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9/6/2018 9:25 AM Steven D. Grierson CLERK OF THE COURT

Electronically Filed

EIGHTH JUDICIAL DISTRICT COURT

CLARK COUNTY, NEVADA

ERICA REED, on behalf of herself and all others similarly situated,

Plaintiff,

VS.

Attorneys for Plaintiff

BOYD GAMING CORPORATION d/b/a and a/k/a SAM'S TOWN HOTEL AND GAMBLING HALL also d/b/a and a/k/a SAM'S TOWN; CALIFORNIA HOTEL AND CASINO d/b/a and a/k/a SAM'S TOWN HOTEL AND GAMBLING HALL; DOES 1 through 50; inclusive,

Defendant(s).

Case No.: A-18-780612-C Dept. No.: Department 15

CLASS ACTION COMPLAINT

Arbitration Exemption Claimed: Class Action

- Failure to Pay Minimum Wages in Violation of the Nevada Constitution;
- 2) Failure to Pay Overtime in Violation of NRS 608.018 and 608.140;
- 3) Failure to Timely Pay All Wages Due and Owing in Violation of NRS 608.020-050 and 608.140; and
- 4) Injunctive Relief.

LIEN REQUESTED PURSUANT TO NRS 608.050

JURY TRIAL DEMANDED

- 1 -CLASS ACTION COMPLAINT

Case Number: A-18-780612-C

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All allegations in the Complaint are based upon information and belief except for those allegations that pertain to the Plaintiff named herein and her 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.

COMES NOW Plaintiff Erica Reed, on behalf of herself and all others similarly

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. Terrible Herbst, Inc., 133 Nev. Adv. Op. 95 (Dec. 7, 2017).
- 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 August 31, 2018.
- Jurisdiction and venue are also based on Plaintiff's claims under Nevada state and common law.
- 5. Venue is proper in this Court because the Defendants named herein each 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.
 - 6. Plaintiff demands a jury trial on all issues triable by jury herein.

PARTIES

- 7. Plaintiff Erica Reed (hereinafter "Plaintiff" or "Plaintiff Reed") was at all relevant times a resident of the State of Nevada and was employed by Defendants as a non-exempt hourly employee from July of 2015 to July of 2018.
- 8. Defendant Boyd Gaming Corporation d/b/a and a/k/a Sam's Town Hotel and Gambling Hall also d/b/a and a/k/a Sam's Town ("Defendant Boyd") is a domestic

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corporation registered with the Nevada Secretary of State.

- Defendant California Hotel and Casino d/b/a and a/k/a Sam's Town Hotel and Gambling Hall ("Defendant California Hotel") is a domestic corporation registered with the Nevada Secretary of State.
- 10. Defendant Boyd Gaming Corporation holds the service mark for Sam's Town with the Nevada Secretary of State.
- 11. Defendant Boyd was doing business in this Judicial District in Clark County, Nevada where the subject incidences occurred.
- 12. Defendant California Hotel and Casino holds the fictitious firm name for Sam's Town Hotel and Gambling Hall with Clark County.
- 13. Defendant California Hotel was doing business in this Judicial District in Clark County, Nevada where the subject incidences occurred.
- 14. At all relevant times, each Defendant was an agent, employee, jointventurer, shareholder, director, member, co-conspirator, alter ego, master, or partner of each of the other Defendants, and at all times mentioned herein were acting within the scope and course and in pursuance of his, her, or its agency, joint venture, partnership, employment, common enterprise, or actual or apparent authority in concert with each other and the other Defendants.
- 15. At all relevant times, the acts and omissions of Defendants concurred and contributed to the various acts and omissions of each and every one of the other Defendants in proximately causing the complaints, injuries, and damages alleged herein. At all relevant times herein, Defendants approved of, condoned and/or otherwise ratified each and every one of the acts or omissions complained of herein. At all relevant times herein, Defendants aided and abetted the acts and omissions of each and every one of the other Defendants thereby proximately causing the damages as herein alleged.
- 16. The Defendants named herein are the employers of the Plaintiff and all Class Members alleged herein. The Defendants are employers engaged in commerce under the provisions of NRS 608.011. The identity of DOES 1-50 is unknown at the time

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and the Complaint will be amended at such time when the identities are known to Plaintiff. Plaintiff is informed and believes that each Defendant sued herein as DOE is responsible in some manner for the acts, omissions, or representations alleged herein and any reference to "Defendant" or "Defendants" herein shall mean "Defendants and each of them."

FACTUAL ALLEGATIONS

The Named-Plaintiff

- 17. Plaintiff Reed was employed by Defendants from July 2015 to July 2018. She had been classified as an hourly non-exempt employee of Defendants and was earning less than the higher-tier minimum wage rate of \$8.25 per hour.
- 18. Plaintiff Reed was regularly scheduled for and regularly worked at least 40 hours per workweek.
- 19. Plaintiff Reed was regularly scheduled for and regularly worked at least 8 hours per workday.

Defendant's Policy of Failing to Offer or Provide Health Insurance Benefits Less Than 10% of Employees' Total Gross Income

- 20. Defendants maintain an unlawful payment practice of paying Plaintiff and all other similarly situated employees less than the higher-tier minimum and overtime wage rate even though Defendants do not offer or provide insurance that is less than 10% of the total gross income of Plaintiff and other similarly situated employees.
- 21. For instance, on the pay period ending June 3, 2018 (a true and correct copy of this pay statement is attached hereto as Exhibit I), Defendants paid Plaintiff Reed a total gross taxable income of \$326.77 in minimum and overtime wages (\$326.43 in minimum wages for 42.67 regular hours worked and \$0.34 in overtime hours worked during the pay period). Tips are not included in the calculation of an employee's total gross taxable income. See MDC Restaurants, LLC et al v. The Eighth Judicial Dist. Court, 132 Nev. Op. 76 (Oct. 27, 2016). During that same period of time (and indeed during her entire employment), Plaintiff Reed was not offered or provided with health

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benefits of less than the 10% maximum percentage for an employer to qualify for the lower-tier minimum wage payment. Accordingly, Defendants failed to compensate Plaintiff Reed at the correct legal higher-tier minimum wage rate of \$8.25 per nonovertime hour and \$12.38 per overtime hour worked. Defendants therefore underpaid Plaintiff Reed \$25.63 during that pay period.

22. The policies and practices of Defendants at all relevant times have been substantially similar, if not identical, for all employees. Defendants are legally required to maintain all itemized pay statements that will demonstrate the amount of health insurance premiums paid by Plaintiff and all putative class member and the resulting amount of wages underpaid to Plaintiff and all members of the putative class during the entire period of time at issue in this case

CLASS ACTION ALLEGATIONS

- 23. Plaintiff realleges and incorporates by this reference all the paragraphs above in this Complaint as though fully set forth herein.
- 24. Plaintiff brings this action on behalf of herself and all other similarly situated employees as a class action under Rule 23 of the Nevada Rules of Civil Procedure.
 - 25. The **Classes** are defined as follows:
 - Α. Minimum Wage Class: "All hourly paid non-exempt persons employed by Defendants who were paid less than \$8.25 per nonovertime hour worked in the state of Nevada within 2 years from the filing of this complaint until judgment."
 - Overtime Class: "All hourly paid non-exempt persons B. employed by Defendants who were paid less than \$12.38 per overtime hour worked in the state of Nevada within 3 years from the filing of this complaint until judgment."
 - Waiting Time Penalty Class: "All members of the Minimum Wage and/or Overtime Wage Classes who are former employees."
- 26. Class treatment is appropriate under Rule 23's class certification mechanism because:
 - Α. The Classes are Sufficiently Numerous: Upon information and belief, Defendants employs, and has employed, in excess 300 Minimum Wage,

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Overtime, and Waiting Time Penalty Class Members within the applicable time period. Because Defendants are legally obligated to keep accurate payroll records, Plaintiff alleges that Defendants' records will establish the members of these Classes as well as their numerosity.

- B. Plaintiff's Claims is Typical to Those of Fellow Class Members: Each Class Member is and was subject to the same practices, plans, or policies as Plaintiff: (1) Whether Defendants can meet their burden of demonstrating that Plaintiff and Minimum Wage Class Members were only entitled to receive less than the higher-tier minimum wage rate; (2) Whether Defendants can meet their burden of demonstrating that Plaintiff and Overtime Class Members were only entitled to receive less than the higher-tier overtime wage rate; (3) Whether Plaintiff and members of the Waiting Time Penalty Class are entitled to waiting time penalties for the failure to pay them minimum, regular, and overtime wages owed.
- C. Common Questions of Law and Fact Exist: Common guestions of and fact exist and predominate as to Plaintiff and the Class Members, including, without limitation: Whether Defendants offered health insurance to Plaintiff and Class Members that was no more than 10% of employees' gross taxable income.
- D. Plaintiff is Adequate Representative of the Class: Plaintiff will fairly and adequately represent the interests of the Class because Plaintiff is a member of all the Classes, she has issues of law and fact in common with all members of the Classes, and her interests are not antagonistic to Class members. Plaintiff and her counsel are aware of their fiduciary responsibilities to Class Members and are determined to discharge those duties diligently by vigorously seeking the maximum possible recovery for Class Members.
- E. Predominance/Superior Mechanism: Class claims predominate and a class action is superior to other available means for the fair and efficient adjudication of this controversy. Each Class Member has been damaged and is

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entitled to recovery by reason of Defendants' illegal policy and/or practice of failing to compensate their employees in accordance with Nevada wage and hour law. The prosecution of individual remedies by each Class Member will tend to establish inconsistent standards of conduct for Defendants and result in the impairment of Class Members' rights and the disposition of their interest through actions to which they were not parties.

FIRST CAUSE OF ACTION

Failure to Pay Minimum Wages in Violation of the Nevada Constitution (On Behalf of Plaintiff and the Minimum Wage Class Against Defendants)

- Plaintiff realleges and incorporates by this reference all the paragraphs above in this Complaint as though fully set forth herein.
- 28. Article 15 Section 16 of the Nevada Constitution sets forth the requirements the minimum wage requirements in the State of Nevada ("MWA"). The MWA sets forth a two-tiered minimum wage, which were set at \$7.25 and \$8.25 for the relevant time period covered in this action.
- 29. In order to pay less than the higher-tier minimum wage amount, an employer must offer health benefits to its employees and the dependents of the employees "at a total cost to the employee for premiums of not more than 10 percent of the employee's gross taxable income from the employer."
- 30. As alleged herein, Defendants paid Plaintiff and all other members of the Class less than the higher-tier minimum wage rate but have failed to offer health benefits to their employees and the employees' dependents at a total cost to the employee for premiums of not more than 10% of the employees' gross taxable income.
- 31. By unlawfully paying Plaintiff and members of the Class less than the higher-tier wage rate of \$8.25, Defendants have failed to compensate Plaintiff and members of the Class at the minimum wage rate for all the hours that they worked pursuant to the Nevada Constitution.
- 32. Wherefore, Plaintiff demands for herself and for all other Class Members that Defendants pay Plaintiff and Class Members their unpaid minimum wages for all

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hours worked during the relevant time period alleged herein together with attorneys' fees, costs, interest, and punitive damages, as provided by law.

SECOND CAUSE OF ACTION

Failure to Pay Overtime Wages in Violation of NRS 608.018 and 608.140 (On Behalf of Plaintiff and the Overtime Class Against Defendants)

- 33. Plaintiff realleges and incorporates by this reference all the paragraphs above in this Complaint as though fully set forth herein.
- 34. NRS 608.140 provides that an employee has a private right of action for unpaid wages.
 - 35. NRS 608.018(1) provides as follows:

An employer shall pay 1 1/2 times an employee's regular wage rate whenever an employee compensation for employment at a rate less than 1 1/2 times 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.

36. NRS 608.018(2) provides as follows:

> An employer shall pay 1 1/2 times an employee's regular wage rate whenever an employee who receives 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.

- 37. As alleged herein, Defendants paid Plaintiff and all other members of the Class less than the higher-tier minimum wage rate but has failed to offer health benefits to their employees and the employees' dependents at a total cost to the employee for premiums of not more than 10% of the employees' gross taxable income.
- 38. By unlawfully paying Plaintiff and members of the Overtime Class less than the higher-tier minimum wage rate of \$8.25 (with an overtime wage rate of \$12.38), Defendants have likewise failed to compensate Plaintiff and members of the Class at the correct overtime wage rate for all the overtime hours that they worked pursuant to NRS 608.018.

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39. Wherefore, Plaintiff demands for herself and all Overtime Class Members that Defendants pay Plaintiff and Overtime Class Members one and one-half times their legally mandated minimum wage rate of pay for all hours worked in excess of eight (8) hours in a workday and/or in excess of forty (40) hours per workweek during the relevant time period together with attorneys' fees, costs, and interest, as provided by law.

THIRD CAUSE OF ACTION Waiting Time Penalties Pursuant to NRS 608.020-.050 and 608.140 (On Behalf of Plaintiff and the Waiting Time Penalty Class Against Defendants)

- 40. Plaintiff realleges and incorporates by this reference all the paragraphs above in this Complaint as though fully set forth herein.
- 41. NRS 608.140 provides that an employee has a private right of action for unpaid wages.
- 42. NRS 608.020 provides that "[w]henever an employer discharges an employee, the wages and compensation earned and unpaid at the time of such discharge shall become due and payable immediately."
- 43. NRS 608.040(1)(a-b), in relevant part, imposes a penalty on an employer who fails to pay a discharged or quitting employee: "Within 3 days after the wages or compensation of a discharged employee becomes due; or on the day the wages or compensation is due to an employee who resigns or quits, the wages or compensation of the employee continues at the same rate from the day the employee resigned, quit, or was discharged until paid for 30-days, whichever is less."
- 44. NRS 608.050 grants an "employee lien" to each discharged or laid-off 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, until the employee is paid in full, without rendering any service therefore; but the employee shall cease to draw such wages or salary 30 days after such default."
- 45. By failing to pay Plaintiff and the Waiting Time Penalty Class Members their legally mandated minimum and overtime wages, Defendants have failed to timely remit all wages due and owing to Plaintiff and the Waiting Time Penalty Class Members.

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- 46. Despite demand, Defendants willfully refuse and continue to refuse to pay Plaintiff and Waiting Time Penalty Class Members all the wages that were due and owing upon the termination of their employment.
- 47. Wherefore, Plaintiff and the Waiting Time Penalty Class Members demand thirty (30) days of pay as waiting penalties under NRS 608.040 and 608.140, and thirty (30) days of pay as waiting penalties under NRS 608.050 and 608.140, together with attorneys' fees, costs, and interest, as provided by law.

THIRD CAUSE OF ACTION Injunctive/Declaratory Relief (On Behalf of Plaintiff, the Minimum Wage Class, and the Overtime Class Against

- 48. Plaintiff realleges and incorporates by this reference all the paragraphs above in this Complaint as though fully set forth herein.
- 49. As Defendants have failed to compensate Plaintiff and members of the Overtime Class at the correct overtime wage rate for all the overtime hours that they worked pursuant to NRS 608.018, Defendants have wrongfully withheld wages properlyowed to the Plaintiff and the Overtime Class Members.
- 50. Plaintiff and the Nevada Overtime Class will suffer irreparable injury if Defendants are not enjoined from the future wrongful retention of wages owed.
- 51. As a result of the aforementioned unlawful payment practices, Plaintiff submits that there has been a likelihood of success on the merits that Plaintiff and the Class Members have been damaged, that there is irreparable harm, and Plaintiff requests that this Honorable Court enter an Order that restrains Defendants from attempting to enforce the alleged unlawful payment practices.
- 52. Plaintiff requests that this Honorable Court enter a declaration of rights/obligations in regards to all such unlawful payment practices in this matter.
- 53. Further, disputes and controversies have arisen between the parties relative to the lawfulness of the payment practices, and Plaintiff is entitled to have an order entered pursuant to Chapter 30 of the Nevada Revised Statutes construing the

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payment practices and adjudging and declaring Plaintiff and the Class Members' rights and remedies thereunder including such an Order stating that such payment practices are unlawful.

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

PRAYER FOR RELIEF

Wherefore Plaintiff, by herself and on behalf of Class Members, prays for relief as follows relating to her class action allegations:

- 1. For an order certifying this action as a class action on behalf the proposed Classes and providing notice to all Class Members so they may participate in this lawsuit;
- 2. For an order appointing Plaintiff as the Representatives of the Classes and their counsel as Class Counsel;
- 3. For damages according to proof for minimum rate pay under the Nevada Constitution for all hours worked:
- 4. For damages according to proof for overtime compensation under NRS 608.018 and 608.140 for all hours worked over 8 hours per day and/or over 40 hours in a workweek;
- 5. For waiting time penalties pursuant to NRS 608.040-.050 and 608.140;
- 6. For a lien on the property where Plaintiff and all Nevada Class Members labored pursuant to NRS 608.050;
- 7. For injunctive relief;
- 8. For declaratory relief;
- 9. For interest as provided by law at the maximum legal rate;
- 10. For punitive damages;
- 11. For reasonable attorneys' fees authorized by statute;
- 12. For costs of suit incurred herein;
- 13. For pre-judgment and post-judgment interest, as provided by law; and

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14. For such other and further relief as the Court may deem just and proper.

DATED: September 6, 2018

GABROY LAW OFFICES

By: Christian Gabroy, Nev. Bar No. 8805 christian@gabroy.com Kaine Messer, Nev. Bar No. 14240 kmesser@gabroy.com **GABROY LAW OFFICES** 170 S. Green Valley Pkwy, Suite 280 Henderson, NV 89012

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EXHIBIT I



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