

**STATE OF CONNECTICUT**

**RETURN DATE:    OCTOBER 29, 2019**

<b>KIRSTEN SOLONIEWICZ, individually and</b>	<b>:</b>	<b>SUPERIOR COURT</b>
<b>on behalf of all other similarly situated</b>	<b>:</b>	
<b>                  individuals</b>	<b>:</b>	<b>JUDICIAL DISTRICT OF</b>
	<b>:</b>	<b>HARTFORD</b>
	<b>:</b>	
<b>V.</b>	<b>:</b>	
	<b>:</b>	<b>AT HARTFORD</b>
<b>SUGAR FACTORY, LLC and SUGAR FOX</b>	<b>:</b>	
<b>218, LLC</b>	<b>:</b>	
<b>                  Defendants</b>	<b>:</b>	<b>OCTOBER 2, 2019</b>

**CLASS ACTION COMPLAINT**

**I.       INTRODUCTION**

1. Restaurants in Connecticut must pay their servers the full minimum wage and may not take any credit for tips they receive unless they comply with each of Connecticut’s mandatory tip credit regulations. First, a restaurant must allow servers to keep all of their tips. This means no mandatory tip-pooling or “tip out.” Second, the restaurant must record the amount of tip credit they intend to claim each week and must obtain “weekly a statement signed by the employee attesting that he has received in gratuities the amount claimed as a credit for part of the minimum fair wage.” Regs. Conn. State Agencies Sec. 31-62-E3. Finally, a restaurant can only take the tip credit for time the servers are actually being servers – waiting on customers and earning tips. Restaurants may not use servers and their lower minimum wage to perform non-service duties like cleaning and stocking the restaurant. If restaurants assign both service and non-service duties, they must segregate those hours and pay each type of work at the appropriate wage. If they don’t they must pay the full minimum wage for all hours in that shift. Regs., Conn. State Agencies § 31-62-E4; *Stevens v. Vito’s by the Water, LLC*, 2017 Conn. Super. LEXIS 4845, \*10

(Conn. Super. Ct. Nov. 9, 2017) (awarding over \$20,000 in backpay, penalty damages to one server because “Vito’s did not segregate Steven’s non-service work from her service work and thus was obliged to, but did not, pay the service hours at the full minimum fair wage as required by § 31-62-E4.”).

2. Here, Defendants Sugar Factory, LLC and Sugar Fox 218, LLC own and operate a restaurant in Foxwoods Casino. Defendants require their servers to give away thirty 30% of their tips every shift to bartenders, a bar manager, and bussers. Defendants do not record the amount they claimed as credit for gratuities as a separate item in their wage records and do not obtain weekly signed statements attesting that they received sufficient tips to cover the tip credit. Finally, Defendants assigns its servers extensive “non-service” work, including cleaning multiple areas of the restaurant away from the immediate service area where they serve their customers. Defendants do not segregate the time its servers spend performing “non-service” work and pay for that time at the full minimum wage. Despite these obvious failures to comply with our laws, Defendants take the full tip credit for every hour their servers work – paying them \$6.38 rather than \$10.10 per hour. Defendant has retained hundreds of thousands of dollars in wages each year that they should have paid to their servers. This lawsuit seeks to recover these stolen wages and impose penalty damages.

## **II. THE PARTIES**

3. Defendant, Sugar Factory, LLC, is a limited liability company organized and existing under the laws of the State of Nevada, with a principal place of business at 8360 W. Sahara Avenue, Suite 220, Las Vegas, Nevada 861167.

4. Defendant Sugar Factory, LLC owns and operates the website [www.sugarfactory.com](http://www.sugarfactory.com) (“website”).

5. Defendant Sugar Factory, LLC states in its website that it opened the “candy and dining emporium at Foxwoods Resort & Casino in Mashantucket, Connecticut.”

<https://sugarfactory.com/location/foxwoods/>.

6. Defendant Sugar Factory, LLC owns and operates the Sugar Factory restaurant located at Foxwoods Resort & Casino in Mashantucket, Connecticut (hereinafter “Foxwoods Casino Restaurant”).

7. Defendant Sugar Fox 218, LLC is a limited liability company organized under the laws of the state of Delaware, with a principal place of business at 2711 Centerville Road, Suite 400, Wilmington, Delaware 19808.

8. Plaintiff Kirsten Soloniewicz is an adult residing in New London, Connecticut.

9. Soloniewicz has been employed by Defendants as a Server in their Foxwoods Casino Restaurant since July 2018.

10. At all times during the period of the claim, Sugar Factory, LLC was Plaintiff’s employer within the meaning of the Connecticut Minimum Wage Act (“CMWA”).

11. At all times during the period of the claim, Sugar Factory, LLC was the employer of all Connecticut servers working at its Foxwood Casino Restaurant within the meaning of the CMWA.

12. At all times during the period of the claim, Sugar Fox 218, LLC was Plaintiff’s employer within the meaning of the CMWA.

13. At all times during the period of the claim, Sugar Fox 218, LLC was the employer of all Connecticut servers working at its Foxwood Casino Restaurant within the meaning of the CMWA.

### III. THE APPLICABLE LAW

14. Connecticut restaurants cannot take a tip credit from a server's wages unless they comply with each mandatory precondition of Regs., Conn. State Agencies Sec. 31-62-E3 *et seq.* ("Gratuities may be recognized as constituting a part of the minimum fair wage when ***all of the following provisions*** are complied with...").

15. Connecticut regulations also state that employers may not take the tip credit against an employee's tips unless that employee "customarily receives gratuities." Conn. Agencies Reg. § 31-62-E2(c). A gratuity, under the regulations, "means a voluntary monetary contribution received by the employee directly from a guest, patron or customer for services rendered." Conn. Agencies Reg. § 31-62-E2(e). Gratuities distributed pursuant to a "tip pool" cannot be used as a credit against the minimum wage unless "the tip pooling arrangement is voluntary on the part of waiter and waitresses" and "must be initiated and completely controlled by the tipped employees themselves, with no requirement, coercion, or suggestion by the employer." CONN. DEP'T OF LABOR, *Basic Guide to Wage and Hour and Related Laws Regarding the Restaurant Industry*, \*15 (Nov. 2015).

16. Tip pools are also impermissible if they are used to pay managers. *See* Salim Shahriar v. Smith & Wollensky Rest. Group, Inc., 659 F.3d 234, 240 (2d Cir. 2011) (restaurants cannot take a tip credit under the FLSA if they require service employees to share tips with managers).

17. Connecticut regulations prohibit employers from taking credit for a server's tips to satisfy the minimum wage unless the "amount received in gratuities claimed as credit for part of the minimum fair wages [is] recorded on a weekly basis a separate item in the wage record." Regs., Conn. State Agencies Sec. 31-62-E3(b).

18. Connecticut restaurants cannot recognize gratuities as constituting a part of the minimum fair wage for their employees unless they “obtain weekly signed statements of the employee, stating unequivocally that such worker did receive gratuities as herein required, which must be maintained as part of the records of the employer. Such statement shall contain the week ending date of the payroll week for which credit is claimed.” Regs., Conn. State Agencies § 31-62-E3(c).

19. Connecticut restaurants can only take a tip credit for the time their employees are performing “service” or closely related duties. “If an employee performs both service and non-service duties, and the time spent on each is definitely segregated and so recorded, the allowance for gratuities as permitted as part of the minimum fair wage may be applied to the hours worked in the service category.” Regs., Conn. State Agencies § 31-62-E4. If “the time spent on each cannot be definitely segregated and so recorded, or is not definitely segregated and so recorded, no allowances for gratuities may be applied as part of the minimum fair wage.” *Id.*

20. “Non-service” duties include but is not limited to “general set-up work before the restaurant opens,” “and “general cleaning work.” *Stevens v. Vito’s by the Water, LLC*, 2017 Conn. Super. LEXIS 4845, \*3-6 (Conn. Super. Ct. Nov. 9, 2017); CONN. DEP’T OF LABOR, *Gratuities in the Restaurant Industry*, <https://www.ctdol.state.ct.us/wgwkstnd/wage-hour/restaurant.htm>.

#### **IV. FACTS**

21. During the period of this claim, the maximum allowable tip credit a Connecticut restaurant could claim on its servers’ hours has been \$3.72 per hour (Jan. 1, 2017 – present) provided it complies with Connecticut’s tip credit regulations.

22. Defendants took the maximum allowable tip credit (\$3.72/hr.) from the Plaintiff's and all their servers' wages for every hour they worked as servers during the period of the claim.
23. Defendants paid Plaintiff and all Connecticut servers \$6.38 per hour for every hour they worked as servers.
24. Defendants require Plaintiff and all their Connecticut servers to participate in a mandatory tip pool.
25. The participation of Defendants' Connecticut servers in their tip pool is involuntary.
26. Defendants instituted the tip pool operating in their Connecticut restaurant.
27. Defendants require Plaintiff and all Connecticut servers to tip out their bartenders sixteen (16%) of their tips every shift, and bussers fourteen (14%) percent of their tips every shift. In total, Defendants' servers are required to give away thirty (30%) of the tips their customers leave for them every shift.
28. Defendants' bar manager receives tips from Plaintiff, and their other Connecticut servers from this tip pool.
29. Defendants' bar manager can discipline, hire, and fire employees working for Defendants.
30. Defendants require Plaintiff and all Connecticut servers to calculate the amount of tips they owe every shift.
31. Defendants require Plaintiff and all Connecticut servers to fill out a "tip out" form every shift before clocking out.
32. The "tip out" form has a space for Defendants' servers to input their "tips claimed."

33. The “tip out” form has a section entitled “Tipped Out.” In this section, Defendants’ servers input the amount they are giving to Defendants’ bartenders and the amount they are giving to Defendants’ bussers.
34. Defendants’ servers must turn in their completed “tip out” forms to their manager before they can leave for the night.
35. Defendants do not record on weekly basis as a separate item in the Plaintiff, and all Connecticut servers’, wage records, “the amount received in gratuities claimed as credit for part of the minimum wage.”
36. For example, Plaintiff’s paystub for the pay period July 16 through July 29, 2018 does not show the amount Defendants claimed as a tip credit for that pay period.
37. Defendants do not obtain any written statements signed by Plaintiff, or from any of their Connecticut servers, during any week they worked as servers, confirming that they received in gratuities at least the amount Defendants claimed as credit for that payroll period.
38. Defendants assigned Plaintiff and other servers “non-service” work in addition to her “service” work every shift during her employment. Defendants failed to segregate and pay her “non-service” work in the wage record and pay for that time at the full minimum wage. Instead, Defendants took the full tip credit for all hours worked by Plaintiff and all other Connecticut servers – including her “non-service” work – and paid for all that work at \$6.38 per hour.
39. The “non-service” work Defendants require Plaintiff, and their other Connecticut servers to perform during the A.M and P.M. shifts includes, but is not limited to, “bathroom server station,” “kitchen server station,” “beverage station,” “roll up station,” “retail/bar service area,” “candy station,” “back area & DJ booth.”

40. Defendants hang “side work” lists detailing these side work assignments in the restaurant for servers to refer to.
41. Defendants’ Connecticut servers perform these side work assignments away from the tables and booths where they server their customers.
42. Defendants assign their Connecticut servers these, and other side work assignments, every shift and the servers cannot leave until someone else checks their side work to ensure they completed it.
43. This side work takes Plaintiff and Defendants’ Connecticut servers at least 30-60 minutes to complete each shift.
44. As a result of this conduct, Defendants were not allowed to take a tip credit for the wages of the Plaintiff, or any of their Connecticut servers. Defendants impermissibly paid Plaintiff and their other Connecticut servers \$6.38 per hour –\$3.72 per hour less than the Connecticut minimum wage for all their hours worked.

**V. CLASS ALLEGATIONS**

45. Plaintiff sues on behalf of herself and all other members of the Connecticut class pursuant to Practice Book Sections 9-7 and 9-8.
46. The Class is defined as follows: *All current and former employees of Defendants who held the position of server in Connecticut during the two years immediately preceding the filing of this complaint through date of final judgment.*
47. Plaintiff reserves the right to amend said class definition consistent with information obtained through discovery.
48. Class certification for the claims is appropriate under Connecticut’s Practice Book because all of the requirements of those Rules are met:



- (1). The class is so numerous that joinder of all members is impractical. The Defendants have operated their Connecticut restaurant (the Foxwoods Casino Restaurant) during the applicable time period. The Defendants have, on information and belief, over 40 former and/or current employees and/or participants meeting the class definitions set forth above throughout the State of Connecticut.
- (2). There are questions of law and fact common to the class, especially, the questions of whether Defendants required its servers to pool their tips, whether their tips were used to pay managers in Defendants' restaurants, whether Defendants recorded as a separate item in the class' wage records "the amount claimed as credit for gratuities," whether Defendants failed to obtain necessary tip statements from their servers before taking the tip credit from their pay, and whether Defendants assigned non-service work to their servers and failed to pay them the full minimum wage as required by Connecticut law.
- (3). The named Plaintiff's claims are typical of those of the class members. The named Plaintiff's claims encompasses the challenged practices and course of conduct of the Defendants. Furthermore, the named Plaintiff's legal claims are based on the same legal theories as the claims of the putative class members. The legal issues as to whether the CMWA and the applicable regulations of the State of Connecticut Department of Labor are violated by such conduct apply equally to the named Plaintiff and to the class.
- (4). The named Plaintiff will fairly and adequately protect the interests of the class. The named Plaintiff's claims are not antagonistic to those of the putative class and she has hired counsel skilled in the prosecution of class actions.
- (5). Common questions of law and fact predominate over questions affecting only individuals, and a class action is superior to other available methods for the fair and efficient adjudication of this controversy. While the individual compensatory damage suffered by each class member is not insignificant, it is not substantial enough to justify the expense and burden of individual litigation. To conduct this action as a class action under Rule 23 presents few management difficulties, conserves the resources of the parties and the court system, protects the rights of each class member, and maximizes recovery to them.

**COUNT ONE: Kirsten Soloniewicz, individually and on behalf of other similarly situated individuals vs. Sugar Factory, LLC – Violation of the CMWA.**

49. Defendant Sugar Factory, LLC took a tip credit from the wages of the Plaintiff, and all Connecticut servers in its restaurant, for all hours they worked as servers from two years immediately proceeding the filing of this complaint through the date of final judgment.

50. Defendant took a tip credit from Plaintiff, and all its Connecticut servers' wages even though it required Plaintiff and its Connecticut servers to participate in a mandatory tip pool in violation of Regs., Conn. State Agencies Sec. 31-63-E3 as set forth above.
51. Defendant took a tip credit from Plaintiff, and all its Connecticut servers' wages even though it required them to share tips with its bar manager in violation of Regs., Conn. State Agencies Sec. 31-62-E3 as set forth above.
52. Defendant took a tip credit from Plaintiff, and all its Connecticut servers' wages even though it failed to record as a separate item in the wage records for any of their servers, "the amount claimed as credit for gratuities" in violation of Regs., Conn. State Agencies Sec. 31-62-E3(b) as set forth above.
53. Defendant took a tip credit from Plaintiff, and all its Connecticut servers' wages, even though it failed to obtain signed weekly tip statements from Plaintiff and its Connecticut servers in violation of Regs., Conn. State Agencies Sec. 31-62-E3(c) as set forth above.
54. Defendant took a tip credit from the wages of the Plaintiff, and all its Connecticut servers, for all hours they worked as servers from two years immediately preceding the filing of this complaint through the date of final judgment, even though it failed to segregate the "non-service" duties Plaintiff and its Connecticut servers performed in violation of Regs., Conn. State Agencies Sec. 31-62-E4 as set forth above.
55. Defendant's conduct in failing to pay Plaintiff and its other Connecticut servers the full fair minimum wage for each shift was a violation of the CMWA.
56. Defendant's violation of the CMWA, as set forth above, entitles Plaintiff and its other Connecticut servers to payment for all hours worked at "twice the full amount of such

minumum wage [] less any amount actually paid to [them] by the employer, with costs and such reasonable attorney's fees as may be allowed by the court." C.G.S. Sec. 31-68.

**COUNT TWO: Kirsten Soloniewicz, individually and on behalf of other similarly situated individuals vs. Sugar Factory, LLC – Violation of the CMWA.**

57. Defendant Sugar Fox 218, LLC took a tip credit from the wages of the Plaintiff, and all Connecticut servers in its restaurant, for all hours they worked as servers from two years immediately proceeding the filing of this complaint through the date of final judgment.
58. Defendant took a tip credit from Plaintiff, and all its Connecticut servers' wages even though it required Plaintiff and its Connecticut servers to participate in a mandatory tip pool in violation of Regs., Conn. State Agencies Sec. 31-63-E3 as set forth above.
59. Defendant took a tip credit from Plaintiff, and all its Connecticut servers' wages even though it required them to share tips with its bar manager in violation of Regs., Conn. State Agencies Sec. 31-62-E3 as set forth above.
60. Defendant took a tip credit from Plaintiff, and all its Connecticut servers' wages even though it failed to record as a separate item in the wage records for any of their servers, "the amount claimed as credit for grautities" in violation of Regs., Conn. State Agencies Sec. 31-62-E3(b) as set forth above.
61. Defendant took a tip credit from Plaintiff, and all its Connecticut servers' wages, even though it failed to obtain signed weekly tip statements from Plaintiff and its Connecticut servers in violation of Regs., Conn. State Agencies Sec. 31-62-E3(c) as set forth above.
62. Defendant took a tip credit from the wages of the Plaintiff, and all Connecticut servers, for all hours they worked as servers from two years immediately preceding the filing of this complaint through the date of final judgment, even though it failed to segregate the "non-

service” duties Plaintiff and its Connecticut servers performed in violation of Regs., Conn. State Agencies Sec. 31-62-E4 as set forth above.

63. Defendant’s conduct in failing to pay Plaintiff and its other Connecticut servers the full fair minimum wage for each shift was a violation of the CMWA.

64. Defendant’s violation of the CMWA, as set forth above, entitles Plaintiff and its other Connecticut servers to payment for all hours worked at “twice the full amount of such minimum wage [] less any amount actually paid to [them] by the employer, with costs and such reasonable attorney’s fees as may be allowed by the court.” C.G.S. Sec. 31-68.

**COUNT THREE: Kirsten Soloniewicz, individually and on behalf of other similarly situated individuals vs. Sugar Factory, LLC – Statutory Theft (Conn. Gen. Stat. Sec. 52-564) by Taking Tips/Gratuities from the Plaintiff, and all its Connecticut Servers, to Pay its Bar Manager and other employees.**

65. Any person who steals any property of another, or knowingly receives and conceals stolen property, shall pay the owner treble his damages. Conn. Gen. Stat. Sec. 52-564.

66. "Statutory theft under § 52-564 is synonymous with larceny under General Statutes § 53a-119. . . . Pursuant to § 53a-119, [a] person commits larceny when, with intent to deprive another of property or to appropriate the same . . . a third person, he wrongfully takes, obtains or [withholds] such property from an owner.” *Deming v. Nationwide Mut. Ins. Co.*, 279 Conn. 745, 771 (2006).

67. “To prove statutory theft, plaintiffs must demonstrate that (1) defendant intentionally deprived plaintiff of property, (2) the property belonged to plaintiff, and (3) the defendant's conduct was unauthorized.” *Andrade v. Kwon*, 2012 U.S. Dist. LEXIS 106571, 2012 WL 3059616, \*18-20 (D. Conn., Mar. 26, 2012) (granting judgment on statutory theft claim for unauthorized taking of tips).

68. For each shift Plaintiff, and all of Defendant Sugar Factory, LLC's servers worked, Defendant intentionally deprived its servers of thirty (30%) percent of the tips customers left for them.
69. Defendant requires, as a matter of policy, that Plaintiff, and its Connecticut servers, turn over thirty (30%) percent of their tips every shift to bartenders, its bar manager, and bussers.
70. Defendant appropriated these funds and allocated them to its bartenders – including its bar manager – and bussers. In so doing, Defendant benefited by using its Connecticut servers' tips to pay other workers rather than pay them additional money using its own funds.
71. Gratuities are the property of the server the customer left them for. *See Andrade*, 2012 U.S. Dist. LEXIS 106571 at \*19-20 (holding that plaintiffs "pled sufficient facts to establish statutory theft" including that "defendants routinely kept portions of those tips for themselves" without permission).
72. The tips customers left for Plaintiff, and all of Defendant's Connecticut servers, are their property.
73. Defendant's conduct in taking possession of thirty (30%) percent of Plaintiff, and its Connecticut servers' tips was unauthorized.
74. Defendant did not request permission to take possession of Plaintiff, or its Connecticut servers' tips. Defendant simply took those tips as a matter of its policy.
75. As a result, Defendant owes the Plaintiff, and all of its Connecticut servers, all tips deducted pursuant to the unlawfully operated mandatory tip pool for each shift they worked.
76. Defendants' statutory theft, specifically, Conn. Gen. Stat. § 52-564, as set forth above, requires Defendant to pay Plaintiff treble damages for all tips and gratuities which were taken from them to pay its bartenders – including its bar manager – and bussers.

**COUNT FOUR: Kirsten Soloniewicz, individually and on behalf of other similarly situated individuals vs. Sugar Fox 218, LLC – Statutory Theft (Conn. Gen. Stat. Sec. 52-564) by Taking Tips/Gratuities from the Plaintiff, and all its Connecticut Servers, to Pay its Bar Manager and other employees.**

77. Any person who steals any property of another, or knowingly receives and conceals stolen property, shall pay the owner treble his damages. Conn. Gen. Stat. Sec. 52-564.
78. "Statutory theft under § 52-564 is synonymous with larceny under General Statutes § 53a-119. . . . Pursuant to § 53a-119, [a] person commits larceny when, with intent to deprive another of property or to appropriate the same . . . a third person, he wrongfully takes, obtains or [withholds] such property from an owner." *Deming v. Nationwide Mut. Ins. Co.*, 279 Conn. 745, 771 (2006).
79. "To prove statutory theft, plaintiffs must demonstrate that (1) defendant intentionally deprived plaintiff of property, (2) the property belonged to plaintiff, and (3) the defendant's conduct was unauthorized." *Andrade v. Kwon*, 2012 U.S. Dist. LEXIS 106571, 2012 WL 3059616, \*18-20 (D. Conn., Mar. 26, 2012) (granting judgment on statutory theft claim for unauthorized taking of tips).
80. For each shift Plaintiff, and all of Defendant Sugar Fox 218, LLC's servers worked, Defendant intentionally deprived its servers of thirty (30%) percent of the tips customers left for them.
81. Defendant requires, as a matter of policy, that Plaintiff, and its Connecticut servers, turn over thirty (30%) percent of their tips every shift to bartenders, its bar manager, and bussers.
82. Defendant appropriated those funds and allocated them to its bartenders – including its bar manager – and bussers. In so doing, Defendant benefited by using its Connecticut servers' tips to pay other workers rather than pay them additional money using its own funds.

83. Gratuities are the property of the server the customer left them for. *See Andrade*, 2012 U.S. Dist. LEXIS 106571 at \*19-20 (holding that plaintiffs “pled sufficient facts to establish statutory theft” including that “defendants routinely kept portions of those tips for themselves” without permission).
84. The tips customers left for Plaintiff, and all of Defendant’s Connecticut servers, are their property.
85. Defendant’s conduct in taking possession of thirty (30%) percent of Plaintiff, and its Connecticut servers’ tips was unauthorized.
86. Defendant did not request permission to take possession of Plaintiff, or its Connecticut servers’ tips. Defendant simply took those tips as a matter of its policy.
87. As a result, Defendant owes the Plaintiff, and all of its Connecticut servers, all tips deducted pursuant to the unlawfully operated mandatory tip pool for each shift they worked.
88. Defendants’ statutory theft, specifically, Conn. Gen. Stat. § 52-564, as set forth above, requires Defendant to pay Plaintiff treble damages for all tips and gratuities which were taken from them to pay its bartenders – including its bar manager – and bussers.

## **DEMAND FOR RELIEF**

WHEREFORE, Plaintiff claims:

1. Appointment of Kirsten Soloniewicz as Class Representative;
2. Appointment of the Hayber, McKenna & Dinsmore, LLC as Class Counsel;
3. Unpaid minimum wages under the CMWA;
4. Penalty damages pursuant to Conn. Gen. Stat. Sec. 31-68;
5. Treble damages under Conn. Gen. Stat. § 52-564;
6. Pre-judgment interest and post-judgment interest as provided by law;
7. Reasonable attorney's fees and costs as may be allowed by the court. C.G.S. Sec. 31-68;
8. Reasonable incentive awards for Plaintiff to compensate her for the time she spent attempting to recover wages for the Class and for the risks she took in doing so;
9. Trial by jury for all issues so triable; and
10. Such other relief as in law or equity may pertain.

Plaintiff, Kirsten Soloniewicz, individually and on behalf of others similarly situated

By: 

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**STATE OF CONNECTICUT**

**KIRSTEN SOLONIEWICZ, individually and  
on behalf of all other similarly situated  
individuals**

**V.**

**SUGAR FACTORY, LLC and SUGAR FOX  
218, LLC**

**Defendants**

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**SUPERIOR COURT**

**JUDICIAL DISTRICT OF  
HARTFORD**

**AT HARTFORD**

**OCTOBER 2, 2019**

### **STATEMENT OF AMOUNT IN DEMAND**

WHEREFORE, Plaintiff claims a cause of action seeking damages not less than 15,000.00, exclusive of interests and costs, which cause is within the jurisdiction of the Superior Court.

Plaintiff, Kirsten Soloniewicz, individually and on behalf of others similarly situated

By:

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