

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

MAUREEN UCHE *
203 Kimany Court *
Forrest Hill, Maryland 21050 *
Harford County *

Plaintiff

Civil Action No. 8-13-cv-00878-AW

v.

MONTGOMERY HOSPICE, INC. *
Suite 100 *
1355 Piccard Drive *
Rockville, Maryland 20850 *
Montgomery County *

Serve Registered Agent *
Ronald B. Sheff, *Esq.* *
Suite 370 *
180 Admiral Cochrane Drive *
Annapolis, Maryland 21401 *
Anne Arundel County *

ROBERT WASHINGTON *
1355 Piccard Drive *
Rockville, Maryland 20850 *
Montgomery County *

Defendants

* * * * *

PLAINTIFF’S FIRST AMENDED COMPLAINT

Plaintiff Maureen Uche, by and through counsel, LUCHANSKY LAW, files this First Amended Complaint against Defendants Montgomery Hospice, Inc. and Robert Washington (collectively “Defendants”). Attached hereto as exhibit “A” is a red-lined version of Plaintiff’s First Amended Complaint which identifies the amendments to the Original Complaint.

NATURE OF ACTION

1. This lawsuit arises out of Defendants' willful failure to properly compensate Plaintiff for all hours worked and for all wages due and owing pursuant to the Fair Labor Standards Act ("FLSA") and Maryland Wage and Hour Law ("MWHL"). 29 U.S.C. § 201, *et seq.*; Md. Code Ann., Lab & Empl., § 3-401, *et seq.*

JURISDICTION

2. This Court has subject matter jurisdiction over the claims presented herein pursuant to the FLSA.

3. The claims set forth pursuant to the MWHL are so related and intertwined with Plaintiff's claims under the FLSA that they form part of the same case and controversy. Therefore, this Court has supplemental and ancillary jurisdiction over Plaintiff's Maryland State claims relating to Defendants' willful violation of the MWHL.

PARTIES

A. *Plaintiff.*

4. Plaintiff Maureen Uche is a resident of Harford County, Maryland.

5. Plaintiff was employed by Defendants within the meaning of the FLSA and MWHL.

B. *Defendants.*

6. Defendant Montgomery Hospice, Inc. ("Montgomery Hospice") is a for-profit business entity based in Montgomery County, Maryland.

7. Defendant Montgomery Hospice was Plaintiff's employer as the term "employer" is defined by the FLSA.

8. Defendant Montgomery Hospice was Plaintiff's employer as the term "employer" is defined by the MWHL.

9. Defendant Montgomery Hospice may be served at the address listed in the above caption or wherever an appropriate agent for Defendant may be found.

10. Defendant Robert Washington is an individual who, on information and belief, is presently employed by Montgomery Hospice, Inc.

11. During some or all periods of Plaintiff's employment, Robert Washington exercised managerial responsibilities over Plaintiff's employment with Montgomery Hospice.

12. During some or all periods of Plaintiff's employment, Robert Washington exercised substantial control over the terms and conditions of Plaintiff's employment with Montgomery Hospice.

13. Defendant Robert Washington was Plaintiff's employer as the term "employer" is defined by the FLSA.

14. Defendant Robert Washington was Plaintiff's employer as the term "employer" is defined by the MWHL.

15. Whenever in this Complaint it is alleged that Defendants committed any act or omission, it is meant that Defendants' officers, directors, vice-principals, agents, servants, regional managers, or employees committed such act or omission and that at the time such act or omission was committed, it was done with the full authorization, ratification or approval of Defendants or was done in the routine and normal course and scope of employment of Defendants' officers, directors, vice-principals, agents, servants, regional managers or employees.

FACTUAL ALLEGATIONS

A. *Introduction.*

16. Plaintiff's employment with Montgomery Hospice began on approximately October 10, 2011.

17. Plaintiff's employment with Montgomery Hospice concluded on approximately February 1, 2013.

18. Plaintiff's job title with Montgomery Hospice was Chaplain.

19. Plaintiff's job responsibilities included providing spiritual counseling and religious services to patients of Montgomery Hospice.

20. Plaintiff was employed on a full-time basis.

21. Throughout Plaintiff's employment, Robert Washington was an employee of Montgomery Hospice.

22. Mr. Washington was Plaintiff's supervisor at Montgomery Hospice.

23. Plaintiff was compensated on an hourly basis.

24. At the conclusion of her employment, Plaintiff was being compensated at the rate of \$26.15 per hour.

25. Throughout her employment with Montgomery Hospice, Plaintiff was a non-exempt employee under the FLSA.

26. Throughout her employment with Montgomery Hospice, Plaintiff was a non-exempt employee under the MWHL.

B. *Tracking hours.*

27. Plaintiff's hours were recorded by way of a computer system which required her to enter the hours she worked.

28. Plaintiff was only compensated for the hours she entered into the computer system.

29. At the beginning of Plaintiff's employment with Montgomery Hospice, Plaintiff attended a series of orientation classes for new employees.

30. During Plaintiff's orientation with Montgomery Hospice, Plaintiff was given instruction on how to record the hours she worked.

31. During Plaintiff's employment with Montgomery Hospice, Plaintiff was only compensated for the hours she recorded in Montgomery Hospice's time tracking system.

32. During Plaintiff's orientation with Montgomery Hospice, Plaintiff was instructed that, typically, she was only permitted to record working approximately forty hours per each seven-day workweek.

33. During Plaintiff's orientation with Montgomery Hospice, Plaintiff was instructed that she should only record working Monday through Friday and between the hours of 8:30 a.m. to 4:30 p.m. unless given permission to record different hours.

34. As a general rule, Plaintiff was instructed by Montgomery Hospice that she was only permitted to record on her timesheets having worked Monday through Friday and between the hours of 8:30 a.m. to 4:30 p.m.

35. While Plaintiff was instructed by Montgomery Hospice as a general rule not to record working outside of Monday through Friday and the hours of 8:30 a.m. to 4:30 p.m., she was not instructed to refrain from working outside of these hours.

36. As described below, Plaintiff regularly worked outside of the hours she was permitted to record on her timesheets.

37. Defendants had actual knowledge that Plaintiff regularly worked outside of the hours she was permitted to record on her timesheets. Defendants had constructive knowledge that Plaintiff regularly worked outside of the hours she was permitted to record on her timesheets.

38. Plaintiff was not compensated for the work she performed outside of the hours recorded on her timesheets.

C. *Defendants failed to compensate Plaintiff for all hours worked.*

39. During her first month of working at Montgomery Hospice, Plaintiff informed her supervisor that she was working in excess of the Monday through Friday, 8:30 a.m. to 4:30 p.m. hours.

40. Plaintiff was told by her supervisor that Montgomery Hospice does not want her to document the actual hours she works.

41. Plaintiff was instructed by her supervisor to generally continue recording having worked only Monday through Friday and from 8:30 a.m. to 4:30 p.m., irrespective of the actual hours she works, unless permission was provided to record different hours.

42. Plaintiff was responsible for visiting ill patients of Montgomery Hospice and providing them spiritual consolation.

43. Plaintiff would visit patients outside of the 8:30 a.m. to 4:30 p.m. hours and was not allowed to record these hours for the purpose of being compensated for working such hours.

44. Plaintiff visited patients as early as 6:30 a.m., which was typically outside of the hours she was allowed to record on her timesheets. Plaintiff was not compensated for the hours she worked which were outside of those recorded on her timesheets.

45. Plaintiff was assigned to a team of individuals who performed various services for Montgomery Hospice patients. Plaintiff was responsible for meeting with her other team members and discussing the status of their patients.

46. Plaintiff would, at times, begin preparing for her team meetings as early as 6:30 a.m.

47. Plaintiff was generally not allowed to record this time on Montgomery Hospice's time tracking system..

48. Plaintiff was required to communicate with her team members at Montgomery Hospice outside of the hours she was permitted to record on her timesheets.

49. Plaintiff was required to communicate via email and telephone with other staff members of Montgomery Hospice outside of the hours she was permitted to record on her timesheets.

50. Plaintiff was required to communicate via email and telephone with supervisors at Montgomery Hospice outside of the hours she was permitted to record on her timesheets.

51. Plaintiff's supervisors emailed her information in regards to patients of Montgomery Hospice outside of the hours she was permitted to record on her timesheets.

52. Since these emails were coming from Plaintiff's supervisor, Plaintiff felt an obligation to read, reply and act upon the emails whenever they were received. The emails were received and responded to outside of the hours Plaintiff was permitted to record on her timesheets.

53. In addition, the admissions department of Montgomery Hospice would send Plaintiff emails regarding new patients to whom Plaintiff was assigned.

54. The emails from Montgomery Hospice's admissions department were, at times, sent to Plaintiff outside of the hours she was permitted to record on her timesheets.

55. Plaintiff was responsible for returning phone calls to Montgomery Hospice patients outside of the hours she was permitted to record on her timesheets.

56. Plaintiff was responsible for returning phone calls to the family members of Montgomery Hospice patients outside of the hours she was permitted to record on her timesheets.

57. Plaintiff had to create reports in regards to the recertification of Montgomery Hospice patients.

58. Plaintiff, at times, performed the work related to the recertification of Montgomery Hospice patients outside of the hours she was permitted to record on her timesheets.

59. Plaintiff had to create reports in regards to the admission of new patients to Montgomery Hospice.

60. Plaintiff, at times, performed the work related to reports for the admission of new patients outside of the hours she was permitted to record on her timesheets.

61. Plaintiff had to create various types of documentation in regards to her patients, including “Spiritual Care Assessments,” “Plans of Care,” “Bereavement Reports.”

62. Plaintiff, at times, had to perform the work associated with creating Spiritual Care Assessments outside of the hours she was permitted to record on her timesheets.

63. Plaintiff, at times, had to perform the work associated with creating Plans of Care outside of the hours she was permitted to record on her timesheets. Plaintiff, at times, had to perform the work associated with creating Bereavement Reports outside of the hours she was permitted to record on her timesheets. Plaintiff had to collaborate with the personal clergy of patients of Montgomery Hospice.

64. Plaintiff, at times, had to meet with the clergy of patients of Montgomery Hospice outside of the hours she was permitted to record on her timesheets.

65. Plaintiff had to attend mandatory training provided by Montgomery Hospice.

66. The training that Plaintiff attended with Montgomery Hospice was typically scheduled to conclude at 4:30 p.m.

67. While training that Plaintiff attended with Montgomery Hospice was typically scheduled to conclude by 4:30 p.m., it, at times, went past 4:30 p.m., which was commonly outside of the hours she was permitted to record on her timesheets.

68. Montgomery Hospice required that Plaintiff work “on call” hours twice per week.

69. Montgomery Hospice refers to being on call as the “Contact Person of the Day.”

70. When Plaintiff was on call, she, at times, had to read and review emails from night shift nurses which Plaintiff received outside of the hours she was permitted to record on her timesheets.

71. If the Night Nurse required a call back from Plaintiff, then Plaintiff, at times, had to call them back. This would, at times, occur outside of the hours she was permitted to record on her timesheets.

72. While on call, Plaintiff received emails from Montgomery Hospice’s admissions department outside of the hours she was permitted to record on her timesheets.

73. After Plaintiff received an email from Montgomery Hospice’s admissions department, she, at times, had to contact the patient’s family.

74. Plaintiff was responsible for documenting the contact she had with the family member of a Montgomery Hospice patient.

75. Plaintiff would, at times, perform the work associated with documenting contacts with family members of Montgomery Hospice patients outside of the hours she was permitted to record on her timesheets.

76. Plaintiff was required to be familiar with the files of Montgomery Hospice patients, as Plaintiff was contacted by Montgomery Hospice patients outside of the hours she was permitted to record on her timesheets in order to assist patients with emergencies.

D. *Facts which implicate Robert Washington.*

77. Mr. Washington instructed Plaintiff not to record on her timesheets all of the hours which she was working. Mr. Washington instructed Plaintiff that, generally, she was only permitted to record on her timesheets having worked up to forty hours per week and that the time was typically to be recorded as eight hours per day. As a direct supervisor to Plaintiff, Mr. Washington was aware that Plaintiff regularly worked in excess of the hours recorded on her timesheets. This knowledge came from a variety of sources, including, but not limited to, the following: (1) Plaintiff specifically informing Mr. Washington that the job duties she was assigned required her to work in excess of the hours which he was permitting her to submit on her timesheets; (2) Mr. Washington personally observed Plaintiff working outside of the hours which he permitted her to record on her time sheet (including, but not limited to, Plaintiff arriving to work prior to the start time recorded on her timesheet, Plaintiff remaining at work after the end time recorded on her timesheet, Plaintiff meeting and corresponding with Mr. Washington about work related matters outside of the hours recorded on her timesheets, etc.); and (3) Mr. Washington reviewed and approved Plaintiff's timesheets and, as such, was aware of the hours she was submitting. Irrespective of the foregoing, Mr. Washington refused to allow Plaintiff to record on her timesheets the additional hours which she was working.

78. On a number of occasions, Mr. Washington met with Plaintiff for the purpose of informing her that she was not completing her timesheets in a manner which was acceptable to him. In instances where Plaintiff recorded her hours in a manner which did not conform with Mr. Washington's

instructions, Mr. Washington would, at times, follow-up by contacting Plaintiff and instructing her to only record her hours in the manner described above and would threaten disciplinary action against her if she failed to do so. At one point during Plaintiff's employment, Mr. Washington informed Plaintiff that if she continued to submit timesheets which did not conform to his instruction, she would face termination of her employment from Montgomery Hospice.

79. On multiple occasions, Mr. Washington instructed Plaintiff that she was not permitted to record on her timesheets having worked in excess of 40 hours in a single week. Mr. Washington gave this instruction to Plaintiff with the knowledge that Plaintiff was working in excess of 40 hours in a week. In doing so, Mr. Washington was explicitly instructing Plaintiff to work off the clock and directly preventing her from receiving compensation for all of the hours she worked.

80. Mr. Washington was responsible for reviewing Plaintiff's timesheets. It was Plaintiff's understanding that Mr. Washington reviewed all of the timesheets submitted by her throughout her employment with Montgomery Hospice. Further, it was Plaintiff's understanding that Montgomery Hospice required that Mr. Washington provide his approval of the hours submitted by her prior to her timesheets being submitted to Montgomery Hospice's payroll department for processing. It was Plaintiff's understanding that if Mr. Washington did not give his approval to the timesheets which she submitted, she was not entitled to be paid for the hours she submitted.

81. Mr. Washington had the authority to hire employees of Montgomery Hospice. Plaintiff was interviewed by Mr. Washington for employment at Montgomery Hospice. On information and belief, Mr. Washington made the decision to hire Plaintiff. On information and belief, Mr. Washington made the decision to hire other Chaplains employed in similar positions to Plaintiff at Montgomery

Hospice. From the time Plaintiff's employment began with Montgomery Hospice, Mr. Washington served as her supervisor.

82. Mr. Washington had the authority to terminate employees of Montgomery Hospice and he effectively terminated Plaintiff's employment. At the time Plaintiff's employment with Montgomery Hospice concluded, Mr. Washington instructed Plaintiff that if she did not resign from her employment at Montgomery Hospice, he would immediately terminate her employment from Montgomery Hospice. Mr. Washington advised Plaintiff that it would be to her benefit if she were to resign rather than be terminated by him. This meeting between Plaintiff and Mr. Washington ultimately resulted in the conclusion of Plaintiff's employment with Montgomery Hospice.

83. Mr. Washington had the authority to create policies on behalf of Montgomery Hospice. At the time of Plaintiff's hire, Mr. Washington held the title Vice President of Counseling. At some point during Plaintiff's employment, Mr. Washington's title changed to Chief Clinical Officer. Irrespective of his title, it was Plaintiff's understanding that Mr. Washington retained the power to create the policies of employment which affected her and all other Chaplains of Montgomery Hospice who were employed in a similar capacity to her. These policies included establishing the number of hours per week which Plaintiff was permitted to record on her timesheets, establishing the number of hours per day which Plaintiff was permitted to record on her timesheet, establishing the number of days per week which Plaintiff was permitted to work, establishing the manner in which Plaintiff was to carry out her job duties as a Chaplain for Montgomery Hospice, establishing the manner in which Plaintiff was to communicate with patients of Montgomery Hospice, establishing the topics which Plaintiff was permitted to discuss with patients of Montgomery Hospice in Plaintiff's role as a Chaplain, establishing

the extent to which Plaintiff could discuss religious matters with patients of Montgomery Hospice, and establishing many other policies which affected a variety of other aspects of Plaintiff's employment.

84. Mr. Washington supervised the day-to-day operation of Chaplains employed by Montgomery Hospice, including Plaintiff. Throughout the first six months of her employment, Plaintiff consulted with Mr. Washington regularly, and commonly multiple times per week, in regards to her job duties and specific job assignments.

85. Mr. Washington counseled and disciplined employees of Montgomery Hospice.

86. Mr. Washington performed annual performance reviews of Chaplains employed by Montgomery Hospice. Mr. Washington performed an annual performance review of Plaintiff and that review played a role in determining Plaintiff's wages and the amount of any raise which she might receive. On information and belief, Mr. Washington was involved in other aspects of determining the wages which were earned by Plaintiff and other Chaplains employed in a similar capacity.

E. *Estimate of unpaid and overtime hours worked.*

87. On information and belief, Defendants attempted to evade the FLSA and MWHL by duping Plaintiff into believing that she was only entitled to compensation during the hours which Defendants permitted her to record and submit. Accordingly, Plaintiff did not maintain precise records demonstrating the actual number of hours which she worked every workweek over the course of her employment.

88. Plaintiff can only provide her best estimate of the unpaid hours she, in good faith, believes she worked.

89. Plaintiff does not have records demonstrating the precise number of unpaid hours she worked per workweek.

90. On information and belief, the information necessary to accurately calculate the total number of hours worked by Plaintiff is in large part presently in the exclusive possession of Defendants.

91. Plaintiff regularly worked many hours for Defendants which were unpaid.

92. While the unpaid hours which Plaintiff worked per workweek varied, on information and belief, Plaintiff regularly worked between approximately five (5) and thirty (30) unpaid hours during most weeks of her employment.

93. Plaintiff reserves the right to amend her estimate of unpaid hours at any time prior to trial and after having had the opportunity to conduct discovery in this matter.

94. Defendants had an affirmative legal duty pursuant to the FLSA to maintain accurate records of hours worked by Plaintiff.

95. Defendants had an affirmative legal duty pursuant to the MWHL to maintain accurate records of hours worked by Plaintiff.

F. *Defendants failed to maintain accurate records of hours worked by Plaintiff.*

96. Plaintiff was a non-exempt employee of Montgomery Hospice.

97. Defendants had a duty pursuant to the MWHL and FLSA to maintain accurate records of all hours worked by Plaintiff.

98. Defendants failed in their obligation to maintain accurate records of all hours worked by Plaintiff.

99. Defendants' failure to maintain accurate records of all hours worked by Plaintiff was willful.

G. *Defendants acted willfully in regards to their wage violations.*

100. The illegal pay practices claimed herein were conceived and executed willfully by Defendants.

101. Defendants knew that Plaintiff was working for the benefit of Defendants and that Plaintiff was not receiving proper and complete compensation for the labor performed.

102. If Defendants claim to not have expressly known that Plaintiff was working for the benefit of Defendants and that Plaintiff was not receiving proper and complete compensation for the labor provided, then Defendants should have known that Plaintiff was working for the benefit of Defendants and that Plaintiff was not receiving proper and complete compensation for the labor performed.

103. Despite the fact that Defendants knew, or should have known, that Plaintiff was performing work for Defendants' benefit and not being properly compensated, Defendants allowed Plaintiff to perform this work and failed to properly compensate her pursuant to the applicable wage laws.

104. The basis for Defendants' actual knowledge that Plaintiff was not being properly compensated for all hours worked includes the fact that Defendants approved, instituted and enforced the illegal pay practices described more fully herein.

105. The basis for Defendants' actual knowledge that Plaintiff was not being properly compensated for all hours worked includes the fact that Defendants specifically instructed Plaintiff not to record all hours worked.

106. On information and belief, additional bases corroborating Plaintiff's claims of willfulness will be identified during discovery in this matter. As such, Plaintiff specifically reserves the right to amend her Complaint in order to add further allegations of willfulness as discovery proceeds.

DAMAGE DEMAND ESTIMATE

107. Plaintiff seeks the maximum amount of damages to which she is entitled and capable of recovering under all applicable laws based upon the Counts alleged herein.

108. The information necessary to calculate Plaintiff's losses is, on information and belief, in large part presently in the exclusive possession of Defendants.

109. Notwithstanding the above, Plaintiff's best estimate as to the total damages she has incurred is in the amount of approximately \$80,000 and, therefore, Plaintiff demands payment of same, in addition to all other relief demanded herein.

110. Plaintiff reserves the right to amend her damage demand any time prior to trial and after having had the opportunity to conduct full discovery in this matter.

COUNT I
Maryland Wage and Hour Law
Md. Code Ann., Lab & Empl. § 3-401, et seq.

111. Plaintiff hereby incorporates all allegations set forth in all of the foregoing paragraphs as though fully alleged herein.

112. Plaintiff, who was not paid for all hours actually worked, is protected by the MWHL, and is entitled to be paid at the proper regular and overtime hourly rate for each hour worked. Md. Code Ann., Lab & Empl. § 3-413(b).

113. Defendants did not compensate Plaintiff at the appropriate regular or overtime hourly rate for each hour worked in excess of 40 during a single workweek. *Id.* at §§ 3-415(a), 3-420.

114. Defendants did not compensate Plaintiff at the legally required minimum wage rate for each hour worked.

115. Defendants' failure to pay Plaintiff the appropriate wages for all hours worked violated MWHL. *Id.* at § 3-413(b).

116. Defendants' failure to accurately track and record the hours worked by Plaintiff violated the MWHL.

117. Plaintiff was entitled to be compensated for all hours worked and to be compensated at 1.5 times the regular hourly wage rate for each hour worked over 40 in a single workweek. *Id.* at §§ 3-415, 3-420.

118. Defendants' failure to compensate Plaintiff at the appropriate regular hourly wage rate for each hour worked violated the MWHL. *Id.*

119. Defendants' failure to compensate Plaintiff at 1.5 times the regular hourly wage for each hour in excess of 40 hours per workweek violated MWHL. *Id.*

120. As the direct and proximate result of Defendants' violations of the MWHL, Plaintiff suffered significant damages.

121. Pursuant to the MWHL, Defendant is liable to Plaintiff for all hours worked which were not compensated and for the difference between the wages paid and the wages required by statute, plus reasonable attorneys' fees, pre- and post-judgment interest, fees and costs. *Id.* at § 3-427.

WHEREFORE, Plaintiff respectfully requests that this Court enter a judgment awarding Plaintiff:

a. Unpaid wages due under the MWHL (including unpaid regular-time, minimum wage and overtime wages);

- b. Treble, or alternatively liquidated, damages multiplied times the unpaid wages due and owing;
- c. Pre- and post-judgment interest;
- d. Reasonable attorneys' fees and costs incurred in pursuing this action; and
- e. Such other and further relief as this Court deems necessary and proper.

COUNT II
Fair Labor Standards Act of 938
29 U.S.C. § 201, et seq.

122. Plaintiff hereby incorporates all allegations set forth in all of the foregoing paragraphs as though fully alleged herein.

123. Defendants willfully and/or intentionally failed and/or refused to pay Plaintiff the regular, minimum wage and overtime wages which Plaintiff was due and owed pursuant to the FLSA.

124. Defendants' actions were taken with willful disregard for the rights of Plaintiff under the FLSA.

125. Defendants' failure to accurately track and record the hours worked by Plaintiff violated FLSA.

126. As a result of Defendants' unlawful conduct, Plaintiff suffered a loss of wages.

127. For violating the FLSA, Plaintiff is entitled to recover from Defendants—in addition to the money judgment awarded for unpaid regular, minimum wage and overtime compensation—an additional equal amount as liquidated damages and interest on the monies due and owing. *See* 29 U.S.C. § 216(b).

128. The FLSA further provides that Plaintiff shall be awarded reasonable attorneys' fees and the costs of this action. *See id.*

WHEREFORE, Plaintiff respectfully requests that this Court enter a judgment awarding Plaintiff:

- a. Unpaid wages due under the FLSA (including unpaid regular-time, minimum wage and overtime wages);
- b. Liquidated damages multiplied times the unpaid wages due and owing;
- c. Pre- and post-judgment interest;
- d. Reasonable attorneys' fees and costs incurred in pursuing this action; and
- e. Such other and further relief as this Court deems necessary and proper.

JURY DEMAND

129. Plaintiff demands a trial by jury on all issues triable to a jury.

Respectfully submitted,

/s/ Judd G. Millman

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