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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

_____, Individually and on
behalf of all others similarly situated,

Plaintiff,

v.

ASGN INCORPORATED and PETER
T. DAMERIS,

Defendants.

Case No. DRAFT

**CLASS ACTION COMPLAINT
FOR VIOLATIONS OF THE
FEDERAL SECURITIES LAWS**

JURY TRIAL DEMANDED

1 Plaintiff _____ (“Plaintiff”), individually and on behalf of all others
2 similarly situated, by and through his attorneys, alleges the following upon
3 information and belief, except as to those allegations concerning Plaintiff, which are
4 alleged upon personal knowledge. Plaintiff’s information and belief is based upon,
5 among other things, his counsel’s investigation, which includes without limitation:
6 (a) review and analysis of regulatory filings made by ASGN Incorporated (“ASGN”
7 or the “Company”) with the United States (“U.S.”) Securities and Exchange
8 Commission (“SEC”); (b) review and analysis of press releases and media reports
9 issued by and disseminated by ASGN; and (c) review of other publicly available
10 information concerning ASGN.

11 **NATURE OF THE ACTION AND OVERVIEW**

12 1. This is a class action on behalf of persons and entities that acquired
13 ASGN securities between April 24, 2019 and May 24, 2019, inclusive (the “Class
14 Period”), seeking to pursue remedies under the Securities Exchange Act of 1934
15 (the “Exchange Act”).

16 2. ASGN purports to provide information technology and professional
17 staffing services in the technology, digital, creative, engineering, and life sciences
18 fields.

19 3. On April 24, 2019, after the market closed, ASGN announced that
20 Peter T. Dameris (“Dameris”) had resigned as Chief Executive Officer (“CEO”) but
21 would continue serving as a director and advisor to the Company.

22 4. On this news, the Company’s share price fell \$4.72, or nearly 7%, to
23 close at \$63.24 per share on April 25, 2019, on unusually heavy trading volume.

24 5. On May 24, 2019, after the market closed, the Company disclosed that
25 Dameris was being investigated by the U.S. Attorney’s Office in Boston,
26 Massachusetts.

27 6. Before the market opened the next trading session, on May 28, 2019,
28 the Company disclosed that Dameris resigned as director.

1 Judicial District. Many of the acts charged herein, including the dissemination of
2 materially false and/or misleading information, occurred in substantial part in this
3 Judicial District.

4 13. In connection with the acts, transactions, and conduct alleged herein,
5 Defendants directly and indirectly used the means and instrumentalities of interstate
6 commerce, including the United States mail, interstate telephone communications,
7 and the facilities of a national securities exchange.

8 PARTIES

9 14. Plaintiff _____, as set forth in the accompanying certification,
10 incorporated by reference herein, purchased ASGN securities during the Class
11 Period, and suffered damages as a result of the federal securities law violations and
12 false and/or misleading statements and/or material omissions alleged herein.

13 15. Defendant ASGN is incorporated under the laws of Delaware and its
14 principal executive offices are located in Calabasas, California. ASGN's common
15 stock trades on the NYSE exchange under the symbol "ASGN."

16 16. Defendant Dameris, also referred to hereinafter as the "Individual
17 Defendant," was the CEO of the Company from September 2004 to April 30, 2019.
18 Defendant Dameris because of his position with the Company, possessed the power
19 and authority to control the contents of the Company's reports to the SEC, press
20 releases and presentations to securities analysts, money and portfolio managers and
21 institutional investors, *i.e.*, the market. The Individual Defendant was provided with
22 copies of the Company's reports and press releases alleged herein to be misleading
23 prior to, or shortly after, their issuance and had the ability and opportunity to prevent
24 their issuance or cause them to be corrected. Because of his position and access to
25 material non-public information available to her, the Individual Defendant knew that
26 the adverse facts specified herein had not been disclosed to, and were being
27 concealed from, the public, and that the positive representations which were being
28

1 made were then materially false and/or misleading. The Individual Defendant is
2 liable for the false statements pleaded herein.

3 **SUBSTANTIVE ALLEGATIONS**

4 **Background**

5 17. ASGN purports to provide information technology and professional
6 staffing services in the technology, digital, creative, engineering, and life sciences
7 fields.

8 **Materially False and** 9 **Misleading Statements Issued During the Class Period**

10 18. The Class Period begins on April 24, 2019. On that day, the Company
11 announced that Dameris had resigned as Chief Executive Officer (“CEO”) but
12 would continue serving as a director and advisor to the Company. In a press release,
13 the Company stated, in relevant part:

14 ASGN also announced today that its Chief Executive Officer, Peter T.
15 Dameris, advised the Board of Directors that he will step down from
16 his role as CEO of the Company effective April 30, 2019. The Board
17 has appointed Theodore “Ted” S. Hanson, currently President of
18 ASGN, to serve as CEO. Mr. Dameris will continue as a member of the
19 Company’s Board and as an adviser to the Company.

20 Mr. Dameris told the Company his youngest son, who has been battling
21 acute myeloid leukemia for over a year, will require additional medical
22 treatment. After a successful stem cell transplant in August 2018, Mr.
23 Dameris’ son’s leukemia has returned, and the family is currently
24 assisting their son with aggressive medical treatment.

25 Mr. Dameris stated, “It has been my honor to guide this company and
26 its talented employees for the past 15 years. At this time, I must step
27 back so that I can devote all of my time and energy to what is most
28 important-my children’s health and my family’s welfare.

“For the past two years, I have worked closely with Ted to introduce
him to the analyst and investor community and he has played an
integral role in helping set the company’s strategy and long-term
business objectives. I have every confidence that this transition will be

1 seamless and that ASGN will continue to thrive under Ted's
2 leadership."

3 Jeremy M. Jones, Chairman of the Board of Directors, stated, "Peter
4 has fearlessly grown and tirelessly served this company for over 15
5 years, and we will still benefit from his experience in his roles on the
Board and as an adviser to the Company."

6 19. On this news, the Company's share price fell \$4.72, or nearly 7%, to
7 close at \$63.24 per share on April 25, 2019, on unusually heavy trading volume.

8 20. The above statements identified in ¶18 were materially false and/or
9 misleading, and failed to disclose material adverse facts about the Company's
10 business, operations, and prospects. Specifically, Defendants failed to disclose to
11 investors: (1) that Dameris resigned as CEO due to his involvement in the college
12 admissions scandal; (2) that Dameris was likely to plead guilty in the college
13 admissions investigation; (3) that, despite the criminal misconduct, Dameris would
14 continue to serve as a director of the Company; and (4) that, as a result of the
15 foregoing, Defendants' positive statements about the Company's business,
16 operations, and prospects were materially false and/or misleading and/or lacked a
17 reasonable basis.

18 **Disclosures at the End of the Class Period**

19 21. On May 24, 2019, after the market closed, the Company disclosed that
20 Dameris was being investigated by the U.S. Attorney's Office in Boston,
21 Massachusetts. In a Form 8-K filed with the SEC, the Company stated, in relevant
22 part:

23 On April 24, 2019, the Company announced that Peter T. Dameris
24 advised the Company's Board of Directors that he would step down
25 from his role as Chief Executive Officer of the Company effective
26 April 30, 2019. The Company has been informed that Mr. Dameris'
27 resignation was the subject of negotiations between his counsel and the
28 United States Attorney's Office in Boston, Massachusetts, which has
been investigating Mr. Dameris as a target in connection with the
college admissions investigation.

1 22. Before the market opened the next trading session, on May 28, 2019,
2 the Company disclosed that Dameris resigned as director. In a Form 8-K filed with
3 the SEC, the Company stated, in relevant part:

4 On May 28, 2019, Peter T. Dameris, informed ASGN Incorporated (the
5 “Company”) that he is resigning as a Director of the Company effective
6 immediately. The Company is negotiating a transition agreement with
7 Mr. Dameris.

8 23. On this news, the Company’s share price fell \$3.10, nearly 6%, to close
9 at \$51.20 per share on May 28, 2019, on unusually heavy trading volume.

10 **CLASS ACTION ALLEGATIONS**

11 24. Plaintiff brings this action as a class action pursuant to Federal Rule of
12 Civil Procedure 23(a) and (b)(3) on behalf of a class, consisting of all persons and
13 entities that acquired ASGN securities between April 24, 2019 and May 24, 2019,
14 inclusive, and who were damaged thereby (the “Class”). Excluded from the Class
15 are Defendants, the officers and directors of the Company, at all relevant times,
16 members of their immediate families and their legal representatives, heirs,
17 successors, or assigns, and any entity in which Defendants have or had a controlling
18 interest.

19 25. The members of the Class are so numerous that joinder of all members
20 is impracticable. Throughout the Class Period, ASGN’s common stock actively
21 traded on the NYSE. While the exact number of Class members is unknown to
22 Plaintiff at this time and can only be ascertained through appropriate discovery,
23 Plaintiff believes that there are at least hundreds or thousands of members in the
24 proposed Class. Millions of ASGN common stock were traded publicly during the
25 Class Period on the NYSE. Record owners and other members of the Class may be
26 identified from records maintained by ASGN or its transfer agent and may be
27 notified of the pendency of this action by mail, using the form of notice similar to
28 that customarily used in securities class actions.

1 26. Plaintiff's claims are typical of the claims of the members of the Class
2 as all members of the Class are similarly affected by Defendants' wrongful conduct
3 in violation of federal law that is complained of herein.

4 27. Plaintiff will fairly and adequately protect the interests of the members
5 of the Class and has retained counsel competent and experienced in class and
6 securities litigation.

7 28. Common questions of law and fact exist as to all members of the Class
8 and predominate over any questions solely affecting individual members of the
9 Class. Among the questions of law and fact common to the Class are:

10 (a) whether the federal securities laws were violated by Defendants' acts as
11 alleged herein;

12 (b) whether statements made by Defendants to the investing public during
13 the Class Period omitted and/or misrepresented material facts about the business,
14 operations, and prospects of ASGN; and

15 (c) to what extent the members of the Class have sustained damages and
16 the proper measure of damages.

17 29. A class action is superior to all other available methods for the fair and
18 efficient adjudication of this controversy since joinder of all members is
19 impracticable. Furthermore, as the damages suffered by individual Class members
20 may be relatively small, the expense and burden of individual litigation makes it
21 impossible for members of the Class to individually redress the wrongs done to
22 them. There will be no difficulty in the management of this action as a class action.

23 **UNDISCLOSED ADVERSE FACTS**

24 30. The market for ASGN's securities was open, well-developed and
25 efficient at all relevant times. As a result of these materially false and/or misleading
26 statements, and/or failures to disclose, ASGN's securities traded at artificially
27 inflated prices during the Class Period. Plaintiff and other members of the Class
28 purchased or otherwise acquired ASGN's securities relying upon the integrity of the

1 market price of the Company's securities and market information relating to ASGN,
2 and have been damaged thereby.

3 31. During the Class Period, Defendants materially misled the investing
4 public, thereby inflating the price of ASGN's securities, by publicly issuing false
5 and/or misleading statements and/or omitting to disclose material facts necessary to
6 make Defendants' statements, as set forth herein, not false and/or misleading. The
7 statements and omissions were materially false and/or misleading because they
8 failed to disclose material adverse information and/or misrepresented the truth about
9 ASGN's business, operations, and prospects as alleged herein.

10 32. At all relevant times, the material misrepresentations and omissions
11 particularized in this Complaint directly or proximately caused or were a substantial
12 contributing cause of the damages sustained by Plaintiff and other members of the
13 Class. As described herein, during the Class Period, Defendants made or caused to
14 be made a series of materially false and/or misleading statements about ASGN's
15 financial well-being and prospects. These material misstatements and/or omissions
16 had the cause and effect of creating in the market an unrealistically positive
17 assessment of the Company and its financial well-being and prospects, thus causing
18 the Company's securities to be overvalued and artificially inflated at all relevant
19 times. Defendants' materially false and/or misleading statements during the Class
20 Period resulted in Plaintiff and other members of the Class purchasing the
21 Company's securities at artificially inflated prices, thus causing the damages
22 complained of herein when the truth was revealed.

23 **LOSS CAUSATION**

24 33. Defendants' wrongful conduct, as alleged herein, directly and
25 proximately caused the economic loss suffered by Plaintiff and the Class.

26 34. During the Class Period, Plaintiff and the Class purchased ASGN's
27 securities at artificially inflated prices and were damaged thereby. The price of the
28 Company's securities significantly declined when the misrepresentations made to

1 the market, and/or the information alleged herein to have been concealed from the
2 market, and/or the effects thereof, were revealed, causing investors' losses.

3 **SCIENTER ALLEGATIONS**

4 35. As alleged herein, Defendants acted with scienter since Defendants
5 knew that the public documents and statements issued or disseminated in the name
6 of the Company were materially false and/or misleading; knew that such statements
7 or documents would be issued or disseminated to the investing public; and
8 knowingly and substantially participated or acquiesced in the issuance or
9 dissemination of such statements or documents as primary violations of the federal
10 securities laws. As set forth elsewhere herein in detail, the Individual Defendant, by
11 virtue of his receipt of information reflecting the true facts regarding ASGN, his
12 control over, and/or receipt and/or modification of ASGN's allegedly materially
13 misleading misstatements and/or his associations with the Company which made
14 them privy to confidential proprietary information concerning ASGN, participated
15 in the fraudulent scheme alleged herein.

16 **APPLICABILITY OF PRESUMPTION OF RELIANCE**

17 **(FRAUD-ON-THE-MARKET DOCTRINE)**

18 36. The market for ASGN's securities was open, well-developed and
19 efficient at all relevant times. As a result of the materially false and/or misleading
20 statements and/or failures to disclose, ASGN's securities traded at artificially
21 inflated prices during the Class Period. On May 24, 2019, the Company's share
22 price closed at a Class Period high of \$67.96 per share. Plaintiff and other members
23 of the Class purchased or otherwise acquired the Company's securities relying upon
24 the integrity of the market price of ASGN's securities and market information
25 relating to ASGN, and have been damaged thereby.

26 37. During the Class Period, the artificial inflation of ASGN's shares was
27 caused by the material misrepresentations and/or omissions particularized in this
28 Complaint causing the damages sustained by Plaintiff and other members of the

1 Class. As described herein, during the Class Period, Defendants made or caused to
2 be made a series of materially false and/or misleading statements about ASGN's
3 business, prospects, and operations. These material misstatements and/or omissions
4 created an unrealistically positive assessment of ASGN and its business, operations,
5 and prospects, thus causing the price of the Company's securities to be artificially
6 inflated at all relevant times, and when disclosed, negatively affected the value of
7 the Company shares. Defendants' materially false and/or misleading statements
8 during the Class Period resulted in Plaintiff and other members of the Class
9 purchasing the Company's securities at such artificially inflated prices, and each of
10 them has been damaged as a result.

11 38. At all relevant times, the market for ASGN's securities was an efficient
12 market for the following reasons, among others:

13 (a) ASGN shares met the requirements for listing, and was listed and
14 actively traded on the NYSE, a highly efficient and automated market;

15 (b) As a regulated issuer, ASGN filed periodic public reports with the SEC
16 and/or the NYSE;

17 (c) ASGN regularly communicated with public investors via established
18 market communication mechanisms, including through regular dissemination of
19 press releases on the national circuits of major newswire services and through other
20 wide-ranging public disclosures, such as communications with the financial press
21 and other similar reporting services; and/or

22 (d) ASGN was followed by securities analysts employed by brokerage
23 firms who wrote reports about the Company, and these reports were distributed to
24 the sales force and certain customers of their respective brokerage firms. Each of
25 these reports was publicly available and entered the public marketplace.

26 39. As a result of the foregoing, the market for ASGN's securities promptly
27 digested current information regarding ASGN from all publicly available sources
28 and reflected such information in ASGN's share price. Under these circumstances,

1 all purchasers of ASGN’s securities during the Class Period suffered similar injury
2 through their purchase of ASGN’s securities at artificially inflated prices and a
3 presumption of reliance applies.

4 40. A Class-wide presumption of reliance is also appropriate in this action
5 under the Supreme Court’s holding in *Affiliated Ute Citizens of Utah v. United*
6 *States*, 406 U.S. 128 (1972), because the Class’s claims are, in large part, grounded
7 on Defendants’ material misstatements and/or omissions. Because this action
8 involves Defendants’ failure to disclose material adverse information regarding the
9 Company’s business operations and financial prospects—information that
10 Defendants were obligated to disclose—positive proof of reliance is not a
11 prerequisite to recovery. All that is necessary is that the facts withheld be material
12 in the sense that a reasonable investor might have considered them important in
13 making investment decisions. Given the importance of the Class Period material
14 misstatements and omissions set forth above, that requirement is satisfied here.

15 **NO SAFE HARBOR**

16 41. The statutory safe harbor provided for forward-looking statements
17 under certain circumstances does not apply to any of the allegedly false statements
18 pleaded in this Complaint. The statements alleged to be false and misleading herein
19 all relate to then-existing facts and conditions. In addition, to the extent certain of
20 the statements alleged to be false may be characterized as forward looking, they
21 were not identified as “forward-looking statements” when made and there were no
22 meaningful cautionary statements identifying important factors that could cause
23 actual results to differ materially from those in the purportedly forward-looking
24 statements. In the alternative, to the extent that the statutory safe harbor is
25 determined to apply to any forward-looking statements pleaded herein, Defendants
26 are liable for those false forward-looking statements because at the time each of
27 those forward-looking statements was made, the speaker had actual knowledge that
28 the forward-looking statement was materially false or misleading, and/or the

1 forward-looking statement was authorized or approved by an executive officer of
2 ASGN who knew that the statement was false when made.

3 **FIRST CLAIM**

4 **Violation of Section 10(b) of The Exchange Act and**
5 **Rule 10b-5 Promulgated Thereunder**

6 **Against All Defendants**

7 42. Plaintiff repeats and re-alleges each and every allegation contained
8 above as if fully set forth herein.

9 43. During the Class Period, Defendants carried out a plan, scheme and
10 course of conduct which was intended to and, throughout the Class Period, did: (i)
11 deceive the investing public, including Plaintiff and other Class members, as alleged
12 herein; and (ii) cause Plaintiff and other members of the Class to purchase ASGN's
13 securities at artificially inflated prices. In furtherance of this unlawful scheme, plan
14 and course of conduct, Defendants, and each defendant, took the actions set forth
15 herein.

16 44. Defendants (i) employed devices, schemes, and artifices to defraud; (ii)
17 made untrue statements of material fact and/or omitted to state material facts
18 necessary to make the statements not misleading; and (iii) engaged in acts, practices,
19 and a course of business which operated as a fraud and deceit upon the purchasers of
20 the Company's securities in an effort to maintain artificially high market prices for
21 ASGN's securities in violation of Section 10(b) of the Exchange Act and Rule 10b-
22 5. All Defendants are sued either as primary participants in the wrongful and illegal
23 conduct charged herein or as controlling persons as alleged below.

24 45. Defendants, individually and in concert, directly and indirectly, by the
25 use, means or instrumentalities of interstate commerce and/or of the mails, engaged
26 and participated in a continuous course of conduct to conceal adverse material
27 information about ASGN's financial well-being and prospects, as specified herein.

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1 46. Defendants employed devices, schemes and artifices to defraud, while
2 in possession of material adverse non-public information and engaged in acts,
3 practices, and a course of conduct as alleged herein in an effort to assure investors of
4 ASGN's value and performance and continued substantial growth, which included
5 the making of, or the participation in the making of, untrue statements of material
6 facts and/or omitting to state material facts necessary in order to make the
7 statements made about ASGN and its business operations and future prospects in
8 light of the circumstances under which they were made, not misleading, as set forth
9 more particularly herein, and engaged in transactions, practices and a course of
10 business which operated as a fraud and deceit upon the purchasers of the Company's
11 securities during the Class Period.

12 47. The Individual Defendant's primary liability and controlling person
13 liability arises from the following facts: (i) the Individual Defendant was a high-
14 level executive and/or director at the Company during the Class Period and member
15 of the Company's management team or had control thereof; (ii) the Individual
16 Defendant by virtue of his responsibilities and activities as a senior officer and/or
17 director of the Company, was privy to and participated in the creation, development
18 and reporting of the Company's internal budgets, plans, projections and/or reports;
19 (iii) the Individual Defendant enjoyed significant personal contact and familiarity
20 with the other defendants and was advised of, and had access to, other members of
21 the Company's management team, internal reports and other data and information
22 about the Company's finances, operations, and sales at all relevant times; and (iv)
23 the Individual Defendant was aware of the Company's dissemination of information
24 to the investing public which they knew and/or recklessly disregarded was
25 materially false and misleading.

26 48. Defendants had actual knowledge of the misrepresentations and/or
27 omissions of material facts set forth herein, or acted with reckless disregard for the
28 truth in that they failed to ascertain and to disclose such facts, even though such

1 facts were available to them. Such defendants' material misrepresentations and/or
2 omissions were done knowingly or recklessly and for the purpose and effect of
3 concealing ASGN's financial well-being and prospects from the investing public
4 and supporting the artificially inflated price of its securities. As demonstrated by
5 Defendants' overstatements and/or misstatements of the Company's business,
6 operations, financial well-being, and prospects throughout the Class Period,
7 Defendants, if they did not have actual knowledge of the misrepresentations and/or
8 omissions alleged, were reckless in failing to obtain such knowledge by deliberately
9 refraining from taking those steps necessary to discover whether those statements
10 were false or misleading.

11 49. As a result of the dissemination of the materially false and/or
12 misleading information and/or failure to disclose material facts, as set forth above,
13 the market price of ASGN's securities was artificially inflated during the Class
14 Period. In ignorance of the fact that market prices of the Company's securities were
15 artificially inflated, and relying directly or indirectly on the false and misleading
16 statements made by Defendants, or upon the integrity of the market in which the
17 securities trades, and/or in the absence of material adverse information that was
18 known to or recklessly disregarded by Defendants, but not disclosed in public
19 statements by Defendants during the Class Period, Plaintiff and the other members
20 of the Class acquired ASGN's securities during the Class Period at artificially high
21 prices and were damaged thereby.

22 50. At the time of said misrepresentations and/or omissions, Plaintiff and
23 other members of the Class were ignorant of their falsity, and believed them to be
24 true. Had Plaintiff and the other members of the Class and the marketplace known
25 the truth regarding the problems that ASGN was experiencing, which were not
26 disclosed by Defendants, Plaintiff and other members of the Class would not have
27 purchased or otherwise acquired their ASGN securities, or, if they had acquired such
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1 securities during the Class Period, they would not have done so at the artificially
2 inflated prices which they paid.

3 51. By virtue of the foregoing, Defendants violated Section 10(b) of the
4 Exchange Act and Rule 10b-5 promulgated thereunder.

5 52. As a direct and proximate result of Defendants' wrongful conduct,
6 Plaintiff and the other members of the Class suffered damages in connection with
7 their respective purchases and sales of the Company's securities during the Class
8 Period.

9 **SECOND CLAIM**

10 **Violation of Section 20(a) of The Exchange Act**

11 **Against the Individual Defendant**

12 53. Plaintiff repeats and re-alleges each and every allegation contained
13 above as if fully set forth herein.

14 54. The Individual Defendant acted as a controlling person of ASGN
15 within the meaning of Section 20(a) of the Exchange Act as alleged herein. By
16 virtue of their high-level positions and their ownership and contractual rights,
17 participation in, and/or awareness of the Company's operations and intimate
18 knowledge of the false financial statements filed by the Company with the SEC and
19 disseminated to the investing public, Individual Defendant had the power to
20 influence and control and did influence and control, directly or indirectly, the
21 decision-making of the Company, including the content and dissemination of the
22 various statements which Plaintiff contends are false and misleading. Individual
23 Defendant was provided with or had unlimited access to copies of the Company's
24 reports, press releases, public filings, and other statements alleged by Plaintiff to be
25 misleading prior to and/or shortly after these statements were issued and had the
26 ability to prevent the issuance of the statements or cause the statements to be
27 corrected.

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1 55. In particular, Individual Defendant had direct and supervisory
2 involvement in the day-to-day operations of the Company and, therefore, had the
3 power to control or influence the particular transactions giving rise to the securities
4 violations as alleged herein, and exercised the same.

5 56. As set forth above, ASGN and Individual Defendant each violated
6 Section 10(b) and Rule 10b-5 by their acts and omissions as alleged in this
7 Complaint. By virtue of his position as controlling person, Individual Defendant is
8 liable pursuant to Section 20(a) of the Exchange Act. As a direct and proximate
9 result of Defendants' wrongful conduct, Plaintiff and other members of the Class
10 suffered damages in connection with their purchases of the Company's securities
11 during the Class Period.

12 **PRAYER FOR RELIEF**

13 WHEREFORE, Plaintiff prays for relief and judgment, as follows:

14 (a) Determining that this action is a proper class action under Rule 23 of
15 the Federal Rules of Civil Procedure;

16 (b) Awarding compensatory damages in favor of Plaintiff and the other
17 Class members against all defendants, jointly and severally, for all damages
18 sustained as a result of Defendants' wrongdoing, in an amount to be proven at trial,
19 including interest thereon;

20 (c) Awarding Plaintiff and the Class their reasonable costs and expenses
21 incurred in this action, including counsel fees and expert fees; and

22 (d) Such other and further relief as the Court may deem just and proper.

23 **JURY TRIAL DEMANDED**

24 Plaintiff hereby demands a trial by jury.
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1 DATED: _____, 2019 **GLANCY PRONGAY & MURRAY LLP**

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