

1 **COMP**

2 Sarah Grossman-Swenson, SBN 11979

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10 **EIGHTH JUDICIAL DISTRICT COURT**

11 **CLARK COUNTY, NEVADA**

12 DEBRA ADIMEY; LISANDRA AGUERO;
 13 TONY ALEXIEV; ELIDA AMIGO
 14 SANTIESTEBAN; LUIS BEDOYA; LORENA
 15 BELTRAN; JAVIER BENITES; JOSE
 16 BERNAL; JOSE BERNARDINO; PRECIOUS
 17 BRIGGS; MARCOS CANCHE; JOSE
 18 CARDENAS; KELLY CARL; VINCENT
 19 CARVALHO; KENIA COBAS; OSCAR
 20 COLORADO; TRIANA CUNDIFF; NANCY
 21 DAVILA; PAT DE CARBO; MARIA
 22 TORRES DE BALANDRAN; JESUS DE
 23 LEON; NANCY DICKINSON; ELENA
 24 DRAKE GONZALEZ; NADIA EL MAHER;
 25 ORLANDO FERREIRA LAMELAS;
 26 SAMUEL FLETES; VIOLETA ISAI FLORES
 27 DELGADO; AMARILYS GONZALEZ; ROSA
 28 GONZALEZ; YELBA GONZALEZ;
 ANTONIA GUTIERREZ; ELIZABETH
 HALATSIS; ORLANDO HENRIQUEZ; LILA
 HERNANDEZ; MARIA ELENA
 HERNANDEZ; NIDIA HERNANDEZ;
 ALEJANDRO HIGUERA; EMMA HOLTZ;
 GUILLERMO INCLAN; VALERIE
 JORGENSEN; LETICIA LUIS; CARMEN
 MARISCAL; ANDREA MCKEANNEY;

Case No.

**COMPLAINT FOR VIOLATION OF THE
NEVADA HOSPITALITY AND TRAVEL
WORKERS RIGHT TO RETURN ACT
AGAINST STATION CASINOS, LLC**

1 ADALI MEJIA; AUDREY MELTON;
2 ALEXANDRIA MILLER; YAQUELIN
3 MORALES; TERESA OCEGUERA;
4 YOHANNA GABRIELA OSORTO CARIAS;
5 CLAUDIA PEREZ-ZUÑIGA; MARIA
6 PICHARDO; ERIKA RIOS; AMAURY
7 RODRIGUEZ; DAVID LEON RODRIGUEZ;
8 FERNANDO SALAZAR; MARIA
9 SALGADO; YUSETT SALOMON DIAZ;
10 RENE SANCHEZ; CLARA SANCHEZ
11 RECIO; AMANDA SANTOYA; ASHLEY
12 SCHWARTZ; VICTOR HUGO SIMENTAL
13 GARCIA; RODRIGO SOLANO; MICHELLE
14 STRANDE; LUZ TAFOLLA; SERGIO
15 TEJIDO; EDGAR TEVALAN-BARRIOS;
16 BARBARA TIVAS; AURORA TORRES;
17 JOSE VALLE; MARIO VALLES; OSCAR
18 VALLEJO; RAMON VIVANCO; JUAN
19 VIVAS; MARK WALKER; ROSA ZAVALA
20 and DOES I through XX, inclusive;

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Plaintiffs,

v.

STATION CASINOS, LLC

Defendants.

1 **COMPLAINT FOR VIOLATION OF THE NEVADA HOSPITALITY**
2 **AND TRAVEL WORKERS RIGHT TO RETURN ACT**

3 Plaintiffs allege as follows:

4 **INTRODUCTION**

5 1. Plaintiffs are current and former employees of Defendant Station Casinos, LLC
6 (“Defendant” or “Stations”), which operates nine casinos in Las Vegas, Nevada. Plaintiffs seek
7 enforcement of their rights under the Nevada Hospitality and Travel Workers Right to Return
8 Act (“SB 386”) and allege that Defendant has operated in flagrant violation of its obligations as
9 a covered employer. Plaintiffs seek hiring and reinstatement, future and back pay, civil
10 penalties, compensatory and liquidated damages, interest, costs and attorneys’ fees resulting
11 from Defendant’s violations of SB 386.

12 2. It is well-established that the SARS-CoV-2 virus and the associated COVID-19
13 disease is a highly contagious respiratory virus that causes long-term health complications,
14 including lung inflammation, clogging of air lung sacs, sharp reductions in oxygen supply,
15 blood clots, organ failure, intestinal damage, heart inflammation, liver problems, neurological
16 malfunction, acute kidney disease, and death.

17 3. On March 12, 2020, Nevada Governor Steve Sisolak issued a Declaration of
18 Emergency to facilitate Nevada’s response to the COVID-19 pandemic, and on March 17, 2020,
19 ordered implementation of Declaration of Emergency Directive 002, which closed gaming
20 establishments effective March 17, 2020.

21 4. As a result of the COVID-19 pandemic, a large majority of hospitality and casino
22 workers were laid off in mid-March 2020.

23 5. Stations closed Red Rock Resort, Casino & Spa; Green Valley Ranch, Resort,
24 Casino & Spa; Palace Station; Santa Fe Station; Sunset Station; Boulder Station; Texas Station;
25 Fiesta Rancho Station; and Fiesta Henderson Station on March 18, 2020 due to the COVID-19
26 pandemic, and laid off thousands of employees on or about that same date. Red Rock Resort,
27 Casino & Spa; Green Valley Ranch, Resort, Casino & Spa; Palace Station; Santa Fe Station;
28 Sunset Station; and Boulder Station properties did not reopen until on or about June 4, 2020,

1 with significantly reduced staffing levels. Texas Station; Fiesta Rancho Station; and Fiesta
2 Henderson Station remain closed.

3 6. On May 26, 2021, the Nevada legislature passed SB 386 to ensure that the State’s
4 casino, hospitality, stadium, and travel-related employers honor their former employees’ right to
5 return to their former positions and speed the transition back to a functioning labor market.
6 SB 386 went into effect upon passage and approval on May 26, 2021, and creates a cause of
7 action against employers who fail to abide by the process it lays out for orderly recall of
8 hospitality and travel workers to positions with their former employers for which they are
9 qualified.

10 7. On July 16, 2021, Stations stated in a letter to the Local Joint Executive Board of
11 Las Vegas (“LJEB”), the bargaining representative for multiple Stations properties, that SB 386
12 is “nothing to celebrate and that it is counterproductive to its stated goals and harmful to our
13 former team members, in addition to being unnecessary.” Rather than committing to comply
14 with SB 386 like many other employers in the Las Vegas region, Stations has insisted in
15 bargaining sessions on July 16, 2021 and September 9, 2021, that LJEB should indemnify
16 Stations for violations of SB 386. Simultaneously, Stations has pursued a haphazard recall and
17 hiring strategy, conducted in blatant disregard of the guidelines laid out in SB 386. Upon
18 information and belief, Stations has hired workers out of order based on length of service and
19 refused to notify laid off employees of many job postings for which they were qualified. In
20 doing so, Stations has deprived numerous former employees of their rights under SB 386.

21 **PARTIES, JURISDICTION & VENUE**

22 8. Plaintiff Debra Adimey worked as a Banquet Server from November 26, 2013 to
23 approximately March 2020 at Santa Fe Station, a casino that is owned by Stations. She is and at
24 all relevant times was a resident of Clark County, Nevada.

25 9. Plaintiff Lisandra Aguero worked as a Guest Room Attendant from May 27, 2019
26 to approximately March 2020 at Green Valley Ranch, a casino that is owned by Stations. She is
27 and at all relevant times was a resident of Clark County, Nevada.

28 10. Plaintiff Tony Alexiev worked as a Banquet Server from November 21, 2004 to

1 approximately March 2020 at Green Valley Ranch, a casino that is owned by Stations. He is and
2 at all relevant times was a resident of Clark County, Nevada.

3 11. Plaintiff Elida Amigo Santiesteban worked as a Kitchen from on or about October
4 29, 2018 until approximately March 2020 at Green Valley Ranch, a casino that is owned by
5 Stations. She is and at all relevant times was a resident of Clark County, Nevada.

6 12. Plaintiff Luis Bedoya worked as a Room Runner from March 7, 2011 to
7 approximately March 2020 at Green Valley Ranch, a casino that is owned by Stations. He is and
8 at all relevant times was a resident of Clark County, Nevada.

9 13. Plaintiff Lorena Beltran worked as a Cook's Helper from November 26, 2006 to
10 approximately March 2020 at Santa Fe Station, a casino that is owned by Stations. She is and at
11 all relevant times was a resident of Clark County, Nevada.

12 14. Plaintiff Javier Benites worked as a Buffet Food Server for twenty years from
13 April 2, 1992 to approximately March 2020 at Green Valley Ranch, a casino that is owned by
14 Stations. He is and at all relevant times was a resident of Clark County, Nevada.

15 15. Plaintiff Jose Bernal worked as a Cook from November 15, 2006 to approximately
16 March 2020 at Santa Fe Station, a casino that is owned by Stations. He is and at all relevant
17 times was a resident of Clark County, Nevada.

18 16. Plaintiff Jose Bernardino worked as a Buffet Food Server from March 16, 1997 to
19 approximately March 2020 at Green Valley Ranch, a casino that is owned by Stations. He is and
20 at all relevant times was a resident of Clark County, Nevada.

21 17. Plaintiff Precious Briggs worked for Stations as a Beverage Server from July 30,
22 2018 to approximately March 2020 at the Palace Station, a casino that is owned by Stations. She
23 is and at all relevant times was a resident of Clark County, Nevada.

24 18. Plaintiff Marcos Canche worked as a Cook from April 16, 2018 to approximately
25 March 2020 at Sunset Station, a casino that is owned by Stations. He is and at all relevant times
26 was a resident of Clark County, Nevada.

27 19. Plaintiff Jose Cardenas worked as a Cook's Helper from April 15, 2013 to
28 approximately March 2020 at Green Valley Ranch, a casino that is owned by Stations. He is and

1 at all relevant times was a resident of Clark County, Nevada.

2 20. Plaintiff Kelly Anne Carl worked as a Food Server from January 1, 2018 to
3 approximately March 2020 at Green Valley Ranch, a casino that is owned by Stations. She is
4 and at all relevant times was a resident of Clark County, Nevada.

5 21. Plaintiff Vincent Carvalho worked as a Buffet Food Server from September 12,
6 2002 to approximately March 2020 at Green Valley Ranch, a casino that is owned by Stations.
7 He is and at all relevant times was a resident of Clark County, Nevada.

8 22. Plaintiff Kenia Cobas worked as a Cook's Helper from August 17, 2004 to
9 approximately March 2020 at Green Valley Ranch, a casino that is owned by Stations. She is
10 and at all relevant times was a resident of Clark County, Nevada.

11 23. Plaintiff Oscar Colorado worked as a Kitchen Worker from July 30, 2018 to
12 approximately March 2020 at Red Rock, a casino that is owned by Stations. He is and at all
13 relevant times was a resident of Clark County, Nevada.

14 24. Plaintiff Triana Cundiff worked for Stations as a Bartender from August 14, 2017
15 to approximately March 2020 at the Palace Station, a casino that is owned by Stations. She is
16 and at all relevant times was a resident of Clark County, Nevada.

17 25. Plaintiff Nancy Davila worked for Stations as a Banquet Food Server from March
18 9, 2017 until approximately March 2020 at Green Valley Ranch, a casino that is owned by
19 Stations. She is and at all relevant times was a resident of Clark County Nevada.

20 26. Plaintiff Maria Torres de Balandran worked as a Cook's Helper from August 29,
21 August 29, 2002 to approximately March 2020 at Green Valley Ranch, a casino that is owned by
22 Stations. She is and at all relevant times was a resident of Clark County, Nevada.

23 27. Plaintiff Pat De Carbo worked as a Captain at Hank's Steakhouse from January
24 23, 2017 to approximately March 2020 at Green Valley Ranch, a casino that is owned by
25 Stations. He is and at all relevant times was a resident of Clark County, Nevada.

26 28. Plaintiff Jesus De Leon worked for Stations as a Banquet Server from March 19,
27 2012 to approximately March 2020 at the Green Valley Ranch, a casino that is owed by
28 Stations. He is and at all relevant times was a resident of Clark County, Nevada.

1 29. Plaintiff Nancy Dickinson worked as a Food Server from December 3, 2001 to
2 approximately March 2020 at Green Valley Ranch, a casino that is owned by Stations. She is
3 and at all relevant times was a resident of Clark County, Nevada.

4 30. Plaintiff Elena Drake Gonzales worked as a Cook from October 29, 2018 to
5 approximately March 2020 at Palace Station, a casino that is owned by Stations. She is and at all
6 relevant times was a resident of Clark County, Nevada.

7 31. Plaintiff Nadia El Maher worked as a Food Server from November 15, 2004 to
8 approximately March 2020 at Green Valley Ranch, a casino that is owned by Stations. She is
9 and at all relevant times was a resident of Clark County, Nevada.

10 32. Plaintiff Orlando Ferreira Lamelas worked for Stations as a Kitchen Worker from
11 March 12, 2019 to approximately March 2020 at Palace Station, a casino that is owned by
12 Stations. He is and at all relevant times was a resident of Clark County, Nevada.

13 33. Plaintiff Samuel Fletes worked as a Cook's Helper from July 1, 2012 to
14 approximately March 2020 at Sunset Station, a casino that is owned by Stations. He is and at all
15 relevant times was a resident of Clark County, Nevada.

16 34. Plaintiff Violeta Isai Flores Delgado worked as a Cook's Helper from May 13,
17 2019 to approximately March 2020 at Sunset Station, a casino that is owned by Stations. She is
18 and at all relevant times was a resident of Clark County, Nevada.

19 35. Plaintiff Amarilys Gonzalez has worked as a Stove Cleaner from May 1, 2017 to
20 approximately March 2020 at Sunset Station, a casino that is owned by Stations. She is and at all
21 relevant times was a resident of Clark County, Nevada.

22 36. Plaintiff Rosa Gonzalez worked as a Cook from August 9, 2009 to approximately
23 March 2020 at Palace Station, a casino that is owned by Stations. She is a resident of Clark
24 County, Nevada.

25 37. Plaintiff Yelba Gonzalez worked as Pantry from January 26, 2014 to
26 approximately March 2020 at Palace Station, a casino that is owned by Stations. She is and at all
27 relevant times was a resident of Clark County, Nevada.

28 38. Plaintiff Antonia Gutierrez worked as Pantry from March 6, 2007 to

1 approximately March 2020 at Palace Station, a casino that is owned by Stations. She is and at all
2 relevant times was a resident of Clark County, Nevada.

3 39. Plaintiff Elizabeth Halatsis worked as a Food Server from September 2, 2004 to
4 approximately March 2020 at Red Rock Casino, a casino that is owned by Stations. She is and at
5 all relevant times was a resident of Clark County, Nevada.

6 40. Plaintiff Orlando Henriquez worked as a Cook from March 28, 2011 to
7 approximately March 2020 at Sunset Station, a casino owned by Stations. He is and at all
8 relevant times was a resident of Clark County, Nevada.

9 41. Plaintiff Lila Hernandez worked as a Cook's Helper from November 14, 2013 to
10 approximately March 2020 at Boulder Station, a casino that is owned by Stations. She is and at
11 all relevant times was a resident of Clark County, Nevada.

12 42. Plaintiff Maria Elena Hernandez worked as a Food Server from September 21,
13 2005 until approximately March 2020 at Green Valley Ranch, a casino that is owned by
14 Stations. She is and at all relevant times was a resident of Clark County, Nevada.

15 43. Plaintiff Nidia Hernandez worked as a Kitchen Worker from October 22, 2018 to
16 approximately March 2020 at Green Valley Ranch, a casino that is owned by Stations. She is
17 and at all relevant times was a resident of Clark County, Nevada.

18 44. Plaintiff Alejandro Higuera worked as a Buffet Food Server from November 20,
19 2017 to approximately March 2020 at Green Valley Ranch, a casino that is owned by Stations.
20 He is and at all relevant times was a resident of Clark County, Nevada.

21 45. Plaintiff Emma Holtz worked as a Food Server from November 21, 2004 to
22 approximately March 2020 at Green Valley Ranch, a casino owned by Stations. She is and at all
23 relevant times was a resident of Clark County, Nevada.

24 46. Plaintiff Guillermo Inclan worked as a Kitchen Worker from March 4, 2019 to
25 approximately March 2020 at Palace Station, a casino that is owned by Stations. He is and at all
26 relevant times was a resident of Clark County, Nevada.

27 47. Plaintiff Valerie Jorgensen has worked as a Food Server from June 7, 2015 to
28 approximately March 2020 at Red Rock Casino, Resort, and Spa ("Red Rock"), a casino that is

1 owned by Stations. She is and at all relevant times was a resident of Clark County, Nevada.

2 48. Plaintiff Leticia Luis worked as a Cook from February 18, 2016 to approximately
3 March 2020 at Boulder Station, a casino that is owned by Stations. She is and at all relevant
4 times was a resident of Clark County, Nevada.

5 49. Plaintiff Carmen Mariscal worked for Stations as a Food Server from January 2,
6 2007 to approximately March 2020 at Green Valley Ranch, a casino that is owned by Stations.
7 She is and at all relevant times was a resident of Clark County, Nevada.

8 50. Plaintiff Andrea McKeaney worked as a Banquet Server from 2003 to
9 approximately March 2020 at Santa Fe Station, a casino that is owned by Stations. She is and at
10 all relevant times was a resident of Clark County, Nevada.

11 51. Plaintiff Adali Mejia worked as a Cook from December 21, 2014 to approximately
12 March 2020 at Sunset Station, a casino that is owned by Stations. He is and at all relevant times
13 was a resident of Clark County, Nevada.

14 52. Plaintiff Audrey Melton worked as a Food Server from March 9, 2009 to
15 approximately March 2020 at Green Valley Ranch, a casino that is owned by Stations. She is
16 and at all relevant times was a resident of Clark County, Nevada.

17 53. Plaintiff Alexandria Miller worked as a Beverage Server from July 18, 2017 to
18 approximately March 2020 at Santa Fe Station, a casino that is owned by Stations. He is and at
19 all relevant times was a resident of Clark County, Nevada.

20 54. Plaintiff Yaquelin Morales worked as a Cook from May 23, 2011 to
21 approximately March 2020 at Sunset Station, a casino that is owned by Stations. She is and at all
22 relevant times was a resident of Clark County, Nevada.

23 55. Plaintiff Teresa Ocegüera worked as a Cook's Helper from February 28, 2010 to
24 approximately March 2020 at Boulder Station, a casino that is owned by Stations. She is and at
25 all relevant times was a resident of Clark County, Nevada.

26 56. Plaintiff Yohanna Gabriela Osorto Carias worked as a Stove Person from February
27 7, 2019 until approximately March 2020 at Green Valley Ranch, a casino that is owned by
28 Stations. She is and at all relevant times was a resident of Clark County, Nevada.

1 57. Plaintiff Claudia Perez-Zuñiga worked as a Cook from April 2, 2018 to
2 approximately March 2020 at Green Valley Ranch, a casino that is owned by Stations. She is
3 and at all relevant times was a resident of Clark County, Nevada.

4 58. Plaintiff Maria Pichardo worked as Pantry from May 18, 1997 to approximately
5 March 2020 at Sunset Station, a casino that is owned by Stations. She is and at all relevant times
6 was a resident of Clark County, Nevada.

7 59. Plaintiff Erika Rios worked as a Cook's Helper from March 4, 2019 to
8 approximately March 2020 at Boulder Station, a casino that is owned by Stations. She is and at
9 all relevant times was a resident of Clark County, Nevada.

10 60. Plaintiff Amaury Rodriguez worked as a Banquet Food Server from March 1,
11 2006 to approximately March 2020 at Green Valley Ranch, a casino that is owned by Stations.
12 He is and at all relevant times was a resident of Clark County Nevada.

13 61. Plaintiff David Leon Rodriguez worked as a Kitchen Worker from January 28,
14 2005 to approximately March 2020 at Santa Fe Station, a casino that is owned by Stations. He is
15 and at all relevant times was a resident of Clark County, Nevada.

16 62. Plaintiff Fernando Salazar worked as a Kitchen Worker from February 16, 2016 to
17 approximately March 2020 at Green Valley Ranch, a casino that is owned by Stations. He is and
18 at all relevant times was a resident of Clark County, Nevada.

19 63. Plaintiff Maria Salgado worked as Pantry from April 30, 2011 to approximately
20 March 2020 at Sunset Station, a casino that is owned by Stations. She is and at all relevant times
21 was a resident of Clark County, Nevada.

22 64. Plaintiff Yuset Salomon Diaz worked as a Cook's Helper from August 14, 2018
23 to approximately March 2020 at Red Rock Casino, a casino that is owned by Stations. He is and
24 at all relevant times was a resident of Clark County, Nevada.

25 65. Plaintiff Rene Sanchez worked as a Stove Person from August 19, 2019 to
26 approximately March 2020 at Sunset Station, a casino that is owned by Stations. He is and at all
27 relevant times was a resident of Clark County, Nevada.

28 66. Plaintiff Clara Sanchez Recio worked as a Kitchen Worker from May 28, 2018 to

1 approximately March 2020 at Green Valley Ranch, a casino that is owned by Stations. She is
2 and at all relevant times was a resident of Clark County, Nevada.

3 67. Plaintiff Amanda Santoyo worked as a Cook's Helper from November 23, 2004 to
4 approximately March 2020 at Santa Fe Station, a casino that is owned by Stations. She is and at
5 all relevant times was a resident of Clark County, Nevada.

6 68. Plaintiff Ashley Schwartz worked for Stations as a Beverage Server from June 20,
7 2018 to approximately March 2020 at the Palace Station, a casino that is owned by Stations. She
8 is and at all relevant times was a resident of Clark County, Nevada.

9 69. Plaintiff Victor Hugo Simental Garcia worked as a Cook's Helper from January
10 21, 2013 to approximately March 2020 at Santa Fe Station, a casino that is owned by Stations.
11 He is and at all relevant times was a resident of Clark County, Nevada.

12 70. Plaintiff Rodrigo Solano worked as a Cook for from November 9, 1993 to
13 approximately March 2020 at Boulder Station, a casino that is owned by Stations. He is and at
14 all relevant times was a resident of Clark County, Nevada.

15 71. Plaintiff Michelle Strande worked as a Café Server for two years from October 22,
16 2018 to approximately March 2020 at Green Valley Ranch, a casino that is owned by Stations.
17 She is and at all relevant times was a resident of Clark County, Nevada.

18 72. Plaintiff Luz Tafolla worked as a Cook from September 26, 2016 to approximately
19 March 2020 at Green Valley Ranch, a casino that is owned by Stations. She is and at all relevant
20 times was a resident of Clark County, Nevada.

21 73. Plaintiff Sergio Tejido worked as a Kitchen Runner from February 22, 2016 to
22 approximately March 2020 at Sunset Station, a casino that is owned by Stations. He is and at all
23 relevant times was a resident of Clark County, Nevada.

24 74. Plaintiff Edgar Tevalan-Barrios worked as a Kitchen Runner from July 8, 1997 to
25 approximately March 2020 at Sunset Station, a casino that is owned by Stations. He is and at all
26 relevant times was a resident of Clark County, Nevada.

27 75. Plaintiff Barbara Tivas has worked as a Banquet Server from April 10, 2007 to
28 approximately March 2020 at Green Valley Ranch, a casino that is owned by Stations. She is

1 and at all relevant times was a resident of Clark County, Nevada.

2 76. Plaintiff Aurora Torres worked as a Food Server from March 15, 2009 to
3 approximately March 2020 at Green Valley Ranch, a casino that is owned by Stations. She is
4 and at all relevant times was a resident of Clark County, Nevada.

5 77. Plaintiff Jose Valle worked as a Buffet Cook for from September 11, 1997 to
6 approximately March 2020 at Boulder Station, a casino that is owned by Stations. He is and at
7 all relevant times was a resident of Clark County, Nevada.

8 78. Plaintiff Oscar Vallejo worked as a Cook from October 16, 2017 to approximately
9 March 2020 at Sunset Station, a casino that is owned by Stations. He is and at all relevant times
10 was a resident of Clark County, Nevada.

11 79. Plaintiff Mario Valles worked as a Cook from January 29, 2019 to approximately
12 March 2020 at Green Valley Ranch, a casino that is owned by Stations. He is and at all relevant
13 times was a resident of Clark County, Nevada.

14 80. Plaintiff Ramon Vivanco worked as a Banquet Server from 2006 to approximately
15 March 2020 at Santa Fe Station, a casino that is owned by Stations. He is and at all relevant
16 times was a resident of Clark County, Nevada.

17 81. Plaintiff Juan Vivas worked as a Cook's Helper from May 26, 1997 to
18 approximately March 2020 at Sunset Station, a casino that is owned by Stations. He is and at all
19 relevant times was a resident of Clark County, Nevada.

20 82. Plaintiff Mark Walker worked as a Banquet Server from March 29, 2011 to
21 approximately March 2020 at Green Valley Ranch, a casino that is owned by Stations. He is and
22 at all relevant times was a resident of Clark County, Nevada.

23 83. Plaintiff Rosa Zavala worked as a Kitchen Runner from December 12, 2016 to
24 approximately March 2020 at Sunset Station, a casino that is owned by Stations. She is and at all
25 relevant times was a resident of Clark County, Nevada.

26 84. Plaintiffs DOES I through XX, inclusive are unknown to Plaintiffs at this time.
27 Plaintiffs reserve the right to amend this Complaint to add any additional Plaintiffs, together
28 with their true identities and capacities, when the same has been ascertained.

1 91. Plaintiffs received Layoff Notices when they were laid off in or about March
2 2020. In the same communication containing the Layoff Notice required by Section 24 of SB
3 386, Stations stated that SB 386 would “discourage, not encourage, hiring,” and that it is “not in
4 favor of [SB 386].”

5 92. Stations was well aware of its obligation to comply with SB 386. Stations
6 publicly stated its opinion that “SB386 is a dumpster fire that discourages hiring by creating a
7 liability trap for employers.” *See, e.g.,* Jessica Hill, LAS VEGAS SUN, “Nevada probing 6 ‘return
8 to work’ complaints,” Oct. 18, 2021, available at [https://lasvegassun.com/news/2021/oct/18/law-](https://lasvegassun.com/news/2021/oct/18/law-aiming-to-help-workers-get-their-old-jobs-back/)
9 [aiming-to-help-workers-get-their-old-jobs-back/](https://lasvegassun.com/news/2021/oct/18/law-aiming-to-help-workers-get-their-old-jobs-back/).

10 93. Stations then repeatedly failed to comply with SB 386 by failing to provide proper
11 notice to its employees and by failing to recall its employees in accordance with SB 386, Nev.
12 Rev. Stat. Chapter 613, §§ 2-28. Stations’ failure to comply was knowing and willful: Stations
13 repeatedly failed to comply with the requirements of SB 386 by refusing to re-hire Plaintiffs
14 even after Stations was placed on written notice of their failure to comply with SB 386 by each
15 and every individual Plaintiff named in this Complaint.

16 **FIRST CAUSE OF ACTION**
17 **VIOLATION OF THE NEVADA HOSPITALITY AND TRAVEL WORKERS RIGHT**
18 **TO RETURN ACT, NEV. REV. STAT. CHAPTER 613, SECTIONS 2-28**

19 94. The Plaintiffs re-allege paragraphs 1 through 93 and incorporate them by reference
20 as if fully re-stated herein.

21 95. Plaintiffs allege that each of the named Plaintiffs are employees within the
22 meaning of SB 386, Section 12 of Chapter 613 of the Nevada Revised Statutes, and Nev. Rev.
23 Stat. 608.010, as further described below. Each of the Plaintiffs is a resident of the State of
24 Nevada.

25 96. **Debra Adimey:** Plaintiff Debra Adimey was employed by Stations at Santa Fe
26 Station as a Banquet Server from on or about November 26, 2013 until she was laid off on or
27 after March 12, 2020. On or about November 22, 2021, Stations had an open Banquet Server
28 position but failed to notify Ms. Adimey of that position. Ms. Adimey provided written notice

1 to Stations of the alleged violation on or about November 22, 2021, which Stations failed to
2 respond to or cure within 15 days of receipt. The failure of Stations to notify Ms. Adimey of a
3 job posting for which she was qualified violates Section 22(1) of SB 386. Stations also violated
4 Section 22(5) of SB 386 when it failed to notify Ms. Adimey why it claimed she lacked the
5 qualifications for the open position. As a result, Ms. Adimey has suffered damages through the
6 deprivation of his recall rights and loss of potential income from being hired into a job posting
7 for which she was qualified. She is entitled to hiring and reinstatement, future and back pay,
8 civil penalties, compensatory and liquidated damages, interest, costs and attorneys' fees
9 resulting from Defendant's violations of SB 386, Chapter 613 of Nevada Revised Statutes,
10 sections 2-28, inclusive.

11 97. **Lisandra Agüero:** Plaintiff Lisandra Agüero was employed by Stations at the
12 Green Valley Ranch as a Guest Room Attendant from on or about May 27, 2019 until she was
13 laid off on or after March 12, 2020. On or about September 16, 2021, Stations had an open
14 Housekeeping position but failed to notify Ms. Agüero of that job posting. Ms. Agüero
15 provided written notice to Stations of the alleged violation on or about September 16, 2021, to
16 which Stations failed to respond or cure within 15 days of receipt. In fact, Ms. Agüero has
17 never received a response to her written notice. On information and belief, Stations hired an
18 employee with less seniority than Ms. Agüero into the position. The failure of Stations to notify
19 Ms. Agüero of a job posting for which she was qualified violates Section 22(1) of SB 386.
20 Stations also violated Section 22(5) of SB 386 when it failed to notify Ms. Agüero why it
21 claimed she lacked the qualifications for the open position. As a result, Ms. Agüero has suffered
22 damages through the deprivation of her recall rights and loss of potential income from being
23 hired into a job posting for which she was qualified. She is entitled to hiring and reinstatement,
24 future and back pay, civil penalties, compensatory and liquidated damages, interest, costs and
25 attorneys' fees resulting from Defendant's violations of SB 386, Chapter 613 of Nevada Revised
26 Statutes, sections 2-28, inclusive.

27 98. **Tony Alexiev:** Plaintiff Tony Alexiev was employed by Stations at Green Valley
28 Ranch as a Banquet Server from on or about November 21, 2004 until he was laid off on or after

1 March 12, 2020. On or about December 14, 2021, Mr. Alexiev learned that Stations had an
2 open position for Banquet Server but failed to notify him of that position. Mr. Alexiev provided
3 written notice to Stations of the alleged violation on or about December 14, 2021, which
4 Stations failed to respond to or cure within 15 days of receipt. On information and belief,
5 Stations offered Banquet Server shifts to employees with less seniority than Mr. Alexiev. The
6 failure of Stations to notify Mr. Alexiev of a job posting for which he was qualified violates
7 Section 22(1) of SB 386. Stations also violated Section 22(5) of SB 386 when it failed to notify
8 Mr. Alexiev why it claimed he lacked the qualifications for the open position. As a result, Mr.
9 Alexiev has suffered damages through the deprivation of his recall rights and loss of potential
10 income from being hired into a job posting for which he was qualified. He is entitled to hiring
11 and reinstatement, future and back pay, civil penalties, compensatory and liquidated damages,
12 interest, costs and attorneys' fees resulting from Defendant's violations of SB 386, Chapter 613
13 of Nevada Revised Statutes, sections 2-28, inclusive.

14 **99. Elida Amigo Santiesteban:** Plaintiff Elida Amigo Santiesteban was employed by
15 Stations at Green Valley Ranch as a Kitchen Worker from on or about October 29, 2018 until
16 she was laid off on or after March 12, 2020. On or about October 22, 2021, Stations posted a
17 Kitchen Worker position but failed to notify Ms. Amigo Santiesteban of that position. Ms.
18 Amigo Santiesteban provided written notice to Stations of the alleged violation on or about
19 January 27, 2022, which Stations failed to respond to or cure within 15 days of receipt. On
20 information and belief, Stations hired an employee with less seniority than Ms. Amigo
21 Santiesteban into the position. The failure of Stations to notify Ms. Amigo Santiesteban of a job
22 posting for which she was qualified violates Section 22(1) of SB 386. Stations also violated
23 Section 22(5) of SB 386 when it failed to notify Ms. Amigo Santiesteban why it claimed she
24 lacked the qualifications for the open position. As a result, Ms. Amigo Santiesteban has
25 suffered damages through the deprivation of her recall rights and loss of potential income from
26 being hired into a job posting for which she was qualified. She is entitled to hiring and
27 reinstatement, future and back pay, civil penalties, compensatory and liquidated damages,
28 interest, costs and attorneys' fees resulting from Defendant's violations of SB 386, Chapter 613

1 of Nevada Revised Statutes, sections 2-28, inclusive.

2 **100. Luis Bedoya:** Plaintiff Luis Bedoya was employed by Stations at Green Valley
3 Ranch as a Room Runner from on or about March 7, 2011 until he was laid off on or after
4 March 12, 2020. As a Room Runner, Mr. Bedoya was responsible for keeping restaurants and
5 kitchens fully stocked. On or around October 22, 2021, Stations advertised a Sprinter position
6 on its Careers website. The Sprinter was expected to coordinate food orders from servers at the
7 kitchen line and effectively pick up and serve items ordered to each guest table. The
8 qualifications for a Sprinter included the ability to develop a thorough knowledge of all food
9 items including plate specifications, garnishing, and table numbering, and effective
10 communication with servers to time orders and perform side service functions as required.
11 Stations did not notify Mr. Bedoya of the Sprinter position despite the fact that he was qualified
12 by virtue of working a similar job at Green Valley Ranch in the same job classification. Mr.
13 Bedoya provided written notice to Stations of the alleged violation on or about November 4,
14 2021, which Stations has yet to respond to. The failure of Stations to notify Mr. Bedoya of a job
15 posting for which he was qualified violates Section 22(1) of SB 386. Stations also violated
16 Section 22(5) of SB 386 when it failed to notify Mr. Bedoya why it claimed he lacked the
17 qualifications for the open position. As a result, Mr. Bedoya has suffered damages through the
18 deprivation of his recall rights and loss of potential income from being hired into a job posting
19 for which he was qualified. He is entitled to hiring and reinstatement, future and back pay, civil
20 penalties, compensatory and liquidated damages, interest, costs and attorneys' fees resulting
21 from Defendant's violations of SB 386, Chapter 613 of Nevada Revised Statutes, sections 2-28,
22 inclusive.

23 **101. Lorena Beltran:** Plaintiff Lorena Beltran was employed by Stations at Santa Fe
24 Station as a Cook's Helper from on or about November 21, 2006 until she was laid off on or
25 after March 12, 2020. On or about October 22, 2021, Stations posted a Cook's Helper position
26 but failed to notify Ms. Beltran of that position. Ms. Beltran provided written notice to Stations
27 of the alleged violation on or about December 1, 2021, which Stations failed to respond to or
28 cure within 15 days of receipt. The failure of Stations to notify Ms. Beltran of a job posting for

1 which she was qualified violates Section 22(1) of SB 386. Stations also violated Section 22(5)
2 of SB 386 when it failed to notify Ms. Beltran why it claimed she lacked the qualifications for
3 the open position. As a result, Ms. Beltran has suffered damages through the deprivation of her
4 recall rights and loss of potential income from being hired into a job posting for which she was
5 qualified. She is entitled to hiring and reinstatement, future and back pay, civil penalties,
6 compensatory and liquidated damages, interest, costs and attorneys' fees resulting from
7 Defendant's violations of SB 386, Chapter 613 of Nevada Revised Statutes, sections 2-28,
8 inclusive.

9 102. **Javier Benites:** Plaintiff Javier Benites was employed by Stations at Green Valley
10 Ranch as a Food Server from on or about April 2, 1992 until he was laid off on or after March
11 12, 2020. On or about October 22, 2021, Stations posted a Food Server position but failed to
12 notify Mr. Benites of that position. Mr. Benites provided written notice to Stations of the alleged
13 violation on or about January 13, 2022, which Stations failed to respond to or cure within 15
14 days of receipt. The failure of Stations to notify Mr. Benites of a job posting for which he was
15 qualified violates Section 22(1) of SB 386. Stations also violated Section 22(5) of SB 386 when
16 it failed to notify Mr. Benites why it claimed he lacked the qualifications for the open position.
17 As a result, Mr. Benites has suffered damages through the deprivation of his recall rights and
18 loss of potential income from being hired into a job posting for which he was qualified. He is
19 entitled to hiring and reinstatement, future and back pay, civil penalties, compensatory and
20 liquidated damages, interest, costs and attorneys' fees resulting from Defendant's violations of
21 SB 386, Chapter 613 of Nevada Revised Statutes, sections 2-28, inclusive.

22 103. **Jose Bernal:** Plaintiff Jose Bernal was employed by Stations at Santa Fe as a
23 Cook from on or about November 15, 2006 until he was laid off on or after March 12, 2020. On
24 or about September 15, 2021, Stations had an open position for Cook but failed to notify Jose
25 Bernal of that position. Mr. Bernal provided written notice to Stations of the alleged violation on
26 or about November 17, 2021, which Stations failed to respond to or cure within 15 days of
27 receipt. The failure of Stations to notify Mr. Bernal of a job posting for which he was qualified
28 violates Section 22(1) of SB 386. Stations also violated Section 22(5) of SB 386 when it failed

1 to notify Mr. Bernal why it claimed he lacked the qualifications for the open position. As a
2 result, Mr. Bernal has suffered damages through the deprivation of his recall rights and loss of
3 potential income from being hired into a job posting for which he was qualified. He is entitled to
4 hiring and reinstatement, future and back pay, civil penalties, compensatory and liquidated
5 damages, interest, costs and attorneys' fees resulting from Defendant's violations of SB 386,
6 Chapter 613 of Nevada Revised Statutes, sections 2-28, inclusive.

7 104. **Jose Bernardino:** Plaintiff Jose Bernardino was employed by Stations at Green
8 Valley Ranch as a Food Server from on or about March 16, 1997 until he was laid off on or after
9 March 12, 2020. On or about October 22, 2021, Stations posted a Food Server position but
10 failed to notify Mr. Bernardino of that position. Mr. Bernardino provided written notice to
11 Stations of the alleged violation on or about November 23, 2021, which Stations failed to
12 respond to or cure within 15 days of receipt. The failure of Stations to notify Mr. Bernardino of
13 a job posting for which he was qualified violates Section 22(1) of SB 386. Stations also violated
14 Section 22(5) of SB 386 when it failed to notify Mr. Bernardino why it claimed he lacked the
15 qualifications for the open position. As a result, Mr. Bernardino has suffered damages through
16 the deprivation of his recall rights and loss of potential income from being hired into a job
17 posting for which he was qualified. He is entitled to hiring and reinstatement, future and back
18 pay, civil penalties, compensatory and liquidated damages, interest, costs and attorneys' fees
19 resulting from Defendant's violations of SB 386, Chapter 613 of Nevada Revised Statutes,
20 sections 2-28, inclusive.

21 105. **Precious Briggs:** Plaintiff Precious Briggs was employed by Stations at the Palace
22 Station as a Beverage Server from on or about July 1, 2018 until she was laid off on or after
23 March 12, 2020. On or about July 29, 2021, Stations had an open position for Beverage server at
24 Palace Station but failed to notify Ms. Briggs of that job positing. Ms. Briggs provided written
25 notice to Stations of the alleged violation on or about July 29, 2021, which Stations failed to
26 respond to or cure within 15 days of receipt. In fact, Ms. Briggs has never received any response
27 at all to her written notice. On or about October 22, 2021, Stations posted a Beverage Server
28 position but failed to notify Ms. Briggs of that position. On or about January 14, 2022, Ms.

1 Briggs provided written notice to Stations of the alleged violation, which Stations failed to
2 respond to or cure within 15 days of receipt. Each failure of Stations to notify Ms. Briggs of a
3 job posting for which she was qualified is a violation of Section 22(1) of SB 386. Stations also
4 violated Section 22(5) of SB 386 when it failed to notify Ms. Briggs why it claimed she lacked
5 the qualifications for the open positions. As a result, Ms. Briggs has suffered damages through
6 the deprivation of her recall rights and loss of potential income from being hired into a job
7 posting for which she was qualified. She is entitled to hiring and reinstatement, future and back
8 pay, civil penalties, compensatory and liquidated damages, interest, costs and attorneys' fees
9 resulting from Defendant's violations of SB 386, Chapter 613 of Nevada Revised Statutes,
10 sections 2-28, inclusive.

11 106. **Marcos Canche:** Plaintiff Marcos Canche was employed by Stations at Sunset
12 Station as a Cook from on or about April 16, 2018 until he was laid off on or after March 12,
13 2020. On or about October 22, 2021, Stations posted a Cook position but failed to notify Mr.
14 Canche of that position. Mr. Canche provided written notice to Stations of the alleged violation
15 on or about January 11, 2022, which Stations failed to respond to or cure within 15 days of
16 receipt. The failure of Stations to notify Mr. Canche of a job posting for which he was qualified
17 violates Section 22(1) of SB 386. Stations also violated Section 22(5) of SB 386 when it failed
18 to notify Mr. Canche why it claimed he lacked the qualifications for the open position. As a
19 result, Mr. Canche has suffered damages through the deprivation of his recall rights and loss of
20 potential income from being hired into a job posting for which he was qualified. He is entitled to
21 hiring and reinstatement, future and back pay, civil penalties, compensatory and liquidated
22 damages, interest, costs and attorneys' fees resulting from Defendant's violations of SB 386,
23 Chapter 613 of Nevada Revised Statutes, sections 2-28, inclusive.

24 107. **Jose Cardenas:** Plaintiff Jose Cardenas was employed by Stations at Green
25 Valley Ranch as a Cook's Helper from on or about April 15, 2013 until he was laid off on or
26 after March 12, 2020. On or about October 22, 2021, Stations posted a Cook's Helper position
27 but failed to notify Mr. Cardenas of that position. Mr. Cardenas provided written notice to
28 Stations of the alleged violation on or about January 7, 2022, which Stations failed to respond to

1 or cure within 15 days of receipt. The failure of Stations to notify Mr. Cardenas of a job posting
2 for which he was qualified violates Section 22(1) of SB 386. Stations also violated Section 22(5)
3 of SB 386 when it failed to notify Mr. Cardenas why it claimed he lacked the qualifications for
4 the open position. As a result, Mr. Cardenas has suffered damages through the deprivation of his
5 recall rights and loss of potential income from being hired into a job posting for which he was
6 qualified. He is entitled to hiring and reinstatement, future and back pay, civil penalties,
7 compensatory and liquidated damages, interest, costs and attorneys' fees resulting from
8 Defendant's violations of SB 386, Chapter 613 of Nevada Revised Statutes, sections 2-28,
9 inclusive.

10 108. **Kelly Carl:** Plaintiff Kelly Carl was employed by Stations at Green Valley Ranch
11 as a Food Server from on or about January 1, 2018 until she was laid off on or after March 12,
12 2020. On or about October 22, 2021, Stations posted a Food Server position but failed to notify
13 Ms. Carl of that position. Ms. Carl provided written notice to Stations of the alleged violation on
14 or about December 9, 2021, which Stations failed to respond to or cure within 15 days of
15 receipt. The failure of Stations to notify Ms. Carl of a job posting for which she was qualified
16 violates Section 22(1) of SB 386. Stations also violated Section 22(5) of SB 386 when it failed
17 to notify Ms. Carl why it claimed she lacked the qualifications for the open position. As a result,
18 Ms. Carl has suffered damages through the deprivation of her recall rights and loss of potential
19 income from being hired into a job posting for which she was qualified. She is entitled to hiring
20 and reinstatement, future and back pay, civil penalties, compensatory and liquidated damages,
21 interest, costs and attorneys' fees resulting from Defendant's violations of SB 386, Chapter 613
22 of Nevada Revised Statutes, sections 2-28, inclusive.

23 109. **Vincent Carvalho:** Plaintiff Vincent Carvalho was employed by Stations at Green
24 Valley Ranch as a Good Server from on or about September 12, 2002 until he was laid off on or
25 after March 12, 2020. On or about October 22, 2021, Stations posted a Food Server position but
26 failed to notify Mr. Carvalho of that position. Mr. Carvalho provided written notice to Stations
27 of the alleged violation on or about November 29, 2021, which Stations failed to respond to or
28 cure within 15 days of receipt. The failure of Stations to notify Mr. Carvalho of a job posting

1 for which he was qualified violates Section 22(1) of SB 386. Stations also violated Section 22(5)
2 of SB 386 when it failed to notify Mr. Carvalho why it claimed he lacked the qualifications for
3 the open position. As a result, Mr. Carvalho has suffered damages through the deprivation of his
4 recall rights and loss of potential income from being hired into a job posting for which he was
5 qualified. He is entitled to hiring and reinstatement, future and back pay, civil penalties,
6 compensatory and liquidated damages, interest, costs and attorneys' fees resulting from
7 Defendant's violations of SB 386, Chapter 613 of Nevada Revised Statutes, sections 2-28,
8 inclusive.

9 **110. Kenia Cobas:** Plaintiff Kenia Cobas was employed by Stations at Green Valley
10 Ranch as a Cook's Helper from on or about August 17, 2004 until she was laid off on or after
11 March 12, 2020. On or about October 22, 2021, Stations posted a Cook's Helper position but
12 failed to notify Ms. Cobas of that position. Ms. Cobas provided written notice to Stations of the
13 alleged violation on or about January 7, 2022, which Stations failed to respond to or cure within
14 15 days of receipt. The failure of Stations to notify Ms. Cobas of a job posting for which she
15 was qualified violates Section 22(1) of SB 386. Stations also violated Section 22(5) of SB 386
16 when it failed to notify Ms. Cobas why it claimed she lacked the qualifications for the open
17 position. As a result, Ms. Cobas has suffered damages through the deprivation of her recall
18 rights and loss of potential income from being hired into a job posting for which she was
19 qualified. She is entitled to hiring and reinstatement, future and back pay, civil penalties,
20 compensatory and liquidated damages, interest, costs and attorneys' fees resulting from
21 Defendant's violations of SB 386, Chapter 613 of Nevada Revised Statutes, sections 2-28,
22 inclusive.

23 **111. Oscar Colorado:** Plaintiff Oscar Colorado was employed by Stations at Red Rock
24 as a Kitchen Worker from on or about July 30, 2018 until he was laid off on or after March 12,
25 2020. On or about October 22, 2021, Stations posted a Kitchen Worker position but failed to
26 notify Mr. Colorado of that position. Mr. Colorado provided written notice to Stations of the
27 alleged violation on or about January 13, 2022, which Stations failed to respond to or cure
28 within 15 days of receipt. The failure of Stations to notify Mr. Colorado of a job posting for

1 which he was qualified violates Section 22(1) of SB 386. Stations also violated Section 22(5) of
2 SB 386 when it failed to notify Mr. Colorado why it claimed he lacked the qualifications for the
3 open position. As a result, Mr. Colorado has suffered damages through the deprivation of his
4 recall rights and loss of potential income from being hired into a job posting for which he was
5 qualified. He is entitled to hiring and reinstatement, future and back pay, civil penalties,
6 compensatory and liquidated damages, interest, costs and attorneys' fees resulting from
7 Defendant's violations of SB 386, Chapter 613 of Nevada Revised Statutes, sections 2-28,
8 inclusive.

9 112. **Triana Cundiff:** Plaintiff Triana Cundiff was employed by Stations at Palace
10 Station as a Bartender from on or about August 14, 2017 until she was laid off on or after March
11 12, 2020. On or about July 29, 2021, Stations had an open position for Bartender at Palace
12 Station but failed to notify Ms. Cundiff of that job posting. Ms. Cundiff provided written notice
13 to Stations of the alleged violation on or about July 29, 2021, which Stations failed to respond to
14 or cure within 15 days of receipt. In fact, Ms. Cundiff has never received any response at all to
15 her written notice. The failure of Stations to notify Ms. Cundiff of a job posting for which she
16 was qualified violates Section 22(1) of SB 386. Stations also violated Section 22(5) of SB 386
17 when it failed to notify Ms. Cundiff why it claimed she lacked the qualifications for the open
18 position. As a result, Ms. Cundiff has suffered damages through the deprivation of her recall
19 rights and loss of potential income from being hired into a job posting for which she was
20 qualified. She is entitled to hiring and reinstatement, future and back pay, civil penalties,
21 compensatory and liquidated damages, interest, costs and attorneys' fees resulting from
22 Defendant's violations of SB 386, Chapter 613 of Nevada Revised Statutes, sections 2-28,
23 inclusive.

24 113. **Nancy Davila:** Plaintiff Nancy Davila was employed by Stations at Green Valley
25 Ranch as a Banquets Food Server from on or about March 9, 2017 until she was laid off on or
26 after March 12, 2020. On or about January 29, 2022, Ms. Davila learned that Green Valley
27 Ranch had an open position for a Banquets Food Server but failed to notify Ms. Davila of that
28 position. Ms. Davila provided written notice to Stations of the alleged violation on or about

1 January 29, 2022, which Stations failed to respond to or cure within 15 days of receipt. On
2 information and belief, Stations offered Banquets Food Server shifts to employees with less
3 seniority than Ms. Davila. The failure of Stations to notify Ms. Davila of a job posting for which
4 she was qualified violates Section 22(1) of SB 386. Stations also violated Section 22(5) of SB
5 386 when it failed to notify Ms. Davila why it claimed she lacked the qualifications for the open
6 position. As a result, Ms. Davila has suffered damages through the deprivation of her recall
7 rights and loss of potential income from being hired into a job posting for which she was
8 qualified. She is entitled to hiring and reinstatement, future and back pay, civil penalties,
9 compensatory and liquidated damages, interest, costs and attorneys' fees resulting from
10 Defendant's violations of SB 386, Chapter 613 of Nevada Revised Statutes, sections 2-28,
11 inclusive.

12 114. **Maria Torres de Balandran:** Plaintiff Maria Torres de Balandran was employed
13 by Stations at Green Valley Ranch as a Cook's Helper from on or about August 29, 2002 until
14 she was laid off on or after March 12, 2020. On or about October 22, 2021, Stations posted a
15 Cook's Helper position but failed to notify Ms. Torres de Balandran of that position. Ms. Torres
16 de Balandran provided written notice to Stations of the alleged violation on or about January 7,
17 2022, which Stations failed to respond to or cure within 15 days of receipt. The failure of
18 Stations to notify Ms. Torres de Balandran of a job posting for which she was qualified violates
19 Section 22(1) of SB 386. Stations also violated Section 22(5) of SB 386 when it failed to notify
20 Ms. Torres de Balandran why it claimed she lacked the qualifications for the open position. As a
21 result, Ms. Torres de Balandran has suffered damages through the deprivation of her recall rights
22 and loss of potential income from being hired into a job posting for which she was qualified.
23 She is entitled to hiring and reinstatement, future and back pay, civil penalties, compensatory
24 and liquidated damages, interest, costs and attorneys' fees resulting from Defendant's violations
25 of SB 386, Chapter 613 of Nevada Revised Statutes, sections 2-28, inclusive.

26 115. **Pat De Carbo:** Plaintiff Pat De Carbo was employed by Stations at Green Valley
27 Ranch as a Food Server from on or about January 23, 2017 until he was laid off on or after
28 March 12, 2020. On or about October 22, 2021, Stations had an open position for Food Server

1 but failed to notify Mr. De Carbo of that position. Mr. De Carbo provided written notice to
2 Stations of the alleged violation on or about January 14, 2022, which Stations failed to respond
3 to or cure within 15 days of receipt. The failure of Stations to notify Mr. De Carbo of a job
4 posting for which he was qualified violates Section 22(1) of SB 386. Stations also violated
5 Section 22(5) of SB 386 when it failed to notify Mr. De Carbo why it claimed he lacked the
6 qualifications for the open position. As a result, Mr. De Carbo has suffered damages through the
7 deprivation of his recall rights and loss of potential income from being hired into a job posting
8 for which he was qualified. He is entitled to hiring and reinstatement, future and back pay, civil
9 penalties, compensatory and liquidated damages, interest, costs and attorneys' fees resulting
10 from Defendant's violations of SB 386, Chapter 613 of Nevada Revised Statutes, sections 2-28,
11 inclusive.

12 116. **Jesus De Leon:** Plaintiff Jesus De Leon was employed by Stations at Green
13 Valley Ranch Resort, Casino, and Spa as a Banquet Server until he was laid off on or after
14 March 12, 2020. On or about January 13, 2022, Mr. De Leon Learned that Stations had an open
15 position for Banquet Server but failed to notify him of that position. Mr. De Leon provided
16 written notice to Stations of the alleged violation on or about January 13, 2021, which Stations
17 has yet to respond to or cure within 15 days of receipt. On information and belief, Stations
18 offered Banquets Food Server shift to employees with less seniority than Mr. De Leon. The
19 failure of Stations to notify Mr. De Leon of a job posting for which he was qualified violates
20 Section 22(1) of SB 386. Stations also violated Section 22(5) of SB 386 when it failed to notify
21 Mr. De Leon why it claimed he lacked the qualifications for the open position. As a result, Mr.
22 De Leon has suffered damages through the deprivation of his recall rights and loss of potential
23 income from being hired into a job posting for which he was qualified. He is entitled to hiring
24 and reinstatement, future and back pay, civil penalties, compensatory and liquidated damages,
25 interest, costs and attorneys' fees resulting from Defendant's violations of SB 386, Chapter 613
26 of Nevada Revised Statutes, sections 2-28, inclusive.

27 117. **Nancy Dickinson:** Plaintiff Nancy Dickinson was employed by Stations at Green
28 Valley Ranch as a Food Server from on or about December 3, 2001 until she was laid off on or

1 after March 12, 2020. On or about October 22, 2021, Stations posted a Food Server position but
2 failed to notify Ms. Dickinson of that position. Ms. Dickinson provided written notice to
3 Stations of the alleged violation on or about December 1, 2021, which Stations failed to respond
4 to or cure within 15 days of receipt. The failure of Stations to notify Ms. Dickinson of a job
5 posting for which she was qualified violates Section 22(1) of SB 386. Stations also violated
6 Section 22(5) of SB 386 when it failed to notify Ms. Dickinson why it claimed she lacked the
7 qualifications for the open position. As a result, Ms. Dickinson has suffered damages through
8 the deprivation of her recall rights and loss of potential income from being hired into a job
9 posting for which she was qualified. She is entitled to hiring and reinstatement, future and back
10 pay, civil penalties, compensatory and liquidated damages, interest, costs and attorneys' fees
11 resulting from Defendant's violations of SB 386, Chapter 613 of Nevada Revised Statutes,
12 sections 2-28, inclusive.

13 **118. Elena Drake Gonzalez:** Plaintiff Elena Drake Gonzalez was employed by
14 Stations at Palace Station as a Kitchen Worker from on or about October 29, 2018 until she was
15 laid off on or after March 12, 2020. On or about October 22, 2021, Stations posted a Kitchen
16 Worker position but failed to notify Ms. Drake of that position. Ms. Drake provided written
17 notice to Stations of the alleged violation on or about January 12, 2022 which Stations failed to
18 respond to or cure within 15 days of receipt. The failure of Stations to notify Ms. Drake
19 Gonzalez of a job posting for which she was qualified violates Section 22(1) of SB 386. Stations
20 also violated Section 22(5) of SB 386 when it failed to notify Ms. Drake Gonzalez why it
21 claimed she lacked the qualifications for the open position. As a result, Ms. Drake Gonzalez has
22 suffered damages through the deprivation of her recall rights and loss of potential income from
23 being hired into a job posting for which she was qualified. She is entitled to hiring and
24 reinstatement, future and back pay, civil penalties, compensatory and liquidated damages,
25 interest, costs and attorneys' fees resulting from Defendant's violations of SB 386, Chapter 613
26 of Nevada Revised Statutes, sections 2-28, inclusive.

27 **119. Nadia El Maher:** Plaintiff Nadia El Maher was employed by Stations at Green
28 Valley Ranch as a Food Server from on or about November 15, 2004 until she was laid off on or

1 after March 12, 2020. As a Food Server, Ms. El Maher was responsible for was responsible for
2 serving guests in a quick efficient and courteous manner. The qualifications for a Food Server
3 included the ability to possess a detailed knowledge of the menu, daily specials, beverages,
4 preparation of food, and prices. On or around August 2, 2021, Ms. El Maher discovered that
5 Green Valley Ranch had a Sprinter position available. The Sprinter was expected to coordinate
6 food orders from servers at the kitchen line and effectively pick up and serve items ordered to
7 each guest table. The qualifications for Sprinter included the ability to develop a thorough
8 knowledge of all food items including plate specifications, garnishing, and table numbering, and
9 effective communication with servers to time orders and perform side service functions as
10 required. Stations did not notify Ms. El Maher of the Sprinter position despite the fact that she
11 was qualified by virtue of working a similar job at Green Valley Ranch in the same job
12 classification. Ms. El Maher provided written notice to Stations of the alleged violation on or
13 about August 2, 2021, which Stations has yet to respond to. The failure of Stations to notify Ms.
14 El Maher of a job posting for which she was qualified violates Section 22(1) of SB 386. Stations
15 also violated Section 22(5) of SB 386 when it failed to notify Ms. El Maher why it claimed she
16 lacked the qualifications for the open position. As a result, Ms. El Maher has suffered damages
17 through the deprivation of her recall rights and loss of potential income from being hired into a
18 job posting for which she was qualified. She is entitled to hiring and reinstatement, future and
19 back pay, civil penalties, compensatory and liquidated damages, interest, costs and attorneys'
20 fees resulting from Defendant's violations of SB 386, Chapter 613 of Nevada Revised Statutes,
21 sections 2-28, inclusive.

22 120. **Orlando Ferreira Lamelas:** Plaintiff Orlando Ferreira Lamelas was employed by
23 Stations at Palace Station as a Kitchen Worker from on or about March 12, 2019 until he was
24 laid off on or after March 12, 2020. On or about October 22, 2021, Stations posted a Kitchen
25 Worker position but failed to notify Mr. Ferreira Lamelas of that position. Mr. Ferreira Lamelas
26 provided written notice to Stations of the alleged violation on or about January 14, 2022, which
27 Stations failed to respond to or cure within 15 days of receipt. The failure of Stations to notify
28 Mr. Ferreira Lamelas of a job posting for which he was qualified violates Section 22(1) of SB

1 386. Stations also violated Section 22(5) of SB 386 when it failed to notify Mr. Ferreira Lamelas
2 why it claimed he lacked the qualifications for the open position. As a result, Mr. Ferreira
3 Lamelas has suffered damages through the deprivation of his recall rights and loss of potential
4 income from being hired into a job posting for which he was qualified. He is entitled to hiring
5 and reinstatement, future and back pay, civil penalties, compensatory and liquidated damages,
6 interest, costs and attorneys' fees resulting from Defendant's violations of SB 386, Chapter 613
7 of Nevada Revised Statutes, sections 2-28, inclusive.

8 **121. Samuel Fletes:** Plaintiff Samuel Fletes was employed by Stations at Sunset
9 Station as a Cook's Helper from on or about July 1, 2012 until he was laid off on or after March
10 12, 2020. On or about October 22, 2021, Stations posted a Cook's Helper position but failed to
11 notify Mr. Fletes of that position. Mr. Fletes provided written notice to Stations of the alleged
12 violation on or about January 10, 2022, which Stations failed to respond to or cure within 15
13 days of receipt. The failure of Stations to notify Mr. Fletes of a job posting for which he was
14 qualified violates Section 22(1) of SB 386. Stations also violated Section 22(5) of SB 386 when
15 it failed to notify Mr. Fletes why it claimed he lacked the qualifications for the open position. As
16 a result, Mr. Fletes has suffered damages through the deprivation of his recall rights and loss of
17 potential income from being hired into a job posting for which he was qualified. He is entitled to
18 hiring and reinstatement, future and back pay, civil penalties, compensatory and liquidated
19 damages, interest, costs and attorneys' fees resulting from Defendant's violations of SB 386,
20 Chapter 613 of Nevada Revised Statutes, sections 2-28, inclusive.

21 **122. Violeta Isai Flores Delgado:** Plaintiff Violeta Isai Flores Delgado was employed
22 by Stations at Sunset Station as a Cook's Helper from on or about May 13, 2019 until she was
23 laid off on or after March 12, 2020. On or about October 22, 2021, Stations posted a Cook's
24 Helper position but failed to notify Ms. Flores Delgado of that position. Ms. Flores Delgado
25 provided written notice to Stations of the alleged violation on or about January 6, 2021, which
26 Stations failed to respond to or cure within 15 days of receipt. The failure of Stations to notify
27 Ms. Flores Delgado of a job posting for which she was qualified violates Section 22(1) of SB
28 386. Stations also violated Section 22(5) of SB 386 when it failed to notify Ms. Flores Delgado

1 why it claimed she lacked the qualifications for the open position. As a result, Ms. Flores
2 Delgado has suffered damages through the deprivation of her recall rights and loss of potential
3 income from being hired into a job posting for which she was qualified. She is entitled to hiring
4 and reinstatement, future and back pay, civil penalties, compensatory and liquidated damages,
5 interest, costs and attorneys' fees resulting from Defendant's violations of SB 386, Chapter 613
6 of Nevada Revised Statutes, sections 2-28, inclusive.

7 **123. Amariyls Gonzalez:** Plaintiff Amariyls Gonzalez was employed by Stations at the
8 Sunset Station as a Stove Cleaner from on or about May 1, 2017 until she was laid off on or
9 after March 12, 2020. On or about August 5, 2021, Stations had an open position for Stove
10 Cleaner at Sunset Station but failed to notify Ms. Gonzalez of that job posting. Ms. Gonzalez
11 provided written notice to Stations of the alleged violation on or about August 5, 2021, which
12 Stations failed to respond to or cure within 15 days of receipt. In fact, Ms. Gonzalez has never
13 received a response to her written notice. On information and belief, Stations filled the Stove
14 Cleaner position by transferring an employee who was a Kitchen Worker into the Stove Cleaner
15 position. The failure of Stations to notify Ms. Gonzalez of a job posting for which she was
16 qualified violates Section 22(1) of SB 386. Stations also violated Section 22(5) of SB 386 when
17 it failed to notify Ms. Gonzalez why it claimed she lacked the qualifications for the open
18 position. As a result, Ms. Gonzalez has suffered damages through the deprivation of her recall
19 rights and loss of potential income from being hired into a job posting for which she was
20 qualified. She is entitled to hiring and reinstatement, future and back pay, civil penalties,
21 compensatory and liquidated damages, interest, costs and attorneys' fees resulting from
22 Defendant's violations of SB 386, Chapter 613 of Nevada Revised Statutes, sections 2-28,
23 inclusive.

24 **124. Rosa Gonzalez:** Plaintiff Rosa Gonzalez was employed by Stations at Palace
25 Station as a Cook from on or about August 9, 2009 until she was laid off on or after March 12,
26 2020. On or about September 9, 2021, Stations posted a Cook position but failed to notify Ms.
27 Gonzalez of that position. Ms. Gonzalez provided written notice to Stations of the alleged
28 violation on or about December 1, 2021, which Stations failed to respond to or cure within 15

1 days of receipt. The failure of Stations to notify Ms. Gonzalez of a job posting for which she
2 was qualified violates Section 22(1) of SB 386. Stations also violated Section 22(5) of SB 386
3 when it failed to notify Ms. Gonzalez why it claimed she lacked the qualifications for the open
4 position. As a result, Ms. Gonzalez has suffered damages through the deprivation of her recall
5 rights and loss of potential income from being hired into a job posting for which she was
6 qualified. She is entitled to hiring and reinstatement, future and back pay, civil penalties,
7 compensatory and liquidated damages, interest, costs and attorneys' fees resulting from
8 Defendant's violations of SB 386, Chapter 613 of Nevada Revised Statutes, sections 2-28,
9 inclusive.

10 **125. Yelba Gonzalez:** Plaintiff Yelba Gonzalez was employed by Stations at Palace
11 Station as a Pantry from on or about January 26, 2014 until she was laid off on or after March
12 12, 2020. On or about October 22, 2021, Stations posted a Pantry position but failed to notify
13 Ms. Gonzalez of that position. Ms. Gonzalez provided written notice to Stations of the alleged
14 violation on or about January 13, 2022, which Stations failed to respond to or cure within 15
15 days of receipt. The failure of Stations to notify Ms. Gonzalez of a job posting for which she
16 was qualified violates Section 22(1) of SB 386. Stations also violated Section 22(5) of SB 386
17 when it failed to notify Ms. Gonzalez why it claimed she lacked the qualifications for the open
18 position. As a result, Ms. Gonzalez has suffered damages through the deprivation of her recall
19 rights and loss of potential income from being hired into a job posting for which she was
20 qualified. She is entitled to hiring and reinstatement, future and back pay, civil penalties,
21 compensatory and liquidated damages, interest, costs and attorneys' fees resulting from
22 Defendant's violations of SB 386, Chapter 613 of Nevada Revised Statutes, sections 2-28,
23 inclusive.

24 **126. Antonia Gutierrez:** Plaintiff Antonia Gutierrez was employed by Stations at
25 Palace Station as a Pantry from on or about March 6, 2007 until she was laid off on or after
26 March 12, 2020. On or about October 22, 2021, Stations posted a Pantry position but failed to
27 notify Ms. Gutierrez of that position. Ms. Gutierrez provided written notice to Stations of the
28 alleged violation on or about January 13, 2022, which Stations failed to respond to or cure

1 within 15 days of receipt. The failure of Stations to notify Ms. Gutierrez of a job posting for
2 which she was qualified violates Section 22(1) of SB 386. Stations also violated Section 22(5)
3 of SB 386 when it failed to notify Ms. Gutierrez why it claimed she lacked the qualifications for
4 the open position. As a result, Ms. Gutierrez has suffered damages through the deprivation of
5 her recall rights and loss of potential income from being hired into a job posting for which she
6 was qualified. She is entitled to hiring and reinstatement, future and back pay, civil penalties,
7 compensatory and liquidated damages, interest, costs and attorneys' fees resulting from
8 Defendant's violations of SB 386, Chapter 613 of Nevada Revised Statutes, sections 2-28,
9 inclusive.

10 **127. Elizabeth Halatsis:** Plaintiff Elizabeth Halatsis was employed by Stations at Red
11 Rock as a Food Server from on or about September 2, 2004 until she was laid off on or after
12 March 12, 2020. On or about October 22, 2021, Stations posted a Food Server position but
13 failed to notify Ms. Halatsis of that position. Ms. Halatsis provided written notice to Stations of
14 the alleged violation on or about January 14, 2022, which Stations failed to respond to or cure
15 within 15 days of receipt. On information and belief, Stations hired an employee with less
16 seniority than Ms. Halatsis into the position. The failure of Stations to notify Ms. Halatsis of a
17 job posting for which she was qualified violates Section 22(1) of SB 386. Stations also violated
18 Section 22(5) of SB 386 when it failed to notify Ms. Halatsis why it claimed she lacked the
19 qualifications for the open position. As a result, Ms. Halatsis has suffered damages through the
20 deprivation of her recall rights and loss of potential income from being hired into a job posting
21 for which she was qualified. She is entitled to hiring and reinstatement, future and back pay,
22 civil penalties, compensatory and liquidated damages, interest, costs and attorneys' fees
23 resulting from Defendant's violations of SB 386, Chapter 613 of Nevada Revised Statutes,
24 sections 2-28, inclusive.

25 **128. Orlando Henriquez:** Plaintiff Orlando Henriquez was employed by Stations at
26 Sunset Station as a Cook from on or about March 28, 2011 until he was laid off on or after
27 March 12, 2020. On or about October 22, 2021, Stations posted a Cook position but failed to
28 notify Mr. Henriquez of that position. Mr. Henriquez provided written notice to Stations of the

1 alleged violation on or about December 1, 2021, which Stations failed to respond to or cure
2 within 15 days of receipt. On information and belief, Stations hired an employee with less
3 seniority than Mr. Henriquez into the position. The failure of Stations to notify Mr. Henriquez of
4 a job posting for which he was qualified violates Section 22(1) of SB 386. Stations also violated
5 Section 22(5) of SB 386 when it failed to notify Mr. Henriquez why it claimed he lacked the
6 qualifications for the open position. As a result, Mr. Henriquez has suffered damages through
7 the deprivation of his recall rights and loss of potential income from being hired into a job
8 posting for which he was qualified. He is entitled to hiring and reinstatement, future and back
9 pay, civil penalties, compensatory and liquidated damages, interest, costs and attorneys' fees
10 resulting from Defendant's violations of SB 386, Chapter 613 of Nevada Revised Statutes,
11 sections 2-28, inclusive.

12 129. **Lila Hernandez:** Plaintiff Lila Hernandez was employed by Stations at Boulder
13 Station as a Cook's Helper from on or about November 14, 2013 until she was laid off on or
14 after March 12, 2020. On or about October 22, 2021, Stations posted a Cook's Helper position
15 but failed to notify Ms. Hernandez of that position. Ms. Hernandez provided written notice to
16 Stations of the alleged violation on or about January 13, 2022, which Stations failed to respond
17 to or cure within 15 days of receipt. The failure of Stations to notify Ms. Hernandez of a job
18 posting for which she was qualified violates Section 22(1) of SB 386. Stations also violated
19 Section 22(5) of SB 386 when it failed to notify Ms. Hernandez why it claimed she lacked the
20 qualifications for the open position. As a result, Ms. Hernandez has suffered damages through
21 the deprivation of her recall rights and loss of potential income from being hired into a job
22 posting for which she was qualified. She is entitled to hiring and reinstatement, future and back
23 pay, civil penalties, compensatory and liquidated damages, interest, costs and attorneys' fees
24 resulting from Defendant's violations of SB 386, Chapter 613 of Nevada Revised Statutes,
25 sections 2-28, inclusive.

26 130. **Maria Elena Hernandez:** Plaintiff Maria Elena Hernandez was employed by
27 Stations at Green Valley Ranch as a Food Server from on or about September 21, 2005 until she
28 was laid off on or after March 12, 2020. On or about October 22, 2021, Stations posted a Food

1 Server position but failed to notify Ms. Hernandez of that position. Ms. Hernandez provided
2 written notice to Stations of the alleged violation on or about December 1, 2021, which Stations
3 failed to respond to or cure within 15 days of receipt. The failure of Stations to notify Ms.
4 Hernandez of a job posting for which she was qualified violates Section 22(1) of SB 386.
5 Stations also violated Section 22(5) of SB 386 when it failed to notify Ms. Hernandez why it
6 claimed she lacked the qualifications for the open position. As a result, Ms. Hernandez has
7 suffered damages through the deprivation of her recall rights and loss of potential income from
8 being hired into a job posting for which she was qualified. She is entitled to hiring and
9 reinstatement, future and back pay, civil penalties, compensatory and liquidated damages,
10 interest, costs and attorneys' fees resulting from Defendant's violations of SB 386, Chapter 613
11 of Nevada Revised Statutes, sections 2-28, inclusive.

12 131. **Nidia Hernandez:** Plaintiff Nidia Hernandez was employed by Stations at Green
13 Valley Ranch as a Kitchen Worker from on or about December 22, 2018 until she was laid off
14 on or after March 12, 2020. On or about October 22, 2021, Stations posted a Kitchen Worker
15 position but failed to notify Ms. Hernandez of that position. Ms. Hernandez provided written
16 notice to Stations of the alleged violation on or about December 17, 2021, which Stations failed
17 to respond to or cure within 15 days of receipt. On information and belief, Stations hired an
18 employee with less seniority than Ms. Hernandez into the position. The failure of Stations to
19 notify Ms. Hernandez of a job posting for which she was qualified violates Section 22(1) of SB
20 386. Stations also violated Section 22(5) of SB 386 when it failed to notify Ms. Hernandez why
21 it claimed she lacked the qualifications for the open position. As a result, Ms. Hernandez has
22 suffered damages through the deprivation of her recall rights and loss of potential income from
23 being hired into a job posting for which she was qualified. She is entitled to hiring and
24 reinstatement, future and back pay, civil penalties, compensatory and liquidated damages,
25 interest, costs and attorneys' fees resulting from Defendant's violations of SB 386, Chapter 613
26 of Nevada Revised Statutes, sections 2-28, inclusive.

27 132. **Alejandro Higuera:** Plaintiff Alejandro Higuera was employed by Stations at
28 Green Valley Ranch as a Food Server from on or about November 21, 2017 until he was laid off

1 on or after March 12, 2020. On or about October 22, 2021, Stations posted a Food Server
2 position but failed to notify Mr. Higuera of that position. Mr. Higuera provided written notice to
3 Stations of the alleged violation on or about November 24, 2021, which Stations failed to respond
4 to or cure within 15 days of receipt. The failure of Stations to notify Mr. Higuera of a job
5 posting for which he was qualified violates Section 22(1) of SB 386. Stations also violated
6 Section 22(5) of SB 386 when it failed to notify Mr. Higuera why it claimed he lacked the
7 qualifications for the open position. As a result, Mr. Higuera has suffered damages through the
8 deprivation of his recall rights and loss of potential income from being hired into a job posting
9 for which he was qualified. He is entitled to hiring and reinstatement, future and back pay, civil
10 penalties, compensatory and liquidated damages, interest, costs and attorneys' fees resulting
11 from Defendant's violations of SB 386, Chapter 613 of Nevada Revised Statutes, sections 2-28,
12 inclusive.

13 133. **Emma Holtz:** Plaintiff Emma Holtz was employed by Stations at Green Valley
14 Ranch as a Food Server from on or about November 21, 2004 until she was laid off on or after
15 March 12, 2020. On or about January 26, 2022, Ms. Holtz discovered that Green Valley Ranch
16 had an open position for Food Server but failed to notify Ms. Holtz of that position. Ms. Holtz
17 provided written notice to Stations of the alleged violation on or about January 26, 2022, which
18 Stations failed to respond to or cure within 15 days of receipt. The failure of Stations to notify
19 Ms. Holtz of a job posting for which she was qualified violates Section 22(1) of SB 386.
20 Stations also violated Section 22(5) of SB 386 when it failed to notify Ms. Holtz why it claimed
21 she lacked the qualifications for the open position. As a result, Ms. Holtz has suffered damages
22 through the deprivation of her recall rights and loss of potential income from being hired into a
23 job posting for which she was qualified. She is entitled to hiring and reinstatement, future and
24 back pay, civil penalties, compensatory and liquidated damages, interest, costs and attorneys'
25 fees resulting from Defendant's violations of SB 386, Chapter 613 of Nevada Revised Statutes,
26 sections 2-28, inclusive.

27 134. **Guillermo Inclan:** Plaintiff Guillermo Inclan was employed by Stations at Palace
28 Station as a Cook from on or about March 4, 2019 until he was laid off on or after March 12,

1 2020. On or about October 22, 2021, Stations posted a Cook position but failed to notify Mr.
2 Inclan of that position. Mr. Inclan provided written notice to Stations of the alleged violation on
3 or about November 30, 2021, which Stations failed to respond to or cure within 15 days of
4 receipt. The failure of Stations to notify Mr. Inclan of a job posting for which he was qualified
5 violates Section 22(1) of SB 386. Stations also violated Section 22(5) of SB 386 when it failed
6 to notify Mr. Inclan why it claimed he lacked the qualifications for the open position. As a
7 result, Mr. Inclan has suffered damages through the deprivation of his recall rights and loss of
8 potential income from being hired into a job posting for which he was qualified. He is entitled to
9 hiring and reinstatement, future and back pay, civil penalties, compensatory and liquidated
10 damages, interest, costs and attorneys' fees resulting from Defendant's violations of SB 386,
11 Chapter 613 of Nevada Revised Statutes, sections 2-28, inclusive.

12 135. **Valerie Jorgensen:** Plaintiff Valerie Jorgensen was employed by Stations at Red
13 Rock as a Food Server from on or about June 7, 2015 until she was laid off on or after March
14 12, 2020. As a Food Server, Ms. Jorgenson was responsible for serving guests in a quick
15 efficient and courteous manner. The qualifications for a Food Server included the ability to
16 possess a detailed knowledge of the menu, daily specials, beverages, preparation of food, and
17 prices. On or around July 22, 2021, Red Rock advertised a temporary Pool Sprinter position on
18 its Careers website. The Pool Sprinter was expected to coordinate food orders from servers at
19 the kitchen line and effectively pick up and serve items ordered to each guest table. The
20 qualifications for Pool Sprinter included the ability to develop a thorough knowledge of all food
21 items including plate specifications, garnishing, and table numbering, and effective
22 communication with servers to time orders and perform side service functions as required.
23 Stations did not notify Ms. Jorgenson of the Pool Sprinter position despite the fact that she was
24 qualified by virtue of working a similar job at Red Rock in the same job classification. Ms.
25 Jorgenson provided written notice to Stations of the alleged violation on or about August 5,
26 2021, which Stations has yet to respond to. On or about October 22, 2021, Stations posted a
27 Food Server position but failed to notify Ms. Jorgensen of that position. On or about October
28 26, 2022, Ms. Jorgensen provided written notice to Stations of the alleged violation, which

1 Stations failed to respond to or cure within 15 days of receipt. Each failure of Stations to notify
2 Valerie Jorgensen of a job posting for which she was qualified is a violation of Section 22(1) of
3 SB 386. Stations also violated Section 22(5) of SB 386 when it failed to notify Ms. Jorgensen
4 why it claimed she lacked the qualifications for the open positions. As a result, Ms. Jorgenson
5 has suffered damages through the deprivation of her recall rights and loss of potential income
6 from being hired into a job posting for which she was qualified. She is entitled to hiring and
7 reinstatement, future and back pay, civil penalties, compensatory and liquidated damages,
8 interest, costs and attorneys' fees resulting from Defendant's violations of SB 386, Chapter 613
9 of Nevada Revised Statutes, sections 2-28, inclusive.

10 **136. Leticia Luis:** Plaintiff Leticia Luis was employed by Stations at Boulder Station
11 as a Cook from on or about February 18, 2016 until she was laid off on or after March 12, 2020.
12 On or about October 22, 2021, Stations had an open position for Cook as Boulder Station but
13 failed to notify Ms. Luis of that job posting. Ms. Luis provided written notice to Stations of the
14 alleged violation on or about January 13, 2022, which Stations failed to respond to or cure
15 within 15 days of receipt. The failure of Stations to notify Ms. Luis of a job posting for which
16 she was qualified violated Section 22(1) of SB 386. Stations also violated Section 22(5) of SB
17 386 when it failed to notify Ms. Luis why it claimed she lacked the qualifications for the open
18 position. As a result, Ms. Luis has suffered damages through the deprivation of her recall rights
19 and loss of potential income from being hired into a job posting for which she was qualified.
20 She is entitled to hiring and reinstatement, future and back pay, civil penalties, compensatory
21 and liquidated damages, interest, costs and attorneys' fees resulting from Defendant's violations
22 of SB 386, Chapter 613 of Nevada Revised Statutes, sections 2-28, inclusive.

23 **137. Carmen Mariscal:** Plaintiff Carmen Mariscal was employed by Stations at Green
24 Valley Ranch as a Food Server until she was laid off on or after March 12, 2020. On or about
25 November 23, 2021, Stations had an open position for a Food Server at Green Valley Ranch but
26 failed to notify Ms. Mariscal of that open position. Ms. Mariscal provided written notice to
27 Stations of the alleged violation on or about November 23, 2021, which Stations has failed to
28 respond to or cure within 15 days of receipt. The failure of Stations to notify Ms. Mariscal of a

1 job posting for which she was qualified violates Section 22(1) of SB 386. Stations also violated
2 Section 22(5) of SB 386 when it failed to notify Ms. Mariscal why it claimed she lacked the
3 qualifications for the open position. As a result, Ms. Mariscal has suffered damages through the
4 deprivation of her recall rights and loss of potential income from being hired into a job posting
5 for which she was qualified. She is entitled to hiring and reinstatement, future and back pay,
6 civil penalties, compensatory and liquidated damages, interest, costs and attorneys' fees
7 resulting from Defendant's violations of SB 386, Chapter 613 of Nevada Revised Statutes,
8 sections 2-28, inclusive.

9 138. **Andrea McKeane**y: Plaintiff Andrea McKeane y was employed by Stations at
10 Santa Fe Station as a Banquet Server from on or about April 18, 2007 until she was laid off on
11 or after March 12, 2020. On or about November 8, 2021, Ms. McKeane y discovered that Santa
12 Fe Station was hiring workers from other Stations properties like Texas Station into Banquet
13 Server positions, but Stations failed to notify Ms. McKeane y of those open positions. Ms.
14 McKeane y provided written notice to Stations of the alleged violation on or about November 8,
15 2021, which Stations failed to respond to or cure within 15 days of receipt. The failure of
16 Stations to notify Ms. McKeane y of a job posting for which she was qualified violates Section
17 22(1) of SB 386. Stations also violated Section 22(5) of SB 386 when it failed to notify Ms.
18 McKeane y why it claimed she lacked the qualifications for the open position. As a result, Ms.
19 McKeane y has suffered damages through the deprivation of his recall rights and loss of potential
20 income from being hired into a job posting for which she was qualified. She is entitled to hiring
21 and reinstatement, future and back pay, civil penalties, compensatory and liquidated damages,
22 interest, costs and attorneys' fees resulting from Defendant's violations of SB 386, Chapter 613
23 of Nevada Revised Statutes, sections 2-28, inclusive.

24 139. **Adali Mejia**: Plaintiff Adali Mejia was employed by Stations at Sunset Station as
25 a Cook from on or about December 21, 2014 until she was laid off on or after March 12, 2020.
26 On or about October 22, 2021, Stations posted a Cook position but failed to notify Ms. Mejia of
27 that position. Ms. Mejia provided written notice to Stations of the alleged violation on or about
28 January 10, 2022, which Stations failed to respond to or cure within 15 days of receipt. On

1 information and belief, Stations hired an employee with less seniority than Ms. Mejia into the
2 position. The failure of Stations to notify Ms. Mejia of a job posting for which she was qualified
3 violates Section 22(1) of SB 386. Stations also violated Section 22(5) of SB 386 when it failed
4 to notify Ms. Mejia why it claimed she lacked the qualifications for the open position. As a
5 result, Ms. Mejia has suffered damages through the deprivation of her recall rights and loss of
6 potential income from being hired into a job posting for which she was qualified. She is entitled
7 to hiring and reinstatement, future and back pay, civil penalties, compensatory and liquidated
8 damages, interest, costs and attorneys' fees resulting from Defendant's violations of SB 386,
9 Chapter 613 of Nevada Revised Statutes, sections 2-28, inclusive.

10 140. **Audrey Melton:** Plaintiff Audrey Melton was employed by Stations at Green
11 Valley Ranch as a Food Server from on or about March 9, 2009 until she was laid off on or after
12 March 12, 2020. On or about October 22, 2021, Stations posted a Food Server position but
13 failed to notify Ms. Melton of that position. Ms. Melton provided written notice to Stations of
14 the alleged violation on or about November 29, 2021, which Stations failed to respond to or cure
15 within 15 days of receipt. The failure of Stations to notify Ms. Melton of a job posting for
16 which she was qualified violates Section 22(1) of SB 386. Stations also violated Section 22(5)
17 of SB 386 when it failed to notify Ms. Melton why it claimed she lacked the qualifications for
18 the open position. As a result, Ms. Melton has suffered damages through the deprivation of her
19 recall rights and loss of potential income from being hired into a job posting for which she was
20 qualified. She is entitled to hiring and reinstatement, future and back pay, civil penalties,
21 compensatory and liquidated damages, interest, costs and attorneys' fees resulting from
22 Defendant's violations of SB 386, Chapter 613 of Nevada Revised Statutes, sections 2-28,
23 inclusive.

24 141. **Alexandria Miller:** Plaintiff Alexandria was employed by Stations at the Santa Fe
25 Station as a Beverage Server from on or about July 18, 2017 until she was laid off on or after
26 March 12, 2020. On or about October 15, 2021, Ms. Miller discovered that Santa Fe Station was
27 hiring workers from other Stations properties like Texas Station into Cocktails positions, but
28 failed to notify her of those open positions. Ms. Miller provided written notice to Stations of the

1 alleged violation on October 15, 2021, which Stations failed to respond to or cure within 15
2 days of receipt, or October 30, 2021. Stations offered Ms. Miller her former position back on
3 November 18, 2021. The failure of Stations to notify Ms. Miller of a job posting for which she
4 was qualified violated Section 22(1) of SB 386. Stations also violated Section 22(5) of SB 386
5 when it failed to notify Ms. Miller why it claimed she lacked the qualifications for the open
6 position. As a result, Ms. Miller has suffered damages through the deprivation of her recall
7 rights and loss of potential income from being hired into a job posting for which she was
8 qualified. She is entitled to hiring and reinstatement, future and back pay, civil penalties,
9 compensatory and liquidated damages, interest, costs and attorneys' fees resulting from
10 Defendant's violations of SB 386, Chapter 613 of Nevada Revised Statutes, sections 2-28,
11 inclusive.

12 142. **Yaquelin Marisol Morales:** Plaintiff Yaquelin Marisol Morales was employed by
13 Stations at Sunset Station as a Cook's Helper from on or about March 23, 2011 until she was
14 laid off on or after March 12, 2020. On or about October 22, 2021, Stations posted a Cook's
15 Helper position but failed to notify Ms. Marisol Morales of that position. Ms. Marisol Morales
16 provided written notice to Stations of the alleged violation on or about November 24, 2021,
17 which Stations failed to respond to or cure within 15 days of receipt. The failure of Stations to
18 notify Ms. Marisol Morales of a job posting for which she was qualified violates Section 22(1)
19 of SB 386. Stations also violated Section 22(5) of SB 386 when it failed to notify Ms. Marisol
20 Morales why it claimed she lacked the qualifications for the open position. As a result, Ms.
21 Marisol Morales has suffered damages through the deprivation of her recall rights and loss of
22 potential income from being hired into a job posting for which she was qualified. She is entitled
23 to hiring and reinstatement, future and back pay, civil penalties, compensatory and liquidated
24 damages, interest, costs and attorneys' fees resulting from Defendant's violations of SB 386,
25 Chapter 613 of Nevada Revised Statutes, sections 2-28, inclusive.

26 143. **Teresa Ocegueda:** Plaintiff Teresa Ocegueda was employed by Stations at
27 Boulder Station as a Cook's Helper from on or about February 28, 2010 until she was laid off on
28 or after March 12, 2020. On or about October 22, 2021, Stations posted a Cook's Helper

1 position but failed to notify Ms. Ocegüera of that position. Ms. Ocegüera provided written
2 notice to Stations of the alleged violation on or about January 13, 2022, which Stations failed to
3 respond to or cure within 15 days of receipt. The failure of Stations to notify Ms. Ocegüera of a
4 job posting for which she was qualified violates Section 22(1) of SB 386. Stations also violated
5 Section 22(5) of SB 386 when it failed to notify Ms. Ocegüera why it claimed she lacked the
6 qualifications for the open position. As a result, Ms. Ocegüera has suffered damages through the
7 deprivation of her recall rights and loss of potential income from being hired into a job posting
8 for which she was qualified. She is entitled to hiring and reinstatement, future and back pay,
9 civil penalties, compensatory and liquidated damages, interest, costs and attorneys' fees
10 resulting from Defendant's violations of SB 386, Chapter 613 of Nevada Revised Statutes,
11 sections 2-28, inclusive.

12 144. **Yohanna Gabriela Osorto Carias:** Plaintiff Yohanna Gabriela Osorto Carias was
13 employed by Stations at Green Valley Ranch as a Stove Person from on or about February 7,
14 2019 until she was laid off on or after March 12, 2020. On or about October 22, 2021, Stations
15 posted a Stove Person position but failed to notify Ms. Osorto Carias of that position. Ms.
16 Osorto Carias provided written notice to Stations of the alleged violation on or about January
17 11, 2022, which Stations failed to respond to or cure within 15 days of receipt. The failure of
18 Stations to notify Ms. Osorto Carias of a job posting for which she was qualified violates
19 Section 22(1) of SB 386. Stations also violated Section 22(5) of SB 386 when it failed to notify
20 Ms. Osorto Carias why it claimed she lacked the qualifications for the open position. As a result,
21 Ms. Osorto Carias has suffered damages through the deprivation of her recall rights and loss of
22 potential income from being hired into a job posting for which she was qualified. She is entitled
23 to hiring and reinstatement, future and back pay, civil penalties, compensatory and liquidated
24 damages, interest, costs and attorneys' fees resulting from Defendant's violations of SB 386,
25 Chapter 613 of Nevada Revised Statutes, sections 2-28, inclusive.

26 145. **Claudia Perez-Zuñiga:** Plaintiff Claudia Perez-Zuñiga was employed by Stations
27 at Green Valley Ranch as a Cook from on or about April 2, 2018 until she was laid off on or
28 after March 12, 2020. On or about October 22, 2021, Stations posted a Cook position but failed

1 to notify Ms. Perez-Zuñiga of that position. Ms. Perez-Zuñiga provided written notice to
2 Stations of the alleged violation on or about December 2, 2021, which Stations failed to respond
3 to or cure within 15 days of receipt. The failure of Stations to notify Ms. Perez-Zuñiga of a job
4 posting for which she was qualified violates Section 22(1) of SB 386. Stations also violated
5 Section 22(5) of SB 386 when it failed to notify Ms. Perez-Zuñiga why it claimed she lacked the
6 qualifications for the open position. As a result, Ms. Perez-Zuñiga has suffered damages through
7 the deprivation of her recall rights and loss of potential income from being hired into a job
8 posting for which she was qualified. She is entitled to hiring and reinstatement, future and back
9 pay, civil penalties, compensatory and liquidated damages, interest, costs and attorneys' fees
10 resulting from Defendant's violations of SB 386, Chapter 613 of Nevada Revised Statutes,
11 sections 2-28, inclusive.

12 146. **Maria Pichardo:** Plaintiff Maria Pichardo was employed by Stations at Sunset
13 Station as a Pantry from on or about May 18, 1997 until she was laid off on or after March 12,
14 2020. On or about October 22, 2021, Stations posted a Pantry position but failed to notify Ms.
15 Pichardo of that position. Ms. Pichardo provided written notice to Stations of the alleged
16 violation on or about January 13, 2022, which Stations failed to respond to or cure within 15
17 days of receipt. The failure of Stations to notify Ms. Pichardo of a job posting for which she
18 was qualified violates Section 22(1) of SB 386. Stations also violated Section 22(5) of SB 386
19 when it failed to notify Ms. Pichardo why it claimed she lacked the qualifications for the open
20 position. As a result, Ms. Pichardo has suffered damages through the deprivation of her recall
21 rights and loss of potential income from being hired into a job posting for which she was
22 qualified. She is entitled to hiring and reinstatement, future and back pay, civil penalties,
23 compensatory and liquidated damages, interest, costs and attorneys' fees resulting from
24 Defendant's violations of SB 386, Chapter 613 of Nevada Revised Statutes, sections 2-28,
25 inclusive.

26 147. **Erika Rios:** Plaintiff Erika Rios was employed by Stations at Boulder Station as a
27 Cook's Helper from on or about March 4, 2019 until she was laid off on or after March 12,
28 2020. On or about October 22, 2021, Stations posted a Cook's Helper position but failed to

1 notify Ms. Rios of that position. Ms. Rios provided written notice to Stations of the alleged
2 violation on or about January 13, 2022, which Stations failed to respond to or cure within 15
3 days of receipt. The failure of Stations to notify Ms. Rios of a job posting for which she was
4 qualified violates Section 22(1) of SB 386. Stations also violated Section 22(5) of SB 386 when
5 it failed to notify Ms. Rios why it claimed she lacked the qualifications for the open position. As
6 a result, Ms. Rios has suffered damages through the deprivation of her recall rights and loss of
7 potential income from being hired into a job posting for which she was qualified. She is entitled
8 to hiring and reinstatement, future and back pay, civil penalties, compensatory and liquidated
9 damages, interest, costs and attorneys' fees resulting from Defendant's violations of SB 386,
10 Chapter 613 of Nevada Revised Statutes, sections 2-28, inclusive.

11 148. **Amaury Rodriguez:** Plaintiff Amaury Rodriguez was employed by Stations at
12 Green Valley Ranch as a Banquets Food Server from on or about March 1, 2006 until he was
13 laid off on or after March 12, 2020. On or about January 29, 2022, Mr. Rodriguez learned that
14 Green Valley Ranch had open positions for Banquets Food Server, but failed to notify him of
15 that position. Mr. Rodriguez provided written notice to Stations of the alleged violation on or
16 about January 29, 2021, which Stations failed to respond to or cure within 15 days of receipt.
17 The failure of Stations to notify Mr. Rodriguez of a job posting for which he was qualified
18 violates Section 22(1) of SB 386. On information and belief, Stations offered Banquets Food
19 Server shifts to employees with less seniority than Mr. Rodriguez. Stations also violated Section
20 22(5) of SB 386 when it failed to notify Mr. Rodriguez why it claimed he lacked the
21 qualifications for the open position. As a result, Mr. Rodriguez has suffered damages through
22 the deprivation of his recall rights and loss of potential income from being hired into a job
23 posting for which he was qualified. He is entitled to hiring and reinstatement, future and back
24 pay, civil penalties, compensatory and liquidated damages, interest, costs and attorneys' fees
25 resulting from Defendant's violations of SB 386, Chapter 613 of Nevada Revised Statutes,
26 sections 2-28, inclusive.

27 149. **David Leon Rodriguez:** Plaintiff David Leon Rodriguez was employed by
28 Stations at Santa Fe Station as a Kitchen Worker from on or about January 29, 2005 until he was

1 laid off on or after March 12, 2020. On or about October 22, 2021, Stations posted a Kitchen
2 Worker position but failed to notify Mr. Rodriguez of that position. Mr. Rodriguez provided
3 written notice to Stations of the alleged violation on or about January 20, 2021, which Stations
4 failed to respond to or cure within 15 days of receipt. The failure of Stations to notify Mr.
5 Rodriguez of a job posting for which he was qualified violates Section 22(1) of SB 386. Stations
6 also violated Section 22(5) of SB 386 when it failed to notify Mr. Rodriguez why it claimed he
7 lacked the qualifications for the open position. As a result, Mr. Rodriguez has suffered damages
8 through the deprivation of his recall rights and loss of potential income from being hired into a
9 job posting for which he was qualified. He is entitled to hiring and reinstatement, future and
10 back pay, civil penalties, compensatory and liquidated damages, interest, costs and attorneys'
11 fees resulting from Defendant's violations of SB 386, Chapter 613 of Nevada Revised Statutes,
12 sections 2-28, inclusive.

13 150. **Fernando Salazar:** Plaintiff Fernando Salazar was employed by Stations at Green
14 Valley Ranch as a Kitchen Worker from on or about February 16, 2016 until she was laid off on
15 or after March 12, 2020. On or about October 22, 2021, Stations posted a Kitchen Worker
16 position but failed to notify Mr. Salazar of that position. Mr. Salazar provided written notice to
17 Stations of the alleged violation on or about January 7, 2022, which Stations failed to respond to
18 or cure within 15 days of receipt. On information and belief, Stations hired an employee with
19 less seniority than Mr. Salazar into the position. The failure of Stations to notify Mr. Salazar of a
20 job posting for which he was qualified violates Section 22(1) of SB 386. Stations also violated
21 Section 22(5) of SB 386 when it failed to provide notice to Mr. Salazar about why it claimed he
22 lacked the qualifications for the open position. As a result, Mr. Salazar has suffered damages
23 through the deprivation of his recall rights and loss of potential income from being hired into a
24 job posting for which he was qualified. He is entitled to hiring and reinstatement, future and
25 back pay, civil penalties, compensatory and liquidated damages, interest, costs and attorneys'
26 fees resulting from Defendant's violations of SB 386, Chapter 613 of Nevada Revised Statutes,
27 sections 2-28, inclusive.

28 151. **Maria Salgado:** Plaintiff Maria Salgado was employed by Stations at Sunset

1 Station as a Pantry from on or about April 30, 2011 until she was laid off on or after March 12,
2 2020. On or about October 22, 2021, Stations posted a Pantry position but failed to notify Ms.
3 Salgado of that position. Ms. Salgado provided written notice to Stations of the alleged violation
4 on or about January 13, 2022, which Stations failed to respond to or cure within 15 days of
5 receipt. The failure of Stations to notify Ms. Salgado of a job posting for which she was
6 qualified violates Section 22(1) of SB 386. Stations also violated Section 22(5) of SB 386 when
7 it failed to provide notice to Ms. Salgado about why it claimed she lacked the qualifications for
8 the open position. As a result, Ms. Salgado has suffered damages through the deprivation of her
9 recall rights and loss of potential income from being hired into a job posting for which she was
10 qualified. She is entitled to hiring and reinstatement, future and back pay, civil penalties,
11 compensatory and liquidated damages, interest, costs and attorneys' fees resulting from
12 Defendant's violations of SB 386, Chapter 613 of Nevada Revised Statutes, sections 2-28,
13 inclusive.

14 152. **Yusett Salomon Diaz:** Plaintiff Yusett Salomon Diaz was employed by Stations
15 at Red Rock as a Cook's Helper from on or about August 14, 2018 until he was laid off on or
16 after March 12, 2020. On or about October 22, 2021, Stations posted a Cook's Helper position
17 but failed to notify Mr. Salomon Diaz of that position. Mr. Salomon Diaz provided written
18 notice to Stations of the alleged violation on or about January 11, 2022, which Stations failed to
19 respond to or cure within 15 days of receipt. The failure of Stations to notify Mr. Salomon Diaz
20 of a job posting for which he was qualified violates Section 22(1) of SB 386. Stations also
21 violated Section 22(5) of SB 386 when it failed to provide notice to Mr. Salomon Diaz about
22 why it claimed he lacked the qualifications for the open position. As a result, Mr. Salomon Diaz
23 has suffered damages through the deprivation of his recall rights and loss of potential income
24 from being hired into a job posting for which he was qualified. He is entitled to hiring and
25 reinstatement, future and back pay, civil penalties, compensatory and liquidated damages,
26 interest, costs and attorneys' fees resulting from Defendant's violations of SB 386, Chapter 613
27 of Nevada Revised Statutes, sections 2-28, inclusive.

28 153. **Rene Sanchez:** Plaintiff Rene Sanchez was employed by Stations at Sunset

1 Station as a Stove Person from on or about August 19, 2019 until he was laid off on or after
2 March 12, 2020. On or about October 22, 2021, Stations posted a Stove Person position but
3 failed to notify Mr. Sanchez of that position. Mr. Sanchez provided written notice to Stations of
4 the alleged violation on or about January 13, 2021, which Stations failed to respond to or cure
5 within 15 days of receipt. The failure of Stations to notify Mr. Sanchez of a job posting for
6 which he was qualified violates Section 22(1) of SB 386. Stations also violated Section 22(5) of
7 SB 386 when it failed to provide notice to Mr. Sanchez why it claimed he lacked the
8 qualifications for the open position. As a result, Mr. Sanchez has suffered damages through the
9 deprivation of his recall rights and loss of potential income from being hired into a job posting
10 for which he was qualified. He is entitled to hiring and reinstatement, future and back pay, civil
11 penalties, compensatory and liquidated damages, interest, costs and attorneys' fees resulting
12 from Defendant's violations of SB 386, Chapter 613 of Nevada Revised Statutes, sections 2-28,
13 inclusive.

14 154. **Clara Sanchez Recio:** Plaintiff Clara Sanchez Recio was employed by Stations at
15 Green Valley Ranch as a Kitchen Worker from on or about May 28, 2018 until she was laid off
16 on or after March 12, 2020. On or about October 22, 2021, Stations posted a Kitchen Worker
17 position but failed to notify Ms. Sanchez Recio of that position. Ms. Sanchez Recio provided
18 written notice to Stations of the alleged violation on or about December 13, 2021, which
19 Stations failed to respond to or cure within 15 days of receipt. On information and belief,
20 Stations hired an employee with less seniority than Ms. Sanchez Recio into the position. The
21 failure of Stations to notify Ms. Sanchez Recio of a job posting for which she was qualified
22 violates Section 22(1) of SB 386. Stations also violated Section 22(5) of SB 386 when it failed
23 to notify Ms. Sanchez Recio about why it claimed she lacked the qualifications for the open
24 position. As a result, Ms. Sanchez Recio has suffered damages through the deprivation of her
25 recall rights and loss of potential income from being hired into a job posting for which she was
26 qualified. She is entitled to hiring and reinstatement, future and back pay, civil penalties,
27 compensatory and liquidated damages, interest, costs and attorneys' fees resulting from
28 Defendant's violations of SB 386, Chapter 613 of Nevada Revised Statutes, sections 2-28,

1 inclusive.

2 **155. Amanda Santoyo:** Plaintiff Amanda Santoyo was employed by Stations at Santa
3 Fe Station as a Cook's Helper from on or about November 23, 2004 until she was laid off on or
4 after March 12, 2020. On or about October 22, 2021, Stations posted a Cook's Helper position
5 but failed to notify Ms. Santoyo of that position. Ms. Santoyo provided written notice to Stations
6 of the alleged violation on or about January 29, 2022, which Stations failed to respond to or cure
7 within 15 days of receipt. The failure of Stations to notify Ms. Santoyo of a job posting for
8 which she was qualified violates Section 22(1) of SB 386. Stations also violated Section 22(5)
9 of SB 386 when it failed to notify Ms. Santoyo about why it claimed she lacked the
10 qualifications for the open position. As a result, Ms. Santoyo has suffered damages through the
11 deprivation of her recall rights and loss of potential income from being hired into a job posting
12 for which she was qualified. She is entitled to hiring and reinstatement, future and back pay,
13 civil penalties, compensatory and liquidated damages, interest, costs and attorneys' fees
14 resulting from Defendant's violations of SB 386, Chapter 613 of Nevada Revised Statutes,
15 sections 2-28, inclusive.

16 **156. Ashley Schwartz:** Plaintiff Ashley Schwartz was employed by Stations at the
17 Palace Station as a Beverage Server from on or about June 19, 2018 until she was laid off on or
18 after March 12, 2020. On or about July 28, 2021, Stations had an open position for Beverage
19 Server at Palace Station but failed to notify Ms. Schwartz of that job posting. Ms. Schwartz
20 provided written notice to Stations of the alleged violation on or about July 28, 2021, which
21 Stations failed to respond to or cure within 15 days of receipt. In fact, Ms. Schwartz never
22 received any response at all to her written notice. The failure of Stations to notify Ms. Schwartz
23 of a job posting for which she was qualified violates Section 22 of SB 386. On or about October
24 22, 2021, Stations posted a Beverage Server position but failed to notify Ms. Schwartz of that
25 position. On or about January 13, 2022, Ms. Schwartz provided written notice to Stations of the
26 alleged violation, which Stations failed to respond to or cure within 15 days of receipt. Each
27 failure of Stations to notify Ms. Schwartz of a job posting for which she was qualified is a
28 violation of Section 22(1) of SB 386. Stations also violated Section 22(5) of SB 386 when it

1 failed to notify Ms. Schwartz about why it claimed she lacked the qualifications for the
2 positions. As a result, Ms. Schwartz has suffered damages through the deprivation of her recall
3 rights and loss of potential income from being hired into a job posting for which she was
4 qualified. She is entitled to hiring and reinstatement, future and back pay, civil penalties,
5 compensatory and liquidated damages, interest, costs and attorneys' fees resulting from
6 Defendant's violations of SB 386, Chapter 613 of Nevada Revised Statutes, sections 2-28,
7 inclusive.

8 **157. Victor Hugo Simental Garcia:** Plaintiff Victor Hugo Simental Garcia was
9 employed by Stations at Santa Fe Station as a Cook's Helper from on or about June 18, 2001
10 until he was laid off on or after March 12, 2020. On or about October 22, 2021, Stations posted
11 a Cook's Helper position but failed to notify Mr. Simental Garcia of that position. Mr. Simental
12 Garcia provided written notice to Stations of the alleged violation on or about November 23,
13 2021, which Stations failed to respond to or cure within 15 days of receipt. The failure of
14 Stations to notify Mr. Simental Garcia of a job posting for which he was qualified violates
15 Section 22(1) of SB 386. Stations also violated Section 22(5) of SB 386 when it failed to notify
16 Mr. Simental Garcia about why it claimed he lacked the qualifications for the open position. As
17 a result, Mr. Simental Garcia has suffered damages through the deprivation of his recall rights
18 and loss of potential income from being hired into a job posting for which he was qualified. He
19 is entitled to hiring and reinstatement, future and back pay, civil penalties, compensatory and
20 liquidated damages, interest, costs and attorneys' fees resulting from Defendant's violations of
21 SB 386, Chapter 613 of Nevada Revised Statutes, sections 2-28, inclusive.

22 **158. Rodrigo Solano:** Plaintiff Rodrigo Solano was employed by Stations at the
23 Boulder Station as a Cook from on or about November 9, 1993 until he was laid off on or after
24 March 12, 2020. On or about September 9, 2021, Stations posted a Cook position but failed to
25 notify Mr. Solano of that job posting. Mr. Solano provided written notice to Stations of the
26 alleged violation on or about September 15, 2021, to which Stations failed to respond or cure
27 within 15 days of receipt. In fact, Mr. Solano has never received a response to his written notice.
28 The failure of Stations to notify Mr. Solano of a job posting for which he was qualified violates

1 Section 22(1) of SB 386. Stations also violated Section 22(5) of SB 386 when it failed to notify
2 Mr. Solano about why it claimed he lacked the qualifications for the open position. As a result,
3 Mr. Solano has suffered damages through the deprivation of his recall rights and loss of
4 potential income from being hired into a job posting for which he was qualified. He is entitled to
5 hiring and reinstatement, future and back pay, civil penalties, compensatory and liquidated
6 damages, interest, costs and attorneys' fees resulting from Defendant's violations of SB 386,
7 Chapter 613 of Nevada Revised Statutes, sections 2-28, inclusive.

8 159. **Michelle Strande:** Plaintiff Michelle Strande was employed by Stations at Green
9 Valley Ranch as a Café Server from on or about October 22, 2018 until she was laid off on or
10 after March 12, 2020. As a Café Server, Ms. Strande was responsible for serving guests in a
11 quick efficient and courteous manner. The qualifications for a Café Server included the ability
12 to possess a detailed knowledge of the menu, daily specials, beverages, preparation of food, and
13 prices. On or around July 28, 2021, Green Valley Ranch advertised a temporary Pool Sprinter
14 position on its Careers website. The Pool Sprinter was expected to coordinate food orders from
15 servers at the kitchen line and effectively pick up and serve items ordered to each guest table.
16 The qualifications for Pool Sprinter included the ability to develop a thorough knowledge of all
17 food items including plate specifications, garnishing, and table numbering, and effective
18 communication with servers to time orders and perform side service functions as required.
19 Stations did not notify Ms. Strande of the Pool Sprinter position despite the fact that she was
20 qualified by virtue of working a similar job at Green Valley Ranch in the same job
21 classification. Ms. Strande provided written notice to Stations of the alleged violation on or
22 about August 3, 2021, which Stations has yet to respond to. The failure of Stations to notify Ms.
23 Strande of a job posting for which she was qualified violates Section 22(1) of SB 386. Stations
24 also violated Section 22(5) of SB 386 when it failed to notify Ms. Strande about why it claimed
25 she lacked the qualifications for the open position. As a result, Ms. Strande has suffered
26 damages through the deprivation of her recall rights and loss of potential income from being
27 hired into a job posting for which she was qualified. She is entitled to hiring and reinstatement,
28 future and back pay, civil penalties, compensatory and liquidated damages, interest, costs and

1 attorneys' fees resulting from Defendant's violations of SB 386, Chapter 613 of Nevada Revised
2 Statutes, sections 2-28, inclusive.

3 **160. Luz Tafolla:** Plaintiff Luz Tafolla was employed by Stations at Green Valley
4 Ranch as a Cook from on or about September 26, 2016 until she was laid off on or after March
5 12, 2020. On or about October 22, 2021, Stations posted a cook position but failed to notify Ms.
6 Tafolla of that position. Ms. Tafolla provided written notice to Stations of the alleged violation
7 on or about November 30, 2021, which Stations failed to respond to or cure within 15 days of
8 receipt. The failure of Stations to notify Ms. Tafolla of a job posting for which she was
9 qualified violates Section 22(1) of SB 386. Stations also violated Section 22(5) of SB 386 when
10 it failed to notify Ms. Tafolla about why it claimed she lacked the qualifications for the open
11 position. As a result, Ms. Tafolla has suffered damages through the deprivation of her recall
12 rights and loss of potential income from being hired into a job posting for which she was
13 qualified. She is entitled to hiring and reinstatement, future and back pay, civil penalties,
14 compensatory and liquidated damages, interest, costs and attorneys' fees resulting from
15 Defendant's violations of SB 386, Chapter 613 of Nevada Revised Statutes, sections 2-28,
16 inclusive.

17 **161. Sergio Tejido:** Plaintiff Sergio Tejido was employed by Stations at Sunset Station
18 as a Kitchen Runner from on or about February 22, 2016 until he was laid off on or after March
19 12, 2020. On or about October 22, 2021, Stations posted a Kitchen Runner position but failed to
20 notify Mr. Tejido of that position. Mr. Tejido provided written notice to Stations of the alleged
21 violation on or about January 12, 2022, which Stations failed to respond to or cure within 15
22 days of receipt. The failure of Stations to notify Mr. Tejido of a job posting for which he was
23 qualified violates Section 22(1) of SB 386. Stations also violated Section 22(5) of SB 386 when
24 it failed to notify Mr. Tejido about why it claimed he lacked the qualifications for the open
25 position. As a result, Mr. Tejido has suffered damages through the deprivation of his recall
26 rights and loss of potential income from being hired into a job posting for which he was
27 qualified. He is entitled to hiring and reinstatement, future and back pay, civil penalties,
28 compensatory and liquidated damages, interest, costs and attorneys' fees resulting from

1 Defendant's violations of SB 386, Chapter 613 of Nevada Revised Statutes, sections 2-28,
2 inclusive.

3 **162. Edgar Tevalan-Barrios:** Plaintiff Edgar Tevalan-Barrios was employed by
4 Stations at Sunset Station as a Kitchen Runner from on or about July 8, 1997 until he was laid
5 off on or after March 12, 2020. On or about October 22, 2021, Stations posted a Kitchen
6 Runner position but failed to notify Mr. Tevalan-Barrios of that position. Mr. Tevalan-Barrios
7 provided written notice to Stations of the alleged violation on or about January 13, 2022, which
8 Stations failed to respond to or cure within 15 days of receipt. The failure of Stations to notify
9 Mr. Tevalan-Barrios of a job posting for which he was qualified violates Section 22(1) of SB
10 386. Stations also violated Section 22(5) of SB 386 when it failed to notify Mr. Tevalan-Barrios
11 about why it claimed he lacked the qualifications for the open position. As a result, Mr. Tevalan-
12 Barrios has suffered damages through the deprivation of his recall rights and loss of potential
13 income from being hired into a job posting for which he was qualified. He is entitled to hiring
14 and reinstatement, future and back pay, civil penalties, compensatory and liquidated damages,
15 interest, costs and attorneys' fees resulting from Defendant's violations of SB 386, Chapter 613
16 of Nevada Revised Statutes, sections 2-28, inclusive.

17 **163. Barbara Tivas:** Plaintiff Barbara Tivas was employed by Stations at Green
18 Valley Ranch as a Banquet Server from on or about April 11, 2007 until she was laid off on or
19 after March 12, 2020. On or about November 29, 2011, Ms. Tivas discovered that Stations had
20 an open position for Banquet Server but failed to notify Ms. Tivas of that position. Ms. Tivas
21 provided written notice to Stations of the alleged violation on or about November 29, 2011,
22 which Stations failed to respond to or cure within 15 days of receipt. The failure of Stations to
23 notify Ms. Tivas of a job posting for which she was qualified violates Section 22(1) of SB 386.
24 Stations also violated Section 22(5) of SB 386 when it failed to notify Ms. Tivas about why it
25 claimed she lacked the qualifications for the open position. As a result, Ms. Tivas has suffered
26 damages through the deprivation of her recall rights and loss of potential income from being
27 hired into a job posting for which she was qualified. She is entitled to hiring and reinstatement,
28 future and back pay, civil penalties, compensatory and liquidated damages, interest, costs and

1 attorneys' fees resulting from Defendant's violations of SB 386, Chapter 613 of Nevada Revised
2 Statutes, sections 2-28, inclusive.

3 164. **Aurora Torres Gonzalez:** Plaintiff Aurora Torres Gonzalez was employed by
4 Stations at Green Valley Ranch as a Food Server from on or about March 15, 2009 until she was
5 laid off on or after March 12, 2020. On or about October 22, 2021, Stations posted a Food
6 Server position but failed to notify Ms. Torres Gonzalez of that position. Ms. Torres Gonzalez
7 provided written notice to Stations of the alleged violation on or about December 2, 2021, which
8 Stations failed to respond to or cure within 15 days of receipt. The failure of Stations to notify
9 Ms. Torres Gonzalez of a job posting for which she was qualified violates Section 22(1) of SB
10 386. Stations also violated Section 22(5) of SB 386 when it failed to notify Ms. Torres Gonzalez
11 why it claimed she lacked the qualifications for the open position. As a result, Ms. Torres
12 Gonzalez has suffered damages through the deprivation of her recall rights and loss of potential
13 income from being hired into a job posting for which she was qualified. She is entitled to hiring
14 and reinstatement, future and back pay, civil penalties, compensatory and liquidated damages,
15 interest, costs and attorneys' fees resulting from Defendant's violations of SB 386, Chapter 613
16 of Nevada Revised Statutes, sections 2-28, inclusive.

17 165. **Jose Valle:** Plaintiff Jose Valle was employed by Stations at the Boulder Station
18 as a Buffet Cook from on or about November 9, 1993 until he was laid off on or after March 12,
19 2020. On or about September 9, 2021, Stations posted a Cook position but failed to notify Mr.
20 Valle of that job posting. Mr. Valle provided written notice to Stations of the alleged violation
21 of his rights under SB 386 on or about September 24, 2021, to which Stations failed to respond
22 or cure within 15 days of receipt. In fact, Mr. Valle has never received a response to his written
23 notice. The failure of Stations to notify Mr. Valle of a job posting for which he was qualified
24 violates Section 22(1) of SB 386. Stations also violated Section 22(5) of SB 386 when it failed
25 to notify Mr. Valle why it claimed he lacked the qualifications for the open position. As a result,
26 Mr. Valle has suffered damages through the deprivation of his recall rights and loss of potential
27 income from being hired into a job posting for which he was qualified. He is entitled to hiring
28 and reinstatement, future and back pay, civil penalties, compensatory and liquidated damages,

1 interest, costs and attorneys' fees resulting from Defendant's violations of SB 386, Chapter 613
2 of Nevada Revised Statutes, sections 2-28, inclusive.

3 **166. Oscar Vallejo:** Plaintiff Oscar Vallejo was employed by Stations at Sunset Station
4 as a Cook from on or about October 16, 2017 until he was laid off on or after March 12, 2020.
5 On or about October 22, 2021, Stations posted a Cook position but failed to notify Mr. Vallejo
6 of that position. Mr. Vallejo provided written notice to Stations of the alleged violation on or
7 about January 30, 2022, which Stations failed to respond to or cure within 15 days of receipt.
8 The failure of Stations to notify Mr. Vallejo of a job posting for which he was qualified violates
9 Section 22(1) of SB 386. Stations also violated Section 22(5) of SB 386 when it failed to notify
10 Mr. Vallejo why it claimed he lacked the qualifications for the open position. As a result, Mr.
11 Vallejo has suffered damages through the deprivation of his recall rights and loss of potential
12 income from being hired into a job posting for which he was qualified. He is entitled to hiring
13 and reinstatement, future and back pay, civil penalties, compensatory and liquidated damages,
14 interest, costs and attorneys' fees resulting from Defendant's violations of SB 386, Chapter 613
15 of Nevada Revised Statutes, sections 2-28, inclusive

16 **167. Mario Valles:** Plaintiff Mario Valles was employed by Stations at Green Valley
17 Ranch as a Cook from on or about September 26, 2016 until he was laid off on or after March
18 12, 2020. On or about, October 22, 2021, Stations posted a Cook position but failed to notify
19 Mr. Valles of that position. Mr. Valles provided written notice to Stations of the alleged
20 violation on or about December 1, 2021, which Stations failed to respond to or cure within 15
21 days of receipt. The failure of Stations to notify Mr. Valles of a job posting for which he was
22 qualified violates Section 22(1) of SB 386. Stations also violated Section 22(5) of SB 386 when
23 it failed to notify Mr. Valles why it claimed he lacked the qualifications for the open position.
24 As a result, Mr. Valles has suffered damages through the deprivation of his recall rights and loss
25 of potential income from being hired into a job posting for which he was qualified. He is entitled
26 to hiring and reinstatement, future and back pay, civil penalties, compensatory and liquidated
27 damages, interest, costs and attorneys' fees resulting from Defendant's violations of SB 386,
28 Chapter 613 of Nevada Revised Statutes, sections 2-28, inclusive.

1 168. **Juan Vivas:** Plaintiff Juan Vivas was employed by Stations at Sunset Station as a
2 Cook's Helper from on or about May 26, 1997 until he was laid off on or after March 12, 2020.
3 On or about October 22, 2021, Stations posted a Cook's Helper position but failed to notify Mr.
4 Vivas of that position. Mr. Vivas provided written notice to Stations of the alleged violation on
5 or about January 13, 2022, which Stations failed to respond to or cure within 15 days of receipt.
6 The failure of Stations to notify Mr. Vivas of a job posting for which he was qualified violates
7 Section 22(1) of SB 386. Stations also violated Section 22(5) of SB 386 when it failed to notify
8 Mr. Vivas why it claimed he lacked the qualifications for the open position. As a result, Mr.
9 Vivas has suffered damages through the deprivation of his recall rights and loss of potential
10 income from being hired into a job posting for which he was qualified. He is entitled to hiring
11 and reinstatement, future and back pay, civil penalties, compensatory and liquidated damages,
12 interest, costs and attorneys' fees resulting from Defendant's violations of SB 386, Chapter 613
13 of Nevada Revised Statutes, sections 2-28, inclusive.

14 169. **Ramon Vivanco:** Plaintiff Ramon Vivanco was employed by Stations at Santa Fe
15 Station as a Banquet Server from on or about December 5, 2006 until he was laid off on or after
16 March 12, 2020. On or about November 8, 2021, Stations had an open Banquet Server position
17 but failed to notify Mr. Vivanco of that position. Mr. Vivanco provided written notice to
18 Stations of the alleged violation on or about November 8, 2021, which Stations failed to respond
19 to or cure within 15 days of receipt. The failure of Stations to notify Mr. Vivanco of a job
20 posting for which he was qualified violates Section 22(1) of SB 386. Stations also violated
21 Section 22(5) of SB 386 when it failed to notify Mr. Vivanco why it claimed he lacked the
22 qualifications for the open position. As a result, Mr. Vivanco has suffered damages through the
23 deprivation of his recall rights and loss of potential income from being hired into a job posting
24 for which he was qualified. He is entitled to hiring and reinstatement, future and back pay, civil
25 penalties, compensatory and liquidated damages, interest, costs and attorneys' fees resulting
26 from Defendant's violations of SB 386, Chapter 613 of Nevada Revised Statutes, sections 2-28,
27 inclusive.

28 170. **Mark Walker:** Plaintiff Mark Walker was employed by Stations at Green Valley

1 Ranch as a Banquet Server from on or about March 28, 2011 until he was laid off on or after
2 March 12, 2020. On or about March 28, 2011, Stations had an open position for Banquet Server
3 but failed to notify Mr. Walker of that position. Mr. Walker provided written notice to Stations
4 of the alleged violation on or about January 13, 2022, which Stations failed to respond to or cure
5 within 15 days of receipt. On information and belief, Stations offered Banquet Server shifts to
6 employees with less seniority than Mr. Walker. The failure of Stations to notify Mr. Walker of a
7 job posting for which he was qualified violates Section 22(1) of SB 386. Stations also violated
8 Section 22(5) of SB 386 when it failed to notify Mr. Walker why it claimed he lacked the
9 qualifications for the open position. As a result, Mr. Walker has suffered damages through the
10 deprivation of his recall rights and loss of potential income from being hired into a job posting
11 for which he was qualified. He is entitled to hiring and reinstatement, future and back pay, civil
12 penalties, compensatory and liquidated damages, interest, costs and attorneys' fees resulting
13 from Defendant's violations of SB 386, Chapter 613 of Nevada Revised Statutes, sections 2-28,
14 inclusive.

15 171. **Rosa Zavala:** Plaintiff Rosa Zavala was employed by Stations at Sunset Station as
16 a Kitchen Runner from on or about December 12, 2016 until she was laid off on or after March
17 12, 2020. On or about October 22, 2021, Stations posted a Kitchen Runner position but failed to
18 notify Ms. Zavala of that position. Ms. Zavala provided written notice to Stations of the alleged
19 violation on or about January 12, 2021, which Stations failed to respond to or cure within 15
20 days of receipt. The failure of Stations to notify Ms. Zavala of a job posting for which she was
21 qualified violates Section 22(1) of SB 386. Stations also violated Section 22(5) of SB 386 when
22 it failed to notify Ms. Zavala why it claimed she lacked the qualifications for the open position.
23 As a result, Ms. Zavala has suffered damages through the deprivation of her recall rights and
24 loss of potential income from being hired into a job posting for which she was qualified. She is
25 entitled to hiring and reinstatement, future and back pay, civil penalties, compensatory and
26 liquidated damages, interest, costs and attorneys' fees resulting from Defendant's violations of
27 SB 386, Chapter 613 of Nevada Revised Statutes, sections 2-28, inclusive.

28 //

1 **PRAYER**

2 WHEREFORE, Plaintiffs pray for the following relief:

- 3 1. Rights of hiring and reinstatement into job positions for which they are qualified;
4 2. Future and back pay for each Plaintiff starting 15 days after Stations received and
5 failed to respond to each Plaintiff’s written notice of a violation under SB 386;
6 3. Civil penalties of \$100 for each employee whose rights under SB 386 were
7 violated;
8 4. Compensatory and liquidated damages payable to each Plaintiff in the amount of
9 \$500 per day that Stations violated SB 386;
10 5. Reasonable attorneys’ fees and costs; and
11 6. Such other and further relief as this court deems just and equitable.

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13 Dated: March 29, 2022

Respectfully Submitted,
MCCRACKEN, STEMERMAN, & HOLSBERY, LLP

14
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