#### IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ALABAMA MIDDLE DIVISION

- 1. Matthew R. Blom
- 2. Austin T. Abernathy
- 3. Joseph C. Bailey
- 4. Charles M. Barclay
- 5. James B. Barker
- 6. Paul A. Bonds
- 7. Ralls H. Brisendine
- 8. Vance M. Brown
- 9. Kane B. Brueggert
- 10. John A. Calvert
- 11. Justin A. Campbell
- 12. Craig D. Chappell
- 13. Raymond L. Chiz
- 14. Neal A. Clayton
- 15. Ryan J. Coley
- 16. Rickey A. Collie
- 17. Andrew T. Cotton
- 18. Bryan P. Couch
- 19. Alexander R. Cromer
- 20. Joe P. Dalrymple
- 21. Nathaniel Davenport Jr.
- 22. Dexter W. Davis
- 23. Jonathan H. Davis
- 24. Jonathan E. Day
- 25. James M. Dillard
- 26. Britton L. Dove
- 27. Lee E. Dye
- 28. Eric C. Estes
- 29. Jonathan H. Evans
- 30. James S. Gann
- 31. Joshua K. Goosby
- 32. Brandon L. Green
- 33. Kevin M. Griffith
- 34. Jonah E. Harris
- 35. Andrew G. Hiti
- 36. Noah M. Huff
- 37. Jacob E. Humphreys
- 38. Phillip A. Hutchens
- 39. Ryan M. Ivy
- 40. Noah E. Johnson
- 41. Jeffrey P. Jones
- 42. Timothy R. Keener

Civil Action No.	
CIVII / ICHOII I 10.	

JURY TRIAL DEMANDED

- 43. Christopher B. Kiser
- 44. Daniel S. Langley
- 45. Frankie D. Langley
- 46. Matthew D. Light
- 47. Dillon S. Maddox
- 48. Gerald W. Malone
- 49. Tyson K. Martin
- 50. Gary R. McGlaughn
- 51. Jeffrey D. Morris
- 52. Joshua J. Nabors
- 53. Micah L. Nance
- 54. Kyle R. Nelson
- 55. Shawn L. Nelson
- 56. Kaiden R. Patterson
- 57. Alex K. Payne
- 58. Michael L. Peek
- 59. Micah L. Phillips
- 60. Michael K. Preston
- 61. William D. Putman
- 62. Phillip C. Ramsey
- 63. Roger J. Reynolds
- 64. Jason B. Rich
- 65. Matthew R. Roberts
- 66. Stephen M. Robertson
- 67. Lewis E. Rowan
- 68. Ralph S. Royal
- 69. Devin S. Sauls
- 70. Steven T. Sharp
- 71. David J. Smith
- 72. Kyle C. Smith
- 73. Stephen T. Snead
- 74. Dustin M. Still
- 75. Ian G. Street
- 76. Aaron J. Talton
- 77. Arlin J. Taylor
- 78. Charlie D. Taylor
- 79. Joseph R. Taylor
- 80. Travis D. Ulbrich
- 81. Phillip S. Ulrich
- 82. James D. Walker
- 83. Ramey M. Waters
- 84. Ryan L. Wells
- 85. Brent E. White
- 86. Michael L. White
- 87. Ronald D. Wideman
- 88. Kameron Z. Wilson

89. Jason L. Winstead

90. Richard S. Wolfe

91. Justin R. Zemo

Plaintiffs,

v.

CITY OF GADSDEN, ALABAMA,

Defendant.

#### **COMPLAINT**

#### **INTRODUCTION**

Plaintiffs, by and through their counsel, respectfully submit this Complaint for violations of the Fair Labor Standards Act ("FLSA"), 29 U.S.C. § 201, et seq., against the City of Gadsden, Alabama and state as follows:

#### **PARTIES**

- 1. The Plaintiffs are current and former employees of the Defendant, City of Gadsden, Alabama ("Defendant" or "City"), who bring this action under the FLSA against Defendant, because of Defendant's unlawful deprivation of Plaintiffs' rights to overtime compensation. *See* 29 U.S.C. §§ 207(a), 207(k), 216(b).
- 2. Defendant operates the City of Gadsden Fire Department (the "Department"), which is the department responsible for providing emergency services to the City, including fire prevention, fire suppression, and emergency medical services.
- 3. At all times material herein, Defendant has employed Plaintiffs in various positions within the Department, including as Fire Fighters, Drivers, and Fire Commanders, among others.

The exact titles, job descriptions, and dates of the Plaintiffs' employment are in the custody and control of the Defendant.

- 4. The Plaintiffs bring this action for a declaratory judgment under 28 U.S.C. § 2201 for backpay compensation, liquidated damages, attorneys' fees and costs, and other relief available under 29 U.S.C § 216(b) the FLSA.
- 5. The Plaintiffs who are identified in the caption of the Complaint have given their written consent to be party Plaintiffs in this action pursuant to 29 U.S.C. § 216(b). These consents are appended to this Complaint as Exhibit A.
- 6. At all times material herein, all Plaintiffs have been "employees" within the meaning of the FLSA, 29 U.S.C. § 203(e)(1) and have been engaged in "fire protection activities" within the meaning of the FLSA, 29 U.S.C § 203(y), and are similarly situated to one another.
- 7. Defendant is a municipal corporation under the laws of the State of Alabama, with the power to sue and be sued in its own name, and, at all times material herein, Defendant has been a "public agency" and "employer" within the meaning of the FLSA, 29 U.S.C. §§ 203(d), 203(x)...

#### **JURISDICTION AND VENUE**

8. This Court has original federal question jurisdiction over the FLSA claims brought in this Complaint through 29 U.S.C. § 216(b), 28 U.S.C. § 1331, and 28 U.S.C. § 1337(a). Venue is proper in this District pursuant to 28 U.S.C. § 1391, as a substantial part of the events giving rise to Plaintiffs' claims occurred in Etowah County, Alabama.

#### **FACTS**

9. From April 12, 2019, through the present (the "Claims Period"), the Plaintiffs have worked for the Department in various firefighting and emergency services roles, including in jobs entitled Fire Fighters, Drivers, and Fire Commanders.

- 10. During the Claims Period, Plaintiffs' primary job duties have been to provide emergency fire and medical services to the citizens and individuals residing within the City of Gadsden. To that end, Plaintiffs have diligently executed their job duties on behalf of their employer and the citizens of Gadsden by mandatorily responding to emergency calls, and performing other fire protection activities critical to the public health and safety of the citizens of Gadsden, Alabama.
- 11. During the Claims Period, Plaintiffs have been assigned to work and did in fact work a regular, repeating schedule of 24-hour shifts followed by 48 hours off. This shift schedule is referred to as a "24/48."
- 12. Defendant has adopted a 28-day "work period" for the City's fire protection employees, pursuant to 29 U.S.C. § 207(k) of the FLSA. As a result, the applicable overtime threshold for Plaintiffs under the FLSA is 212 hours in each 28-day work period. *See* 29 C.F.R. § 553.230.
- 13. As a result of the 24/48 work schedule, Plaintiffs are scheduled to work either 9 or 10 shifts in each work period. As such, Plaintiffs are either scheduled for 216 hours or 240 hours during each 28-day work cycle, resulting in either 4 or 28 scheduled FLSA overtime hours (the hours that exceed 212 in a 28-day period).
- 14. During the claims period, Plaintiffs regularly worked more than 212 hours in a 28-day work period because, in addition to the scheduled overtime described above, Plaintiffs also regularly worked substantial amounts of unscheduled overtime beyond their 24/48 shift schedule. The exact hours worked by Plaintiffs during each work period can be determined by looking at the Plaintiffs' timekeeping and payroll records, which are in the possession, custody, and control of Defendant.

- 15. Plaintiffs are paid weekly on a salaried basis. As such, they receive 1/52 of their annual salary each pay period as base pay each paycheck.
- 16. Plaintiffs also receive a variety of additional remuneration outside of their weekly salary. The precise amounts and types of pay vary depending on the individual Plaintiff's rank, certifications, and assignments. These premiums include, among others, longevity pay, EMT pay, and "Acting Pay," which is a premium paid for work performed at a higher rank. The exact premiums Plaintiffs receive during each work period can easily be determined by looking at the Plaintiffs' timekeeping and payroll records, which are in the possession, custody, and control of Defendant.
- 17. The City fails to pay overtime at the correct regular rate of pay under the FLSA for all overtime hours worked in two primary ways. First, when Fire Commanders and Drivers work unscheduled overtime as a "Fire Fighter," the City will only pay them overtime at the rate of the highest paid "Fire Fighter." Second, when Fire Fighters and Drivers receive "Acting Pay" during their regularly scheduled or overtime hours, the City fails to include that premium in the regular rate of pay when calculating the amount of overtime owed. As such, the City's "overtime" rate is less than one and one-half times the "regular rate of pay" for each employee, as required by the FLSA. See 29 U.S.C. § 207(a).
- 18. In fact, at times, the City pays less than the base rate of pay for overtime work performed by certain Plaintiffs. For example, some Plaintiffs at the rank of "Fire Commander" make \$17.66 per hour for each non-overtime hour worked. They are therefore entitled to overtime compensation of at least \$26.94 per hour (more if they receive additional remuneration that is required to be included in calculating their regular rate of pay). These Fire Commanders, however,

only receive \$17.62 per hour (the overtime rate of the highest paid Fire Fighter) when working unscheduled overtime in the job title of "Fire Fighter."

- 19. Similarly, Plaintiffs at the rank of Driver make \$14.00 per hour for each non-overtime hour worked. Drivers are therefore entitled to overtime compensation of at least \$21.00 per hour (and possibly more if they receive additional remuneration that is required to be included in calculating their regular rate of pay). They too only receive \$17.62 per hour when working unscheduled overtime in the job title "Fire Fighters."
- 20. Moreover, while the City is quick to underpay Plaintiffs that are working overtime "under rank," it does not pay a higher rate of overtime for Plaintiffs that are working up a grade. In fact, not only does it fail to pay Plaintiffs working as a "Driver" or "Commander" the overtime rate applicable to that rank, it also fails to include the "Acting Pay" premium in the regular rate of pay when calculating overtime at the Plaintiffs' normal ranks. *See* 29 C.F.R. § 778.109.
- 21. These overtime violations have led to other derivative regular rate violations. For example, the City fails to include EMT pay in the regular rate for overtime purposes, but instead includes it as a percentage of total income on each paycheck. In failing to pay the correct amount of overtime however, the City has miscalculated the percentage of EMT pay appropriate for each employee, resulting in further damages
- 22. As Defendant pays the incorrect rate of overtime for all employees, regardless of each employees' base rate of pay or additional remuneration required to be considered as part of the employees' regular rate, Defendants' FLSA violations were willful and in bad faith.

#### <u>COUNT I:</u> <u>VIOLATION OF SECTION 7(a) OF THE FLSA, 29 U.S.C. §§ 207(a), 207(a)</u>

23. Plaintiffs re-allege, and incorporate by reference herein the foregoing paragraphs1-22 of this Complaint.

- 24. Plaintiffs have worked in excess of the hourly standards set forth under 29 U.S.C. § 207(k) and 29 C.F.R. § 553.230, and as such, are entitled to overtime compensation at the rate of one and one-half times their regular rate of pay for each hour worked in excess of 212 hours in a 28-day work period. However, during the times that Plaintiffs have worked in excess of 212 hours in a 28-day work period, Defendant has failed to provide Plaintiffs with overtime pay at the rate of one and one-half times their regular rates of pay for all overtime hours.
- 25. Specifically, Defendant has failed to calculate the regular rate of pay consistent with the FLSA. "The regular hourly rate of pay of an employee is determined by dividing his total remuneration for employment (except statutory exclusions) in any workweek by the total number of hours actually worked by him in that workweek for which such compensation was paid." 29 C.F.R. § 778.109. Defendant here, however, pays overtime rates without regard to Plaintiffs' base rate of pay and/or additional remuneration. For example:
  - a. Defendant pays Plaintiffs who work "under rank" the overtime rate of a lowerranked employee despite requiring Plaintiffs to continue working fire suppression activities;
  - b. Defendant fails to include acting pay in the employees' regular rate of pay when calculating overtime; and
  - c. Defendant fails to calculate the proper percentage of EMT pay during work periods where Plaintiffs have worked overtime while either acting a grade up or working a grade down, resulting in additional regular rate violations.
- 26. By failing to pay the Plaintiffs and other employees similarly situated the overtime pay required under the law, the Defendant has violated and is continuing to violate the provisions of the FLSA set forth at 29 U.S.C. § 207(k).

- 27. By failing to pay the Plaintiffs and other employees similarly situated the overtime pay required under the law in a manner that is willful and in bad faith. As a result, at all times material herein, the Plaintiffs have been unlawfully deprived of overtime compensation and other relief for the maximum period allowed under the law.
- As a result of the Defendant's willful and bad faith violations of the FLSA, there have become due and owing to the Plaintiffs an amount that has not yet been precisely determined. The employment and work records for the Plaintiffs (including time and attendance records) are in the exclusive possession, custody, and control of the Defendant, and the Plaintiffs are unable to state at this time the exact amount owing to them. Defendant is under a duty imposed under the FLSA, 29 U.S.C. § 211(c), and various other statutory and regulatory provisions, 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.
- 29. Pursuant to 29 U.S.C. § 216(b), Plaintiffs are entitled to recover liquidated damages in an amount equal to their backpay for Defendant's failure to pay overtime compensation.
  - 30. Plaintiffs are entitled to recover attorneys' fees and costs under 29 U.S.C. § 216(b).

#### **DEMAND FOR A JURY TRIAL**

Pursuant to Rule 38 of the Federal Rules of Civil Procedure and applicable law, all Plaintiffs hereby demand that their claims be tried before a jury.

#### PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully pray that this Court:

(a) Enter judgment declaring that the Defendant has willfully and wrongfully violated its statutory obligations under federal law and deprived each of the Plaintiffs of his/her rights;

- (b) Order a complete and accurate accounting of all the unpaid compensation to which the Plaintiffs are entitled;
- (c) Award Plaintiffs compensatory relief in the form of unpaid compensation and liquidated damages equal to their unpaid compensation;
  - (d) Award Plaintiffs interest on their unpaid compensation;
- (e) Award Plaintiffs their reasonable attorneys' fees to be paid by the Defendant, and the costs associated with bringing this action; and
  - (f) Grant such other relief as may be just and proper.

DATE: May 5, 2022

Respectfully submitted,

/s/ David Ricksecker

David Ricksecker (VA Bar No. 78388)\* McGILLIVARY STEELE ELKIN LLP 1101 Vermont Avenue, N.W. Suite 1000 Washington, DC 20005

Phone: (202) 833-8855

Email: dr@mselaborlaw.com

\*Pro Hac Vice Application Forthcoming

/s/ Kayla L. Sullivan

Kayla Lawrence Sullivan Sullivan Legal Services, LLC 2100 SouthBridge Parkway, Ste. 650 Birmingham, AL 35209

Office: 205-730-8869 Cell: 205-482-1922

Email: kayla@sullivanlegalservices.llc

Counsel for Plaintiffs

2022 May-05 PM 01:39 U.S. DISTRICT COURT N.D. OF ALABAMA

# Exhibit A

NAME	Aberna	thy	Aust	in	Taylor	
		Last Name		First	Midd	le
НОМЕ	ADDRESS	101 doughboy	rd			
					Apartment/Unit	
		Rainbow city	Al	35906	Etowah	
		City	State	Zip Code	County	
		DocuSigned by:				
SIGNA	TURE	OCSD2DFBB4EF4AA		-		

NAME Bailey			Jose	ph	Chad	
		Last Name		First	Middle	
HOME A	DDRESS	980 Delmont Dr	ive			
					Apartment/Unit	
		Gadsden	Al	35904	Etowah	
		City	State	Zip Code	County	
SIGNATU	URE	DocuSigned by:		-		

NAME	Barker		James		Bradley	
_		Last Name		First	Middle	
HOME A	ADDRESS	5152 County	Road 66			
					Apartment/Unit	
		Heflin	Al	36264	Cleburne	
		City	State	Zip Code	County	
		DocuSigned by:				
SIGNAT	TURE	Brogle (>				
		D2645305617D4D4		_		

NAME	Blom	Matthew		Robert		
_		Last Name		First	Midd	e
HOME A	ADDRESS	3455 rosewoo	od lane			
					Apartment/Unit	
		Southside	Al	35907	Etowah	
		City	State	Zip Code	County	
		DocuSigned by:				
SIGNAT	URE	F343DF546852428		_		

NAME	Bonds		Paul		Allen	
		Last Name		First	Mide	lle
HOME A	ADDRESS	100 Clay Dr				
					Apartment/Unit	
		Gadsden	Al	35903	Etowah	
		City	State	Zip Code	County	
		DocuSigned by:				
SIGNAT	URE					

NAME	Briseno	line	Ralls	S	Hunter	
		Last Name		First	Middle	
HOME A	DDRESS	106 bowman	drive			
					Apartment/Unit	
		Gadsden	AL	35983	Cherokee	
		City	State	Zip Code	County	
SIGNAT	URE	DocuSigned by:		-		

NAME	Brown	Vance			Michael	
-		Last Name		First	Middle	
HOME A	ADDRESS	2016 Lookout St				
					Apartment/Unit	
		Gadsden	Al	35904	Etowah	
		City	State	Zip Code	County	
		DocuSigned by:				
SIGNAT	ΓURE	2F0ABCB8522743B				

NAME _	Bruegg	gert	Kan	e	Brandon scot	
_		Last Name		First	Middle	
HOME A	ADDRESS	104 quail dr.				_
					Apartment/Unit	
		Albertville	Al	35951	Marshall	
		City	State	Zip Code	County	_
SIGNAT	TURE	DocuSigned by:		-		

NAME	Calvert		John		A	nthony	
_	Las	t Name		First		Middle	
HOME A	ADDRESS 304	wildhaven ci	rcle				
					Apartment/Unit		
	Gads	den	Al	35901	Etowah		
		City	State	Zip Code	County		
SIGNAT	TURE 9	ocuSigned by:  A A CAA 987C06D2404E8					

NAME	Campbe	11	Justi	n	Ant	hony	
_		Last Name		First		Middle	
HOME A	ADDRESS_	5552 old Gallan	t rd				
					Apartment/Unit		
	(	Gallant	Al	35972	Etowah		
	_	City	State	Zip Code	County		
SIGNAT	TURE	DocuSigned by:  September 1990    E900FDA11C5C44B					

NAME	Chappe	ell	Crai	g	DeLynn		
		Last Name		First	Mi	ddle	
HOME A	ADDRESS	107 Fairoaks s	t				
					Apartment/Unit		
		Gadsden	Al	35901	Etowah		
		City	State	Zip Code	County		
		DocuSigned by:					
SIGNAT	URE	EF7653454433437	V	-			

NAME	Chiz		Raym	ond	Lavonne	
_		Last Name		First	Middle	
HOME A	.DDRESS_	6226 AL Hwy 75				
					Apartment/Unit	
		Horton	AL	35980	Marshall	
		City	State	Zip Code	County	
SIGNAT	URE	DocuSigned by:  Raswal Oby  B943550AAF784E9				

NAME	Clayton	n Neal			Allen	
_		Last Name		First		Middle
НОМЕ А	DDRESS	1706 Tillison Rd				
					Apartment/Unit	
		Gadsden	AL	35903	Etowah	
		City	State	Zip Code	County	
SIGNAT	URE	DocuSigned by:  72D1A40EBD6147B				

NAME	Coley	Ryan			Jackson	
_		Last Name		First	Middle	
HOME A	ADDRESS	139 Garmon D	rive			
					Apartment/Unit	
		Gadsden	Al	35901	Etowah	
		City	State	Zip Code	County	
		DocuSigned by:				
SIGNAT	URE	9536D4FR97274D7	<u> </u>	_		

NAME	Collie		Rick	ey	Albert	
		Last Name		First	Middle	
HOME A	ADDRESS_	140 Noblitt C	ircle			
					Apartment/Unit	
		Boaz	Al	35956	Etowah	
	-	City	State	Zip Code	County	
SIGNAT	URE	DocuSigned by:	, . L	-		

NAME	Cotton	Andrew		Trey	
_	Last Name		First	Middle	
HOME A	ADDRESS 325 county roa	d 460			
				Apartment/Unit	_
	Heflin	Al	36264	Cleburne	
	City	State	Zip Code	County	_
	Docusigned by:				
SIGNAT	URE866BC6FCDC9443C		_		

NAME	Couch		Bryan		Patrick	
		Last Name		First	Middle	
HOME AI	DDRESS_	1013 Jimmy Dr				
					Apartment/Unit	
		Glencoe	Al	35905	Etowah	
		City	State	Zip Code	County	
SIGNATU	JRE	DocuSigned by:  099494278268418	Cauch			

NAME	Cromer		Alex	ander	R		
_		Last Name		First		Middle	
HOME A	ADDRESS_	4170 Gallant R	ld .				
					Apartment/Unit		
		Attalla	AL	35954	Etowah		
		City	State	Zip Code	County		
		DocuSigned by:	_				
SIGNAT	TURE	Child R. C	<u></u>	-			

NAME	Dalrymple	Joe		Patrick	
	Last Name		First	Middle	
HOME A	ADDRESS 80 Brushcreek	Drive			
				Apartment/Unit	
	Boaz	Al	35957	Marshal	
	City	State	Zip Code	County	
SIGNAT	DocuSigned by:  TURE		-		

NAME _	DAVENPORT JR	NAT	ΓHANIEL	NA	
_	Last Name		First	Middle	
HOME A	ADDRESS 909 LAY ST				
				Apartment/Unit	
	GADSDEN	ALA	35903	ETOWAH	
	City	State	Zip Code	County	
SIGNAT	DocuSigned by:  One of the control o		_		

NAME Davis	Dexter			Washington	
	Last Name		First	Middle	
HOME ADDRES	S 214 Ann Street				
				Apartment/Unit	
	Rainbow City	Al	35906	Etowah	
	City	State	Zip Code	County	
	DocuSigned by:				
SIGNATURE	Donto	_			
	C8946AE159294D2				

NAME Dav			Jonathan		Hea	th
_		Last Name		First		Middle
HOME A	DDRESS	2130 Clinton Pl.				
					Apartment/Unit	
		Hokes Bluff	Al	35903	Etowah	
		City	State	Zip Code	County	
SIGNAT	URE	DocuSigned by:		_		

NAME	Day		Jona	than	Eric		
_		Last Name		First	Middle		
HOME A	ADDRESS	596 Née Liberty Rd					
		Apartment/Unit					
		Wellingron	Al	36279	Calhoun		
		City	State	Zip Code	County		
		DocuSigned by:					
SIGNAT	URE	Journ 754D05E2D4ED435	<u> </u>	-			

NAME	Dillard		Jame	es	Mich	nael
		Last Name		First		Middle
HOME A	DDRESS	304 Sterling St			Apartment/Unit	
		Piedmont	AL	36272	Calhou	
		City	State	Zip Code	County	
		DocuSigned by:				
SIGNAT	URE	0C8250BECR0F4F4 —		-		

NAME Dove		Britton			Lee	
		Last Name		First	N	fiddle
HOME A	ADDRESS	604 Greensport	Road			
					Apartment/Unit	
		Glencoe	Al	35905	Etowah	
		City	State	Zip Code	County	
SIGNAT	URE	DocuSigned by:  5FD9A32E6BB148D		-		

NAME Dye			Lee		Euclid	
		Last Name		First	Middle	
HOME A	ADDRESS	138 Bryant Stre	et			
					Apartment/Unit	
		Gadsden	Ala	35901	Etowah	
		City	State	Zip Code	County	
SIGNAT	TURE	DocuSigned by:  55098274F8F7494		-		

NAME	Estes		Eric		Clark	
		Last Name		First	Midd	le
HOME A	DDRESS	305 Fox Chase	Dr			
					Apartment/Unit	
		Gadsden	Al	35903	Etowah	
		City	State	Zip Code	County	
SIGNAT	URE	DocuSigned by:  0855B81AE124480		-		

NAME <u>Evans</u>		Jonathan			Hayes	
		Last Name		First	Middle	
HOME A	DDRESS	5314 Johnson St	reet			
			Apartment/Unit			
		Gadsden	AL	35903	Etowah	
		City	State	Zip Code	County	
SIGNATU	URE	DocuSigned by:		_		

NAME	Gann		James		Samuel	
_		Last Name		First	M	iddle
HOME A	ADDRESS	3655 Lakeshore I	Or.			
					Apartment/Unit	
		Gadsden	AL	35901	Etowah	
		City	State	Zip Code	County	
SIGNAT	ΓURE	DocuSigned by:  33475C1CD0C54EB				

NAME	Goosby		Josh	ua	Kyle	
_		Last Name		First	Middl	e
HOME A	ADDRESS	2681 Langdale S	St			
					Apartment/Unit	
	(	Gadsden	AL	35903	Etowah	
	_	City	State	Zip Code	County	
SIGNAT	TURE(	DocuSigned by:    John   John   ED2820D43EF44C1	9	_		

NAME Gree			Bran	ndon	Larry	
_		Last Name		First	Middle	
HOME A	ADDRESS_	1255 Horton	Road			
				Apartment/Unit		
		Horton	Al	35980	US	
		City	State	Zip Code	County	
SIGNAT	URE	DocuSigned by:	/			

NAME	Griffith	Kevin			Matthew	
		Last Name		First	Middle	
HOME A	ADDRESS	350Deer Creek	k Way			
					Apartment/Unit	
		Odenville	AL	35120	St Clair	
		City	State	Zip Code	County	
		DocuSigned by:				
SIGNAT	URE	60BAA50B4D16424		-		

NAME	Harris		Jonah			n	
_		Last Name		First		Middle	
HOME A	DDRESS	106 Arcade St					
					Apartment/Unit		
		Gadsden	Al	35903	Etowah		
		City	State	Zip Code	County		
SIGNAT	URE	DocuSigned by: 956D31DBB6ED43A					

NAME	Hiti	Andrew		rew	Gerard	
_		Last Name		First	Middle	
HOME A	ADDRESS	4828 Rainbow	Drive			
				Apartment/Unit		
		Rainbow city	AL	35906	Etowah	
		City	State	Zip Code	County	
SIGNAT	URE	DocuSigned by:		-		

NAME Huff			Noal	h	Michael	
		Last Name		First	Middle	
HOME AI	DDRESS	3380 New Libe	erty Rd.			
			Apartment/Unit			
		Wellington	AL	36279	Calhoun	
		City	State	Zip Code	County	
		DocuSigned by:	~			
SIGNATU	JRE	A22A38346969461	$\mathscr{Y}_{}$	_		

NAME	Humph	reys	Jaco	Ь	Earl		
_		Last Name		First		Middle	
HOME A	ADDRESS_	74 Gaskin rd					
					Apartment/Unit		
		Attalla	Al	35954	Etowah		
	-	City	State	Zip Code	County		
SIGNAT	TURE	DocuSigned by:  DocuSigned by:  EEC957388AC4468	ayour	-			

NAME	Hutche	ns	Phil	lip	Aaron	
_		Last Name		First	N	Middle
HOME A	DDRESS_	204 Macon dr				
					Apartment/Unit	
		Glencoe	AL	35905	Etowah	
		City	State	Zip Code	County	
		DocuSigned by:	<b>—</b> a			
SIGNAT	URE	Philip Hul	ehes	_		

NAME Ivy	7	Rya	n	Michael	
	Last Name		First	Middle	
HOME ADDR	ESS 1086 Saint Cl	air Road			
				Apartment/Unit	
	Leesburg	AL	35983	Cherokee	
	City	State	Zip Code	County	
SIGNATURE_	DocuSigned by:		_		

NAME	Johnson	Noah		Edgar	
	Last Name		First	Middle	
HOME A	ADDRESS 1247 Goody	ear Ave			
				Apartment/Unit	
	Gadsden	AL	35903	Etowah	
	City	State	Zip Code	County	
SIGNAT	URE580EB83215D4	56	-		

NAME	Jones		Jeffrey		Paul	
_		Last Name		First		Middle
HOME A	ADDRESS	2200 Mountain	n View Drive			
					Apartment/Unit	
		Attalla	Alabama	35901	Etowah	
		City	State	Zip Code	County	
		DocuSigned by:				
SIGNAT	URE	Jeffrey Paul	Jones			

NAME Ke	eener	Time	othy	Ray	
	Last Name		First	Middle	
HOME ADDR	ESS_ 4149 Blake D	r.			
				Apartment/Unit	
	Southside	AL	35907	Etowah	
	City	State	Zip Code	County	
SIGNATURE <sub>.</sub>	DocuSigned by:  90F6FC315F5F490	ame	_		

NAME K	iser	Christ	topher	Blake	
	Last Name		First	Middle	
HOME ADD	RESS 3970 old hwy	9			
				Apartment/Unit	
	Cedar Bluff	Alabama	35959	Cherokee	
	City	State	Zip Code	County	
CIONATUDI	Bocusigned by:	10 <del>0</del>			
SIGNATURI	54042A56E8184AE	<i>\(\bu\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\</i>			

NAME	Langley	ey Daniel			Scott		
		Last Name		First		Middle	
HOME A	DDRESS	7155 Valleyview	Street				
					Apartment/Unit		
	Н	okes Bluff	AL	35903	Etowah		
		City	State	Zip Code	County		
		—DocuSigned by:					
SIGNAT	URE	Daniel langley BE9584093CC14B7					

NAME	Langley	Frankie		Drew	
	Last Name		First	Middle	
HOME A	ADDRESS 2978 Margue	erite St.			
				Apartment/Unit	
	Gadsden	AL	35903	Etowah	
	City	State	Zip Code	County	
SIGNAT	DocuSigned by:  Trembic Punc 8CFA6FBE0D7D45	•	_		

NAME	Light		Matt	hew	Dane	
_		Last Name		First	Middle	
HOME A	ADDRESS	416 Robert G	ene St			
					Apartment/Unit	
		Glencoe	AL	35905	Etowah	
		City	State	Zip Code	County	
		DocuSigned by:				
SIGNAT	URE	C5D276C85596426	<i>ff</i>	-		

NAME	Maddo	X	Dille	on	Shane	
		Last Name		First	Middle	
HOME A	ADDRESS	2630 Reeves St	reet			
	_				Apartment/Unit	
		Hokes Bluff	AL	35903	Etowah	
		City	State	Zip Code	County	
SIGNAT	TURE	DocuSigned by:  A0FE4E26500E4B1		-		

NAME	Malone		Gera	ıld	Wayne	
_		Last Name		First	Middle	
HOME A	DDRESS	1044 3rd ave				
					Apartment/Unit	
		Gadsden	Al	35901	Etowah	
		City	State	Zip Code	County	
		DocuSigned by:				
SIGNAT	URE	92eub M	de	-		

NAME	Martin		Tyso	on	Keith	
		Last Name		First	Mi	ddle
HOME A	DDRESS	6674 Gallant roa	d			
					Apartment/Unit	
		Gallant	Al	35972	Etowah	
		City	State	Zip Code	County	
SIGNAT	URE	DocuSigned by: 22C5D6535C90411		-		

NAME	McGlaughn	Gary	y	Ryan	
_	Last Name		First	Middle	
HOME A	ADDRESS 201 Chrislyn l	Drive			
				Apartment/Unit	
	Gadsden	Al	35901	Etowah	
	City	State	Zip Code	County	
SIGNAT	DocuSigned by:  URE  67AB17C022B542F		_		

NAME	Morris	S Je:		rey	D		
		Last Name		First		Middle	
НОМЕ А	DDRESS	131 Mountai	n Creek				
					Apartment/Unit		
		Gadsden	Al	35901	Etowah		
		City	State	Zip Code	County		
		DocuSigned by:					
SIGNAT	URE	Johny,		_			

NAME	Nabors	S	Joshua		James	
		Last Name		First	Middle	
HOME A	ADDRESS	6235 Carnes stre	et			
					Apartment/Unit	
		Hokes Bluff	Al	35903	Etowah	
		City	State	Zip Code	County	
		DocuSigned by:				
SIGNAT	URE	0001B08DB6E347E		_		

NAME	Nance	Micah		Len		
_		Last Name		First	M	iddle
HOME A	ADDRESS	3874 Fleming	gs Way			
					Apartment/Unit	
		Southside	Al	35907	Etowah	
		City	State	Zip Code	County	
		DocuSigned by:				
SIGNAT	URE	Nunce 7E84ED9D57FE47C		-		

NAME	Nelson	Kyle		Russell	
_	Last Name		First	Middle	
HOME A	ADDRESS 1510 Whitest	oro Rd.			
				Apartment/Unit	
	Boaz	Al	35956	Etowah	
	City	State	Zip Code	County	
	DocuSigned by:				
SIGNAT	URE		_		

NAME	Nelson	n Shawn		vn	Lamar	
		Last Name		First	Middle	
HOME A	DDRESS	3972 South V	/alley Rd			
					Apartment/Unit	
		Southside	Al	35907	Etowah	
		City	State	Zip Code	County	
		DocuSigned by:	1			
SIGNAT	URE	Shen N	-0	_		
SIGNAT	URE		-0	-		

NAME	Patterson	Kaid	len	Riley	
_	Last Name		First	Middle	
HOME A	DDRESS 165 county ro	oad 467			
				Apartment/Unit	
	Crossville	Al	35962	DeKalb	
	City	State	Zip Code	County	
	DocuSigned by:				
SIGNAT	UREkaiden Patt		_		

NAME	Payne	Alex			Kyle	
_		Last Name		First	Middle	
HOME A	ADDRESS_	11280 al 168				
					Apartment/Unit	
		Boaz	Al	35957	Marshall	
		City	State	Zip Code	County	
SIGNAT	TURE	DocuSigned by:  DESDD766BFC3499		-		

NAME	Peek		Micl	nael	Lamar	
		Last Name		First	Middle	
HOME A	ADDRESS	5404 1st Street				
					Apartment/Unit	
		Hokes Bluff	AL	35903	Etowah	
		City	State	Zip Code	County	
		DocuSigned by:				
SIGNAT	TURE	M. J.		-		

NAME	Phillips	Mic	ah	Lansing	
_	Last Name		First	Middle	
HOME A	ADDRESS 1291 Sharron	Lane			
				Apartment/Unit	
	Southside	AL	35907	Etowah	
	City	State	Zip Code	County	
SIGNAT	TUREDocuSigned by:		_		

NAME	Prestor	1	Michael		Kolby	
		Last Name		First	Midd	le
HOME AD	DRESS	3987 Oak St				
					Apartment/Unit	
		Hokes Bluff	Al	35903	Etowah	
		City	State	Zip Code	County	
SIGNATU	RE	DocuSigned by:		-		

NAMEPutman			William		David	
		Last Name		First	Middle	
HOME AI	DDRESS_	470 Simpson str	eet			-
					Apartment/Unit	
	Boaz		AL	35957	Marshall	
		City	State	Zip Code	County	_
		DocuSigned by:				
SIGNATU	JRE	FB9654AFFACB4F8				

NAME	Ramsey		Phillip	)	Clayton	
_		Last Name		First		Middle
HOME A	ADDRESS_	4160 Highway 11	l S.			
					Apartment/Unit	
	A	attalla	Al	35954	Etowah	
	_	City	State	Zip Code	County	
SIGNAT	URE	DocuSigned by: PLIM Farm 9C22BEF4EBC84BF				

NAME	Reynolds	Roge	er	J		
_	Last Name		First	N	Middle	
HOME A	ADDRESS 76 county road	1 65				
				Apartment/Unit		
	Collinsville	Al	35961	Dekalb		
	City	State	Zip Code	County		
SIGNAT	UREDocuSigned by:	AU	_			

NAME	Rich	Jason			Barry	
_		Last Name		First	Middle	
HOME A	ADDRESS	2652 Scott st				
					Apartment/Unit	
		Southside	Al	35907	Etowah	
		City	State	Zip Code	County	
SIGNAT	URE	DocuSigned by:  A9288562BA9342F		_		

NAME	Robert	Matt		hew	Ryan	lyan	
		Last Name		First	Middle		
НОМЕ А	DDRESS	272 terry lane					
					Apartment/Unit		
		Rainbow city	Al	35906	Etwoah		
		City	State	Zip Code	County		
		DocuSigned by:	Λ -				
SIGNAT	URE	2FA445760292420	5	-			

NAME	Robertson	Step	hen	Michael	
_	Last Name		First	Middle	
HOME A	ADDRESS 4928 U.S.27	8 East			
				Apartment/Unit	
	Gadsden	AL	35903	United States	
	City	State	Zip Code	County	
	DocuSigned by:				
SIGNAT	TURE SEAARE2154354R6	긕	_		

NAME	Rowan		Lewis		Elliott		
_		Last Name		First	N	ſiddle	
HOME A	ADDRESS	156 Mary Eli	zabeth ln				
					Apartment/Unit		
		Boaz	Alabama	35956	Etowah		
		City	State	Zip Code	County		
		DocuSigned by:					
SIGNAT	ΓURE	963054102097431	vm				

NAME	Royal		Ralph		Scott	
_		Last Name		First	Middle	2
HOME A	DDRESS	3565 Williams st	reet			
					Apartment/Unit	
		Hokes Bluff	Alabama	35903	Etowah	
		City	State	Zip Code	County	
		DocuSigned by:				
SIGNAT	URE	85725AE0D67F4C2				

NAME	Sauls	Devin			Shane	
_		Last Name		First	Middle	
НОМЕ А	ADDRESS	1104 Grady str	eet			
					Apartment/Unit	
		Rainbow city	Al	35906	Etowah	
		City	State	Zip Code	County	
SIGNAT	URE	DocuSigned by:	1			

NAME Sh	arp	Stev	en	Timothy	
	Last Name		First	Middle	
HOME ADDR	ESS 15 Pinetree Lr	1			
				Apartment/Unit	
	Alexandria	Al	36250	Calhoun	
	City	State	Zip Code	County	
	DocuSigned by:				
SIGNATURE <sub>_</sub>	Steven Timos 39D10B37D27944D	thy Sharp _	-		

NAME	Smith	David		Joe		
_		Last Name		First		Middle
HOME A	.DDRESS_	514 Oakes Road				
					Apartment/Unit	
		Boaz	AL	35956	Etowah	
		City	State	Zip Code	County	
		DocuSigned by:				
SIGNAT	URE	David Joe Smith	L			

NAME	Smith	Kyle		Christopher		
		Last Name		First	Middle	
HOME AI	DDRESS	1309 County Road	1 4			
					Apartment/Unit	
		Crossville	Al	35962	Dekalb	
		City	State	Zip Code	County	
SIGNATU	JRE	DocuSigned by: 287C4976678646F				

NAME	Snead	Stephen			Todd	
_		Last Name		First	Middle	
HOME A	ADDRESS	1962 Whisen	ant Rd			
					Apartment/Unit	
		Attalla	Al	35954	Etowah	
		City	State	Zip Code	County	
		DocuSigned by:	0			
SIGNAT	URE	DocuSigned by:	/ from	-		

NAME	Still		Dust	in	M	
		Last Name		First		Middle
HOME AI	DDRESS	236 Keith Dr				
					Apartment/Unit	
		Henagar	Al	35978	DeKalb	
		City	State	Zip Code	County	
SIGNATU	JRE	DocuSigned by:  52E8C3E350BF4CB		-		

NAME	Street		Ian		Garrett	
_		Last Name		First	Middle	
HOME A	DDRESS	4754 Main Stre	eet			
					Apartment/Unit	
		Hokes Bluff	Al	35903	Etowah	
		City	State	Zip Code	County	
		DocuSigned by:				
SIGNAT	URE	Clan St.	ut	-		

NAME	Talton	Aaron			James	
_		Last Name		First	Middl	e
HOME A	ADDRESS	2115 Broadwa	ay ave			
					Apartment/Unit	
		Gadsden	AL	35904	Etowah	
		City	State	Zip Code	County	
		DocuSigned by:				
SIGNAT	URE	ED17FFA654C647D		-		

NAME	Taylor		Arlii	n	James	
		Last Name		First	Mi	iddle
HOME A	DDRESS	1828 old gallar	nt road			
					Apartment/Unit	
		Gallant	AL	35972	Etowah	
		City	State	Zip Code	County	
		DocuSigned by:	_			
SIGNAT	URE	5778C6AA1EE8408		-		

NAME Tay	lor	Cha	rlie	Daniel	
	Last Name		First	Middle	
HOME ADDRI	ESS 188 tredegar rd				
				Apartment/Unit	
	Jacksonville	Al	36265	Calhoun	
	City	State	Zip Code	County	
SIGNATURE_	DocuSigned by:		_		

NAME	Taylor		Jose	ph	R		
_		Last Name		First		Middle	
HOME A	ADDRESS	200 Merchant Dr	r				
					Apartment/Unit		
		Rainbow City	Al	35906	Etowah		
		City	State	Zip Code	County		
SIGNAT	URE	DocuSigned by:		_			

NAME	Ulbrich		Trav	is	D		
_		Last Name		First		Middle	
HOME A	ADDRESS_	1109 Brasher	Cut Off rd				
					Apartment/Unit		
		Gallant	Al	35972	Etowah		
		City	State	Zip Code	County		
SIGNAT	ΓURE	DocuSigned by:					
		2C8A490F3F1A4D4		-			

NAME	Ulrich		Phil	lip	Seth	
_		Last Name		First	Midd	le
HOME A	ADDRESS	2501 Wooder	n Trail			
					Apartment/Unit	
		Southside	AL	35907	Etowah	
		City	State	Zip Code	County	
		DocuSigned by:	1./			
SIGNAT	TURE	5477D0E0C441452	Wint	_		
		3411DUEUU441432				

NAME	Walker	Jame	es	David	
	Last Name		First	Middle	
HOME A	DDRESS 1410 son Joh	nnson road			
				Apartment/Unit	
	Boaz	A1	35956	Etowah	
	City	State	Zip Code	County	
SIGNAT	UREDocuSigned by:	<del>-</del>	-		

NAME	Waters		Rame	ey	Matthew			
		Last Name		First	Middle			
HOME ADDRESS 2288 county road 101								
					Apartment/Unit			
		Cedar Bluff	Al	35959	Dekalb			
		City	State	Zip Code	County	_		
SIGNATU	JRE	DocuSigned by:  ABBC8A772DD74AE	~ J					

NAME	Wells		Rya	n	Lee	
_		Last Name		First	Middle	
HOME A	DDRESS	6753 Norris Far	m Rd			
					Apartment/Unit	
		Trussville	AL	35173	Jefferson	
		City	State	Zip Code	County	
		DocuSigned by:				
SIGNAT	URE	Ryan USZ		_		

NAME	White	Brent			Edsol	
_		Last Name		First	Middle	
HOME A	ADDRESS	109 riverview	lane			
					Apartment/Unit	
		Glencoe	AL	35905	Etowah	
		City	State	Zip Code	County	
		DocuSigned by:	Λ			
SIGNAT	TURE	Gran Ch	T.			
		0805F02CEF9C45F		-		

NAME	White	Michael			Luther	
_		Last Name		First	Middle	
HOME A	DDRESS	1842 Caroline C	Court			
		Southside	AL	35907	Etowah	
		City	State	Zip Code	County	
		DocuSigned by:				
SIGNAT	URE	DocuSigned by:  Muhcel White  E53C581FBAA7430		-		

NAME Wideman		an	Rona	ald	Douglas	
		Last Name		First	Middle	
HOME A	DDRESS_	1678 green hi	lls road			
					Apartment/Unit	
		Ohatchee	Al	36271	Calhoun	
		City	State	Zip Code	County	
SIGNATU	JRE	DocuSigned by: 4F259D22AA454A3				

NAME '	Wilson	Kameron		Zachary	
	Last Name		First	Middle	
HOME ADI	ORESS 219 Elliott Rd				
				Apartment/Unit	
	Gadsden	Al	35904	Etowah	
	City	State	Zip Code	County	
SIGNATUR	DocuSigned by:		_		

NAME	Winstead	Jaso	n	Leslie	
_	Last Name		First	Middle	
HOME A	ADDRESS 2130 County	Rd 178			
				Apartment/Unit	
	Piedmont	AL	36272	Cherokee	
	City	State	Zip Code	County	
	DocuSigned by:				
SIGNAT	TURE 75505864CE82463		_		

NAME	Wolfe	Richard			Scott	
		Last Name		First	Mi	ddle
HOME A	DDRESS	4160 s point cir	north			
					Apartment/Unit	
		Southside	Al	35907	Etowah	
		City	State	Zip Code	County	
SIGNAT	URE	DocuSigned by:    S   W		_		

NAME	Zemo	Justin			Ryan	
_		Last Name		First	Middle	
HOME A	ADDRESS	1817 Hannah St	reet			
					Apartment/Unit	
		Southside	Al	35907	Etowah	
		City	State	Zip Code	County	
SIGNAT	TURE	DocuSigned by: 8C3172A82ED04F3		-		