




Court was truly joint in all respects, so that the proposed FPTO is being placed of record contemporaneously with this memorandum order, with the two documents to be read together. This adds the case to this Court's trial call, with the date of trial to be set as discussed later in this order.

Certain aspects of the proposed FPTO call for modification or correction. Here they are:

1. Tab A p. 4 ¶ (b), which reflects what the parties have labeled a "[s]hort agreed description of case to be read to jurors," will not be used during the trial. Instead this Court, as always, will simply apprise prospective jurors of the general nature of the case via a short neutral oral statement, the purpose of which is to facilitate the selection of jurors who bring no disqualifying biases to the case and who are not perceived by counsel for either side to call for peremptory challenges.
2. As to Tab A p. 5 ¶ (c), which refers to the Exhibit List found at Tab B, defense counsel has orally withdrawn the objection that was listed opposite Ex. 1 but that applied to all designated exhibits that followed. Accordingly all of the listed exhibits (Exs. 1 through 96) are admitted without objection.
3. As to Tab A p. 5 ¶ (h) and p. 6 ¶ (h)(1), the parties' respective proposed jury instructions, those (which comprised Tabs E and F) have been deleted from the FPTO without objection by either party. Instead a new set of proposed jury instructions will be tendered shortly before trial, as provided for later in this memorandum order.

4. As to Tab A p. 6 ¶ (k), each party will file its motion or motions in limine, together with a supporting memorandum, on or before May 31, 2017. On or before June 14 counsel for each party will file a response (including a supporting memorandum) to the other side's motion or motions in limine, together with a letter to this Court, with a copy to opposing counsel, that identifies that party's unavailability for trial (taking into account the availability of both counsel and their respective witnesses) during the period from July 1 through September 30, 2017.
5. As to Tab A p. 6 ¶ (5), this Court contemplates the selection of an eight-person rather than ten-person jury for purposes of the trial.
6. As to Tab A p. 6 ¶ (6), this Court has determined, and the parties have agreed orally, that the issues of liability and damages will not be bifurcated for trial.

When this Court has ruled on the respective motions in limine it will set the case for trial, and the new proposed jury instructions will be due 14 days before the scheduled trial date. For that purpose, to facilitate the jury instruction conference that will be held during the trial, the parties are ordered to develop a set of instructions on which they have reached joint agreement, with each side also ordered to submit separate proposed instructions on subjects as to which they have not reached agreement.



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Milton I. Shadur  
Senior United States District Judge

Date: May 19, 2017





(2) **Trial Attorneys.** The attorneys trying this case are:

Attorneys for Plaintiffs	Attorneys for Defendants
Carlos G. Becerra	Mario E. Utreras
Perla M. Gonzalez	
Becerra Law Group, LLC	Utreras Law Offices, Inc.
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pgonzalez@law-rb.com	

(3) **Stipulations and Statements.** The following stipulations and statements were submitted and are attached to and made part of this Order:

(a) **Uncontested Facts.**

(1) Plaintiffs Maria De Lourdes Cisneros, Griselda Marin, Jackelin Pizano, and Marisol Pizano are former employees of Defendants.

(2) Plaintiffs Maria De Lourdes Cisneros, Griselda Marin, Jackelin Pizano, and Marisol Pizano worked as cashiers for Defendants.

(3) Plaintiffs Maria De Lourdes Cisneros, Griselda Marin, Jackelin Pizano, and Marisol Pizano were involved in interstate commerce while working for Defendants.

(4) Defendant Red Latina Corp. is an "enterprise" as defined by Section 3(r)(1) of the Fair Labor Standards Act, 29 U.S.C. § 203(r)(1).

(5) Defendant Red Latina Corp. is an enterprise engaged in commerce within the meaning of Section 3(s)(1)(a) of the Fair Labor Standards Act, 29 U.S.C. § 203(s)(1)(a).

(6) Defendant Red Latina Corp. was Plaintiffs' employer as defined by the Fair Labor Standards Act, 29 U.S.C. 203(d).

(7) Defendant Red Latina Corp. was Plaintiffs' employer as defined by the Illinois

Minimum Wage Law, 820 ILCS 105/3.

(8) Defendant Josefina Alba was and is the President and sole owner of Red Latina Corp.

(9) Defendant Josefina Alba had the authority to hire and fire Red Latina Corp.

employees.

(10) Defendant Josefina Alba had the authority to direct and supervise the work of Red Latina Corp. employees.

(11) Defendant Josefina Alba had the authority to sign on Red Latina Corp.'s checking accounts.

(12) Defendant Josefina Alba made the final decision regarding employee compensation for Red Latina Corp. employees.

(13) Defendant Josefina Alba was Plaintiffs' employer as defined by the Fair Labor Standards Act, 29 U.S.C. 203(d).

(14) Defendant Josefina Alba was Plaintiffs' employer as defined by the Illinois Minimum Wage Law, 820 ILCS 105/3.

(15) Defendant Josefina Alba made the decision to issue two checks to the Plaintiffs in 2011, 2012, and 2013 for compensation earned by Plaintiffs while working at Red Latina Corp.

(16) Defendant Josefina Alba had received training that employees who worked more than 40 hours in a workweek were entitled to be paid at one and one half times their regular rate for all hours over 40.

(17) Plaintiffs did not earn any "Nonemployee compensation" in 2011, 2012, and 2013.

(18) Plaintiffs were Defendants' employees as defined by the Fair Labor Standards Act, 29 U.S.C. § 203(e)(1).

(19) Defendants did not keep the Plaintiffs' original timesheets.

(20) Defendant no longer has copies of records of its sales of packages, insurance, and envelopes for the years 2011, 2012, and 2013.

**(a)(ii) Contested Facts - Plaintiff**

(1) Defendant Josefina Alba made the decision to report income earned by Plaintiffs on IRS Forms 1099-MISC in the box "Nonemployee compensation" in 2011, 2012, and 2013.

**(a)(iii) Contested Facts – Defendant**

(1) Defendants had filed a lawsuit against Plaintiff Cisneros, titled *Red Latina Corp. v. Cisneros and Internacional Express, Inc.*, 2014-CH-06347 on April 14, 2014, prior to the filing of the instant lawsuit.

(2) Defendants paid Plaintiffs via check at all times pertinent to this lawsuit.

**(b) Case Statement.** (Short agreed description of case to be read to jurors.)

This case involves allegations of unpaid overtime wages and fraudulently filing of IRS 1099-MISC forms for tax years 2011, 2012, and 2013. Plaintiffs Maria de Lourdes Cisneros, Griselda Marin, Jackelin Pizano, and Marisol Pizano filed this lawsuit against their former employer Red Latina Corp. and the company's sole owner Josefina Alba.

Plaintiffs assert claims for unpaid overtime wages under state and federal law. Plaintiffs contend that during their employment, they often were scheduled and were required to work over 40 hours per week, but were paid their regular rate of pay for hours worked over 40 in a workweek and not the overtime rate of one and one half times their regular hourly rate. Defendants deny that Plaintiffs ever worked more than 40 hours per week. Defendants contend that they made



separate payments to Plaintiffs, at their insistence, for commissions paid to them for any transactions they handled as cashiers involving international money transfers and international shipments, as well as for insurance coverage for those shipments. Defendants maintain that the checks paid to Plaintiffs that were separate from their 40 hour per week checks, were only for commissions, and never for overtime, because Plaintiffs never worked overtime for Defendants, according to them.

Plaintiffs also assert that Defendants violated the Internal Revenue Code, 26 U.S.C. §7434 by willfully filing fraudulent MISC-1099 forms with the federal government listing wages earned as nonemployee compensation in 2011, 2012, and 2013. Defendants claim that the amounts listed as nonemployee compensation were for commissions earned by Plaintiffs in their work as cashiers. Defendants contend that the issuance of such MISC-1099 was at the direction of their accountant.

- (c) Plaintiffs' Exhibit List attached hereto as Exhibit A
- (c)(1) Defendants' Exhibit List attached hereto as Exhibit A1.
- (d) Plaintiffs' Witness List attached hereto as Exhibit B.
- (d)(1) Defendants' Witness List attached hereto as Exhibit B1.
- (e) Expert Witness statements and stipulations not applicable.
- (f) Deposition Lists are not applicable.
- (g) Plaintiffs' Itemized Statement of Damages attached hereto as Exhibit C.
- (g)(1) Defendants' Objection to Plaintiff's Statement of Damages attached hereto as Exhibit C1.
- (h) Plaintiffs' Proposed Jury Instructions are attached hereto as Exhibit D.

- (h)(1) Defendants' Proposed Jury Instructions are attached hereto as Exhibit D1.
- (i) Plaintiffs' Proposed Questions to Prospective Jurors is attached hereto as Exhibit E.
- (i)(1) Defendants' Proposed Questions to Prospective Jurors is attached as Exhibit E1.
- (j) Each party has completed discovery.
- (k) Plaintiffs Motions in Limine
  - 1. Plaintiffs' Motion in Limine to Exclude Evidence of Commissions will be filed on November 7, 2016.
  - 2. Plaintiffs' Motion in Limine to Exclude Evidence of Immigration Status will be filed on November 7, 2016.
  - 3. Plaintiffs' Motion in Limine to Exclude Evidence of a Robbery.
- (3) Trial of this case is expected to take 5 days. It will be listed on the trial calendar, to be tried when reached.
- (4) Defendants have requested a jury trial.
- (5) The parties recommend that 10 jurors be selected at the commencement of trial.
- (6) The parties agree that the issues of liability and damages should be bifurcated for trial.
- (7) The parties do not consent to this case being reassigned to a magistrate judge for trial.
- (8) This Order will control the course of the trial and may not be amended except by consent of the parties and the court, or by order of the court to prevent manifest injustice.
- (9) Possibility of settlement was considered by the parties.

Respectfully submitted,

s/ Carlos G. Becerra

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*Attorney for Plaintiffs*

s/ Mario E. Utreras

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Chicago, IL 60601  
mutreras@utreraslaw.com

*Attorneys for Defendants*



	2/19/2013			
11	M. Cisneros Check Stub pay period 5/6/2013 - 5/12/2013			
12	M. Cisneros Check Stub dated 5/13/2013			
13	M. Cisneros Check Stub dated 11/14/2011			
14	G. Marin Time Sheet pay period 2/25/2013 - 3/3/2013			
15	Fax Transmittal dated 1/21/2013 J. Pizano Time Sheet pay period 1/14/2013 - 1/20/2013			
16	J. Pizano Check Stub pay period 1/14/2013 - 1/20/2013; Check Stub dated 1/21/2013			
18	Fax Transmittal dated 1/26/2013 J. Pizano Time Sheet pay period 1/21/2013 - 1/27/2013			
19	J. Pizano Check Stub pay period 1/21/2013 - 1/27/2013; Check Stub dated 1/28/2013			
20	Fax Transmittal dated 2/4/2013 J. Pizano Time Sheet pay period 1/28/2013 - 2/3/2013			
21	J. Pizano Check Stub pay period 1/28/2013 - 2/3/2013; Check Stub dated 2/5/2013			
22	Fax Transmittal dated 2/10/2013 J. Pizano Time Sheet pay period 2/4/2013 - 2/10/2013			
23	J. Pizano Check Stub pay period 2/4/2013 - 2/10/2013			
24	J. Pizano Time Sheet pay period 2/11/13 - 2/17/2013			
25	J. Pizano Check Stub pay period 2/11/13 - 2/17/2013; Check Stub dated 2/19/2013			
26	Fax Transmittal dated 2/23/2013 J. Pizano Time Sheet pay period 2/18/2013 - 2/24/2013			
27	J. Pizano Check Stub pay period 2/11/13 - 2/17/2013; Check Stub dated 2/27/2013			
28	Fax Transmittal dated 3/3/2013 J. Pizano Time Sheet pay period 2/25/2013 - 3/3/2013			
29	J. Pizano Check Stub pay period 2/25/13 - 3/3/2013; Check Stub dated 3/4/2013			
30	J. Pizano Time Sheet 4 - 10/2013			

31	J. Pizano Check Stub dated 3/13/2013; Check Stub pay period 3/4/13 - 3/10/2013			
32	J. Pizano Time Sheet 3/11/2013 - 3/17/2013			
33	J. Pizano Check Stub pay period 3/11/13 - 3/17/2013			
34	J. Pizano Time Sheet 3/18/2013 - 3/24/2013			
35	J. Pizano Check Stub pay period 3/18/13 - 3/24/2013			
36	J. Pizano Time Sheet pay period 3/25/13 - 3/31/2013			
37	J. Pizano Check Stub pay period 3/25/13 - 3/31/2013; Check Stub dated 4/1/2013			
38	J. Pizano Time Sheet pay period 4/1/13 - 4/7/2013			
39	J. Pizano Check Stub pay period 4/1/13 - 4/7/2013; Check Stub dated 4/8/2013			
40	J. Pizano Time Sheet pay period 4/8/13 - 4/14/2013			
41	J. Pizano Check Stub pay period 4/8/13 - 4/14/2013; Check Stub dated 4/17/2013			
42	J. Pizano Time Sheet pay period 4/15/13 - 4/21/2013			
43	J. Pizano Check Stub pay period 4/15/13 - 4/21/2013; Check Stub dated 4/25/2013			
44	J. Pizano Time Sheet pay period 4/22/13 - 4/28/2013			
45	J. Pizano Check Stub pay period 4/22/13 - 4/28/2013; Check Stub dated 4/30/2013			
46	J. Pizano Time Sheet pay period 4/29/13 - 5/5/2013			
47	J. Pizano Check Stub pay period 4/29/13 - 5/5/2013; Check Stub dated 5/6/2013			
48	J. Pizano Time Sheet pay period 5/6/13 - 5/12/2013			
49	J. Pizano Check Stub pay period 5/6/13 - 5/12/2013; Check Stub dated 5/13/2013			
50	J. Pizano Time Sheet pay period 5/13/13 - 5/19/2013			
51	J. Pizano Check Stub pay period 5/13/13 - 5/19/2013; Check Stub			

	dated 5/20/2013			
52	J. Pizano Time Sheet pay period 5/20/13 - 5/26/2013			
53	J. Pizano Check Stub pay period 5/20/13 - 5/26/2013			
54	J. Pizano Time Sheet pay period 5/27/13 - 6/2/2013			
55	J. Pizano Check Stub pay period 5/27/13 - 6/2/2013			
56	J. Pizano Time Sheet pay period 6/3/13 - 6/9/2013			
57	J. Pizano Check Stub pay period 6/3/13 - 6/9/2013			
58	J. Pizano Time Sheet pay period 6/10/13 - 6/16/2013			
59	J. Pizano Check Stub pay period 6/10/13 - 6/16/2013			
60	J. Pizano Time Sheet pay period 17/13 - 23/2013			
61	J. Pizano Check Stub pay period 6/17/13 - 6/23/2013			
62	J. Pizano Time Sheet pay period 6/24/13 - 6/30/2013			
63	J. Pizano Check Stub pay period 6/24/13 - 6/30/2013			
64	J. Pizano Time Sheet pay period 7/1/13 - 7/7/2013			
65	J. Pizano Check Stub pay period 7/1/13 - 7/7/2013			
66	J. Pizano Time Sheet pay period 7/8/13 - 7/14/2013			
67	J. Pizano Check Stub pay period 7/8/13 - 7/14/2013			
68	J. Pizano Time Sheet pay period 7/15/13 - 7/21/2013			
69	J. Pizano Check Stub pay period 7/15/13 - 7/21/2013			
70	J. Pizano Time Sheet pay period 7/22/13 - 7/28/2013			
71	J. Pizano Check Stub pay period 7/22/13 - 7/28/2013			
72	M. Pizano Time Sheet pay period 4/1/13 - 4/7/2013			
73	M. Pizano Time Sheet pay period 4/15/13 - 4/21/2013			
74	M. Pizano Check Stub dated 4/25/2013; Check Stub pay period 4/15/13 - 4/21/2013; Check Stub pay period 4/1/13 - 4/7/2013			

75	M. Pizano Check Stub pay period 6/24/13 - 6/30/2013; Check Stub dated 4/17/2013; Check Stub dated 4/8/2013			
76	M. Pizano Time Sheet pay period 5/13/13 - 5/19/2013			
77	M. Pizano Check Stub dated 5/28/2013; Check Stub dated 5/20/2013; Check Stub pay period 5/13/13 - 5/19/2013			
78	M. Pizano Time Sheet pay period 4/22/13 - 4/28/2013			
79	M. Pizano Check Stub pay period 4/22/13 - 4/28/2013; Check Stub pay period 6/10/13 - 6/16/2013; Check Stub pay period 5/20/13 - 5/26/2013			
80	M. Pizano Check Stub dated 4/30/2013; Check Stub dated 11/19/2012; Check Stub pay period 11/12/12 - 11/18/2012			
81	2011 Form 1096 Transmittal of U.S. Information Returns			
82	2011 Form 1099-MISC issued by Red Latina Corp. to recipient Josefina Alba			
83	2011 Form 1099-MISC issued by Red Latina Corp. to recipient Maria L. Cisernos			
84	2011 Form 1099-MISC issued by Red Latina Corp. to recipient Griselda Marin			
85	2011 Form 1099-MISC issued by Red Latina Corp. to recipient Jackelin Pizano			
86	2011 Form 1099-MISC issued by Red Latina Corp. to recipient Marisol Pizano			
87	2012 Form 1096 Transmittal of U.S. Information Returns			
88	2012 Form 1099-MISC issued by Red Latina Corp. to recipient Maria L. Cisernos			
89	2012 Form 1099-MISC issued by Red Latina Corp. to recipient Griselda Marin			
90	2012 Form 1099-MISC issued by Red Latina Corp. to recipient Jackelin Pizano			
91	2012 Form 1099-MISC issued by			



	Red Latina Corp. to recipient Marisol Pizano			
92	2013 Form 1096 Transmittal of U.S. Information Returns			
93	2013 Form 1099-MISC issued by Red Latina Corp. to recipient Maria L. Cisneros			
94	2013 Form 1099-MISC issued by Red Latina Corp. to recipient Griselda Marin			
95	2013 Form 1099-MISC issued by Red Latina Corp. to recipient Jackelin Pizano			
96	2013 Form 1099-MISC issued by Red Latina Corp. to recipient Marisol Pizano			

Respectfully submitted,

Dated: November 22, 2016

By: s/Carlos G. Becerra  
Attorney for Plaintiffs

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Dated: November 22, 2016

By: s/ Mario E. Utreras  
One of Defendants' Attorneys

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>MARIA DE LOURDES CISNEROS,</b>	)	
<b>GRISELDA MARIN, JACKELIN</b>	)	
<b>PIZANO, and MARISOL PIZANO, on</b>	)	
<b>Behalf of themselves and other persons</b>	)	
<b>Similarly situated, known and unknown,</b>	)	
	)	
<b>Plaintiffs,</b>	)	<b>Case No. 1:14-cv-2806</b>
	)	
<b>v.</b>	)	<b>Honorable Milton Shadur</b>
	)	
<b>RED LATINA CORP. and JOSEFINA</b>	)	
<b>ALBA, individually,</b>	)	
	)	
<b>Defendants.</b>	)	

**PARTIES' PROPOSED VOIRE DIRE**

1. Have you or any of your relatives or friends been employed by any of the Defendants in this case: Red Latina Corp, Josefina Alba?
  
2. Have you or any of your relatives or friends ever had any business dealings or knowledge of any of the attorneys involved in this matter or their firms? The attorneys involved in this matter are Carlos Becerra and Perla Gonzalez of Becerra Law Group, LLC and Mario Utreras of Uteras Offices?
  
3. Have you or any of your relatives or friends ever met with, know of, or been involved with the Plaintiff's in this case, Maria de Lardes Cisneros, Griselda Marin, Jackelin Pizano or Marisol Pizano?
  
4. Have any of your relatives or friends ever met with, know of, or been involved with any employees of the Defendants in this case: Red Latina Corp or Josefina Alba
  
5. Have any of your relatives or friends worked for a money transfer company? If yes, please identify the person's relationship to you (unless you are referring to yourself), the

employer, and the position(s) held, including dates of employment.

6. Have you ever served on a jury before? If you have, please tell us when, what types of cases you were a juror for, and the results of those cases.

7. Please tell us which radio programs you regularly listen to and which television programs you regularly watch.

8. Please tell us what newspapers and magazines you subscribe to or regularly read.

9. Please tell us what organizations you belong to.

10. Please tell us whether or not you use the Internet and, if you do, which websites or blogs you regularly read or visit.

11. Does your job include any supervisory responsibilities? If so, please describe your responsibilities and the number of employees you manage or supervise.

12. Are you or any of your friends or relatives employed in a human resources department? If so, please explain.

13. Have you or any of your relatives or friends ever worked overtime without getting paid for it? Please explain. (Defendants object as stated below).

14. Have you or any of your relatives or friends ever brought a claim against an employer for discrimination, retaliation, unpaid overtime, or any other type of unlawful employment related actions? If yes, what was the outcome?

15. Have any of your relatives or friends ever been a party to any kind of a lawsuit? If yes, please describe the parties, claim, outcome, and how your opinions about the process and outcome of the case.

16. Have you or any of your friends or relatives ever been in a situation where you could have sued but decided not to? If yes, explain.

17. Do you think that you are generally suspicious of people who bring lawsuits?
18. Do you think that your are generally suspicious of people who don't speak English?
19. Is there anything about the nature of this case that would make any of you hesitate to be on this jury?
20. Is there anything we have not asked about that would lead you to feel that you may not be able to be fair and impartial in this case?

Respectfully submitted,

Dated: November 4, 2016

By: s/Carlos G. Becerra  
Attorney for Plaintiffs

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Dated: November 22, 2016

By: s/ Mario E. Utreras  
One of Defendants' Attorneys

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>MARIA DE LOURDES CISNEROS,</b>	)	
<b>GRISELDA MARIN, JACKELIN</b>	)	
<b>PIZANO, and MARISOL PIZANO, on</b>	)	
<b>Behalf of themselves and other persons</b>	)	
<b>Similarly situated, known and unknown,</b>	)	
	)	
<b>Plaintiffs,</b>	)	<b>Case No. 1:14-cv-2806</b>
	)	
<b>v.</b>	)	<b>Honorable Milton Shadur</b>
	)	
<b>RED LATINA CORP. and JOSEFINA</b>	)	
<b>ALBA, individually,</b>	)	
	)	
<b>Defendants.</b>	)	

**DEFENDANTS' PROPOSED VOIR DIRE**

1. Have you or any of your friends ever met with, know of, or been involved with a witness for the Defendants in this case, Maria Ruiz, of RV Financial Services?
2. Do any of your or your immediate family run a small business? If so what type of business is it? How long have you/they run the business? How many employees does it have?
3. The use of English/Spanish translators will be necessary during this trial. Would that fact affect your ability to be fair, impartial, and fully attentive to the case?

Respectfully submitted,

Dated: November 22, 2016

By: s/ Mario E. Utreras  
One of Defendants' Attorneys

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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

<b>MARIA DE LOURDES CISNEROS,</b>	)	
<b>GRISELDA MARIN, JACKELIN</b>	)	
<b>PIZANO, and MARISOL PIZANO,</b>	)	
	)	
<b>Plaintiffs,</b>	)	
	)	
<b>v.</b>	)	<b>1:14-cv-2806</b>
	)	
<b>RED LATINA CORP. and</b>	)	<b>Hon. Milton Shadur</b>
<b>JOSEFINA ALBA, individually,</b>	)	
	)	
<b>Defendants.</b>	)	

**PLAINTIFFS' WITNESS LIST**

Plaintiffs, Maria de Lourdes Cisneros, Griselda Marin, Jackelin Pizano, and Marisol Pizano, by their attorneys, Becerra Law Group, LLC, respectfully submit Plaintiffs' Witness List.

Plaintiff will call the following as witnesses:

1. **Maria de Lourdes Cisneros**  
Plaintiff
2. **Griselda Marin**  
Plaintiff
3. **Marisol Pizano**  
Plaintiff
4. **Jackelin Pizano**  
Plaintiff
5. **Josephina Alba**  
Defendant

Respectfully submitted,

Dated: April 13, 2017

By: s/Carlos G. Becerra  
Attorney for Plaintiffs

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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

<b>MARIA DE LOURDES CISNEROS,</b>	)	
<b>GRISELDA MARIN, JACKELIN</b>	)	
<b>PIZANO, and MARISOL PIZANO,</b>	)	
	)	
<b>Plaintiffs,</b>	)	
	)	
<b>v.</b>	)	<b>1:14-cv-2806</b>
	)	
<b>RED LATINA CORP. and</b>	)	<b>Hon. Milton Shadur</b>
<b>JOSEFINA ALBA, individually,</b>	)	
	)	
<b>Defendants.</b>	)	

**DEFENDANTS' WITNESS LIST**

Defendants, Red Latina Corp., and Josefina Alba, by their attorney, Mario E. Utreras, Utreras Law Offices, Inc., respectfully submits Defendants' Witness List.

Defendants will call the following as witnesses:

1. **Josephina Alba**  
Defendant
2. **Maria Felix**  
Defendant's Accountant
3. **Maria de Lourdes Cisneros**  
Plaintiff
4. **Griselda Marin**  
Plaintiff
5. **Marisol Pizano**  
Plaintiff
6. **Jackelin Pizano**  
Plaintiff

Defendants may call the following as witnesses:

7. **Maribel Mariscal** – former employee at Defendant Red Latina.



8. **Elida Fuentes** - former employee at Defendant Red Latina

Respectfully submitted,

Dated: 4/13/2017

By: s/Carlos G. Becerra  
Attorney for Plaintiffs

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	Wages Owed	FLSA	IMWL	IRC	Total Owed
Maria L. Cisneros	\$ 8,624.63	\$ 8,624.63	\$ 6,209.73	15,000.00	\$ 38,458.99
Griselda Marin	\$ 5,168.00	\$ 5,168.00	\$ 3,720.96	15,000.00	\$ 29,056.96
Jackelin Pizano	\$ 9,879.25	\$ 9,879.25	\$ 7,113.06	15,000.00	\$ 41,871.56
Marisol Pizano	\$ 3,336.25	\$ 3,336.25	\$ 2,402.10	15,000.00	\$ 24,074.60
					\$ 133,462.11