

FILED

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF OKLAHOMA

OCT 2 9 2024

Heidi D. Campbell, Clerk U.S. DISTRICT COURT

1 MELLY W DANIZO	U.S. DISTRICT COURT
1. KELLY W. BANKS,)
2. STEPHANI M. BANKS,)
3. JEREMY J. BATCHELDER)
4. CLINT W. BERRY,)
5. ERIC W. BEVINS,)
6. CHRISTIAN L. BRAMMER,) CIVIL ACTION COMPLAINT
7. THOMAS F. BRINK,	
8. EDWIN L. BROWN,) Case No. 24 CV - 5 2 1 CDL
9. HAROLD A. BROWN,)
10. CHRISTOPHER C BUCHANAN,) JURY TRIAL DEMANDED and
11. MICHAEL P. BURCH,	Attorneys Lien Claimed
12. STEVE W. BURNETT,) 1
13. ADAM W. BUTTERFIELD,) /2/)
14. JUSTIN W. BUTTERFIELD,) / (4)
15. BARRY L. CAMPBELL,) (
16. BRETT L. CHEW,)
17. CAMRON B. CHEW,)
18. JONATHAN K. COLLIVER,)
19. MICHAEL CRABTREE,)
20. MARK C. CURTIS,)
21. RYAN L. DINGMAN,)
22. CURTIS B. FORMBY,)
23. MARLON D. GABRIEL,)
24. BRODERICK GUISE,)
25. ROBERT D. HARRIS,)
26. JACOB L. HICKOCK,)
27. ROBERT M. HORSMAN,)
28. BRETT A. HOWARD,)
29. JEFFREY C. HUBBARD,)
30. JOHNNY C. KELLY,)
31. MICHAEL D. KRAMER,)
32. MATTHEW S. LARSON,)
33. DUSTIN B. LOTT,)
34. CHAD A. MARSHALL,)
35. JUSTIN B. MARSHALL,)
36. TONY A. MCCAMMON,)
37. ROBERT D. MCDANIEL,)
38. PHILLIP L. MENDELL,)
39. JUSTIN M. MILLER,)
40. DUSTIN C. MILLIGAN,)
41. BRITTON R. MONDAY,)
42. JERRSION D. MONDAY,)
43. JOSHUA M. MONDAY,)

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44. ERIC L. MUNDAY, 45. DAVID B. NEER, 46. CHANCE T. NISSEN, 47. CODY B. NISSEN, 48. KRAIG H. OWENS, 49. TREVOR W. RABBIT, **50. MALCOM I. RAYNOR,** 51. EDWIN D. RICE, 52. BENJAMIN W. ROBLES, 53. JOSIAH E. ROVENSTINE, 54. JOHN T. SCHMIDT, 55. JOSEPH A. SCHMIDT, 56. JIMMY L. SCULLY, 57. JEREMY L. SHADWICK, 58. JEFF R. SHUMAN, 59. JACOB R. SPICER, 60. JOHN R. SPICER, 61. DEREK W. TAMPLETON, 62. MATHEW B. TATE, 63. DAVID W. TAYLOR, 64. ADAM DEE TOPPING, 65. LANDON A. ULLRICH, 66. MICHAEL G. UPCHURCH, 67. TIMMY R. VANN, 68. BRADEN A. WANO, 69. "JERRY" ANDERSON WATSON. 70. MIKEL B. WATSON, 71. COLBY A. WILLIAMS, 72. RONALD G. WILLIAMS, 73. BLANDON J. WILLIS, 74. RYAN M. WITTER, and 75. JUSTIN G. WOODWORTH individually and on behalf of themselves and all others similarly situated Plaintiffs, v. CITY OF BARTLESVILLE, OKLAHOMA Defendant.

PRELIMINARY STATEMENT

1. The plaintiffs are current and former employees of the defendant City of Bartlesville, Oklahoma ("City"), and they bring an action on behalf of themselves and other employees similarly situated. This is an action for declaratory judgment under 28 U.S.C. §§ 2201 and 2202 and for compensation and other relief under the Fair Labor Standards Act, as amended, 29 U.S.C. § 201, et seq.

JURISDICTION AND VENUE

- 2. Jurisdiction of this action is conferred upon this Court by 29 U.S.C. § 216(b), 28 U.S.C. § 1331, and 28 U.S.C. § 1337.
 - 3. Venue of this action is established in this Court pursuant to 28 U.S.C. § 1391(b)(2).

PARTIES

- 4. Plaintiffs are each employees, or former employees, of the defendant City at the Bartlesville Fire Department ("Department").
- 5. Pursuant to 29 U.S.C. §§ 216(b) and 256, the named plaintiffs herein have each executed and hereby filed with the Court their respective consents in writing to become a party plaintiff in this action, which are appended hereto as Exhibit A. Should other individuals similarly situated seek to join this action, their consents will be filed with the Court. These written consent forms set forth each plaintiff's name and intent to be party to this suit.
- 6. The defendant in this action is the City of Bartlesville, Oklahoma, which has a principal place of business within the City of Bartlesville.

FACTS

7. The plaintiffs are each employees, or former employees, who were at all times material herein employed in an enterprise engaged in commerce or in the production of goods for

commerce, as defined by 29 U.S.C. § 203(s). More specifically, each plaintiff is, or was, employed by the City at the Department.

- 8. Each of the plaintiffs in this action, while employed by defendant, has been an "employee" within the meaning of the Fair Labor Standards Act ("FLSA"), 29 U.S.C. § 203(e)(1).
- 9. The defendant City is an "employer" as defined by 29 U.S.C. § 203(d) and a "public agency" within 29 U.S.C. § 203(x). Upon information and belief, the defendant at all relevant times has been aware of the provisions of the FLSA.
 - 10. The defendant is an enterprise, as defined by 29 U.S.C. § 203(r).
- 11. The City has adopted a fourteen (14) day FLSA work period requiring the members of the Department to work 106 hours in a work period before the City pays them overtime under the FLSA.
- 12. Pursuant to the collective bargaining agreement ("CBA") between Local 200 and the City, while working as members of the Department, plaintiffs are assigned to work one (1) twenty-four (24) hour shift, followed by forty-eight (48) hours off. This schedule is then repeated. In addition to this schedule, plaintiffs routinely work additional hours causing them to work in excess of 106 hours in a work period. For example, in the work period covering December 24, 2023 through January 6, 2023, plaintiff Lott worked a total of 120 hours, causing him to have worked fourteen (14) hours above the applicable FLSA threshold.
- 13. Plaintiffs are compensated on an hourly basis, determined by position within the Department and "steps" under the CBA (hereinafter referred to as "contractual hourly rate"), for all regularly scheduled hours worked (or an average of 48 hours per week).
- 14. Plaintiffs are also compensated at one and one-half times their contractual hourly rate for all additional hours they work beyond 106 hours in a fourteen (14) day period.

- 15. In addition to plaintiffs' compensation for both regularly scheduled and additional hours of work, the City provides Department employees with additional compensation including, but not limited to: out of classification pay, longevity pay, certification pay (including, emergency medical technician ("EMT") certification, paramedic certification, council on law enforcement education and training certification, and defibrillator certification), uniform allowance, unused sick leave bonuses, and education incentive pay.
- 16. At all times material herein, the City has failed to incorporate these additional payments when calculating plaintiffs' regular rate for purposes of FLSA overtime compensation. 29 U.S.C. § 207(e) (stating that the "regular rate" under the FLSA "include[s] all renumeration for employment paid to, or on behalf of the employee..."). For example, in his check issued on January 13, 2023, plaintiff Lott was compensated at a rate equal to exactly one and one-half of his contractual hourly rate for the 14 hours above the FLSA overtime threshold (106) that he worked in the work period covering December 24, 2022, through January 6, 2023. The City failed to include the additional \$10.00 of defibrillator certification pay, \$5.00 of EMT certification pay, and \$57.59 of longevity pay that plaintiff Lott received during this FLSA pay period in its calculation of his regular rate for overtime purposes.
- 17. On information and belief, the failure by defendant to properly pay compensation owed to each plaintiff is a knowing, willful and reckless violation of 29 U.S.C. § 207 within the meaning of 29 U.S.C. § 255(a).
- 18. On November 7, 2023, plaintiffs, through their attorneys, sent the City a letter detailing the City's failure to properly pay plaintiffs overtime under the FLSA and demanding full payment for the damages, liquidated damages, and attorneys' fees that had accrued under the FLSA within the last three years.

19. Thereafter, the plaintiffs and the City engaged in collective bargaining concerning the City's overtime pay practices. The City's revised overtime pay practices which, upon information and belief, comply with the FLSA are memorialized in the parties July 1, 2024 Collective Bargaining Agreement.

DEFENDANT HAS VIOLATED 29 U.S.C. § 207 BY FAILING TO ACCURATELY CALCULATE PLAINTIFFS' REGULAR RATE FOR OVERTIME COMPENSATION

- 20. Plaintiffs hereby incorporate by reference paragraphs one (1) through nineteen (19) in their entirety and restate them herein.
- 21. At all times material herein, the plaintiffs have been entitled to the rights, protections, and benefits provided under the FLSA, as amended, 29 U.S.C. § 201, et seq.
- 22. During the times where the plaintiffs have worked hours in excess of the hourly levels specified in the FLSA, plaintiffs have been entitled to overtime compensation at a rate of not less than one and one-half times their regular rate of pay for the hours of overtime they have worked in excess of 106 hours in a fourteen (14) day FLSA work period. 29 U.S.C. § 207(k); 29 C.F.R. §553.230.
- 23. Plaintiffs' "regular rate" of pay must include "all remuneration for employment." 29 U.S.C. § 207(e).
- 24. At all times material herein, the defendant has failed and refused to provide plaintiffs with overtime compensation at a rate of one and one-half times their regular rate of pay by failing to include all remuneration in plaintiffs' regular rate of pay, including, but not limited to, out of classification pay, longevity pay, certification pay, uniform allowance, unused sick leave bonuses, and education incentive pay.
- 25. Defendant's refusal to provide overtime pay at the proper rate to plaintiffs for the hours plaintiffs have worked in excess of the hourly levels specified in the FLSA, 29 U.S.C. §

207; 29 C.F.R. § 553.230, wrongly deprives plaintiffs of the FLSA overtime compensation that is due to them at times material herein.

- 26. The defendant's actions and omissions as alleged herein were done in a willful, unreasonable and bad faith manner.
- As a result of the aforesaid willful violations of the FLSA, overtime compensation has been unlawfully withheld by defendant from plaintiffs for which defendant is liable pursuant to 29 U.S.C. §§ 216(b) and 255, together with an additional equal amount as liquidated damages, interest, reasonable attorneys' fees and the costs of this action.
- 28. On information and belief, plaintiffs are collectively entitled to an estimated \$63,106.69 in unpaid overtime. The employment and work records for plaintiffs (including time and attendance records) necessary for an exact calculation of damages are in the exclusive possession, custody, and control of the defendant. The defendant is under duty imposed by the FLSA, 29 U.S.C. § 211(c), and the regulations of the United States Department of Labor, to maintain and preserve payroll and other employment records with respect to the plaintiffs and other employees similarly situated from which the amount of defendant's liability can be ascertained.

PRAYER FOR RELIEF

WHEREFORE, each plaintiff requests from the Court the following relief:

- A. A declaratory judgment declaring that the defendant has willfully, unreasonably, wrongfully, and without good faith, violated its statutory and legal obligations, and deprived each plaintiff of his/her rights, protections and entitlements under federal law, as alleged herein;
- B. An order for a complete and accurate accounting of all the compensation to which each plaintiff is entitled;

- C. Judgment against the defendant awarding each plaintiff monetary damages in the form of back pay compensation, liquidated damages equal to his/her unpaid compensation, plus pre-judgment and post-judgment interest;
- D. An award of reasonable attorneys' fees, as well as costs and disbursement of this action; and
 - E. An award granting such other further relief as the Court deems proper.

JURY TRIAL DEMANDED

Pursuant to Rule 38 of the Federal Rules of Civil Procedure, plaintiffs hereby respectfully request a trial by jury on all claims presented in this Complaint.

Respectfully submitted,

/s/ Lauren McDermott

Lauren McDermott (*Pro Hac Vice* Application forthcoming)

Mark A. Linscott (*Pro Hac Vice* Application forthcoming)

Mooney, Green, Saindon, Murphy & Welch, P.C.

1920 L Street NW, Suite 400

Washington, D.C. 20036 Phone: (202) 783-0010

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<u>lmcdermott@mooneygreen.com</u> <u>mlinscott@mooneygreen.com</u>

Steven R. Hickman, OBA #4172

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Tulsa, OK 74107

Phone: (918) 584-4724 Fax: (918) 583-5637

info@frasierlaw.com

Counsel for Plaintiffs

EXHIBIT A

REQUEST TO	BECOME PARTY PLAINTIFF	(FI SA _	Bartlecville	Oklahoma
MEGOLOT TO	DECOME LYKEL LEWINIEL	(LEOM -	barnesville,	Okianoma)

NAME	Banks Last	Lelly First	Wayne Middle	
HOME ADDRESS	240 CR Address	27/2		
	Bartlesville	OK	74003	
	City	State	Zip Code	
PHONE (cell)	718) 335-7000	_EMAIL: Kelly	barks 68@ yahoon com	,

PLAINTIFF SIGNATURE Kelly Back

RE	EQUEST TO BECOME PARTY PLAINTIFF (FLSA – Bartlesville, Oklahoma)
I hereby consent to Labor Standards Ad	become a party plaintiff in an action to recover overtime wages and other relief under the Fair
NAME	Banks Stephanie Micheli
HOME ADDRESS	Service State Addle Addl
	Bautlesville GK 74003
	City State Zip Code
PHONE (cell)	9/8)33/6573 EMAIL: SS/Wa-13@yahor.com
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PLAINTIFF SIGNA	TURE

REQUEST TO BECOME PARTY PLAINTIFF (FLSA – Bartlesville, Oklahoma)

I hereby consent to become a party plaintiff in an action to recover overtime wages and other relief under the Fair Labor Standards Act.

NAME	1347548W41 Last	JERELY IV	Tos each Middle	
HOME ADDRESS	993/ W. 39	75 Rd.		
	Copan OK	74022		
	City	State	Zip Code	
PHONE (cell) 2	18-766-1813	EMAIL: 6at	Lip Code	
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PLAINTIFF SIGNA	TURE Many	THE L		

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I hereby consent to Labor Standards Ac	become a party plainti	ff in an action to rec	over overtime wages and	other relief under the Fair
NAME	Bessy Last	Clin + First	Wade Middle	
HOME ADDRESS	1066 Renick	<u> </u>	711001	
	<u>Bartlesville</u>	OK State	/9006 Zip Code	-0 +
PHONE (cell)	(918) 214-5837	EMAIL:	20-900 clint.berry 58.	37(Qgmail.com
PLAINTIFF SIGNATURE				

			
DECLIEST TO RECOME PARTY P	AINTIFF (FLSA - Bartlesville,	, Oklahoma)	

MARKE	Beuins	Enc	ω	
NAME Last	Last	First	Middle	
HOME ADDRESS	401 cold	creck R.O		
	Cleveland	ols	74020	
	City	State	Zip Code	
PHONE (cell)	918-519-950	EMAIL: Ewber	145 16 9. mar. 1	

PLAINTIFF SIGNATURE 4. 62

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	Brammer	Christian	Lee
NAME	Last	First	Middle
HOME ADDRESS	2450 S.E. Address	: Bison Rd.	
	Bartlesville	<u>OK</u> State	74006 Zip Code
	City		•
PHONE (cell)	18)440-6603	EMAIL: Braw	MICLER Dyahoo. com
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PLAINTIFF SIGNATURE

REQUEST TO B	ECOME PARTY PL	AINTIFF (FLSA -	- Bartiesville,	Oklahoma)
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NAME Brink Thomas Frederick
Last First Middle

HOME ADDRESS 21214 N.S. 401 Rd.

Nowata OK 74048
City State Zip Code

PHONE (cell) 918-766-6779 EMAIL: Firemantom 29 @ yahoo . Com

PLAINTIFF SIGNATURE Tunnas B

	AINTIFF (FLSA — Bartlesville, Oklahoma)
SEALIFOR TO BECOME PARITY PL	AINTIFF (FESA - Dataserine)

	Brown	Edwin	Leon	
NAME	Last	First	Middle	
	27503	N 3990	Rd	
HOME ADDRESS	Address			
	Ramona	OK.	74061	
	City	State	Zip Code	
	919-214-71	74 EMAIL: Be	\$1017@ aol.com	
PHONE (cell) .	1.0			

DI AINTIFF SIGNATURE

	Brown	Harold	Austin	
ME	Last	First	Middle	
ME ADDRE	SS <u>29494</u> Address	N. 3990 Rd.		
	Ramona	OK.	74061	
	City	State	Zip Code	

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REQUEST TO BECOME PARTY PL		

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NAME	Last	Fir	st		Middle		
HOME ADDRESS	23531 N Address	4025	20				
	BARTUESVILL	E	ox	74	1006		
	City		State	Zip	Code		
PHONE (cell)	918-766-1911	E	MAIL: <u>C78</u>	3 bud	honon (gnoil	.com

PLAINTIFF SIGNATURE

REQUEST	TO	BECOME PARTY PLAINTIFF (FI	LSA -	Bartlesville,	Oklahoma)

NAME	Buich Mi	Chael First	Parlip Middle		· h. ·	
HOME ADDRESS	4019 E. Tuvedo Address	,		of the seath		
	Bartlessile	OK_ State	740ds Zip Code		- 25	
PHONE (cell)	118-440-3436	_EMAIL: FIREMIK	cb87ex	aboo com		
PLAINTIFF SIGNA	ATURE MR	7	- Andrews	Refund	1 January	2023

REQUEST TO BECOME PARTY PLAINTIFF (FLSA - Bartlesville	, Oklahoma)

NAME	Burnet	Steve	<i>W</i> .	
IVAIIL	Last	First	Middle	
HOME ADDRESS	1255 CR	2712		
	Address			
	BarHesville	Oh	74003	
	City	State	Zip Code	
PHONE (cell) _	918-440-645	EMAIL: 8	wburnett 76@ Yahoo. com	

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PLAINTIFF SIGNATURE Sters Owner

REQUEST TO BECOME PARTY PLAINTIFF	(FLSA - Bartlesville, Oklahoma)

NAME	Butterfield	Aclam	Wade	
	Last	First	Middle	
HOME ADDRESS	1318 Me Address	eadow Ch	F 1	
	Bartlesville	Oh	74066	
	City	State	Zip Code	
PHONE (cell)	718-533-4380	EMAIL: a do.	m6/95/201	meilicom
PLAINTIFF SIGNA	ATURE all	ell.		

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I hereby consent to Labor Standards A	become a party plai ct.	ntiff in an action to re	cover overtime wages and	other relief under the Fair
NAME	Butter field Last	<u> </u>	Middle	
HOME ADDRESS	396911 W Address	1400 20		
	<u>Dewey</u>	OK. State	74029 Zip Code	
		EMAIL: 38	tter field 6046@	gmad, com
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NAME	<u>Campbell</u> Last	First	Middle	
HOME ADDRESS	<u>28562</u> N 3960 Address	3.1		
	Ocholata City	OK. State	7405 7 Zip Code	
PHONE (cell) _	918-332-7204	_EMAIL: 6/ca	mphelle city of barthewilk	<u>~</u>

PLAINTIFF SIGNATURE

REQUEST TO BECOME PARTY PLAI	VITIFF (FLSA -	Bartlesville,	Oklahoma)
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NAME	Chew	Campan	13195-6
	Last	First	Middle
HOME ADDRESS	402 /33 W Address	3400 Pd	
	Lamona	oK	74061
	City	State	Zip Code
PHONE (cell) _	918 440 0359	_EMAIL: Blak	e Chew @ Hol. Com

PLAINTIFF SIGNATURE Blue

REQUEST TO BECOME PARTY PLAINTIFF (FLSA – Bartlesvii	lla Oklahoma\

NAME	Chew	BreT	-	Lloyd	
	Last	First		Middle	
HOME ADDRESS		N 4060 K)			
	Address				
	Ramera		K	74061	
	City	s	itate	Zip Code	
PHONE (cell)	718-693	<u>-6133</u> email <u>:</u>	Che	whrete Auscom	

PLAINTIFF SIGNATURE Bat J. Char (Redired 6-30-22)

REQUEST TO	BECOME PARTY PL	_aintiff (flsa -	Bartlesville,	Oklahoma)
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NAME	colliver	Jonathan	Kevin	
	Last	First	Middle	
HOME ADDRESS	329 NS	Pruce Avc		
	Bartlesu:11e	ok	74006	
	City	State	Zip Code	
PHONE (cell)	918-841-3953	EMAIL: ĴKIa	olliver @ gmail.co	, po

PLAINTIFF SIGN

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DECLIEST TO	BECOME PARTY P	I AINTIEE /EI CA	Particovilla	Oklahoma\
KEUUESI IU	I BECUME PARTY P	LAINTIFF IFLSA	— Daruesville	. Ukianoma)

NAME	Crabtree Last	Michael First	Edwin Middle	
HOME ADDRESS	404 N. He	ndricus		
	ochelata	<u>oh</u>	74051	
	City	State	Zip Code	
PHONE (cell) (9)	<u>8) 440 - 3925</u>	EMAIL: Righ	velder OH Pam	ail.com
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PLAINTIFF SIGNATURE (M) Crubwee

REQUEST TO BECOME PARTY PLAINTIFF (FLSA — Bartlesv	ile, Oklahoma)
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	Curtis	Mark	Cameron	
NAME	Last	First	Middle	
HOME ADDRESS	418 S	Hickory St.		
	Wowata	OK	740 48°	
	City	State	Zip Code	
PHONE (cell)	918-841-187	O EMAIL: MCC	91091@201.com	

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PECULIST TO RECOME PARTY PL	AINTIFF (FLSA – Bartiesvii	ie, Okianomaj

		_	1	
NAME	Dingman Last	Ryan	Middle	
HOME ADDRESS	13831 N 39 Address	183 DC	46	
	Bewey	O K State	Zip Code	
PHONE (cell)	918-244-300	ο EMAIL: Λ	Jingman ff @ gmail	Com

DI AINTIFF SIGNATURE

QUEST TO BECOME PARTY PLAINTIFF (FLSA – Bartlesville, Oklahoma)
become a party plaintiff in an action to recover overtime wages and other relief under the Fait.
Formby Cirtis Boyd
Last First Middle
3493 CR 5251 Address
Hominy BK 74035
City State Zip Code
918-332-0663 EMAIL: 60. Formby & yahro-com
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REQUEST TO	BECOME PARTY P	LAINTIFF (FLSA -	Bartlesville,	Oklahoma)

Bubbi Bumam as ix	***				
NAME	Gabriel	Marlou	Dean Middle		
HOME ADDRESS	3021 3.41 Address	00 ref			
	Talala	0 k State	74080 Zip Code	2 , ×	
PHONE (cell)	918-373-471	7 EMAIL: tequ		a@ GMail	1
PLAINTIFF SIGNA	ATURE May	Par Si	ahrf)	_	

REQUEST TO BECOME PARTY PLAINTIFF (FLSA -	 Bartlesville, 	(Oklahoma)

AME Guise Broderick J.

HOME ADDRESS 2546 Frequent.

Bartlesville, Okc 7/00 6

PHONE (cell) (918/907-1264 EMAIL: broderickgruse Dymail. com

PLAINTIFF SIGNATURE & FILE

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REQUEST TO BECOME PARTY PLAINTIFF (FLSA	- Bartlesville.	Oklahoma)
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NAME	Harnis	Kubert	Darrell	
. •	Last	First	Middle	
HOME ADDRESS	63/1 Be	/mont		
	Bactlesvill	e ok	74006	
	City	State	Zip Code	
PHONE (cell) _	918-214-25	EMAIL: Rose	13. Hams 2587	@Gmay - Com

PLAINTIFF SIGNATURE MM

REQUEST TO BECOME PARTY PLAINTIFF	: (FLSA – Bartlesville, Oklahom	a)
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NAME	Hickok) Aco5	Lyle	
NAME	Last	First	Middle	
HOME ADDRESS	/4/40 Address	N 3988 DR		
	Dewey	8K	74029	
	City	State	Zip Code	
PHONE (cell)	918-214-7	19/1 EMAIL: hid	Lok b fd O	yAhoo.com
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PLAINTIFF SIGNATURE JOE S Pulle

REQUEST TO BECOME PARTY PLAIN	TIFF (FLSA – Bartlesville, Oklahoma)
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NAME Horsman Robert Michael

Last First Middle

HOME ADDRESS Po Box 121

Address

Ochelata Ok 74051

City State Zip Code

PHONE (cell) 9186378924 EMAIL: (obhors 25@gmail.com

PLAINTIFF SIGNATURE Reboothasma

I hereby consent t Labor Standards A		f in an action to re	cover overtime wages and other relief	under the Fair
NAME	Last	Brett	<u> Allen</u> Middle	-
HOME ADDRESS	Po Box 1063 Address			_
	Baezl+sville	DIC_ State	7400 <u>S</u> Zip Code	·
DUONE (coll)	918 440 8478	EMAIL: bho	ward 470 Avahoo.com	

REQUEST TO BECOME PARTY PLAINTIFF (FLSA – Bartlesville, Oklahoma)

PLAINTIFF SIGNATURE Day Sources

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BEAUSET TO	BECOME PARTY	PLAINTIFF (FL	LSA — Baniesville.	, Okianuma)
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NAME	Hubbard 7	T. Teffrey First	Clay Middle	
HOME ADDRESS	P016 A1	151st East Ave		
	DWASSO	OK	74055	
	City	State	Zip Code	
PHONE (cell) _	918-855-2	202 <u>EMAIL: jć hu</u>	bbaid Ccity of	barHesville.org



REQUEST TO BECC	ME PARTY PLAINTIFF (F	LSA - Bartlesville,	Oklahoma)

NAME	Kelley	Johnny	Cartis
	Last (First	Middle
HOME ADDRESS	P.O.Bop Address	834	
	Barnsda	y OK	Zyos
	City	State	Zip Code
a	14-697- DO	Al Essau. Mall.	alor (a.)

PHONE (cell) 918-697-2741 EMAIL: Kelloys trucks and more @ grain con

DECLIECT TO	DECOME DARTY	-	/EL O.A	D 41 '11	0111
KEQUEST TO	BECOME PARTY	PLAINTIFF	(FLSA -	Bartiesville,	Oklahoma)

hereby consent to become a party	plaintiff in an action to	recover overtime	wages and other	relief under the Fair
Labor Standards Act.				

NAME	Kramer Last	Michael First	dale Middle	
HOME ADDRESS	400 Morton			7702407000
	Ramona	ÒΙζ	7 406/ Zip Code	
PHONE (cell)	918 332-6604	_EMAIL: Mich	ael Kramer 1984	a I doud . co

DEALIEST :	TA	DECOME DARTY DI A	INITIEE /ELOA	Dodlooville	Oldebone
KEQUESI	ıv	BECOME PARTY PLA	in itle (LPSW -	– Daruesville,	Okianoma)

NAME	Larson	Mathew	stophen	
TO THE STATE OF TH	Last	First	Middle	
HOME ADDRESS	504 U. Address	Iron man Ave		
	Nowata	oK	14048	
	City	State	Zip Code	
PHONE (cell)	918-332- 8	1900 EMAIL: Mice	en 89@ yahoo.c	om.



PLAINTIFF SIGNATURE Matt Jacon

REQUEST TO BECOME PARTY PLAINTIF	F (FLSA – Bartlesville, Oklahoma)
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NAME	Loff Last	Dustin	Boyed Middle	
HOME ADDRES	S 1425 Cre Address	scent Dr		1, 1, 2, 2, 28
	Bartlesuille	⊘k_ State	74006 Zip Code	. F. 47394
PHONE (cell)	918-335-7428	EMAIL: //us	tableH@gmai	1.com

DECUEST TO RECOME PARTY PLA	NTIEE /EI SA _ Rartiesville.	Oklahoma)

NAME	Marchall Last	<u>Ma</u> J First	Alan Middle	
HOME ADDRESS	2783 CK	2708		
	Scriffesoille		74003	
	City	State	Zip Code	_
PHONE (cell) (2	(18) 440 6781	EMAIL: <u>Cam</u>	arshall 79 @ Yehoo. C	on
		<i></i>	•	

DEQUEST TO RECOME PARTY PI	AINTIFF	(FLSA	- Bartlesville.	Oklanoma)

	MARHALL	Javan	BURKE	
NAME	Last	First	Middle	
HOME ADDRESS	<u>29/4 SE. B</u> Address	scien PJ		
	BARTLESVILLE	oK	74006	
	City	State	Zip Code	
PHONE (cell) _	918.440.0447	EMAIL:	n. Harshall & Conast.	-00
	_			

REQUEST TO BECOME PARTY PLAINTIFF (FLSA – Bartlesvi	ville, Oklahoma)
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NAME	Last First	Tony	Allew	
HOME ADDRESS	3901 S € F	Pank h	J	
	BARTles ville	OK/A- State	7400G Zip Code	
PHONE (cell) _	620 -515-2989EM	IAIL:		

		CONTRACTOR				
REQUEST	TO BEC	OME PARTY	PLAINTIFF (F	LSA -	Bartlesville,	Oklahoma)

NAME	McDaniel	Hobert	Don	1. 197,078
	Last	First	Middle	
HOME ADDRESS	S 14/11 C F	2575		
	Address	17.	1	
	Caney	KS	Le7333	
	City	- State	Zip Code	
PHONE (cell)	918440-239	4 EMAIL: TOb.	Mydaniel 2396 6	3 gmail.co

PLAINTIFF SIGNATURE TOLEN D MY

NAME	Mendell	Phillip	Lee	
	Last	First	Middle	
HOME ADDRESS	437620 E.	130 RD		
	Welch	ok	74369	
	City	State	Zip Code	
PHONE (cell) _	918-244-5231	_EMAIL: Phi	Hipmendell@yah	na. Con

PEOLIEST TO	BECOME PARTY PL	AINTIFF (FLSA	- Bartlesville.	Oklahoma)
REQUEST TO	DECUME PARTIFIC			,

NAME	Miller	Justin	Mitchell	
MAIR	Last	First	Middle	
HOME ADDRESS	109 5.	Showner Ave		
	Address			
	Dewey	OK	74029	
	City	State	Zip Code	
PHONE (cell)	718-440-51	76 EMAIL: 3ust	in, 1987@icloud.	com

111/					
1111	REQUEST TO BECC	ME PARTY PLAINTIF	FF (FLSA – Bartlesville, Oklahoma)		
	I hereby consent to become a party plan Labor Standards Act.	intiff in an action to re-	cover overtime wages and other relief	under the Fair	
/// ^	IAME Milligar	First	C Middle	0 20 20 1 1 1	
но	ME ADDRESS 2203 Sa				
	Barres on the	CK State	> 4006 Zip Code		
PHONE	E(cell) (918) 841-8440	EMAIL: Mercan	lligen & gonal won		
PLAINTIFI	F SIGNATURE ACAR				

REQUEST TO	BECOME PARTY PLAINTIFF ((FLSA – Bartlesville,	Oklahoma)

NAME	monday	Br: Hon	Robert	
	Last	First	Middle	
HOME ADDRESS	34999	N 3450		
	Address			
	Romana	OK	74061	
	City	State	Zip Code	
PHONE (cell)	918 440	41237 EMAIL: ddo	gsince ICloud com	_

REQUEST TO	BECOME PARTY F	PLAINTIFF (FLSA	- Bartlesville.	Oklahoma)

I hereby consent to become a party	plaintiff in an action t	o recover overtime	wages and other	relief under the Fair
Labor Standards Act.			4-4 - 4	

NAME	Monay	Verison	Verison Dale	
Should real	Last	First	Middle	
HOME ADDRESS	400852 V 925 Dr Address	E1 1181 137 24 1	. ' > 4000	E' CIEST
	W310	o lc	14083	
	City	State	Zip Code	
BUONE (coll)	(918) 559 -8370	FMAII .i	erisan ISSA @ day	ve. 1 . / .

			D-41	
DECLIECT TO	RECOME PARTY PL	AINTIFF IFI CA.	_ Harriesville i li	danomai
KELIIIESI III	DELAMICEANIEL	MILETINE OF LOW	- Dal dog Allio, Ol	" MALIOTHAL

NAME	Monday	Joshua	Matthew	
	Last /	First	Middle	
HOME ADDRESS	902 € Address	Our Tyle	er Ane	
	Dewey	OK	74029	
	City	State	e Zip Code	
q,	10.53420	220	· A . 1	1 8

PHONE (cell) 918 534 2929 EMAIL: firetighter monday Egmail. com

PLAINTIFF SIGNATURE for Many

PEOLIEST TO B	ECOME PARTY PL	AINTIFF (FLSA -	- Bartlesville,	Oklahoma)
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NAME	MUNDAY Last	ERI C First	L Y L E Middle	
HOME ADDRESS	8382 57 Address	TATE HIGHWI	иу 17	i.
	BARNS DA	State	7400 Z Zip Code	-
PHONE (cell)	918 440 381	69 EMAIL: emu	inday 69 (gmail . con	2,

≥ D ju

DEQUEST TO RECOME PARTY PLAINTIFF (FLSA - Bartlesville,	Oklahoma)	

NAME	Neer	David First	Brent Middle	
HOME ADDRE	ss <u>1356</u> Address	5. Johns	tone Ave	
	Bartle	v:lle OK State	74003 Zin Code	
PHONE (cell)	918-440-8		neer@sbcg	lobal net
•		$\cdot \cdot 0 1 $	00	

DECLIEST TO RECOME PARTY PL	ASSETTED ITS C		Orionom:	21
		$\Delta = Dyingsame$	ONGIVIII	
DEATIEST IN RELIMINE PARTIFIC		M D 6: 800		•

	NISSEN	CHAPCE	TANNER	
NAME	Last	First	Middle	
HOME ADDRESS	27550 N	3945 KD		
HOME ADDRESS	Address			
	ochei mea	oX	74051	
	City	State	Zip Code	
PHONE (cell)	718 815 3958	EMAIL: CHAP	CE. NSSSEN DHOI. con	

BEOLIEST TO RECOME PARTY PLA	INTIFF (FLSA - Bartlesville.	Oklahoma)

	Nissen	Codes	byce	
NAME	Last	First	Middle	
HOME ADDRESS	3800 N 3960 Rd Address			water to the state of the state
	Romers	σK	74061	
	City	State	Zip Code	
PHONE (cell)	918-373-1632	EMAIL: 2 Da	ICK TACK FIN 21 Q (Smail, Com
LHOHE (com) 7				

PEOUEST TO RECOME PARTY PLAINT	TIFF (FI SA – Bartlesville, OF	(lahoma)
DECLIEST TO BELLIME PARTIFICATIVE	III (I LON Dailes)	

TOTAL CO.	Duens	Kronig	Hayden
NAME	Last	First	Middle
HOME ADDRESS	9385 EW 212 Address	RD	
	Nowata	OK	74048
	City	State	Zip Code
PHONE (cell)	918-273 - 8411	EMAIL: Kronige	owars 19 @grail.com

REQUEST TO	BECOME PARTY P	LAINTIFF (FLSA -	Bartlesville,	Oklahoma)

NAME	Rabbitt -	Trevor First	Wayne Middle	<u> </u>
HOME ADDRES	S 16 5 Leblanc Address	St	7)_ : CF	A PARKY
	Ochelata	OK	74051	
	City	State	Zip Code	
PHONE (cell)	9/8-220-0846	EMAIL: Trass	41132 Qgmail.c	on
PHONE (cell)	1/0 200 0876	EMAIL: Trass	H1132 Ugmail.c	on

PLAINTIFF SIGNATURE CONTRACTOR

REQUEST	O BECOME PAI	RTY PLAINTIFF	(FLSA – Bartlesvil	le, Oklahoma)

Labor Standards A	
NAME	Raynor Malcon Isaiah Last First Middle
HOME ADDRESS	132 N Spruce Ave
	Bortlesville OK 74006
	City State Zip Code
PHONE (cell)	620) 642-7955 EMAIL: Malcomraynor @gmail.com

PLAINTIFF SIGNATURE Malean Man

REQUEST	TO BECC	ME PART	Y PLAINTIFI	F (FLSA – Bart	lesville, Okl	ahoma)
						5 En 33

I hereby consent to become a party plaintiff in an action to recover overtime wages and other relief under the Fair Labor Standards Act.
NAME Rice III Edwin Vale Last First Middle
HOME ADDRESS 14895 State Hwy 123
Ros Hegville X 74003 City State Zip Code
PHONE (cell) (918) 378-9104 EMAIL: Collice @ city of bortlesvilles org
PLAINTIFF SIGNATURE MUNICIPALITY RIPOTTI

REQUEST	TO BECOME PARTY	PLAINTIFF (FLSA	\ - Bartlesville,	Oklahoma)
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NAME	Robles	Ben'anin First	Walker Middle	
HOME ADDRESS	Po Box	314		
	Ramena	Oh	74061	
	City	State	Zip Code	
PHONE (cell)	718-714-6077	EMAIL: Wall	ser. robbes @ betm	ail com

PLAINTIFF SIGNATURE 10 Voll Model

REQUEST TO BECOME PARTY PLAINTIFF (FLSA -	 Bartlesville. 	. Oklahoma
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NAME	Rovenstine	Josiah	٤	
• • • • • • • • • • • • • • • • • • • •	Last	First	Middle	_
HOME ADDRESS	663 CR	2702		
	Address			
	Bartlesuille	OK	74003	
	City	State	Zip Code	
PHONE (cell)	18-440-0308	EMAIL: jesiah	rovenstine @ amail. co	m

PLAINTIFF SIGNATURE _____

REQUEST TO	RECOME PART	Y PI AINTIFF (FISA — B	artlesville.	Oklahoma)
KEUDESI IUI	DECUME PART	I PLANTIE I		BI NCSAINC.	Uniditionia

NAME	Schmidt	Joseph	Authory	
NAME	Last	First	Middle J	
HOME ADDRESS	23330	1) 4025 rd.		
	Bar-Hesvill	e OK	7400 B	
	City	State	Zip Code	
PHONE (cell)	18-214-5281	EMAIL: Fines	ighter Schmidt (gurail.com
			,	,

PLAINTIFF SIGNATURE Joseph A John Comments

	" " Oldeberen
DECLIEST TO DECOME PARTY PI	AINTIFF (FLSA – Bartlesville, Oklahoma)
KEDUEST TO DECOME LYMIT .	

NAME	Schmid	(J John First	And the state of t	Middle	<u> </u>
HOME ADDRESS	4000	Sheriden	rd		S.,
BC ³	Address Bartles	rlie	04	74006	11.
	City		State	Zip Code	
PHONE (cell) _	918-8	41-9977 EMA	.IL: <u>)</u>	ihn du Schmld	12 @ Gmail.con

PLAINTIFF SIGNATURE Ohn Cim

DECLIEST TO RECO	ME PARTY PI AINTIFF (FI SA	 Bartlesville, Oklahoma)

NAME	Boully	J _I m		LEE Middle	
HOME ADDRESS		NOTTING	HAM		
	BARTLES City	VILLE	OK State	74 <i>00</i> 6 Zip Code	·
BHONE (cell)	118-637	- 2128 EMAI	L: 75.	FIRE FIGHTER	33 B GMAIL

REQUEST TO RECOME PARTY PLAINTIFF (FLSA - Bartlesville, Oklahoma)	

NAME	Last First Middle
HOME ADDRESS	2100 Nepture Court
	Dorthesmile Ok 74306 City State Zip Code
PHONE (cell)	918-440-7221 EMAIL: While Ccry. Controlled

NAME	Shuman	Jeff	Ray	
IAWIAIC	Last	First	Middle /	
HOME ADDRESS	5580 T	erri Ct.		
	Bartles ville	ok	74006	
	City	State	Zip Code	
PHONE (cell)	918 - 914 -0933	EMAIL: JR Shu	man ecity of bartles vill	e.org

REQUEST TO RECOME	DARTY DI AINTIEE /E	I SA _ Rartiosvillo	Oklahoma)

NAME	SPKER	JACOB	Ray	
	Last	First	Middle ^J	

HOME ADDRESS 1527 PRUDOM AVE

Parwhusika OK 74056
City State Zip Code

PHONE (cell) 918-331-8767 EMAIL: SPICERWELDING @ GMAIL. COM

REQUEST T	TO BECOME PART	Y PLAINTIFF (FLS/	A – Bartlesville	Oklahoma)
		1 1 m-0141111 / [FOX	7 — Dai 80341116	- Unidiloilla)

PHONE (cell)	718-331-8768	EMAIL: Joh	n 5PICET 1980@yahoo.com
	City	State	Zip Code
	PAWHUSKA	OK	74056
HOME ADDRESS	P.O. Box 1534 Address		
Last	Last	First	Middle
NAME	<u>SPICER</u>	John	RAY

REQUEST TO	BECOME PARTY F	PLAINTIFF	(FLSA -	Bartlesville,	Oklahoma)

NAME

Tampleton Decek

Last First Middle

HOME ADDRESS 1001 N. WYANDOTTE APT C

Address

Devey Ou 74029

City State Zip Code

PHONE (cell) 971-4141 EMAIL: DEREX TampleTONE ymars. com

REQUEST TO BECOME PARTY PLAINTIFF (I	FLSA - Bartlesville.	Oklahoma)
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NAME	TATE	MATHEW	BRYAN	
Mair	Last	First	Middle	
HOME ADDRESS	10623 E.74	thst		
	Address	06	コルリクア	
	UISA OTE	State	74133	
	City		Zip Code	
PHONE (cell)	918-277-9366	_EMAIL: bru	tate@Men.com	
•		,		

DI AINTIEE SIGNATURE

DECLIEST TO RECOME	PARTY PLAINTIFF (FLSA	A - Bartlesville.	. Oklahoma)

NAME	TAILOL	DAVID	Mesley	
	Last	First	Middle	
HOME ADDRESS	Address	AT DR.		
	BARTLESUILL	E OK	74006	
	City	State	Zip Code	
PHONE (cell)	918-440-2009	EMAIL: C	FIDAUDTAYLORD	LAMAIL. COX



REQUEST TO	BECOME PARTY F	PLAINTIFF (FLSA -	 Bartlesville. 	Oklahoma\

NAME	Last Topping	Adon First	Dec	
HOME ADDRESS	9475 EV		Wildlie	
	Novata	OK	74048	
	City	State	Zip Code	
PHONE (cell) _	918 214 08	771 EMAIL: ada	topping @ city o	t Bartlesville .

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	QUEST TO BECOME PAR			
I hereby consent to	become a party plaintiff in	an action to recover	r overtime wages and other	relief under the Fair
Labor Standards A	ct.		1	
NAME	0.111.0	ndon	Middle	
Annual Control	Last	First	Middle	
HOME ADDRESS	3/661 N 3990 Address	> RO		
	Ramona	<u>DK</u>	74661	· 4: =
	City	State	Zip Code	
PHONE (cell)	918-991-9213	_EMAIL: au//	rate Cob.org	
DI AINTIEE SIGN	NATURE July	Allrin	_	
FLAMINI GIO.	457 (1457) The Company of the State of the S			

REQUEST TO BECOME PARTY PLAINTIFF (FLSA	 Bartlesville, 	Oklahoma)

NAME	Upchurch	Michael	Grene	
IAVIIIT	Last	First	Middle	
HOME ADDRESS	4765 Dac	tmouth Drive.		
	Bartlesville		74006-8611	
	City	State	Zip Code	
PHONE (cell) _	918 332 634	-2 EMAIL: Mgup	church a city of bar	Hesuille, org

3)

REQUEST	TO	BECOME PARTY F	PLAINTIFF	(FLSA -	Bartlesville,	Oklahoma)

NAME Vann Timmy Ray
Last First Middle

HOME ADDRESS 6901 Sc adams Blud
Address

Bartlesville OK 74006

City State Zip Code

PHONE (cell) 918.440.7337 EMAIL: timmyvannis@gmnil.com

REQUEST TO B	ECOME PARTY PLA	INTIFF (FLSA -	Bartlesville, (Oklahoma)

NAME	Wano	Braden	A	
	Last	First	Middle	
HOME ADDRESS	132 N SPNIE AUR Address			
	Bartlesuine	OK	74006	
	City	State	Zip Code	
PHONE (cell) _	918-397-5919	EMAIL: 3	raden. Waro 00020 Gnail. C.	èn

PLAINTIFF SIGNATURE MM UM

REQUEST TO BECOME PARTY PLAINTIFF (FL:	SA – Bartlesville, Ol	(lahoma)
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NAME	Watsur 111	ANDERSON	BRADY	
	Last	First	Middle	
HOME ADDRESS	10557	N. /2125 E	AVE	
	Address			
	OWNSJO	OK	74055	
	City	State	Zip Code	
PHONE (cell)	918-430-5800	EMAIL: AB	WATSON @ CITY OF BAI	RTLESUICUE. ORG.

PLAINTIFF SIGNATURE ABOVE TO

TO DECOME DARTY DI AINTIEE /EI SA	Partlesville	Oklahomal
	- Barnesvine.	Oktanoniai

I hereby consent to become a party plai	tiff in an action to recover overtime wages and other relief under the Fai	r
Labor Standards Act.		

NAME Last First Middle

HOME ADDRESS 7621 E. 85 Address

City State Zip Code

PHONE (cell) 918-694-25-90 EMAIL:

(10.12 (2.14) / _____

NAME Williams Colby Allen Last First Middle WOME ADDRESS 37501 N 4000 Ld
Last First Middle
27501 11 1/00 11
HOME ADDRESS 3/301 /0 4000 60
Address
Ramona OK 740 Ul
City State Zip Code
PHONE (COII) (918) - 914-0150 EMAIL: has klunfm@gmail.Com
PLAINTIFF SIGNATURE Ally Wine

						- CONTRACTOR 100
DECLIEST TO	DECOME	DADTY DI	AIRITIEE	/ELCA	Particeville	Oklahoma)
DEUILE: 10	RECOME	PARIYPI	AINTIFF	ITLOM .	– Dai nesvine.	Onlandina

Labor Stantant -					
NAME	Williams Last	RONALD	GeN2 Middle		
HOME ADDRESS	402891 W	V. 2150 Pr.			
	BaxHcsville	OR	74006		
PHONE (cell)	City 918-440-9398	State State EMAIL: (o N)	Zip Code 11258 W.	llegmail	· Cour
PLAINTIFF SIGN	ATURE Land			V	6 /30/24

REQUEST TO BECOME PARTY PLAINTIFF	(FLSA - Bartlesville, Oklahoma)
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NAME	WILLIS	Blandon	Jake	
	Last	First	Middle	
HOME ADDRESS	222 E 20th	SF.		
	Bartlesville	OK	74003	
	City	State	Zip Code	
PHONE (cell) _	918-914-319	S4 EMAIL: bean	dan 26 picilis @ gm	iail. com

REQUEST	TO BECOM	E PARTY	PLAINTIFF	(FLSA - I	Bartiesville.	Oklahoma)

NAME	witer	Kyan		Michael	
NAME	Last	First		Middle	
HOME ADDRESS	4000 Shecidan	RL			
	Address				
	BasHesvilles		OK	74006	
	City		State	Zip Code	
	- CZU-7550				

PHONE (ceil)

918-534-7550

EMAIL: Ryanwiller080gmil.com



REQUEST TO	BECOME PARTY	PLAINTIFF (I	FLSA – Bartlesville,	Oklahoma)

NAME	Wadworth	Justin	Gene	
	Last	First	Middle	
HOME ADDRESS		4000 Rd		
	Address Ramona	Ok	740101	
	City	State	Zip Code	
PHONE (cell)	7184636-6750	EMAIL:\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	anducts@gmail.co	n
		יט ט	U	

PLAINTIFF SIGNATURE fulla Walley