

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

GORDON HORNER and ANN MARIE HUDSON,
individually and on behalf of all others similarly
situated,

Plaintiffs,

v.

Little Caesar Enterprises, Inc., Phoenix Nexus
Limited Liability Company, Main St LC LLC, Salina
St SY LC LLC, Onondaga Blvd SY LC LLC, Manlius
St SY LC LLC, Wolf St SY LC LLC, Bartell Rd SY
LC LLC, Second St SY LC LLC, State RT SY LC
LLC, North ST SY LC LLC, Seventh ST SY LC LLC,
Central Ave SY LC LLC, Oswego RD SY LC LLC,
Main St SY LC LLC, and ABC CORPORATIONS 1-
100.

Defendants.

No. 5:22-cv-1324-AJB-TWD

CONSENT TO JOIN FORM

Court-imposed deadline for filing this consent form is SEPTEMBER 15, 2025.

Print Name: _____

1. I consent, agree, and opt-in to the lawsuit filed against Defendants Phoenix Nexus Limited Liability Company, Main St LC LLC, Salina St SY LC LLC, Onondaga Blvd SY LC LLC, Manlius St SY LC LLC, Wolf St SY LC LLC, Bartell Rd SY LC LLC, Second St SY LC LLC, State RT SY LC LLC, North ST SY LC LLC, Seventh ST SY LC LLC, Central Ave SY LC LLC, Oswego RD SY LC LLC, Main St SY LC LLC (collectively "Defendants"), to pursue my claims of unpaid back wages and overtime under the Fair Labor Standards Act ("FLSA") during the time that I was employed by Defendants.
2. I understand that the Lawsuit is brought under the FLSA, and I consent to be bound by the Court's decision.
3. I designate the attorneys at the law firms of VIRGINIA & AMBINDER, LLP and GATTUSO & CIOTOLI, PLLC as my attorneys to prosecute my wage claims in the Lawsuit.
4. I consent to having the representative Plaintiffs Gordon Horner and Ann Marie Hudson in the complaint against Defendants make all decisions regarding the litigation, the method and manner of conducting this litigation, the terms of any potential settlement of this litigation, releasing of claims, entering into an agreement with Plaintiffs' Counsel regarding attorneys' fees and costs, and all other matters pertaining to this lawsuit.

Signature: _____

Date: _____

Please print or type the following information which will be kept confidential:

ADDRESS

E-MAIL ADDRESS

TELEPHONE NUMBER

ESTIMATED DATES OF EMPLOYMENT

LOCATIONS WORKED

RETURN THIS FORM BY MAIL, E-MAIL, OR FAX TO:

**Michele A. Moreno, Esq.
VIRGINIA & AMBINDER, LLP
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New York, New York 10004
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mmoreno@vandallp.com
RE: Little Caesars**