

**UNITED STATES DISTRICT COURT
DISTRICT OF COLORADO**

Case No. 1:23-cv-01519-GPG

LAURA CARLTON AND RUEBEN COTTON,
on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

UNIVERSAL PROTECTION SERVICE, LP
d/b/a ALLIED UNIVERSAL SECURITY SERVICES

Defendant.

**DEFENDANT UNIVERSAL PROTECTION SERVICE, LP’S NOTICE OF MOTION AND
MOTION TO DISMISS PLAINTIFFS’ FIRST AMENDED COMPLAINT PURSUANT TO
FED. R. CIV. P. 12**

TO THE PARTIES AND THEIR ATTORNEYS OF RECORD: NOTICE IS HEREBY GIVEN that Defendant Universal Protection Service, LP dba Allied Universal Security Services (“Defendant”) will and does hereby move the Court for an order dismissing portions of Plaintiffs’ first amended complaint filed by Plaintiffs Laura Carlton and Rueben Cotton (collectively “Plaintiffs”) in this matter pursuant to Federal Rules of Civil Procedure (“FRCP”) Rule 12(b)(2) and (b)(6). Specifically, Defendant moves to dismiss Plaintiffs’ FLSA collective action claims to the extent they purport to include the claims of non-Colorado employees, including the claims of at least 341 opt-ins who never worked within this state. The Court lacks personal jurisdiction over these non-Colorado parties and putative collective action members. Additionally, to the extent the Court has personal

jurisdiction over such claims, Plaintiffs fail to allege facts sufficient to state a valid nationwide FLSA claim. Dismissal is appropriate under FRCP Rule 12(b)(2) and (b)(6).

I confirm that Defendant's counsel has conferred with opposing counsel in good faith regarding this motion, as required under Local Rule D.C.COLO.LCivR 7.1(a) and this Court's standing orders.

Dated at Sacramento, California, this 21st day of September 2023.

Respectfully Submitted,

s/ Ace T. Tate

Robin E. Largent

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INTRODUCTION

Plaintiffs bring a nationwide Fair Labor Standards Act (“FLSA” or “Act”) collective action and statewide class action alleging Defendant Universal Protection Service, LP d/b/a Allied Universal Security Services (“Allied Universal” or “Defendant”) failed to pay all of its hourly employees throughout the country for work they performed “off-the-clock.” However, Plaintiffs’ first amended complaint, like its predecessor, does not contain allegations supporting the Court’s exercise of jurisdiction over the claims of non-Colorado employees, under general or specific personal jurisdiction. Currently, there are at least 341 opt-in plaintiffs who did not work for Defendant in Colorado¹. Therefore, the Court must dismiss the claims of these individuals and any additional putative non-Colorado collective action members pursuant to Federal Rules of Civil Procedure (“FRCP”) Rule 12(b)(2).

Even if the Court did have personal jurisdiction over the claims of non-Colorado employees, Plaintiffs’ action still fails to state facts sufficient to support a valid or plausible nationwide collective. Plaintiffs worked at two locations in Colorado for a year or less and provided only limited information about their alleged individual experiences and even less about the claims of the putative collective action members they seek to represent. This is insufficient to establish a plausible claim that they are similarly situated through a uniform decision, policy or practice for a nationwide collective action claim. For this

¹ Defendant has not been able to identify every opt-in Plaintiff due to the opt-in forms having no identifying information other than the employees’ names. In some instances, Defendant’s records show more than one employee with the same name. Defendant has requested additional identifying information from Plaintiffs’ counsel in order to determine who the opt-ins are. Defendant seeks dismissal of all non-Colorado employee opt-ins.

additional reason, the Court should dismiss the claims of the non-Colorado opt-ins and any putative non-Colorado collective action members² pursuant to FRCP Rule 12(b)(6).

FACTS

Plaintiffs originally filed this action on June 15, 2023, alleging a nationwide FLSA collective action for alleged failure to pay minimum wages and overtime compensation for alleged pre-shift and post-shift off-the-clock work and a statewide Rule 23 class action alleging failure to pay all wages owed under Colorado state law. (ECF 1) After unsuccessfully meeting and conferring with Plaintiffs, Defendant filed a motion to dismiss (1) the claims of non-Colorado opt-ins; (2) the state law claims to the extent reaching back farther than the applicable three-year statute of limitations; and (3) the FLSA minimum wage claim. (ECF 8, 8-1 – 8-10) In response, Plaintiffs filed a First Amended Complaint (FAC) narrowing the state law claims to a three-year statute of limitations and eliminating the FLSA minimum wage claim. (ECF 17) Plaintiffs maintained their nationwide FLSA collective claim for alleged unpaid overtime. (*Id.*) Defendant further met and conferred with Plaintiffs regarding the nationwide scope of the action, reiterating Defendant's position that the nationwide scope is improper, but Plaintiffs do not agree. (Declaration of Robin E. Largent ¶¶ 4 – 5) As such, this second motion to dismiss ensued.

² Defendant entered into an arbitration agreement with Plaintiffs Cotton and other opt-ins which contain class and collective action waivers that bar their participation in this action. Defendant intends to separately file a motion to compel arbitration of Plaintiff Cotton's claims as well as those of other opt-ins that entered into similar agreements depending on how the Court rules on the jurisdictional issues raised herein. (*See Classen v. Nat'l Bd. of Osteopathic Med. Examiners, Inc.*, No. 16-CV-2250-RM-GPG, 2017 WL 3084916, at *2 (D. Colo. Jan. 12, 2017) (concluding threshold questions concerning jurisdiction must be decided before a case can move forward).)

In the FAC, Plaintiffs, who each worked exclusively in Colorado for a year or less at only two locations (ECF – 17 ¶¶ 10, 14, 33, 36), allege that Defendant required them to arrive 10 minutes before their shift to participate in job turnover duties and to stay beyond the end of their shift, without pay. (*Id.* at ¶¶ 41, 43) Plaintiffs further allege, in conclusory fashion, that Defendant’s alleged off-the-clock policies and practices apply uniformly across the country. (*Id.* at ¶¶ 5, 47, 73) Plaintiffs’ only factual support for this conclusory assertion is that other individuals have opted into the action and that there have been other lawsuits filed against Defendant also *alleging* that employees were required to worked off the clock. (*Id.* at ¶ 49) Plaintiffs also allege that other unidentified proposed collective action members shared with them that they experienced “similar” pay violations. (*Id.*) However, Plaintiffs do not identify where these individuals worked or how they have any relationship with Colorado. (*Id.*)

Based on the foregoing limited allegations, Plaintiffs seek to represent a *nationwide* FLSA collective of all current and former hourly paid security guards who have worked for Defendant anywhere in the country over the past three years. (ECF -17 ¶¶ 19, 69, 76) As of the date of this filing, Plaintiffs have opted into the instant action at least 341 individuals who never worked within Colorado. (“Out of State Opt-Ins”) (ECF 2-1, 6-1, 7-1; 12-1, 13-1, 15-1, 16-1, 17-1, 19-1, 23-1; Declaration of Peggy Grzywacz ¶ 6 – 7, Exhibit A)

LEGAL STANDARD

A court without jurisdiction cannot render a valid judgment. (*OMI Holdings, Inc. v. Royal Ins. Co. of Canada*, 149 F.3d 1086, 1090 (10th Cir. 1998).) For the purposes of a

motion under Federal Rules of Civil Procedure FRCP Rule 12(b)(2), “[t]he Plaintiff bears the burden of establishing personal jurisdiction over the defendant.” (*Rambo v. American Southern Ins. Co.*, 839 F.2d 1415, 1417 (10th Cir.1988).) When adjudicating an FRCP Rule 12(b)(2) motion, a district court may consider evidence outside of the pleadings, including affidavits submitted by the parties. (*Behagen v. Amateur Basketball Ass’n*, 744 F.2d 731, 733 (10th Cir.1984).) Conclusory allegations are insufficient to establish jurisdiction. (*Dental Dynamics, LLC v. Jolly Dental Grp., LLC*, 946 F.3d 1223, 1231 (10th Cir. 2020).) Rather, to make a prima facie showing of jurisdiction, a plaintiff must point to well-pleaded factual allegations—both in the complaint and in any supporting affidavits—that, if true, would support jurisdiction. (*Gould v. Wyse*, No. 22-2075, 2023 WL 4994511, at *2 (10th Cir. Aug. 4, 2023).) Dismissal pursuant to Rule 12(b)(2) is without prejudice. (*Goff v. Hackett Stone Co.*, 185 F.3d 874 (10th Cir. 1999); See Also FRCP 41(b).)

Under FRCP Rule 12(b)(6), “[a] complaint is subject to dismissal for failure to state a claim if the allegations, taken as true, show the plaintiff is not entitled to relief.” (*Jones v. Bock*, 549 U.S. 199, 215 (2007).)

ARGUMENT

A. PLAINTIFFS’ FAC, LIKE THE ORIGINAL COMPLAINT, DOES NOT ESTABLISH THIS COURT HAS PERSONAL JURISDICTION OVER INDIVIDUALS WHO NEVER WORKED IN COLORADO

The Court does not have jurisdiction over the claims of the Out of State Opt-Ins or any putative future opt-in who never worked for Defendant within the state of Colorado. “The requirement that a court have personal jurisdiction flows not from Art. III, but from

the Due Process Clause... It represents a restriction on judicial power not as a matter of sovereignty, but as a matter of individual liberty.” (*Ins. Corp. of Ir., Ltd. v. Compagnie des Bauxites de Guinee*, 456 U.S. 694, 702 (1982); *See Also Perkins v. Suzuki Motor Corp.*, No. 118CV00893WYDGPG, 2019 WL 13104644, at *2 (D. Colo. Apr. 28, 2019) (“[d]ue process limits on the State’s adjudicative authority principally protect the liberty of the nonresidential defendant-not the convenience of plaintiffs or third parties.”).) Unless authorized by statute, federal courts do not have nationwide personal jurisdiction and have no broader power over persons outside the state in which they sit than local state courts. (*Omni Capital Int’l, Ltd. v. Rudolph Wolff & Co., Ltd.* 484 US 97, 104-105 (1987); FRCP 4(k).) A court may assert general personal jurisdiction over a defendant where it is “at home” in the forum state. (*Goodyear Dunlop Tires Operations, S.A. v. Brown*, 564 U.S. 915, 919 (2011).) In the absence of general personal jurisdiction, a court may only exercise “specific,” or case-based, jurisdiction over a defendant if there is an affiliation between the forum and the underlying controversy, principally, an activity or an occurrence that takes place in the forum state and is therefore subject to the state’s regulation. (*Hood v. Am. Auto Care, LLC*, 21 F.4th 1216, 1221 (10th Cir. 2021).) As explained below, this Court does not have personal jurisdiction in any form over Defendant with respect to the Out of State Opt-Ins or any other putative non-Colorado collective action members.

1. The Court Does Not Have General Personal Jurisdiction

Plaintiffs cannot maintain a nationwide collective action on the basis of general personal jurisdiction because they have not pled, and cannot plead, that Defendant is “at

home” in Colorado. A corporation is considered at home within their state of incorporation and their principal place of business. (*Gould v. Wyse*, *supra* at *8, fn. 6.) Here, Plaintiffs do not allege in their FAC that Defendant is a Colorado corporation or that its headquarters are in Colorado. Instead, Plaintiffs allege only that Defendant is a *California* limited partnership. (ECF-17 ¶ 22) Since Plaintiffs have failed to plead facts demonstrating that Defendant is “at home” in Colorado, this Court cannot exercise general personal jurisdiction over the claims of the Out of State Opt-ins or putative non-Colorado collective action members Plaintiffs seeks to include in the action.

2. The Court Does Not Have Specific Personal Jurisdiction Over The Claims of Non-Colorado Opt-Ins

Plaintiffs’ FAC does not establish any type of connection between the claims of the Out of State Opt-Ins and Colorado that support this Court’s exercise of personal specific jurisdiction over these claims. In 2017, the U.S. Supreme Court issued its ruling in *Bristol-Myers Squibb Co. v. Superior Ct. of California, San Francisco Cnty.*, 582 U.S. 255 (2017). The case involved a mass tort action brought in California state court, involving more than 600 plaintiffs, most of whom were not California residents and whose injuries occurred outside of California. (*Id.* at 258) The Supreme Court determined that California did not have specific personal jurisdiction over the defendant for the claims of the out-of-state residents because these individuals suffered their injuries outside of the state and there was no other connection to the forum state. (*Id.* at 264 – 265) For specific personal jurisdiction to exist there needs to be “a connection between the forum and the specific claims at issue.” (*Id.* at 265) This arising-out-of component requires courts to ensure that there is an adequate link between the forum state and the claims at issue, regardless of

the extent of a defendant's other activities connected to the forum. (*XMission, L.C. v. Fluent LLC*, 955 F.3d 833, 840 (10th Cir. 2020).)

Like the litigation at issue in *Bristol-Myers*, a FLSA collective action is a mass action where each individual opt-in has party status. (*Beattie v. TTEC Healthcare Sols., Inc.*, No. 1:18-CV-03098-RM-NRN, 2019 WL 4242664, at *1 (D. Colo. Sept. 6, 2019) (collecting cases).) Since the FLSA does not authorize nationwide service, constitutional jurisprudence requires a separate personal jurisdiction analysis for each individual that opts into the action. (See 29 U.S.C. 201 et. seq.; FRCP 4(k).) The majority of circuits that have addressed the issue have concluded that the principles of *Bristol-Myers* apply to FLSA collective actions and preclude the exercise of jurisdiction over the claims of non-resident opt-ins absent a showing that their claims bear a connection to the forum state. (See *Canaday v. Anthem Companies, Inc.*, 9 F.4th 392 (6th Cir. 2021); *Vallone v. CJS Sols. Grp., LLC*, 9 F.4th 861 (8th Cir. 2021); *Fischer v. Fed. Express Corp.*, 42 F.4th 366 (3rd Cir. 2022).) Thus, a court must dismiss the claims of individuals whose claims are unrelated to a defendant's conduct in the forum state.

Plaintiffs' allegations fall far short of the factual threshold needed to establish specific personal jurisdiction over Defendant for the claims of the Out of State Opt-ins because there are no allegations suggesting that the alleged injuries of non-Colorado employees either occurred in Colorado or "ar[ose] out of [or relate to] the defendant[s'] forum-related activities. [internal quotations omitted]" (*Gould v. Wyse, supra* at *3.) Plaintiffs' FAC allege in conclusory fashion that Defendant has uniform "policies and/or practices" of "off the clock work" that are supposedly in place across the country. (ECF -

17 at ¶¶ 5, 47, 73) However, Plaintiffs' FAC is noticeably bereft of any facts demonstrating Defendant created these alleged policies or practices *in* the state of Colorado or that its activities *in* Colorado somehow caused the alleged underpayment of overtime wages to employees *outside* of Colorado. (See *Mobley v. CIG Logistics LLC*, No. 1:22-CV-00226-WJ-LF, 2022 WL 4103980, at *2 (D.N.M. Sept. 8, 2022) (concluding court had no specific personal jurisdiction in FLSA collective action over claims of individuals not hired in New Mexico because the unpaid wages for work in those locations did not arise out of defendants' conduct in forum state).) Plaintiffs' failure to articulate absolutely any connection between Colorado and the claims of non-Colorado employees warrants dismissal of the 341 Out of State Opt-Ins and dismissal of Plaintiffs' FLSA claims to the extent they bring them on behalf of such individuals.

B. EVEN IF THE COURT HAD NATIONWIDE JURISDICTION, PLAINTIFFS HAVE FAILED TO ADEQUATELY PLEAD NATIONWIDE VIOLATIONS

In addition to failing for jurisdictional reasons, Plaintiffs' proposed nationwide FLSA claims also fail and are subject to dismissal under Rule 12(b)(6) because Plaintiffs have failed to sufficiently plead plausible nationwide claims. To survive a motion to dismiss brought pursuant to Rule 12(b)(6), a complaint must include enough factual content to give the opposing party notice of what the claim is and the grounds upon which it rests. (*Bell Atl. Corp. v. Twombly*, 550 U.S. 544, 555 (2007); *Ashcroft v. Iqbal*, 556 U.S. 662, 698 (2009).) Under 29 U.S.C. § 216(b), when a plaintiff brings a collective action under the FLSA, they must allege sufficient facts to support the claim they are "similarly situated" to the individuals they seek to include, specifically substantial allegations that all of these

individuals were victims of a single decision, policy, or plan. (*Thiessen v. Gen. Elec. Capital Corp.*, 267 F.3d 1095, 1102 (10th Cir. 2001).)

Plaintiffs' allegations do not plead any facts, let alone substantial ones, for a valid nationwide collective action. While they allege in purely conclusory fashion that Defendant's alleged off the clock work policies or practices applied nationally, they provide no facts to support this broad conclusion. (ECF – 17 ¶¶ 5, 47, 73). Plaintiffs state they have personal knowledge of individuals who suffered allegedly similar violations to them, but this does not establish a nationwide collective because this information is limited to their "personal knowledge of the treatment of their co-workers at those locations." (ECF – 1 ¶ 70) Both Plaintiffs allege they never worked for Defendant other than in the cities of Aurora and Englewood in Colorado. (ECF – 17 ¶¶ 10, 14) Therefore, their personal knowledge does not extend beyond the borders of this state to support a national scope. Even more deficient and no less speculative is the fact that Plaintiffs allege that other proposed collective action members shared with them that they experienced similar pay violations. (ECF – 1 ¶ 70) Notably, Plaintiffs do not state where these individuals worked or how they concluded they suffered "similar" pay violations with respect to a single decision, policy or plan that would give their claims nationwide reach. (*Smith v. United States*, 156 Fed. Cl. 471, 482 (2021) (denying certification of nationwide collective action because the court could not infer individuals at one location were similarly situated to individuals elsewhere without specific evidence of consistency).)

Similarly unpersuasive, is Plaintiffs' vague reference to other litigation against Defendant involving allegations of "off the clock" work because they do not state whether

it ended in a final judgment or verdict or merits finding supporting their theory in order to provide substantiation for the existence of a nationwide policy. (Id. at ¶ 49; See *Cowell v. Utopia Home Care, Inc.*, 144 F. Supp. 3d 398, 406 (E.D.N.Y. 2015) (striking complaint's references to other litigation against employer, and describing the material as impertinent and inappropriate in a complaint); See Also *RSM Prod. Corp. v. Fridman*, 643 F. Supp. 2d 382, 403 (S.D.N.Y. 2009) (striking paragraphs based on “complaints filed in actions that were never resolved on the merits and, thus, did not result in any findings of law or fact”).) Finally, Plaintiffs’ assertion that individuals have already opted into the action is of no import, without more (and there is nothing more alleged). (*Quint v. Vail Resorts, Inc.*, No. 120CV03569DDDGP, 2022 WL 2756948, at *3 (D. Colo. June 23, 2022) (denying conditional certification and rejecting argument that the number of individuals who opted into nationwide collective action by itself demonstrated they were similarly situated without more information).)

Therefore, to the extent the Court concludes it has jurisdiction over non-Colorado putative collective action members, it should nonetheless dismiss Plaintiffs’ FAC for failing to adequately plead facts supporting a nationwide FLSA collective action pursuant to FRCP Rule 12(b)(6).

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CONCLUSION

For the reasons set forth above, the Court should dismiss the claims of the 341 Out-of-State Opt-ins and putative non-Colorado employees for lack of jurisdiction under Rule 12(b)(2) and, in the alternative, under Rule 12(b)(6) for failure to adequately plead nationwide claims.

Dated this 21st day of September 2023.

Respectfully Submitted,

s/ Ace T. Tate

Robin E. Largent

Ace T. Tate

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing documents were electronically filed using the Court's Electronic Case Filing system and will also be served upon all counsel of record through the ECF system.

/s/ Carol Philip

Carol Philip

**UNITED STATES DISTRICT COURT
DISTRICT OF COLORADO**

Case No. 1:23-cv-01519-GPG

LAURA CARLTON AND RUEBEN COTTON,
on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

UNIVERSAL PROTECTION SERVICE, LP
d/b/a ALLIED UNIVERSAL SECURITY SERVICES

Defendant.

**MEET AND CONFER DECLARATION CERTIFICATE OF ROBIN E. LARGENT
PURSUANT TO D.C.COLO.LCivR 7.1 IN SUPPORT OF DEFENDANT UNIVERSAL
PROTECTION SERVICE, LP'S MOTION TO DISMISS PLAINTIFFS' FIRST
AMENDED COMPLAINT PURSUANT TO FED. R. CIV. P. 12**

1. My name is Robin E. Largent. I am a partner in the law firm of Martenson, Hasbrouck & Simon LLP, counsel for Defendant Universal Protection Service, LP d/b/a Allied Universal Security Services ("Defendant") in the instant action. I am licensed to practice law in the State of California and was admitted to the bar of this district court on June 30, 2023. I have personal knowledge of the facts set forth herein and, if called and sworn as a witness, I could competently testify to these facts.

2. In advance of filing the instant motion, I met and conferred (both in writing and via at least one phone conference) with Plaintiffs' counsel over the course of the prior

two months, explaining that Defendant intended to file a Motion to Dismiss aimed at various aspects of the original Complaint, including the nationwide scope of the collective action, the assertion of a FLSA minimum wage claim, and an erroneous and overbroad statute of limitations on the state law claims. I also met and conferred with Plaintiffs' counsel concerning the fact that Plaintiff Cotton and many opt-ins have arbitration agreements with class action waivers that bar their participation in the action.

3. The meet and confer efforts proved unsuccessful, resulting in Defendant filing a Motion to Dismiss targeting the original Complaint. In response to the filing of the Motion, Plaintiffs filed a First Amended Complaint resolving some of the issues raised by the Motion about which we had previously met and conferred. Specifically, Plaintiffs eliminated the FLSA minimum wage claim and changed the statute of limitations on the state law claims to three years (instead of six years, as previously alleged). However, Plaintiffs maintained the nationwide scope of the FLSA collective claim for alleged unpaid overtime wages.

4. Following the filing of the First Amended Complaint, I met and conferred with Plaintiffs' counsel again regarding the nationwide scope and Defendant's belief that the Court lacks personal jurisdiction over the claims of non-Colorado employees and many of the opt-ins are non-Colorado employees. Plaintiffs' counsel stated that they believe nationwide jurisdiction is proper on the FLSA claim. The inability to resolve this issue necessitated the filing of a second Motion to Dismiss.

5. There are a number of opt-in Plaintiffs for whom we have requested additional identifying information from Plaintiffs' counsel. This is because the opt-in forms

list only the employee's name with no additional identifying detail. I understand that there are multiple employees with the same names in Allied Universal's database, making it impossible to determine which employee is the opt-in without more information. Plaintiffs' counsel has cooperated in providing additional identifying information when requested. However, because some of this identification work is ongoing, the list of out-of-state opt-ins is likely to be longer than the list attached to the supporting Declaration of Peggy Grzywacz. Should Plaintiffs file additional opt-ins subsequent to the filing of this Motion, the list may also grow for that additional reason. On September 18, 2023, Plaintiffs' counsel substantively responded that they continued to believe the court had jurisdiction over the individuals that never worked in Colorado. Additionally, Plaintiffs' counsel stated they would not stipulate to arbitration for any individual that entered into an arbitration agreement. Subsequently, I requested Plaintiffs' counsel provide additional information concerning individuals who opted into the action that Defendant could not identify to determine whether they had worked within the state of Colorado.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on September 21, 2023

/s/ Robin E. Largent
Robin E. Largent

**UNITED STATES DISTRICT COURT
DISTRICT OF COLORADO**

Case No. 1:23-cv-01519-GPG

LAURA CARLTON AND RUEBEN COTTON,
on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

UNIVERSAL PROTECTION SERVICE, LP
d/b/a ALLIED UNIVERSAL SECURITY SERVICES

Defendant.

**DECLARATION OF PEGGY GRZYWACZ IN SUPPORT OF UNIVERSAL
PROTECTION SERVICE, LP'S MOTION TO DISMISS PLAINTIFFS' FIRST
AMENDED COMPLAINT PURSUANT TO FED. R. CIV. P. 12**

Pursuant to 28 U.S.C. Section 1746, I declare as follows:

1. My name is Peggy Grzywacz. I am over twenty-one (21) years of age. I am employed by Universal Protection Service, LP d/b/a Allied Universal Security Services ("Allied Universal"), the defendant in the above-entitled action. I have been employed in various human resources roles with Allied Universal since May 2018. I am currently a Senior Director – Corporate Human Resources. I have personal knowledge of the facts set forth herein and, if called and sworn as a witness, I could competently testify to these facts.

2. Allied Universal, one of the nation's largest providers of security professional services, does business in multiple states and employs thousands of employees who provide contract-based security services to thousands of different clients. It provides security services to clients who are (or operate) airports, hospitals, retail centers, residential communities, office buildings, and distribution/manufacturing facilities, among other industries.

3. Allied Universal human resources staff, including myself, are involved in the overall process and implementation of policies involving documentation related to hiring new employees as well as ensuring the company is tracking where employees work throughout Allied Universal's operations in the United States. In my capacity as Senior Director-Corporate Human Resources, I receive regular training on how these systems operate and have specific experience accessing, navigating, and reviewing information collected. Allied Universal maintains these records in the regular course of business in electronic databases for employees that work within the United States. In my job position, I have access to these electronic databases.

4. When a candidate applies for an open position at an Allied Universal work site, that individual must complete an application that includes their name, mailing address and an email address. After a candidate accepts an offer of employment and provides documents that establish both the candidate's identity and employment authorization, Allied Universal utilizes an electronic onboarding system for its employees. Among the documents which a new hire completes for onboarding are forms that require the individual to provide their home address. Onboarding documents are automatically

and contemporaneously stored in the ordinary course of business at the time at the time the individual completes the document.

5. Allied Universal pays different rates of pay for hourly employees depending on the site they work at. Therefore, it is necessary to track at what site an hourly employee works to ensure they are paid correctly. The job location(s) where the employees work is stored in electronic databases that I can access and review.

6. I have reviewed the consents to join the action filed by the Plaintiffs in this case. (ECF 2-1; ECF 6-1; ECF 7-1; ECF 13-1, ECF 15-1, ECF 16-1, ECF 17-1, ECF 19-1, ECF 23-1) I also reviewed the personnel information for these individuals in Allied Universal's electronic databases to determine the states in which they resided and worked while employed by Allied Universal. Based on my review of Allied Universal's records, the individuals listed in Exhibit A attached hereto lived and worked exclusively in states other than Colorado.

7. Allied Universal has more than one employee with the same name for some opt-ins and I do not know from the opt-in form alone which employee signed the form. However, based on the information contained within Allied Universal's records, none of the employees with these names ever worked within the state of Colorado either. In Exhibit A, these individuals are: Sean Hinds, James McCarter, India White, William Felix, Aeronda Jackson, Alesia Taylor, Alvin F. Carter, Andrew Reed, Antonio Cherry, Brandon Patton, Brian Tooley, Cadmus Hogg, Carlos Esquivel, Cesar Solis, Curtis Watson, Darren Smalls, Darryl Scott, David A. Taylor, David Reyes, Francisco Campos, Guadalupe Torres, Jennifer Beatty, Karen Richardson, Marilyn Thompson, Mark Macia, Martha Sims, Marvin W. Scott, Mauricio Lopez, Michelle Drake, Mike R. Tillman, Nathan Barber,

Reynaldo Valdez Soto, Richard Mumolo, Robert E. Thomas, Robert Lombardo, Roberta Walker, Rodney Lablue, Sonia Brown, Tonya Page, Valerie George, Victor J. Morales, Andre L. Robinson, Andrew Ricketts, Angela Murphy, Belinda Jackson, Brandy Baldwin, Charlene Berry, Christian Navarette, Danesha White, Douglas Rolando Lopez, Gregory Shaw, Jacquelyn Jackson, James T. Johnson, Janet Presley, Jeannette Hodges, Marlon Wade Tolbert, Rodolfo Rodriguez, Shanika Johnson, Tenia LaDett Dottin, Thomas DeWitt, Timmie E. Jennings, Tyrone Thomas, Vanity White, and William Munoz.

8. Also due to a lack of sufficient identifying information, I have been unable to identify the following opt-ins to determine whether they ever worked within the state of Colorado: Brad Jackson (ECF 2-1, p. 12), Erica Putman (ECF 7-1, p. 3), Tia Rich (ECF 7-1, p. 10), Craig L. Noble (ECF 12-1, p. 38), Gary Ortez (ECF 13-1, p. 19), Jason Jacob Green (ECF 13-1, p. 34), Jermaine Johnson (ECF 13-1, p. 39), Jessica Allen (ECF 13-1, p. 41), Jorge Romero (ECF 13-1, p. 48), Joshua Paul (ECF 13-1, p. 49), Kathleen Matthews (ECF 15-1, p. 1), Marcus Mitchell Zackery (ECF 15-1, p. 19), Maria Maldonado (ECF 15-1, p. 20), Mark Thomas (ECF 15-1, p. 26), Mary Baker (ECF 15-1, p. 30), Patricia Lynn Carpenter (ECF 15-1, p. 48), Pete Rodriguez (ECF 15-1, p. 50), Ray Howard (ECF 16-1, p. 5), Richard Alexander (ECF 16-1, p. 11), Tanner S. Halsey (ECF 16-1, p. 35), Andrew Anderson (ECF 19-1, p. 7), Candice Madison (ECF 19-1, p. 22), Charles Watson (ECF 19-1, p. 25), David A. Reece (ECF 19-1, p. 37), Deigo Robinson (ECF 19-1, p. 39), Dwight Wilson (ECF 19-1, p. 46), India White (ECF 19-1, p. 58), Jazmeen K. Adams (ECF 19-1, p. 65), Joe Decker (ECF 19-1, p. 68), Jose Rodriguez, Jr. (ECF 23-1, p. 3), Krista Schmidt (ECF 23-1, p. 11), Laura M. Geho, (ECF 23-1, p. 16), Alfredo Montero (ECF 23-

1, p. 27), Oscar Marquez (ECF 23-1, p. 32), Richard Carillo, Jr. (ECF 23-1, p. 39), Timothy Burke (ECF 23-1, p. 56).

9. Based on Allied Universal's ordinary business practices concerning the information it collects during the onboarding process as well as how it catalogues where an employee works, the storage of this information and its security protocols, I believe the foregoing information is accurate. I have no reason to believe that this information is inaccurate.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on September 20, 2023 at Irvine, California.

DocuSigned by:

A6A6C63A236043D...

PEGGY GRZYWACZ

EXHIBIT A

EXHIBIT A

	First Name	Last Name	ECF Doc No.	Date Opted In
1	Joshua	Amyx	2-1, p. 1	6/15/23
2	Tangela	Blue	2-1, p. 2	6/15/23
3	Jerrie	Bowen	2-1, p. 3	6/15/23
4	Taizea	Dedner	2-1, p. 4	6/15/23
5	Martin	Ekeh	2-1, p. 5	6/15/23
6	Giordan	Figueroa	2-1, p. 6	6/15/23
7	Joannie	Hall	2-1, p. 7	6/15/23
8	Sean	Hinds	2-1, p. 8	6/15/23
9	Kathisla	Irizarry (Irizarry Hellinger)	2-1, p. 9 - 10	6/15/23
10	Cynthia	Johns	2-1, p. 12	6/15/23
11	Takeema	Latta	2-1, p. 13	6/15/23
12	Josephine	Leverett	2-1, p. 14	6/15/23
13	James	McCarter	2-1, p. 15	6/15/23
14	Norma	Noriega	2-1, p. 16	6/15/23
15	Jamie	Seymour	2-1, p. 17	6/15/23
16	Jilliann	Thomas	2-1, p. 18	6/15/23
17	Dale	Rabion	6-1, p. 1	6/30/23
18	India	White	6-1, p. 2	6/30/23
19	Daisy	Bowman	7-1, p. 2	8/1/23
20	Erinesha	Gross	7-1, p. 4	8/1/23
21	Eulesha	Gross	7-1, p. 5	8/1/23
22	Melynda	Phillips	7-1, p. 7	8/1/23
23	Rogenna	Knox	7-1, p. 8	8/1/23
24	Tila	Good	7-1, p. 11	8/1/23
25	William	Felix	7-1, p. 12	8/1/23
26	Wytitina LeAnn	Rice	7-1, p. 13	8/1/23
27	Aaron A.	Segovia	12-1, p. 1	9/1/23
28	Adebowale G.	Ojajuni	12-1, p. 2	9/1/23
29	Aeronda	Jackson	12-1, p. 3	9/1/23
30	Alec Samuel	Lopez	12-1, p. 4	9/1/23
31	Alesia A.	Taylor	12-1, p. 5	9/1/23
32	Alfonso Parra	Magana	12-1, p. 6	9/1/23
33	Alphanso	Llewellyn	12-1, p. 7	9/1/23
34	Alvin F.	Carter	12-1, p. 8	9/1/23
35	Amie	Lindsey	12-1, p. 9	9/1/23
36	Andrea	Buford	12-1, p. 10	9/1/23
37	Andrew	Grant	12-1, p. 11	9/1/23
38	Andrew J.	Owens	12-1, p. 12	9/1/23
39	Andrew	Reed	12-1, p. 13	9/1/23
40	Andrew	Tarigan	12-1, p. 14	9/1/23
41	Angel	Rosas-Esparza	12-1, p. 15	9/1/23
42	Angela	Rosales	12-1, p. 16	9/1/23
43	Angelia	Moore	12-1, p. 17	9/1/23
44	Ann Marie	McCullough	12-1, p. 18	9/1/23
45	Antonio	Cherry	12-1, p. 19	9/1/23
46	Antonio	Obsequio	12-1, p. 20	9/1/23
47	Arleen	Lee	12-1, p. 21	9/1/23
48	Barbara	Sanchez	12-1, p. 22	9/1/23
49	Benjamin	Mangum	12-1, p. 23	9/1/23
50	Brandon	Patton	12-1, p. 24	9/1/23
51	Brandy	Firman	12-1, p. 25	9/1/23
52	Brian	Tooley	12-1, p. 26	9/1/23
53	Cadmus E.	Hogg	12-1, p. 27	9/1/23
54	Calib	Flory	12-1, p. 28	9/1/23
55	Calvert Glen	Love	12-1, p. 29	9/1/23
56	Cameron S.	Espinoza Ohl	12-1, p. 30	9/1/23
57	Carlos	Esquivel	12-1, p. 31	9/1/23
58	Cesar	Solis	12-1, p. 32	9/1/23
59	Champagne Erica	Cosey	12-1, p. 33	9/1/23
60	Christina	Sgro	12-1, p. 34	9/1/23
61	Christopher M.	Lemieux	12-1, p. 35	9/1/23
62	Clement	Mayo	12-1, p. 36	9/1/23

63	Corey Michael	McKinney	12-1, p. 37	9/1/23
64	Crystal Marie	Moreno	12-1, p. 39	9/1/23
65	Curtis	Watson	12-1, p. 40	9/1/23
66	Daniel A.	Silva	12-1, p. 41	9/1/23
67	Daniel	Blythe	12-1, p. 42	9/1/23
68	Darren	Smalls	12-1, p. 44	9/1/23
69	Darryl	Hargrave	12-1, p. 45	9/1/23
70	Darryl	Scott	12-1, p. 46	9/1/23
71	Darryl	Strader	12-1, p. 47	9/1/23
72	Darshell A.	Hines	12-1, p. 48	9/1/23
73	Dassah M.	Maketa	12-1, p. 49	9/1/23
74	David A.	Jaurigue	12-1, p. 50	9/1/23
75	David A.	Arndt	12-1, p. 51	9/1/23
76	David A.	Taylor	12-1, p. 52	9/1/23
77	David	Laplana	12-1, p. 53	9/1/23
78	David	Reyes	12-1, p. 54	9/1/23
79	David W	Lofton	12-1, p. 55	9/1/23
80	Daydrien	Lee	13-1, p. 1	9/1/23
81	Dennis John	Loewer	13-1, p. 2	9/1/23
82	Derrell	Hartley	13-1, p. 3	9/1/23
83	Derrick D.	Cannon	13-1, p. 4	9/1/23
84	Derrick Eugene	Lipsey	13-1, p. 5	9/1/23
85	Derrick Terrence	Dorris	13-1, p. 6	9/1/23
86	Dinora	Ortiz	13-1, p. 7	9/1/23
87	Douglas	Marsh	13-1, p. 8	9/1/23
88	Dylan James	Venn	13-1, p. 9	9/1/23
89	Earl R.	Lillie	13-1, p. 10	9/1/23
90	Ebony J.	Ford	13-1, p. 11	9/1/23
91	Eduardo	Ruiz-Nunez	13-1, p. 12	9/1/23
92	Elijah C.	Thomas	13-1, p. 13	9/1/23
93	Esau Mahammed	Pine	13-1, p. 14	9/1/23
94	Francisco	Campos	13-1, p. 15	9/1/23
95	Francisco M.	Lechuga	13-1, p. 16	9/1/23
96	Francisco, Jr.	Mendez	13-1, p. 17	9/1/23
97	Frankie	Ballowe	13-1, p. 18	9/1/23
98	George H.	Long	13-1, p. 20	9/1/23
99	Glenda Jean	Woolbright-Stern	13-1, p. 21	9/1/23
100	Guadalupe	Torres	13-1, p. 22	9/1/23
101	Henry G.	Jauregui	13-1, p. 23	9/1/23
102	Irene	Rubio	13-1, p. 24	9/1/23
103	Irwin	Keller	13-1, p. 25	9/1/23
104	Isaiah T.	Padilla	13-1, p. 26	9/1/23
105	Iyani Aishia	Lopez-Ison	13-1, p. 27	9/1/23
106	Jabre	Hunter-Seals	13-1, p. 28	9/1/23
107	Jacob	Ogbamichael	13-1, p. 29	9/1/23
108	Jaime Antonio	Molinar	13-1, p. 30	9/1/23
109	James Patrick	Porter	13-1, p. 31	9/1/23
110	Jamui Pele	Redic	13-1, p. 32	9/1/23
111	Janice	Tumelson	13-1, p. 33	9/1/23
112	Jennifer	Beatty	13-1, p. 35	9/1/23
113	Jennifer F.	Kloeppe	13-1, p. 37	9/1/23
114	Jeremiah	Gorman	13-1, p. 38	9/1/23
115	Jerry Alan	Teal	13-1, p. 40	9/1/23
116	Jessica Marie	Bertels	13-1, p. 42	9/1/23
117	Joe Guadalupe	Juarez	13-1, p. 43	9/1/23
118	John	Godsey	13-1, p. 44	9/1/23
119	Joi Lucille	Mccall	13-1, p. 45	9/1/23
120	Jonathan	Asadourian	13-1, p. 46	9/1/23
121	Jonathan W.	Stagnolia	13-1, p. 47	9/1/23
122	Joyce	Washington	13-1, p. 50	9/1/23
123	Judy Ann	Stephens	13-1, p. 51	9/1/23
124	Karen	Richardson	13-1, p. 53	9/1/23
125	Katelynn Nicole	Coonrod	13-1, p. 54	9/1/23

126	Kato	Tyree	15-1, p. 2	9/5/23
127	Kayla	Pence	15-1, p. 3	9/5/23
128	Keiari	Moore-Lott	15-1, p. 4	9/5/23
129	Kenneth R. (Jr.)	Rengnerth	15-1, p. 5	9/5/23
130	Kennisha Monay	Morgan	15-1, p. 6	9/5/23
131	Keoreyontaye Donnie	Sauders	15-1, p. 7	9/5/23
132	Kevin K.	Quach	15-1, p. 8	9/5/23
133	Keyana	Lindsey-Jackson	15-1, p. 9	9/5/23
134	Kyle	Laurentz	15-1, p. 10	9/5/23
135	Latricia	Hopes	15-1, p. 11	9/5/23
136	Leonard	Paire	15-1, p. 12	9/5/23
137	LeRon Ron	Price	15-1, p. 13	9/5/23
138	Leveies Cartelies	Smith	15-1, p. 14	9/5/23
139	Lolita	Wallace	15-1, p. 15	9/5/23
140	Lonnell L.	Walker	15-1, p. 16	9/5/23
141	Luis K.	Schwenke	15-1, p. 17	9/5/23
142	Malcolm Eversley (Jr.)	King	15-1, p. 18	9/5/23
143	Marilyn	Thompson	15-1, p. 21	9/5/23
144	Mark A.	Abina	15-1, p. 22	9/5/23
145	Mark	Chaisson	15-1, p. 23	9/5/23
146	Mark	Macia	15-1, p. 24	9/5/23
147	Mark	Muhammad	15-1, p. 25	9/5/23
148	Martha	Sims	15-1, p. 27	9/5/23
149	Martin K.	Sinnott	15-1, p. 28	9/5/23
150	Marvin W.	Scott	15-1, p. 29	9/5/23
151	Marylou	Geer	15-1, p. 31	9/5/23
152	Mauricio	Lopez	15-1, p. 32	9/5/23
153	Memory	Muro	15-1, p. 33	9/5/23
154	Michael A	Galperin	15-1, p. 34	9/5/23
155	Michelle	Drake	15-1, p. 35	9/5/23
156	Michelle	Vidal	15-1, p. 36	9/5/23
157	Mike R.	Tillman	15-1, p. 37	9/5/23
158	Mikeniecesha	Hicks	15-1, p. 38	9/5/23
159	Moses	Nsubuga	15-1, p. 39	9/5/23
160	Nathan	Barber	15-1, p. 40	9/5/23
161	Nicodemus	Blanco	15-1, p. 41	9/5/23
162	Norberto	Ramos	15-1, p. 42	9/5/23
163	Norma Beatrice	Luster	15-1, p. 43	9/5/23
164	Norman	Lucas	15-1, p. 44	9/5/23
165	Oslee Strowder	Minor	15-1, p. 45	9/5/23
166	Patricia Cherie	Peggese	15-1, p. 46	9/5/23
167	Patricia E.	Ramos	15-1, p. 47	9/5/23
168	Paul	Neuhausen	15-1, p. 49	9/5/23
169	Philip (Jr.)	King	15-1, p. 51	9/5/23
170	Phillip	Meris	15-1, p. 52	9/5/23
171	Phillip Scamby	Irizarry	15-1, p. 53	9/5/23
172	Rachel Marie	Rodriguez	16-1, p. 1	9/6/23
173	Rahchelle	White	16-1, p. 2	9/6/23
174	Rasheka	Hankton	16-1, p. 3	9/6/23
175	Ratish	Lal	16-1, p. 4	9/6/23
176	Raymond James	Voyles	16-1, p. 6	9/6/23
177	Rebecca S.	Ethridge	16-1, p. 7	9/6/23
178	Rebekah	Wimmer	16-1, p. 8	9/6/23
179	Regina D.	Rowland	16-1, p. 9	9/6/23
180	Reynaldo Valdez	Soto	16-1, p. 10	9/6/23
181	Richard	Mumolo	16-1, p. 12	9/6/23
182	Rickey	Nowell	16-1, p. 13	9/6/23
183	Robert Dean (II)	Russell	16-1, p. 14	9/6/23
184	Robert E.	Thomas	16-1, p. 15	9/6/23
185	Robert	Lombardo	16-1, p. 16	9/6/23
186	Roberta	Walker	16-1, p. 17	9/6/23
187	Rodney D.	Gundy	16-1, p. 18	9/6/23
188	Rodney James	Mays	16-1, p. 19	9/6/23

189	Rodney	Lablue	16-1, p. 20	9/6/23
190	Rodney	Quiros	16-1, p. 21	9/6/23
191	Rodney	Ribali	16-1, p. 22	9/6/23
192	Rodney T.	Mills	16-1, p. 23	9/6/23
193	Ruth	Lewis	16-1, p. 24	9/6/23
194	Satya A.	Swamy	16-1, p. 25	9/6/23
195	Shantelle	Nakea	16-1, p. 26	9/6/23
196	Sharron J.	Rhodes	16-1, p. 27	9/6/23
197	Shea	Taylor	16-1, p. 28	9/6/23
198	Sonia	Brown	16-1, p. 29	9/6/23
199	Steven L.	Youger	16-1, p. 30	9/6/23
200	Sunday	Obukohwo	16-1, p. 31	9/6/23
201	Tabitha	Ryan	16-1, p. 32	9/6/23
202	Tahja	Tinsley	16-1, p. 33	9/6/23
203	Tanae Deshell	Aubry	16-1, p. 34	9/6/23
204	Teresa Butler	Nunez	16-1, p. 36	9/6/23
205	Teresa	Stant -Marlette	16-1, p. 37	9/6/23
206	Terry	Hinman	16-1, p. 38	9/6/23
207	Terry Lee	Lopez	16-1, p. 39	9/6/23
208	Tonya	Page	16-1, p. 40	9/6/23
209	Trevor	Berarducci	16-1, p. 41	9/6/23
210	Troy Jr.	McGee	16-1, p. 42	9/6/23
211	Tyrese	Green	16-1, p. 43	9/6/23
212	Unique	Dantzler	16-1, p. 44	9/6/23
213	Valerie	George	16-1, p. 45	9/6/23
214	Victor J.	Morales	16-1, p. 46	9/6/23
215	Vyacheslav	Shneyder	16-1, p. 47	9/6/23
216	Wade	Chaussee	16-1, p. 48	9/6/23
217	Wilfred Morris	Dillard	16-1, p. 49	9/6/23
218	William B.	Cabell	16-1, p. 50	9/6/23
219	William E.	Touhey	16-1, p. 51	9/6/23
220	Willie Dion	Walker	16-1, p. 52	9/6/23
221	Xavier A.	Gordon	16-1, p. 53	9/6/23
222	Zach	Snyder	16-1, p. 54	9/6/23
223	Aaron	Rahman	19-1, p. 1	9/8/23
224	Adam James	Rankin	19-1, p. 2	9/8/23
225	Airreal	Elliott	19-1, p. 3	9/8/23
226	Alyssa Lynn	Coccia	19-1, p. 4	9/8/23
227	Amber Lynn	Bordeaux	19-1, p. 5	9/8/23
228	Andre L.	Robinson	19-1, p. 6	9/8/23
229	Andrew	Ricketts	19-1, p. 8	9/8/23
230	Andrew	Ruff	19-1, p. 9	9/8/23
231	Andria	Cook	19-1, p. 10	9/8/23
232	Andy Duane	Couch	19-1, p. 11	9/8/23
233	Angela Helen	Gutierrez	19-1, p. 12	9/8/23
234	Angela	Murphy	19-1, p. 13	9/8/23
235	Anja	Washington	19-1, p. 14	9/8/23
236	Annamae	Fricke	19-1, p. 15	9/8/23
237	Annastasia	Carpenter	19-1, p. 16	9/8/23
238	Anthony L.	Blevins	19-1, p. 17	9/8/23
239	Belinda	Jackson	19-1, p. 18	9/8/23
240	Brandon	Rezai	19-1, p. 19	9/8/23
241	Brandy	Baldwin	19-1, p. 20	9/8/23
242	Candace Renee	Shields	19-1, p. 21	9/8/23
243	Cassie R.	Crane	19-1, p. 23	9/8/23
244	Charlene	Berry	19-1, p. 24	9/8/23
245	Christian	Navarrete	19-1, p. 26	9/8/23
246	Christine	Coonse	19-1, p. 27	9/8/23
247	Christopher Ray	Shackelford	19-1, p. 28	9/8/23
248	Claudia A.	Rodriguez	19-1, p. 29	9/8/23
249	Damminic	Archer	19-1, p. 30	9/8/23
250	Daneshia	White	19-1, p. 31	9/8/23
251	Daniel Armando	Gome	19-1, p. 32	9/8/23

252	Danielle S.	Pelmore	19-1, p. 33	9/8/23
253	Danny Isaac	Jara	19-1, p. 34	9/8/23
254	Darion	Obritz	19-1, p. 35	9/8/23
255	Darryl	Ducker	19-1, p. 36	9/8/23
256	Dawona C.	Chiles	19-1, p. 38	9/8/23
257	Diamond	Makey	19-1, p. 40	9/8/23
258	Donalejhia	Cosby	19-1, p. 41	9/8/23
259	Dora M.	Simon	19-1, p. 42	9/8/23
260	Douglas K.	Marsch	19-1, p. 43	9/8/23
261	Douglas Rolando	Lopez	19-1, p. 44	9/8/23
262	Dwight	Creller	19-1, p. 45	9/8/23
263	Elizabeth J.	VanBenschoten	19-1, p. 47	9/8/23
264	Emanuel (III)	Lenoir	19-1, p. 48	9/8/23
265	Felix	Gelman	19-1, p. 49	9/8/23
266	Frankie	Nelson	19-1, p. 50	9/8/23
267	Frederick S.	Adams	19-1, p. 51	9/8/23
268	Gabino A.	Marez	19-1, p. 52	9/8/23
269	Glenn Dean	Gary	19-1, p. 53	9/8/23
270	Gregory	Shaw	19-1, p. 54	9/8/23
271	Harold Benjamin (III)	Bowman	19-1, p. 55	9/8/23
272	Henry	Villarreal	19-1, p. 56	9/8/23
273	Herbert	Watkins	19-1, p. 57	9/8/23
274	Jabari	Holder	19-1, p. 59	9/8/23
275	Jacob	Ontiveros	19-1, p. 60	9/8/23
276	Jacquelyn	Jackson	19-1, p. 61	9/8/23
277	James T.	Johnson	19-1, p. 62	9/8/23
278	Jamey	Speck	19-1, p. 63	9/8/23
279	Janet P	Presley	19-1, p. 64	9/8/23
280	Jeannette	Hodges	19-1, p. 66	9/8/23
281	Jennifer Ann	George	19-1, p. 67	9/8/23
282	John	Jouett	23-1, p. 1	9/12/23
283	John Timothy	Kay	23-1, p. 2	9/12/23
284	Joselito	Limbo	23-1, p. 4	9/12/23
285	Joshuah	Boles	23-1, p. 5	9/12/23
286	Kayla Marie	Smithey	23-1, p. 6	9/12/23
287	Keona	Gandy	23-1, p. 7	9/12/23
288	Kevin Anthony	Duarte	23-1, p. 8	9/12/23
289	Kevin Scott	Dilks	23-1, p. 9	9/12/23
290	Khalil	Haikal	23-1, p. 10	9/12/23
291	Lamar	Ashford	23-1, p. 12	9/12/23
292	Lashea	Nunnery	23-1, p. 13	9/12/23
293	Laszlo	Radovics	23-1, p. 14	9/12/23
294	Latoya S.	Greene	23-1, p. 15	9/12/23
295	Leah	Whatley	23-1, p. 17	9/12/23
296	Leslie	Kirkland	23-1, p. 18	9/12/23
297	Lloyd Thomas	Swanson	23-1, p. 19	9/12/23
298	Maria Esperanza	Menegazzo	23-1, p. 20	9/12/23
299	Maria L.	Bates	23-1, p. 21	9/12/23
300	Marlon	Rosales	23-1, p. 22	9/12/23
301	Marlon Wade	Tolbert	23-1, p. 23	9/12/23
302	Marvin	Gordon	23-1, p. 24	9/12/23
303	Mesha	Miles	23-1, p. 25	9/12/23
304	Michael Edward	Highsmith	23-1, p. 26	9/12/23
305	Natasha A.	Blackwell	23-1, p. 28	9/12/23
306	Natasha Monee	Collins-Brown	23-1, p. 29	9/12/23
307	Nicole Tana	Thorpe	23-1, p. 30	9/12/23
308	Odessa	William	23-1, p. 31	9/12/23
309	Patrick S.	Tolefree	23-1, p. 33	9/12/23
310	Paul	De La Olla	23-1, p. 34	9/12/23
311	Penny M.	Edwards	23-1, p. 35	9/12/23
312	Phyllis J.	Root	23-1, p. 36	9/12/23
313	Premila	Prasadi	23-1, p. 37	9/12/23
314	Regina G.	Willis	23-1, p. 38	9/12/23

315	Ricky	Sakshaug	23-1, p. 40	9/12/23
316	Rodolfo	Rodriguez	23-1, p. 41	9/12/23
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318	Salome	Segarra	23-1, p. 43	9/12/23
319	Shanika	Johnson	23-1, p. 44	9/12/23
320	Shannon	Salato	23-1, p. 45	9/12/23
321	Sonia	Martinez	23-1, p. 46	9/12/23
322	Souheil	Kanafani	23-1, p. 47	9/12/23
323	Stephen	Terzian	23-1, p. 48	9/12/23
324	Steve	Evans	23-1, p. 49	9/12/23
325	Steven	Frias-Diaz	23-1, p. 50	9/12/23
326	Talia	Vega	23-1, p. 51	9/12/23
327	Tarlisha S.	Hall	23-1, p. 52	9/12/23
328	Tenia LaDett	Dottin	23-1, p. 53	9/12/23
329	Thomas	DeWitt	23-1, p. 54	9/12/23
330	Timmie E.	Jennings	23-1, p. 55	9/12/23
331	Tina P.	Robinson	23-1, p. 57	9/12/23
332	Tranell Donnesha	Gatlin	23-1, p. 58	9/12/23
333	Trenton	Reese	23-1, p. 59	9/12/23
334	Trina	Hinton	23-1, p. 60	9/12/23
335	Tyrone Londell	Thomas	23-1, p. 61	9/12/23
336	Tyrone	Thomas	23-1, p. 62	9/12/23
337	Vanity	White	23-1, p. 63	9/12/23
338	Victoria	Pierson	23-1, p. 64	9/12/23
339	Viviana	Valdez	23-1, p. 65	9/12/23
340	William	Munoz	23-1, p. 66	9/12/23
341	Zachary	Russell	23-1, p. 67	9/12/23