

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TENNESSEE  
EASTERN DIVISION**

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RANDALL HOLLIS & STEVEN EBERLINE  
on behalf of themselves and all other similarly  
situated employees,

Plaintiffs,

v.

Case No. 1:13-cv-1077-JDB-egb

DUMP CABLE, INC. &  
RAGHID BAKER ARDAHJI,

Defendants.

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**CONSENT ORDER CONDITIONALLY  
CERTIFYING CASE AS FLSA COLLECTIVE ACTION**

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BY AGREEMENT AND CONSENT of the parties, the Court hereby orders:

1. That this case, brought under the Fair Labor Standards Act (FLSA), is conditionally certified as a collective action under 29 U.S.C. § 216(b);
2. That Defendants will provide Plaintiffs, within twenty (20) days of the entry of this Consent Order, a list of names, last known addresses, telephone numbers (home and cell), email addresses, and the last four digits of their Social Security numbers for all alleged “independent contractors” who performed work for the Defendants during the three (3) years prior to March 1, 2013 or who are currently employed;
3. That the attached agreed court approved notice (Exhibit A) and opt-in Plaintiff consent form (Exhibit B) will be sent to all alleged “independent contractors” who performed work for the Defendants from March 1, 2010 to the present;

4. That Plaintiffs will mail the court approved notice on or before ten (10) days after the Defendants produce the list of “independent contractors” to Plaintiffs, and that the opt-in period will run for sixty (60) days thereafter;

5. That Plaintiffs will be permitted to send one (1) reminder letter twenty (20) days before the expiration of the opt-in period.

6. That the opt-in Plaintiffs’ consent forms will be deemed “filed” on the date they are postmarked;

7. That Defendants will include the court approved notice with each alleged independent contractor’s next scheduled paycheck so that they can assert their claims, if any, on a timely basis as part of this litigation; and,

8. That the statute of limitations for the putative class is tolled as of the date this Consent Order is entered.

**s/ J. Daniel Breen**  
U.S. District Court Judge

Date: April 16, 2013

**APPROVED FOR ENTRY:**

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