

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

JOSE AGEO LUNA VANEGAS,
on behalf of himself and all
others similarly situated,

Case No. 21-cv-54

Plaintiff,

v.

SIGNET BUILDERS, INC.,

Defendant.

**PLAINTIFF'S MOTION FOR CONDITIONAL CERTIFICATION
AS A COLLECTIVE ACTION UNDER 29 USC 216(b)
AND FOR APPROVAL OF NOTICE TO PROPOSED CLASS**

Plaintiff, on behalf of himself and others similarly situated, moves this Court to:

(1) conditionally certify this action as a collective action under the FLSA, 29 U.S.C. §216(b); (2) approve the Plaintiff's Proposed Notice; (3) approve the Plaintiff's plan to distribute Proposed Notice by means other than U.S. mail, including via text message, by posting notices in employer provided housing, and by delivering notices from within Mexico; (4) direct Defendant to post a notice in common areas in all housing locations currently occupied by its H-2A workers; (5) direct Defendant to produce to Plaintiff's counsel within 14 days of the Court's order the names, dates of employment, last-known addresses, and any known telephone numbers for prospective class members; and (6) allow a six-month opt-in period from the date of distribution of the notice.

Plaintiff requests Court directed notice to the following individuals: All H-2A workers employed by Signet Builders, Inc. in 2019-2020.

This motion is supported by the memorandum of law, declarations, and exhibits in docket entries #16-19.

Dated this 12th day of March 2021.

Respectfully submitted,

By: /s/ Erica L. Sweitzer-Beckman
Erica L. Sweitzer-Beckman
One of Plaintiff's Attorneys

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