

Appendix A

First Causes of Action - Back Wages From Time Rounding

Year	# of Employees	Weeks/yr	Hrs/week	Avg. Wage	Total	
2009	643	39	0.5	\$ 17.92	\$ 224,689.92	
2010	643	44	0.5	\$ 17.92	\$ 253,496.32	
2011	643	45	0.5	\$ 17.92	\$ 259,257.60	
2012	643	12	0.5	\$ 17.92	\$ 69,135.36	
Total Claim 1:					\$ 806,579.20	

Second Cause of Action - Penalties from Time Rounding

Year	# of Employees	Weeks/yr	Penalty	Total	
2012	643	0	\$ 100.00	\$ -	
2012	643	12	\$ 50.00	\$ 385,800.00	Total Claim 2: \$ 385,800.00

Third Cause of Action - Missed Meal Breaks in 10+ Hour Shifts

# 10+ hr shifts	Avg. Wage	
55,984	\$ 17.92	Total Claim 3: \$ 1,003,233.28

Fourth Cause of Action - Inaccurate Wage Statements

Year	# of Employees	Weeks/yr	Penalty	Total	
2012	643	11	\$ 100.00	\$ 707,300.00	
2012	643	1	\$ 50.00	\$ 32,150.00	Total Claim 4: \$ 739,450.00

Fifth Cause of Action - Withholding Wages Upon Termination

# of Employees	Days	Hrs/Day	Avg. Wage	
330	30	8	\$ 17.92	Total Claim 5: \$ 1,419,264.00

Subtotal	\$ 4,354,326.48
Attorney Fees:	25%
Total in Controversy	\$ 5,442,908.10