

IN THE UNITED STATES DISTRICT COURT OF THE DISTRICT OF COLUMBIA

Case No. 15-cv-01097-RMG

U.S. District Court for the District of Columbia

Case No. 15-cv-01097-RMG

Plaintiff, v. Defendant.

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wages below the H-2B prevailing wage, and/or during any overtime weeks in 2012, because

Defendant failed to pay the supplemental prevailing wage mandated by the OLC as well

as minimum wages that they were not properly notified of deductions at the

required by SCPWA. (See Dkt. No. 1, Dkt. No. 49 at 21-22).

In GreatDIII Plaintiff claims that Defendant breached its

prevailing wage and supplemental prevailing wage. (Dkt. Plaintiff's 1st. Amended Complaint at 21-22, 24-25, 27-28, 30-31, 33-34, 36-37, 39-40, 42-43, 45-46, 48-49, 51-52, 54-55, 57-58, 60-61, 63-64, 66-67, 69-70, 72-73, 75-76, 78-79, 81-82, 84-85, 87-88, 90-91, 93-94, 96-97, 99-100, 102-103, 105-106, 108-109, 111-112, 114-115, 117-118, 120-121, 123-124, 126-127, 129-130, 132-133, 135-136, 138-139, 141-142, 144-145, 147-148, 150-151, 153-154, 156-157, 159-160, 162-163, 165-166, 168-169, 171-172, 174-175, 177-178, 180-181, 183-184, 186-187, 189-190, 192-193, 195-196, 198-199, 201-202, 204-205, 207-208, 210-211, 213-214, 216-217, 219-220, 222-223, 225-226, 228-229, 231-232, 234-235, 237-238, 240-241, 243-244, 246-247, 249-250, 252-253, 255-256, 258-259, 261-262, 264-265, 267-268, 270-271, 273-274, 276-277, 279-280, 282-283, 285-286, 288-289, 291-292, 294-295, 297-298, 300-301, 303-304, 306-307, 309-310, 312-313, 315-316, 318-319, 321-322, 324-325, 327-328, 330-331, 333-334, 336-337, 339-340, 342-343, 345-346, 348-349, 351-352, 354-355, 357-358, 360-361, 363-364, 366-367, 369-370, 372-373, 375-376, 378-379, 381-382, 384-385, 387-388, 390-391, 393-394, 396-397, 399-400, 402-403, 405-406, 408-409, 411-412, 414-415, 417-418, 420-421, 423-424, 426-427, 429-430, 432-433, 435-436, 438-439, 441-442, 444-445, 447-448, 450-451, 453-454, 456-457, 459-460, 462-463, 465-466, 468-469, 471-472, 474-475, 477-478, 480-481, 483-484, 486-487, 489-490, 492-493, 495-496, 498-499, 501-502, 504-505, 507-508, 510-511, 513-514, 516-517, 519-520, 522-523, 525-526, 528-529, 531-532, 534-535, 537-538, 540-541, 543-544, 546-547, 549-550, 552-553, 555-556, 558-559, 561-562, 564-565, 567-568, 570-571, 573-574, 576-577, 579-580, 582-583, 585-586, 588-589, 591-592, 594-595, 597-598, 600-601, 603-604, 606-607, 609-610, 612-613, 615-616, 618-619, 621-622, 624-625, 627-628, 630-631, 633-634, 636-637, 639-640, 642-643, 645-646, 648-649, 651-652, 654-655, 657-658, 660-661, 663-664, 666-667, 669-670, 672-673, 675-676, 678-679, 681-682, 684-685, 687-688, 690-691, 693-694, 696-697, 699-700, 702-703, 705-706, 708-709, 711-712, 714-715, 717-718, 720-721, 723-724, 726-727, 729-730, 732-733, 735-736, 738-739, 741-742, 744-745, 747-748, 750-751, 753-754, 756-757, 759-760, 762-763, 765-766, 768-769, 771-772, 774-775, 777-778, 780-781, 783-784, 786-787, 789-790, 792-793, 795-796, 798-799, 801-802, 804-805, 807-808, 810-811, 813-814, 816-817, 819-820, 822-823, 825-826, 828-829, 831-832, 834-835, 837-838, 840-841, 843-844, 846-847, 849-850, 852-853, 855-856, 858-859, 861-862, 864-865, 867-868, 870-871, 873-874, 876-877, 879-880, 882-883, 885-886, 888-889, 891-892, 894-895, 897-898, 900-901, 903-904, 906-907, 909-910, 912-913, 915-916, 918-919, 921-922, 924-925, 927-928, 930-931, 933-934, 936-937, 939-940, 942-943, 945-946, 948-949, 951-952, 954-955, 957-958, 960-961, 963-964, 966-967, 969-970, 972-973, 975-976, 978-979, 981-982, 984-985, 987-988, 990-991, 993-994, 996-997, 999-1000).

Employment expenses brought their wages below the H-2B prevailing wage going into the

week of work that Defendant made unreasonable deductions from their wages.

A party seeking class certification must do more than plead some

requirements. *Id.* at 357. She “must present evidence that the class is sufficiently

complies with Rule 23.” *Id.* at 358. The

A. Readily Identifiable Class

of the members of a properly defined

Rule 23(c)(1) requires an applicant to “show that the

it must be able to “readily identify the class members in reference to”

other words, and to

teria.” *Id.* “The plaintiffs need not be able to identify every class member at the

objective cri

time.” *Id.* “The District Court’s finding that the plaintiffs failed to identify the class members at the time of the

hearing was not an abuse of discretion.” *Id.* “The District Court’s finding that the plaintiffs failed to identify the class members at the time of the

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hearing was not an abuse of discretion.” *Id.* “The District Court’s finding that the plaintiffs failed to identify the class members at the time of the

argues that Plaintiffs must certify six different classes, one for each factual allegation in that serves

requirement requires examination of the specific facts of each case.

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with minor discovery. The proposed plan makes an enormous contribution to the

proceedings. It is a very good plan. It is a very good plan. It is a very good plan.

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original mail. A single common question will suffice, but it must be of such nature that it will

Age Group	Percentage
18-24	28%
25-34	22%
35-44	18%
45-54	15%
55-64	12%
65-74	8%
75-84	5%
85+	2%

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...unlawful not to enquire into, or police of the defendants, the above

equipment met the requirements of the Court for the purpose of the examination.

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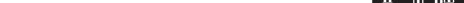
Table 1

Figure 1. The effect of the concentration of the polymer on the gelation time of the epoxy resin.

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1. *Wissenschaftliche Grundlagen der Betriebswirtschaftslehre*
 2. *Wirtschaftsinformatik*
 3. *Wirtschaftsrecht*
 4. *Wirtschaftsprüfung*
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you. I thank you for your letter and for the information you have provided. I will be in touch with you again soon. I am sure you will be able to help me in my research. I am sure you will be able to help me in my research. I am sure you will be able to help me in my research.

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the integrity requirement of Fed. R. Crim. P. 41(e)(2)(A). The all of the issues alluded to in the majority's analysis are addressed in the majority's analysis.

Gov. Frank S. Bland, Jr. said officials would have shown, by approving, that they have suffered the

injuries alleged in the Complaint related to pre-employment expenses and housing and

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Turning to the second prong, the adequacy inquiry, D-1 006160

There is no evidence in the record that the

in 2013, and are working for Defendant again in 2014, therefore it is appropriate for

since rep. [redacted] refuses to instruct our [redacted] current employees, which inexactly do.

It is certainly not exactly the date that of former employees and current empl

practices. They are

Defendant's current HRIS workers will be former employees as of December 1, 2015. See 2015

15. Workers have a voice at the table, but they are inadequately represented.

workers whose

absence, and finds the Rule 7(d)(4) requirement met. *Landbell, Inc.*

"Due to the fact that the defendant's conduct was intentional, the court finds that the defendant is liable for the plaintiff's damages."

WHEREFORE, the plaintiff prays for judgment as follows:

1. That the defendant is liable for the plaintiff's damages.

2. That the defendant is liable for the plaintiff's damages.

3. That the defendant is liable for the plaintiff's damages.

4. That the defendant is liable for the plaintiff's damages.

5. That the defendant is liable for the plaintiff's damages.

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11. That the defendant is liable for the plaintiff's damages.

12. That the defendant is liable for the plaintiff's damages.

13. That the defendant is liable for the plaintiff's damages.

WHEREFORE, the plaintiff prays for judgment as follows:

1. That the defendant is liable for the plaintiff's damages.

2. That the defendant is liable for the plaintiff's damages.

3. That the defendant is liable for the plaintiff's damages.

4. That the defendant is liable for the plaintiff's damages.

5. That the defendant is liable for the plaintiff's damages.

6. That the defendant is liable for the plaintiff's damages.

7. That the defendant is liable for the plaintiff's damages.

8. That the defendant is liable for the plaintiff's damages.

9. That the defendant is liable for the plaintiff's damages.

Rule 23 contains no suggestion that the necessity for individual damage
determinations destroys commonality, typicality, or predominance as a matter of

"there! mass murders are victims of a foreign country, likely to have limited financial resources, unfamiliar with the U.S. Court system, and likely to be intimidated by the government." *Id.* at 10.

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the motion is **motion is DENIED AS MOOT**. As to Counts II and III of the of the Complaint

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