worked. See a true and correct copy of Plaintiff's September 13, 2021  
9 pay statement attached hereto as Exhibit II.

10 18. Similarly, during the workweeks of April 23, 2022 and April 30, 2022,  
11 Defendant scheduled Plaintiff to work and Plaintiff did work over 8 hours in a 24-hour  
12 period of time. See Exhibit I.

13 19. But despite having worked more than 8 hours in a 24-hour period of time,  
14 Defendant failed to compensate Plaintiff at 1 ½ times his regular rate of pay for the  
15 overtime hours he worked. See a true and correct copy of Plaintiff's May 9, 2022 pay  
16 statement attached hereto as Exhibit III.

17 **CLASS ACTION ALLEGATIONS**

18 20. Plaintiff realleges and incorporates by this reference all the paragraphs  
19 above in this Complaint as though fully set forth herein.

20 21. Plaintiff brings this action on behalf of himself and all other similarly  
21 situated employees as a class action under Rule 23 of the Nevada Rules of Civil  
22 Procedure.

23 22. The **Nevada Overtime Class** is defined as "All hourly paid non-exempt  
24 persons employed by Defendant in the state of Nevada who earned less than 1 ½ times  
25 the applicable minimum wage and who worked over eight (8) hours in a workday at any  
26 time within 3 years from March 28, 2023 until judgment."

27 23. The **Waiting Time Wages Class** is defined as "All Nevada Overtime Class  
28 Members who are former employees of Defendant."

1           24. Class treatment is appropriate under Rule 23's class certification  
2 mechanism because:

3           a.     The Classes are Sufficiently Numerous: Upon information and belief,  
4 Defendant employ, and have employed, in excess of 40 Nevada Overtime Class  
5 Members within the applicable time period. Because Defendant are legally obligated to  
6 keep accurate payroll records, Plaintiff alleges that Defendant's records will establish the  
7 members of the Classes as well as their numerosity.

8           b.     Plaintiff's Claim is Typical to Those of Fellow Class Members: Each  
9 Class Member is and was subject to the same practices, plans, or policies as Plaintiff:  
10 whether Defendant compensated Plaintiff and members of the Class daily overtime  
11 wages when they worked over 8 hours in a workday and whether members of the  
12 Waiting Time Wages Class are entitled to waiting time wages for the failure to pay them  
13 minimum, regular, and overtime wages owed.

14           c.     Common Questions of Law and Fact Exist: Common questions of  
15 law and fact exist and predominate as to Plaintiff and the Class Members, including,  
16 without limitation: whether Defendant failed to pay Plaintiff and the Class Members one  
17 and one-half times their regular rate for all hours worked in excess of 8 hours a workday  
18 and whether Defendant failed to pay the Waiting Time Wages Class Members all their  
19 wages due and owing in violation of NRS § 608.020-050.

20           d.     Plaintiff is Adequate Representative of the Class: Plaintiff will fairly  
21 and adequately represent the interests of the Classes because Plaintiff is a member of  
22 the Classes, he has issues of law and fact in common with all members of the Classes,  
23 and his interests are not antagonistic to Class members. Plaintiff and his counsel are  
24 aware of their fiduciary responsibilities to Class Members and are determined to  
25 discharge those duties diligently by vigorously seeking the maximum possible recovery  
26 for Class Members.

27           e.     Predominance/Superior Mechanism: Class claims predominate and  
28 a class action is superior to other available means for the fair and efficient adjudication of

1 this controversy. Each Class Member has been damaged and is entitled to recovery by  
2 reason of Defendant's illegal policy and/or practice of failing to compensate its  
3 employees in accordance with Nevada wage and hour law. The prosecution of individual  
4 remedies by each Class Member will tend to establish inconsistent standards of conduct  
5 for Defendant and result in the impairment of Class Members' rights and the disposition  
6 of their interest through actions to which they were not parties.

7 **FIRST CAUSE OF ACTION**  
8 **Failure to Pay Overtime Wages in Violation of NRS §§ 608.018 and 608.140**  
9 **(On Behalf of Plaintiff and the Nevada Overtime Class)**

10 25. Plaintiff realleges and incorporates by this reference all the paragraphs  
11 above in this Complaint as though fully set forth herein.

12 26. NRS § 608.140 provides that an employee has a private right of action for  
13 unpaid wages.

14 27. NRS § 608.018(1) provides as follows:

15 An employer shall pay 1 1/2 times an employee's  
16 regular wage rate whenever an employee who receives  
17 compensation for employment at a rate less than 1 1/2 times  
18 the minimum rate prescribed pursuant to NRS 608.250  
works: (a) More than 40 hours in any scheduled week of  
work; or (b) More than 8 hours in any workday unless by  
mutual agreement the employee works a scheduled 10  
hours per day for 4 calendar days within any scheduled  
week of work.

19 28. NRS § 608.018(2) provides as follows:

20 An employer shall pay 1 1/2 times an employee's regular  
21 wage rate whenever an employee who receives  
22 compensation for employment at a rate not less than 1 1/2  
times the minimum rate prescribed pursuant to NRS 608.250  
works more than 40 hours in any scheduled week of work.

23 29. As described above, Defendant maintains a policy and/or practice of illegal  
24 shift jamming (i.e., refusing to pay daily overtime when Plaintiff and members of the  
25 Nevada Overtime Class worked over 8 hours in a workday). As a result, Plaintiff and  
26 Nevada Overtime Class Members have been denied overtime compensation according  
27 to Nevada law.

28

1 30. Wherefore, Plaintiff demands for himself and all Nevada Overtime Class  
2 Members that Defendant pays Plaintiff and Nevada Overtime Class Members one and  
3 one-half times their “regular rate” of pay for all hours worked in excess of eight (8) hours  
4 in a workday during the relevant time period together with attorneys’ fees, costs, and  
5 interest as provided by law.

6 **SECOND CAUSE OF ACTION**  
7 **Waiting Time Wages Pursuant to NRS §§ 608.020-.050 and 608.140**  
8 **(On Behalf of Plaintiff and the Waiting Time Wages Class)**

9 31. Plaintiff realleges and incorporates by this reference all the paragraphs  
10 above in this Complaint as though fully set forth herein.

11 32. NRS § 608.140 provides that an employee has a private right of action for  
12 unpaid wages.

13 33. NRS § 608.020 provides that “[w]henver an employer discharges an  
14 employee, the wages and compensation earned and unpaid at the time of such  
15 discharge shall become due and payable immediately.”

16 34. NRS § 608.030 provides that “[w]henver an employee resigns or quits his  
17 or her employment, the wages and compensation earned and unpaid at the time of the  
18 employee’s resignation or quitting must be paid no later than...[t]he day on which the  
19 employee would have regularly been paid the wages or compensation; or[s]even days  
20 after the employee resigns or quits...whichever is earlier.”

21 35. NRS § 608.040(1) (a-b), in relevant part, imposes additional wages on an  
22 employer who fails to pay a discharged or quitting employee: “Within 3 days after the  
23 wages or compensation of a discharged employee becomes due; or on the day the  
24 wages or compensation is due to an employee who resigns or quits, the wages or  
25 compensation of the employee continues at the same rate from the day the employee  
26 resigned, quit, or was discharged until paid for 30-days, whichever is less.”

27 36. NRS § 608.050 grants an “employee lien” to each discharged or laid-off  
28 employee for the purpose of collecting the wages or compensation owed to them “in the  
sum agreed upon in the contract of employment for each day the employer is in default,

1 until the employee is paid in full, without rendering any service therefore; but the  
2 employee shall cease to draw such wages or salary 30 days after such default.”

3 37. By failing to pay Waiting Time Wages Class Members their minimum,  
4 regular, and overtime wages in violation of state and federal law, Defendant have failed  
5 to timely remit all wages due and owing to the Waiting Time Wages Class Members.

6 38. Despite demand, Defendant willfully refused and continues to refuse to pay  
7 Waiting Time Wages Class Members all the wages that were due and owing upon the  
8 termination of their employment.

9 39. Wherefore, the Waiting Time Wages Class Members demand thirty (30)  
10 days of pay as waiting wages under NRS §§ 608.040 and 608.140, and thirty (30) days  
11 of pay as waiting wages under NRS §§ 608.050 and 608.140, together with attorneys’  
12 fees, costs, interest, and punitive damages, as provided by law.

13 **THIRD CAUSE OF ACTION**  
14 **Injunctive/Declaratory Relief**  
15 **(On Behalf of Plaintiff and the Nevada Overtime Class)**

16 40. Plaintiff realleges and incorporates by this reference all the paragraphs  
17 above in this Complaint as though fully set forth herein.

18 41. As Defendant have failed to compensate Plaintiff and members of the  
19 Overtime Class at the correct overtime wage rate for all the overtime hours that they  
20 worked pursuant to NRS § 608.018, Defendant have wrongfully withheld wages properly-  
21 owed to the Plaintiff and the Overtime Class Members.

22 42. Plaintiff and the Nevada Overtime Class will suffer irreparable injury if  
23 Defendant is not enjoined from the future wrongful retention of wages owed.

24 43. As a result of the aforementioned unlawful payment practices, Plaintiff  
25 submits that there has been a likelihood of success on the merits that Plaintiff and the  
26 Class Members have been damaged, that there is irreparable harm, and Plaintiff  
27 requests that this Honorable Court enter an Order that restrains Defendant from  
28 attempting to enforce the alleged unlawful payment practices.



1 44. Plaintiff requests that this Honorable Court enter a declaration of  
2 rights/obligations in regards to all such unlawful payment practices in this matter.

3 45. Further, disputes and controversies have arisen between the parties  
4 relative to the lawfulness of the payment practices, and Plaintiff is entitled to have an  
5 order entered pursuant to Chapter 30 of the Nevada Revised Statutes construing the  
6 payment practices and adjudging and declaring Plaintiff and the Class Members' rights  
7 and remedies thereunder including such an Order stating that such payment practices  
8 are unlawful.

9 46. Plaintiff has been required to retain the services of an attorney and is  
10 entitled to a reasonable award of attorneys' fees and costs.

11 **PRAYER FOR RELIEF**

12 Wherefore Plaintiff, by himself and on behalf of all Class Members, prays for  
13 relief as follows relating to his class action allegations:

- 14 1. For an order certifying this action as a class action on behalf the  
15 proposed Classes and providing notice to all Class Members so they may  
16 participate in this lawsuit;
- 17 2. For an order appointing Plaintiff as the Representative of the Classes and  
18 his counsel as Class Counsel;
- 19 3. For damages according to proof for overtime compensation under NRS  
20 §§ 608.018 and 608.140 for all hours worked over 8 hours per day;
- 21 4. For waiting time wages pursuant to NRS §§ 608.040-.050 and 608.140;
- 22 5. For a lien on the property where Plaintiff and all Nevada Class Members  
23 labored pursuant to NRS § 608.050;
- 24 6. For interest as provided by law at the maximum legal rate;
- 25 7. For injunctive relief;
- 26 8. For declaratory relief;
- 27 9. For punitive damages;
- 28 10. For reasonable attorneys' fees authorized by statute;

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- 11. For costs of suit incurred herein;
- 12. For pre-judgment and post-judgment interest, as provided by law; and,
- 13. For such other and further relief as the Court may deem just and proper.

DATED: April 3, 2023

Respectfully submitted,

GABROY | MESSER

By: /s/ Christian Gabroy  
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# EXHIBIT I

STARRDANYA ROBERTS

Date	Clock		Overtime		LD	Pay		Tips	Meal	Total Hours	Status
	In	Out	Code	Hours		Code	Rate				
02/11/21	16:57	00:20	57	00	01	40.26	N	7.37			
02/13/21	16:59	23:18	57	00	01	21.18	N	6.33			
02/14/21	16:56	22:40	57	00	01	4.00	N	5.74			
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06/29/21	15:58	00:03	57	00	01	51.51	N	8.09
07/01/21	17:01	01:05	57	00	01	29.04	N	8.07
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07/05/21	16:59	00:32	57	00	01	81.46	N	7.56
07/11/21	18:12	00:55	57	00	01	38.98	N	6.71
07/12/21	16:56	00:45	57	00	01	0.00	N	7.80
07/13/21	15:57	23:37	57	00	01	37.63	N	7.66
07/15/21	17:04	00:22	57	00	01	48.71	N	7.29
07/17/21	16:59	23:01	57	00	01	82.30	N	6.04
07/18/21	16:59	00:04	57	00	01	14.18	N	7.08
07/19/21	17:06	00:12	57	00	01	29.96	N	7.11
07/20/21	16:01	23:00	57	00	01	6.00	N	6.98
07/22/21	17:04	23:51	57	00	01	37.52	N	6.79
07/23/21	15:59	22:06	57	00	01	28.83	N	6.11
07/24/21	16:09	22:52	57	00	01	70.62	N	6.73
07/25/21	16:54	00:26	57	00	01	41.34	N	7.54
07/26/21	16:59	00:25	57	00	01	40.43	N	7.44
07/28/21	16:03	22:43	57	00	01	35.91	N	6.68
07/29/21	17:01	00:22	57	00	01	68.26	N	7.35
08/01/21	16:54	00:07	57	00	01	31.01	N	7.21
08/02/21	17:09	00:02	57	00	01	27.96	N	6.88
08/03/21	16:00	23:16	57	00	01	31.67	N	7.26
08/05/21	16:55	00:09	57	00	01	52.15	N	7.22
08/06/21	15:04	21:45	57	00	01	17.58	N	6.69
08/07/21	16:04	18:36	57	00	01	27.78	N	2.54
08/08/21	16:55	23:58	57	00	01	28.69	N	7.05
08/09/21	17:10	00:36	57	00	01	28.13	N	7.43
08/10/21	15:59	23:21	57	00	01	41.37	N	7.36
08/12/21	16:58	00:29	57	00	01	29.22	N	7.51
08/14/21	15:59	22:26	57	00	01	29.24	N	6.46
08/15/21	16:55	00:07	57	00	01	16.75	N	7.21
08/16/21	17:15	00:09	57	00	01	49.84	N	6.90
08/17/21	15:59	23:01	57	00	01	30.65	N	7.03
08/19/21	17:02	00:34	57	00	01	37.54	N	7.55
08/21/21	15:59	21:18	57	00	01	33.54	N	5.31
08/22/21	16:54	00:02	57	00	01	27.48	N	7.13
08/23/21	17:00	00:30	57	00	01	0.00	N	7.49

08/24/21	17:20	00:40	57	00	01	17.13	N	7.35
08/26/21	17:07	00:37	57	00	01	0.00	N	7.49
08/28/21	16:02	22:32	57	00	01	37.79	N	6.51
08/29/21	17:06	00:16	57	00	01	29.59	N	7.17
08/30/21	17:00	00:20	57	00	01	0.00	N	7.33
08/31/21	16:03	21:14	57	00	01	22.35	N	5.18
09/02/21	16:54	00:31	57	00	01	10.17	N	7.61
09/04/21	15:53	22:50	57	00	01	70.57	N	6.95
09/05/21	16:56	00:38	57	00	01	38.72	N	7.70
09/06/21	17:03	00:00	57	00	01	31.75	N	6.94
09/07/21	16:00	23:09	57	00	01	14.54	N	7.14
09/09/21	17:07	00:19	57	00	01	38.19	N	7.21
09/11/21	15:54	23:06	57	00	01	15.11	N	7.19
09/12/21	17:00	00:15	57	00	01	24.74	N	7.25
09/13/21	16:56	00:45	57	00	01	0.00	N	7.81
09/14/21	16:02	21:28	57	00	01	11.39	N	5.43
09/16/21	16:09	00:24	57	00	01	49.15	N	8.26
09/18/21	15:55	22:12	57	00	01	27.03	N	6.28
09/19/21	16:52	00:28	57	00	01	48.86	N	7.60
09/20/21	17:03	00:45	57	00	01	0.00	N	7.70
09/21/21	15:58	16:00	57	00	01	0.00	N	0.02
09/23/21	16:52	00:25	57	00	01	0.00	N	7.54
09/24/21	16:02	01:31	57	00	01	49.41	N	9.48
09/25/21	16:05	01:12	57	00	01	41.75	N	9.12
09/26/21	16:57	00:12	57	00	01	26.86	N	7.26
09/27/21	17:04	00:30	57	00	01	0.00	N	7.43
09/30/21	17:02	23:19	57	00	01	24.31	N	6.29
10/01/21	16:09	01:09	57	00	01	28.23	N	9.00
10/02/21	17:01	00:47	57	00	01	60.68	N	7.76
10/03/21	16:53	00:39	57	00	01	14.76	N	7.77
10/04/21	16:56	21:56	57	00	01	18.31	N	5.00
10/07/21	16:08	00:52	57	00	01	35.77	N	8.74
10/08/21	16:07	23:44	57	00	01	25.85	N	7.62
10/09/21	17:50	22:40	57	00	01	28.20	N	4.84
10/10/21	16:53	20:56	57	00	01	31.08	N	4.05
10/14/21	17:05	22:30	57	00	01	27.90	N	5.42
10/15/21	15:54	23:43	57	00	01	26.54	N	7.82
10/16/21	16:53	01:11	57	00	01	34.60	N	8.29
10/17/21	17:02	23:54	57	00	01	28.42	N	6.87
10/18/21	16:54	00:17	57	00	01	16.93	N	7.37

10/21/21	16:49	00:21	57	00	01	36.53	N	7.54
10/22/21	16:03	23:50	57	00	01	28.37	N	7.78
10/23/21	17:01	00:57	57	00	01	77.15	N	7.93
10/24/21	16:52	23:25	57	00	01	30.00	N	6.55
10/25/21	16:55	23:19	57	00	01	16.24	N	6.40
10/28/21	16:57	00:08	57	00	01	47.53	N	7.17
10/29/21	16:55	00:30	57	00	01	31.07	N	7.58
10/30/21	16:53	01:12	57	00	01	62.26	N	8.32
10/31/21	15:57	00:19	57	00	01	0.00	N	8.36
11/01/21	17:10	23:37	57	00	01	26.11	N	6.45
11/04/21	16:55	23:39	57	00	01	45.47	N	6.73
11/05/21	15:57	01:03	57	00	01	52.08	N	9.10
11/06/21	17:02	01:20	57	00	01	45.82	N	8.31
11/07/21	16:55	22:40	57	00	01	29.88	N	5.75
11/08/21	17:05	22:30	57	00	01	17.00	N	5.42
11/11/21	17:08	00:30	57	00	01	51.15	N	7.36
11/12/21	16:05	00:20	57	00	01	80.33	N	8.26
11/13/21	17:10	01:29	57	00	01	0.00	N	8.31
11/14/21	17:01	23:57	57	00	01	44.72	N	6.94
11/15/21	17:06	23:50	57	00	01	21.68	N	6.74
11/18/21	17:10	00:27	57	00	01	58.06	N	7.29
11/19/21	16:03	00:35	57	00	01	31.58	N	8.53
11/20/21	16:58	01:18	57	00	01	0.00	N	8.32
11/21/21	17:00	00:14	57	00	01	0.00	N	7.23
11/22/21	16:59	00:30	57	00	01	0.00	N	7.52
12/02/21	17:07	01:22	57	00	01	0.00	N	8.24
12/03/21	16:07	01:31	57	00	01	72.77	N	9.39
12/04/21	17:16	01:02	57	00	01	0.00	N	7.76
12/05/21	17:03	23:23	57	00	01	31.88	N	6.33
12/06/21	16:56	00:30	57	00	01	22.81	N	7.56
12/12/21	19:46	00:40	57	00	01	0.00	N	4.89
12/13/21	17:07	00:05	57	00	01	31.67	N	6.97
12/16/21	16:51	00:04	57	00	01	0.00	N	7.22
12/17/21	16:34	01:36	57	00	01	0.00	N	9.03
12/18/21	17:09	01:29	57	00	01	0.00	N	8.33
12/19/21	16:56	00:08	57	00	01	54.05	N	7.20
12/20/21	16:58	00:27	57	00	01	10.77	N	7.49
12/23/21	17:03	00:16	57	00	01	0.00	N	7.21
12/24/21	15:11	20:20	57	00	01	0.00	N	5.14
12/26/21	16:54	01:03	57	00	01	0.00	N	8.14
12/27/21	16:51	00:30	57	00	01	0.00	N	7.64



STARRDANYA ROBERTS

Date	Clock		Overtime		LD	Pay		Tips	Meal	Total Hours	Status
	In	Out	Code	Hours		Code	Rate				
12/30/21	16:59	00:26			57	00	01	0.00	N	7.45	
12/31/21	16:55	01:28			57	00	01	0.00	N	8.53	
01/01/22	16:57	01:07			57	00	01	46.15	N	8.17	
01/02/22	16:57	01:08			57	00	01	0.00	N	8.18	
01/03/22	16:59	00:25			57	00	01	0.00	N	7.43	
01/06/22	16:59	00:28			57	00	01	0.00	N	7.47	
01/07/22	16:51	21:15			57	00	01	62.72	N	4.39	
01/08/22	17:04	01:30			57	00	01	0.00	N	8.43	
01/09/22	17:06	00:23			57	00	01	0.00	N	7.27	
01/10/22	17:06	00:20			57	00	01	0.00	N	7.23	
01/14/22	16:55	00:05			57	00	01	48.32	N	7.17	
01/15/22	17:08	01:45			57	00	01	0.00	N	8.60	
01/16/22	16:58	00:29			57	00	01	0.00	N	7.50	
01/17/22	17:08	00:40			57	00	01	0.00	N	7.53	
01/20/22	16:58	00:01			57	00	01	0.00	N	7.05	
01/21/22	17:06	01:22			57	00	01	0.00	N	8.26	
01/22/22	17:06	22:12			57	00	01	16.67	N	5.10	
01/23/22	18:51	00:02			57	00	01	0.00	N	5.18	
01/24/22	17:02	00:25			57	00	01	0.00	N	7.38	
01/27/22	17:04	00:34			57	00	01	0.00	N	7.50	
01/28/22	17:08	01:43			57	00	01	0.00	N	8.57	
01/29/22	16:59	01:19			57	00	01	0.00	N	8.33	
01/30/22	17:03	00:39			57	00	01	0.00	N	7.59	
01/31/22	17:07	00:20			57	00	01	0.00	N	7.21	
02/03/22	16:59	00:44			57	00	01	0.00	N	7.74	
02/04/22	16:59	23:56			57	00	01	34.35	N	6.95	
02/05/22	17:08	01:17			57	00	01	0.00	N	8.14	
02/06/22	16:57	18:42			57	00	01	0.00	N	1.76	
02/07/22	16:54	00:17			57	00	01	25.70	N	7.38	

02/10/22	17:05	00:36	57	00	01	0.00	N	7.51
02/11/22	16:54	21:50	57	00	01	38.78	N	4.94
02/12/22	00:13	01:23	57	00	01	0.00	N	1.15
02/12/22	17:13	18:15	57	00	01	0.00	N	1.04
02/13/22	16:59	00:40	57	00	01	0.00	N	7.68
02/14/22	17:02	00:33	57	00	01	0.00	N	7.50
02/19/22	18:07	22:13	57	00	01	26.87	N	4.11
02/20/22	17:17	00:30	57	00	01	0.00	N	7.21
02/21/22	17:28	00:33	57	00	01	0.00	N	7.07
02/24/22	17:09	00:32	57	00	01	0.00	N	7.37
02/25/22	17:06	01:33	57	00	01	0.00	N	8.45
02/26/22	17:03	01:29	57	00	01	0.00	N	8.43
02/27/22	17:07	00:30	57	00	01	0.00	N	7.38
02/28/22	17:01	01:04	57	00	01	0.00	N	8.04
03/03/22	17:09	00:38	57	00	01	0.00	N	7.48
03/04/22	17:02	01:12	57	00	01	0.00	N	8.15
03/05/22	16:37	01:24	57	00	01	0.00	N	8.78
03/06/22	17:00	00:25	57	00	01	0.00	N	7.42
03/07/22	16:49	22:51	57	00	01	9.00	N	6.03
03/10/22	17:07	00:08	57	00	01	0.00	N	7.00
03/11/22	16:59	22:21	57	00	01	42.95	N	5.36
03/12/22	17:08	01:35	57	00	01	0.00	N	8.43
03/13/22	17:08	00:16	57	00	01	0.00	N	7.12
03/14/22	17:07	20:37	57	00	01	12.79	N	3.49
03/14/22	23:17	00:27	57	00	01	0.00	N	1.17
03/17/22	16:56	00:12	57	00	01	0.00	N	7.25
03/18/22	17:05	01:07	57	00	01	0.00	N	8.02
03/19/22	17:07	21:05	57	00	01	22.48	N	3.97
03/20/22	17:11	00:43	57	00	01	0.00	N	7.53
03/21/22	16:58	00:40	57	00	01	0.00	N	7.68

03/25/22	17:17	19:14	57	00	01	0.00	N	1.95
03/28/22	17:12	21:14	57	00	01	0.00	N	4.03
03/29/22	18:33	21:08	57	00	01	0.00	N	2.59
03/29/22	21:08	23:38	57	00	01	0.00	N	2.49
04/01/22	21:01	01:28	57	00	01	0.00	N	4.44
04/02/22	19:21	01:47	57	00	01	0.00	N	6.43
04/04/22	18:36	21:25	57	00	01	0.00	N	2.81
04/05/22	18:31	00:30	57	00	01	0.00	N	5.98
04/06/22	18:56	00:11	57	00	01	0.00	N	5.24
04/12/22	18:45	01:06	57	00	01	0.00	N	6.34
04/14/22	17:02	00:27	57	00	01	0.00	N	7.41
04/15/22	17:07	01:16	57	00	01	64.06	N	8.15
04/16/22	17:07	01:06	57	00	01	0.00	N	7.97
04/17/22	17:27	00:19	57	00	01	41.40	N	6.86
04/18/22	17:08	00:25	57	00	01	0.00	N	7.27
04/21/22	17:11	00:14	57	00	01	0.00	N	7.05
04/22/22	17:07	00:30	57	00	01	0.00	N	7.37
04/23/22	17:01	01:05	57	00	01	0.00	N	8.06
04/24/22	17:20	00:34	57	00	01	0.00	N	7.22
04/25/22	17:02	00:31	57	00	01	0.00	N	7.47
04/28/22	17:09	00:25	57	00	01	0.00	N	7.26
04/29/22	17:03	00:29	57	00	01	0.00	N	7.42
04/30/22	16:55	01:06	57	00	01	79.16	N	8.19
05/01/22	17:05	00:07	57	00	01	0.00	N	7.03
05/02/22	16:59	00:56	57	00	01	0.00	N	7.95
05/05/22	17:07	00:27	57	00	01	0.00	N	7.32
05/06/22	17:08	00:17	57	00	01	0.00	N	7.15
05/07/22	17:03	01:24	57	00	01	0.00	N	8.35
05/08/22	17:03	00:47	57	00	01	0.00	N	7.73
05/09/22	17:02	22:15	57	00	01	27.91	N	5.21
05/10/22	16:57	20:46	57	00	01	12.27	N	3.82
05/11/22	17:11	17:22	57	00	01	0.00	N	0.19
05/12/22	17:07	00:38	57	00	01	0.00	N	7.51
05/15/22	17:07	00:32	57	00	01	0.00	N	7.42

05/19/22	17:14	00:30	57	00	01	0.00	N	7.25
05/20/22	17:04	00:34	57	00	01	0.00	N	7.50
05/21/22	16:58	00:33	57	00	01	17.93	N	7.58
05/22/22	16:59	22:05	57	00	01	12.00	N	5.09

# EXHIBIT II



Las Vegas Pizza LLC  
 12121 Harbour Reach Dr  
 Suite 200  
 Mukilteo, WA 98275

**Pay Statement**  
 Period Start Date 08/24/2021  
 Period End Date 09/06/2021  
 Pay Date 09/13/2021  
 Document 758692  
 Net Pay \$565.22

**Pay Details**

STARRDANYA ROBERTS [REDACTED] [REDACTED] [REDACTED] [REDACTED]	Employee Number	001054322	Pay Group	48 Field
	SSN	XXX-XX-XXXX	Location	26621-Jones
	Primary Job	Delivery Driver	Corporate	STORE - Store
	Hourly Pay Rate	\$9.7500	Market	701 - 701
	Pay Frequency	Biweekly	Area	405 - 405
	Date Of Seniority	11/09/2020	Cost Center	026621 - 026621

**Earnings**

Pay Type	WK	STORE	Job Code	Week	Job	Hours	Hourly Rate	Current	YTD
Regular Hrlly	1	026621	Delivery Driver	1	Delivery Driver	35.8600	\$9.75	\$349.64	
Regular Hrlly	2	026621	Delivery Driver	2	Delivery Driver	34.3900	\$9.75	\$335.30	\$10,351.46
Tips	1	026621	Delivery Driver	1	Delivery Driver		\$0.00	\$84.51	
Tips	2	026621	Delivery Driver	2	Delivery Driver		\$0.00	\$173.56	\$4,053.70
Co-Efficient OT						0.0000	\$0.00	\$0.00	\$63.32
Overtime						0.0000	\$0.00	\$0.00	\$126.68
<b>Total Hours Worked</b>		70.25	<b>Total Hours Paid</b>		70.25				

**Deductions**

Deduction	Based On	Pre-Tax	Employee		Employer	
			Current	YTD	Current	YTD
Tips	\$258.07	No	\$258.07	\$4,053.70	\$0.00	\$0.00

**Taxes**

Tax Description	Based On	Current	YTD
Federal Income Tax	\$943.01	\$47.58	\$574.08
Employee Medicare	\$943.01	\$13.67	\$211.63
Social Security Employee Tax	\$943.01	\$58.47	\$904.90

**Paid Time Off**

Plan	Current	Balance	Remaining*
PTO	1.3509	23.9006	23.9006

\*Available to Take

**Net Pay Distribution**

Account Number	Account Type	Amount
Check amount		\$565.22
Total		\$565.22

**Pay Summary**

	Total Hours	Gross	FIT Taxable Wages	Taxes	Deductions	Net Pay
Current	70.25	\$943.01	\$943.01	\$119.72	\$258.07	\$565.22
YTD	1136.30	\$14,595.16	\$14,595.16	\$1,690.61	\$4,053.70	\$8,850.85

# EXHIBIT III



Las Vegas Pizza LLC  
 12121 Harbour Reach Dr  
 Suite 200  
 Mukilteo, WA 98275

**Pay Statement**

Period Start Date 04/19/2022  
 Period End Date 05/02/2022  
 Pay Date 05/09/2022  
 Document 764429

**Net Pay \$638.45**

**Pay Details**

**STARRDANYA ROBERTS**

Employee Number	001054322	Pay Group	48 Field
SSN	XXX-XX-XXXX	Location	26621-Jones
Primary Job	Delivery Driver	Corporate	STORE - Store
Hourly Pay Rate	\$9.7500	Market	701 - 701
Pay Frequency	Biweekly	Area	405 - 405
Date Of Seniority	11/09/2020	Cost Center	026621 - 026621

**Earnings**

Pay Type	WK	STORE	Job Code	Week	Job	Hours	Hourly Rate	Current	YTD
Regular Hrly	1	026621	Delivery Driver	1	Delivery Driver	37.1800	\$9.75	\$362.50	
Regular Hrly	2	026621	Delivery Driver	2	Delivery Driver	37.8300	\$9.75	\$368.84	\$6,037.97
Co-Efficient OT	2	026621	Delivery Driver	2	Delivery Driver	0.0300	\$4.87	\$0.15	\$60.85
Overtime	2	026621	Delivery Driver	2	Delivery Driver	0.0300	\$9.75	\$0.29	\$121.69
Tips	2	026621	Delivery Driver	2	Delivery Driver		\$0.00	\$79.16	\$636.22
<b>Total Hours Worked</b>	75.01				<b>Total Hours</b>	75.04			

**Deductions**

Deduction	Based On	Pre-Tax	Employee Current	Employee YTD	Employer Current	Employer YTD
Tips	\$79.16	No	\$79.16	\$636.22	\$0.00	\$0.00

**Taxes**

Tax	Based On	Current	YTD
Federal Income Tax	\$810.94	\$31.29	\$213.28
Employee Medicare	\$810.94	\$11.76	\$99.42
Social Security Employee Tax	\$810.94	\$50.28	\$425.12

**Paid Time Off**

Plan	Current	Balance	Remaining*	Account Number	Account Type	Amount
PTO	1.4430	28.6369	28.6369	Check amount		\$638.45
			*Available to Take	Total		\$638.45

**Pay Summary**

	Total Hours	Gross	FIT Taxable Wages	Taxes	Deductions	Net Pay
Current	75.04	\$810.94	\$810.94	\$93.33	\$79.16	\$638.45
YTD	631.76	\$6,856.73	\$6,856.73	\$737.82	\$636.22	\$5,482.69

vsn 20200922