IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MICHIGAN **SOUTHERN DIVISION**

MERCEDES WHITFIELD, on behalf of herself and similarly situated employees,

2:18-cv-10973-DML-EAS

Plaintiffs,

Hon. David M. Lawson

v.

TRINITY RESTAURANT GROUP, LLC,

Defendant.

PLAINTIFFS' PRE-DISCOVERY MOTION FOR CONDITIONAL CERTIFICATION AND COURT-AUTHORIZED NOTICE TO POTENTIAL OPT-IN PLAINTIFFS PURSUANT TO 29 U.S.C. § 216(b)

Plaintiff, Mercedes Whitfield, on behalf of herself and all other similarly situated individuals ("Plaintiffs"), respectfully moves, pursuant to Section 16(b) of the Fair Labor Standards Act ("FLSA"), 29 U.S.C. § 216(b), for entry of an order as follows:

- Conditionally certifying the proposed FLSA collective; (1)
- (2) Implementing a procedure whereby Court-authorized notice of Plaintiffs' FLSA claim is sent (via US Mail, e-mail, and text message) to:

All current and former Servers who worked for Trinity Restaurant Group, LLC at its IHOP restaurants at any time during the last three years.

(3) Requiring Defendant to identify all potential opt-in plaintiffs by providing a list, in electronic and importable format, of all current and former Servers who worked for Defendant at its IHOP restaurants at any time during the last three years including their: names, job title(s), addresses, telephone numbers, email addresses, dates of employment, location(s) of employment, and date of birth, within 14 days of the entry of the order.

This motion is based on the pleadings, Plaintiffs' declarations, the memorandum of law in support of this motion (along with its exhibits), and arguments of Counsel. Pursuant to L.R. 7.1, Plaintiffs' counsel sought concurrence from Defendant's counsel in the relief sought herein but the request was denied.

Dated: June 29, 2018 Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on June 29, 2018, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system, thereby serving all counsel of record.

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2:18-cv-10973-DML-EAS

Plaintiffs,

Hon. David M. Lawson

v.

TRINITY RESTAURANT GROUP, LLC,

Defendant.

MEMORANDUM OF LAW IN SUPPORT OF PLAINTIFFS' PRE-DISCOVERY MOTION FOR CONDITIONAL CLASS CERTIFICATION AND COURT-AUTHORIZED NOTICE TO POTENTIAL OPT-IN PLAINTIFFS PURSUANT TO 29 U.S.C. §216(b)

STATEMENT OF ISSUES PRESENTED

1. ARE DEFENDANT'S SERVERS SIMILARLY SITUATED SUCH THAT THE COURT SHOULD CONDITIONALLY CERTIFY A COLLECTIVE ACTION UNDER 29 U.S.C. § 216(b) OF THE FLSA AND AUTHORIZE NOTICE TO AFFECTED EMPLOYEES?

Plaintiffs' Answer: Yes

Defendant's Answer: No

The Court Should Answer: Yes

2. SHOULD DEFENDANT BE REQUIRED TO PRODUCE THE NAMES, ADDRESSES, AND E-MAIL ADDRESSES OF INDIVIDUALS COVERED BY THE COLLECTIVE TO FACILITATE THE NOTICE PROCESS?

Plaintiffs' Answer: Yes

Defendant's Answer: No

The Court Should Answer: Yes

3. SHOULD THE COURT APPROVE A SIXTY (60) DAY OPT-IN PERIOD FOR INDIVIDUALS COVERED BY THE COLLECTIVE TO OPT IN TO THIS LITIGATION?

Plaintiffs' Answer: Yes

Defendant's Answer: No

The Court Should Answer: Yes

CONTROLLING OR MOST APPROPRIATE AUTHORITY

Hoffman-La Roche Inc. v. Sperling, 493 U.S. 165 (1989)

Comer v. Wal-Mart Stores, Inc., 454 F.3d 544 (6th Cir. 2006)

O'Brien v. Ed Donnelly Enters., Inc., 575 F.3d 567 (6th Cir. 2009)

Gaffers v. Kelly Servs., 203 F. Supp. 3d 829 (E.D. Mich. 2016) (Lawson, J.)

McCoy v. RP, Inc., 2015 U.S. Dist. LEXIS 142521 (D.S.C. Oct. 19, 2015)

Flood v. Carlson Rests., Inc., 2015 U.S. Dist. LEXIS 6608 (S.D.N.Y. Jan. 20, 2015)

I. <u>INTRODUCTION</u>

Originating Plaintiff Mercedes Whitfield and Opt-In Plaintiffs Heidi Couter and Katie Elwell (collectively "Plaintiffs") submit this brief in support of their prediscovery motion for "conditional certification" of the following FLSA collective:

All current and former Servers who worked for Trinity Restaurant Group, LLC at its IHOP restaurants at any time during the last three years.

The FLSA's conditional certification standard in the Sixth Circuit is not difficult for employees to satisfy. *See* Section III, *infra*. As discussed below, Plaintiffs have satisfied this standard, and the Court should authorize notice to Defendant's other Servers of their right to participate in this lawsuit. A proposed notice is attached as *Exhibit A*.

II. PERTINENT FACTS AND PROCEDURAL HISTORY

A. Plaintiffs' Common Legal Claims

The FLSA requires employers to pay employees a minimum wage of \$7.25/hour. 29 U.S.C. § 206(a)(1)(C). However, in determining the minimum wage owed to a "tipped employee," the FLSA contains a "tip credit" provision that enables an employer to pay the tipped employee as little as \$2.13/hour under

federal law, so long as the employee's additional tip payments bring her total pay above the \$7.25/hour threshold. *Id.* at § 203(m); 29 C.F.R. § 531.50(a).

Generally speaking, employers can only use the FLSA tip credit in paying a tipped employee if they satisfy several requirements. These include:

- The employer affirmatively notifies the employee that it will be paid in accordance with the FLSA's tip credit provision. 29 C.F.R. § 203(m); and
- The employee retains all tips received by the employee unless they are part of a valid "tip pool" that only includes employees who "customarily and regularly" receive tips because their jobs entail direct customer interaction. Id.; Montano v. Montrose Restaurant Associates, Inc., 800 F.3d 186, 193 (5th Cir. 2015); Ford v. Lehigh Valley Restaurant Group, Inc., 2014 U.S. Dist. LEXIS 92801, *13 (M.D. Pa. July 9, 2014); Pedigo v. Austin Rumba, Inc., 722 F. Supp. 2d 714, 730 (N.D. Tx. 2010); and
- The employee does not spend more than 20% of his or her time performing non-tip producing work such as, inter alia, washing dishes, stocking condiments, preparing salads, cleaning walls, wiping tables, rolling silverware, and cleaning the restaurant. See 29 C.F.R. § 531.56(e); Fast v. Applebee's Int'l., Inc., 638 F.3d 872, *879-82 (8th Cir. 2011); Irvine v. Destination Wild Dunes Management, 106 F. Supp. 3d 729 (D.S.C. 2015); Flood v. Carlson Rests., Inc., 94 F. Supp. 3d 572 (S.D.N.Y. 2015); Ide v. Neighborhood Rest. Partners, LLC, 32 F. Supp. 3d 1285 (N.D. Ga. 2014); U.S. Dep. of Labor, Field Operations Handbook Ch. 30d00(f) (Dec. 9, 1988) (available at http://www.dol.gov/whd/FOH/FOH_Ch30.pdf); U.S. Department of Labor, Wage and Hour Division Fact Sheet #15: Tipped Employees Under the Fair Labor Standards Act (FLSA) (rev. Apr. 2018) ("DOL Fact Sheet #15") (available at http://www.dol.gov/whd/regs/compliance/whdfs15.htm).

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¹ The Michigan Workforce Opportunity Wage Act requires that servers get paid a slightly higher tipped minimum wage of \$3.52 per hour. See WOWA § 408.414d.

Plaintiffs allege that Defendant – having benefitted from the tip credit in paying Plaintiffs and other Servers – has failed to satisfy its FLSA minimum wage obligations in two separate ways.

First, Plaintiffs allege that Defendant violated the FLSA's minimum wage mandate by requiring Plaintiffs and other Servers to spend more than 20% of their time performing non-tip producing sidework while they are still paid the tipped minimum hourly wage. *See* First Amended Cpl. (Doc. 15) at ¶¶ 15, 19-20, 63-71. Examples of these sidework tasks include, but are not limited to, washing dishes, stocking condiments, preparing salads, cleaning the walls, wiping the tables, rolling silverware, preparing toppings, preparing food for the salad bar, getting ice, and cleaning the restaurant. *Id.* at 15, 57, 66.

Servers to share their tips with other restaurant employees performing the work of food expediters. *Id.* at ¶¶ 30-35, 72-80. According to Plaintiffs, Defendant's food expediters do not have the requisite level of direct customer interaction to enable them to participate in the tip pool with the Servers. *Id.*

Based on these practices, Plaintiffs assert that the FLSA entitles them to the tip credit of \$3.73 for each hour worked in the last three years representing the difference between the hourly wage that they were paid by Defendant (\$3.52) and the FLSA's minimum wage requirement (\$7.25).

B. Concise Statement of Facts in the Pleadings, Declarations Filed by Plaintiffs, and Other Documents

Defendant is a company that owns and operates a chain of approximately 14 IHOP restaurants in Michigan. First Amended Complaint ("FAC"), ¶ 8 (Doc. 15).

During the period between approximately February 2015 to December 2016, Plaintiff Whitfield was employed by Defendant as a server at its IHOP restaurant located at 2701 East Jefferson Ave. in Detroit, Michigan. *Id.* at ¶ 12; *see also* Declaration of Mercedes Whitfield ("Whitfield Dec."), ¶ 1, attached as *Exhibit B*. Opt-in Plaintiffs Heidi Courter and Katie Elwell were employed by Defendant at its Mount Pleasant and Saginaw locations during the past three years. *See* Declaration and Notice of Consent to Become Party Plaintiff of Heidi Courter ("Courter Dec."), ¶ 1; Declaration and Notice of Consent to Become Party Plaintiff ("Elwell Dec."), ¶ 1, which are both filed at **Doc. 11**.

During the past three years, Defendant paid Plaintiffs and other Servers a "tipped minimum wage" below \$7.25 per hour plus tips. FAC at ¶ 13; Whitfield Dec. ¶ 1; Courter Dec. ¶ 1; Elwell Dec. ¶ 1. In seeking to comply with the FLSA and WOWA, Defendant has purported to utilize a tip credit under the FLSA and WOWA. FAC at ¶ 14; Whitfield Dec. ¶ 1; Courter Dec. ¶ 1; Elwell Dec. ¶ 1.

Defendant maintains a company-wide policy and practice which requires Plaintiffs and other Servers to spend more than 20% of their work time performing non-tip producing work. Such non-tip producing work includes, but is not limited

to, washing dishes, stocking condiments, preparing salads, cleaning the walls, wiping the tables, rolling silverware, preparing toppings, preparing food for the salad bar, getting ice, and cleaning the restaurant. FAC at ¶ 15-20; Whitfield Dec. ¶¶ 2-6; Courter Dec. ¶¶ 2-6; Elwell Dec. ¶¶ 3-7.

Defendant also maintains a common policy of requiring Plaintiffs and other Servers to contribute a portion of their tips to a "tip pool" that includes other employees of the restaurant. FAC at ¶ 30; Courter Dec. ¶ 7; Elwell Dec. ¶ 8.

On weekends, holidays other busy days (such as "Free Pancake Day") employees who worked for Defendant as expediters (aka "expos) received a portion of the tips that Plaintiff and other Servers were required by Defendant to contribute to the tip pool. FAC at ¶ 31; Whitfield Dec. ¶ 7; Courter Dec. ¶ 7; Elwell Dec. ¶ 8.

The expos' duties primarily consist of readying food orders for pick up by the Servers in and/or near the restaurant's kitchen area. Expos do not receive tips directly from customers. This is because expos are required by Defendant to physically work at or near the restaurant's kitchen and not go on the restaurant floor or interact with restaurant customers. FAC at ¶¶ 32-34; Whitfield Dec. ¶ 7; Courter Dec. ¶ 7; Elwell Dec. ¶ 8.

Defendant requires Servers at all of its IHOP restaurants to share a portion of their tips while earning the subminimum wage with employees who do not have direct customer interaction with customers. FAC at ¶ 35; Whitfield Dec. ¶¶ 7, 9; Courter Dec. ¶ 7; Elwell Dec. ¶ 8.

The Plaintiffs regularly worked with, talked to and saw scores of other Servers who were also covered by Defendant's policies described above. *See generally* FAC; *see also* Whitfield Dec. ¶¶ 9-10; Courter Dec. ¶¶ 9-10; Elwell Dec. ¶¶ 10-11.

Lastly, Defendant's online job postings for its Server positions are nearly identical across all 14 of its Michigan locations. (See online job postings, attached as *Exhibit C*).² This is additional evidence that all of Defendant's Servers are similarly situated for purposes of the instant motion. The postings make specific reference to required sidework as described by the Plaintiffs. Moreover, each job posting references an "SOP" that applies to all Servers who work for Defendant, clearly showing that all Servers – regardless of location – are subject to similar working conditions and expectations. Of course, this evidence is consistent with Defendant's counsel's representation at the June 18, 2018 scheduling conference that Defendant's restaurants are centrally owned and operated.

² Plaintiffs recognize that *Exhibit C* is somewhat cumbersome to review. For the Court's convenience, Defendant's Server job postings are also available for online review at:

https://my.peoplematter.com/mja/trinityrestaurantgroupihop/JobApp/GetBusiness Units?personId=&city=detroit%20&state=mi&latitude=42.331427&longitude=-83.0457538

III. LAW AND ARGUMENT

A. FLSA "Conditional Certification" Generally.

In Gaffers v. Kelly Servs., 203 F. Supp. 3d 829 (E.D. Mich. 2016) (Lawson,

J.), this Court described the process of certifying FLSA collectives as follows:

The class-based litigation format authorized by 29 U.S.C. § 216(b), labeled a collective action, "serves an important remedial purpose" by allowing "a plaintiff who has suffered only small monetary harm [to] join a larger pool of similarly situated plaintiffs" in order to reduce individual litigation costs and employ judicial resources efficiently. O'Brien v. Ed Donnelly Enters., Inc., 575 F.3d 567, 586 (6th Cir. 2009) (citing Hoffmann-La Roche, 493 U.S. at 170). The statute sets out two requirements for collective actions: "1) the plaintiffs must actually be 'similarly situated,' and 2) all plaintiffs must signal in writing their affirmative consent to participate in the action." Comer v. Wal-Mart Stores, Inc., 454 F.3d 544, 546 (6th Cir. 2006). The criteria in such cases generally are evaluated at various stages of the litigation. Id. at 546-47.

At the notice stage, conditional certification may be given along with judicial authorization to notify similarly situated employees of the action. Once discovery has concluded, the district court — with more information on which to base its decision and thus under a more exacting standard — looks more closely at whether the members of the class are similarly situated.

Monroe, 815 F.3d at 1008 (citations omitted). "[C]onditional certification' does not produce a class with an independent legal status, or join additional parties to the action." Genesis Healthcare, 133 S. Ct. at 1530. "The sole consequence of conditional certification is the sending of court-approved written notice to employees, who in turn become parties to a collective action only by filing written consent with the court." Ibid. (citation omitted). At the notice stage, "the certification is conditional and by no means final, and the plaintiff must show only that his position is similar, not identical, to the positions held

by the putative class members." *Comer*, 454 F.3d at 546-47. "At the second stage, following discovery, trial courts examine more closely the question of whether particular members of the class are, in fact, similarly situated." *Id.* at 547. *The preliminary decision to authorize notice "need only be based on a modest factual showing," the "determination is made using a fairly lenient standard," and the analysis "typically results in conditional certification of a representative class." <i>Ibid.*

"[T]he FLSA's 'similarly situated' standard is less demanding than Rule 23's standard [for certification of a class action]." Monroe, 815 F.3d at 1009. When evaluating whether potential opt-in plaintiffs are similarly situated, the Sixth Circuit considers three non-exhaustive factors that many courts have found relevant: (1) the factual and employment settings of the individual plaintiffs; (2) the different defenses to which the plaintiffs may be subject on an individual basis; and (3) the degree of fairness and procedural impact of certifying the action as a collective action. Ibid. (collecting cases). Proof of a "unified policy" of violations is not required, and employees are similarly situated where they either (1) suffer from a single, FLSAviolating policy, or (2) have claims that are unified by common theories of the defendant's statutory violations, even if the proofs of those theories may be necessarily individualized and distinct. Ibid. When deciding whether certification of a collective action is appropriate, "[t]wo governing principles from [the] case law serve as guides: plaintiffs do not have to be 'identically situated' to be similarly situated, and the FLSA is a remedial statute that should be broadly construed." *Id.* at 1011.

Id. at 842-43 (emphasis supplied). As our Supreme Court observed, the collective action mechanism is critical because it provides workers with "the advantage of lower individual costs to vindicate rights by the pooling of resources." Hoffman-La Roche Inc. v. Sperling, 493 U.S. 165, 170 (1989). However these benefits "depend[] on employees receiving accurate and timely notice concerning the

pendency of the collective action, so that they can make informed decisions about whether to participate." *Id.* at 170.

B. Because Plaintiffs Satisfy the "Modest Factual Showing" Standard, Conditional Certification Should Be Granted and Notice Should Issue

Applying the "modest factual showing" standard, the Court should conditionally certify an FLSA collective consisting of: All current and former Servers who worked for Defendant at its IHOP restaurants at any time during the last three years. Even in the absence of discovery, the record sufficiently demonstrates that Plaintiffs and the putative collective assert the same claims and are bound together by a common set of core facts:

First, the record contains ample evidence at this early stage that the proposed collective is bound together by certain common facts relating to Defendant's use of the tip credit, Defendant's requirement that Plaintiff and other servers spend more than 20% of their time performing non-tip producing side work, Defendant's use of a tip-pool that includes expediters who do not customarily and regularly receive tips because their jobs do not entail direct customer interaction, and Defendant's uniform job postings/descriptions and references to a common SOP that apply to all Servers at all locations. *See* Section II.B, *supra*. This is sufficient evidence at this early stage to demonstrate that Plaintiffs and members of the proposed collective are victims of a common scheme of Defendant that violated the FLSA. *Hathaway v. Shawn Jones Masonry*, 2012

U.S. Dist. LEXIS 52313, at *5 (W.D. Ky. April 12, 2012), *citing Comer*, 454 F.3d at 546 ("At this stage, courts generally consider the pleadings and any affidavits which have been submitted."); *accord Douglas v. GE Energy Reuter Stokes*, 2007 U.S. Dist. LEXIS 32449, at *18-19 (N.D. Ohio April 30, 2007) (plaintiff met low standard for conditional certification through his own affidavit and that of one other worker).

Plaintiffs' operative complaint, their declarations, and the job postings easily meet the low standard for pre-discovery notice and demonstrate, at this stage, that Trinity IHOP servers are similarly situated for purposes of collective action under § 216(b). The three declarants' testimony regarding Defendant's use of the tip credit, Defendant's requirement that Plaintiff and other servers spend more than 20% of their time performing non-tip producing side work, and Defendant's use of a tip-pool that includes expediters who do not customarily and regularly receive tips because their jobs do not entail direct customers is substantially similar; and their testimony about the uniformity imposed by Trinity over all the IHOP restaurants it operates raises the reasonable inference that their experiences (in three different restaurants) is <u>not</u> materially different than the experiences of servers in other Trinity IHOP restaurants in Michigan.

Second, because the statute of limitations diminishes or eliminates absent collective members' claims unless and until they opt-in to this litigation, the Court

should allow notice to be disseminated now. The statute of limitations on claims under the FLSA is two years, which can be extended by an additional year upon proof of a defendant's willful violation. 29 U.S.C. §255(a). Unlike a traditional class action under Fed. R. Civ. P. 23, in which absent class members' statutes of limitations are tolled upon the filing of the named plaintiff's initial complaint, a collective action complaint does not toll the FLSA statute of limitations for any absent class members. Włotkowski v. Mich. Bell Tel. Co., 267 F.R.D. 213, 219 (E.D. Mich. 2010) (citing Comer v. Wal-Mart Stores, Inc., 454 F.3d 544, 546 (6th Cir. 2006)). Rather, such class members only arrest the running of the statute of limitations by filing individual written consents to join the collective action. Thus, the prompt issuing of "judicial notice protects these claims by informing similarly situated employees of the facts needed to make an informed decision whether to opt-in." Id. at 219, citing Hoffman-La Rouche v. Sperling, 493 U.S. 165, 170 (1989).

"[C]ourts have concluded that the objectives to be served through a collective action justify the conditional certification of a class of putative plaintiffs early in a proceeding." *LaFleur v. Dollar Tree Stores, Inc.*, 2012 U.S. Dist. LEXIS 143514, at *10-11 (E.D. Va. Oct. 2, 2012). Indeed, "time is of the essence for purposes of FLSA notice because the statute of limitations is not tolled until a potential plaintiff opts into the proposed collective action." *Taylor v. Pittsburgh*

Mercy Health Sys., Inc., 2009 U.S. Dist. LEXIS 40080, at *2 (W.D. Pa. May 11, 2009); accord Lynch v. United Services Auto. Ass'n, 491 F. Supp. 2d 357, 367 (S.D.N.Y. 2007) ("the benefits to the judicial system of collective actions 'depend on employees receiving accurate and timely notice concerning the pendency of the collective action, so that they can make informed decisions about whether to participate"); Smith v. Lowe's Cos., Inc., 2005 U.S. Dist. LEXIS 9763, at *6 (S.D. Ohio May 11, 2005) ("Notice at an early state of litigation is appropriate to further the FLSA's broad remedial goals and to promote efficient case management.").

As this Court explained in *Fisher v. Mich. Bell Tel. Co.*, the failure to provide prompt notice to potential collective action members would frustrate the FLSA's broad remedial purposes and its specific grant of collective action rights to employees. 665 F. Supp. 2d 819, 828-29 (E.D. Mich. 2009).

Lastly, district courts frequently conditionally certified similar collectives challenging a restaurant's inclusion of potentially ineligible employees in a tip pool and the performance of excessive sidework by servers.

For example, in *Flood v. Carlson Rests., Inc.*, the Southern District of New York conditionally certified a collective of approximately 42,000 tipped workers at T.G.I. Friday's restaurants nationwide. 2015 U.S. Dist. LEXIS 6608, *15 (S.D.N.Y. Jan. 20, 2015). As here, the *Flood* plaintiffs alleged that they were subjected to "mandatory tip pooling arrangement[s], in which the tipped employees

were required to share tips with workers who had limited or no interaction with customers, such as *expediters* and silverware rollers" and "also required that tipped workers spend a substantial amount of time performing non-tip producing side work." *Id.* at *8-9 (emphasis supplied and internal quotations omitted).

Likewise, in *McCoy v. RP, Inc.*, the District of South Carolina conditionally certified a collective of employees at multiple restaurant locations who asserted similar claims that they were required to contribute a portion of their tips to a pool that included ineligible "back-of-the-house employees." 2015 U.S. Dist. LEXIS 142521, *11-12 (D.S.C. Oct. 19, 2015). The *McCoy* court relied on a single affidavit by a tipped employee at one restaurant location to authorize collective notice to the defendants other tipped employees. *Id*.

These are just two examples of courts authorizing notice to employees who challenged a restaurant's use of the tip credit against their FLSA minimum wage obligations. Many other district courts across the country have agreed and authorized notice to similar collectives. *See e.g.*, *Irvine v. Destination Wild Dunes Mgmt.*, 132 F. Supp. 3d 707, 710 (D.S.C. 2015); *Pedigo v. 3003 S. Lamar, LLP*, 666 F. Supp. 2d 693, 700 (W.D. Tex. 2009); *Fast v. Applebee's Int'l, Inc.*, 243 F.R.D. 360 (W.D. Mo. 2007); *Stephens v. Farmers Rest. Grp.*, 2018 U.S. Dist. LEXIS 15439, *22-24, (D.D.C. Jan. 31, 2018); *Carbone v. Zen 333 Inc.*, 2016 U.S. Dist. LEXIS 176355, *28 (D.S.C. Dec. 21, 2016); *Sanchez v. Salsa Con Fuego*,

Inc., 2016 U.S. Dist. LEXIS 118315, *16 (S.D.N.Y. Aug. 24, 2016); Mendoza v. Mo's Fisherman Exch., Inc., 2016 U.S. Dist. LEXIS 81764, *68 (D. Md. June 22, 2016); Robbins v. Blazin Wings, Inc., 2016 U.S. Dist. LEXIS 35446 (W.D.N.Y. Mar. 18, 2016); Degidio v. Crazy Horse Saloon & Rest., Inc., 2015 U.S. Dist. LEXIS 132558, *72 (D.S.C. Sep. 30, 2015); Walter v. Buffets Inc., 2015 U.S. Dist. LEXIS 82507 (D.S.C. June 25, 2015); Flood v. Carlson Rests., Inc., 2015 U.S. Dist. LEXIS 6608 (S.D.N.Y. Jan. 20, 2015); Fonseca v. Dircksen & Talleyrand Inc., 2014 U.S. Dist. LEXIS 52744, *19 (S.D.N.Y. Apr. 10, 2014); Torres v. Cache Cache, Ltd., 2012 U.S. Dist. LEXIS 180937, *10 (D. Colo. Dec. 21, 2012); Chhab v. Darden Rests., Inc., 2013 U.S. Dist. LEXIS 135926 (S.D.N.Y. Sep. 19, 2013); Alequin v. Darden Rests., Inc., 2013 U.S. Dist. LEXIS 99458 (S.D. Fla. July 12, 2013); Haschak v. Fox & Hound Rest. Grp., 2012 U.S. Dist. LEXIS 162476 (N.D. III. Nov. 14, 2012); Dorsey v. Greene Turtle Franchising, Corp., 2010 U.S. Dist. LEXIS 95791 (D. Md. Sep. 14, 2010); Rousseau v. Frederick's Bistro, Ltd., 2010 U.S. Dist. LEXIS 34271 (W.D. Tex. Apr. 7, 2010); Lopez v. Valls Grps., Inc., 2008 U.S. Dist. LEXIS 124218, *22 (S.D. Fla. July 14, 2008); Bernal v. Vankar Enters., 2008 U.S. Dist. LEXIS 22814, *12 (W.D. Tex. Mar. 24, 2008).

C. Plaintiffs are Entitled to Obtain a List of All Potential Collective Members.

In order to facilitate timely and orderly notice to all potential collective members, Plaintiffs request this Court to order Defendant to identify all potential opt-in plaintiffs within ten (10) days of the entry of the Order conditionally certifying the collective. Specifically, Plaintiffs request:

A list in electronic and importable format, of all current and former Servers who worked for Defendant at its IHOP restaurants at any time during the last three years including their: names, job title(s), addresses, telephone numbers, email addresses, dates of employment, location(s) of employment, and date of birth.

Discovery of this information is permitted to facilitate effective notice to those employees who need to receive notice in order to exercise their right to opt in, or not. *Hoffmann-La Roche*, 493 U.S. at 170; *see also Lynch v. United Services Automotive Association*, 491 F. Supp. 2d 357, 371-72 (S.D.N.Y. Apr. 25, 2017) (ordering production of list in electronic and importable format within five days); *Gaffers*, 203 F. Supp. 3d at 846 ("defendants must furnish to counsel for the plaintiffs the last known post office and email addresses of the potential members of the described class [within 14 days]").

D. Notice Should Be Circulated Via First-Class Mail, E-Mail, and Text Message.

Citing the realities of modern-day society, the available efficiencies, and the desire to get prompt notice into the hands of similarly situated employees,

numerous courts recognize that it is appropriate to distribute notice by way of email in addition to first-class mail. *See e.g.*, *Anderson v. Minacs Group*, 2017 U.S. Dist. LEXIS 70513, at *30 (E.D. Mich. May 9, 2017) ("[e-mail] notice comports with a trend toward greater use of e-mail (and corresponding less use of ordinary mail) for most types of communications."); *Gaffers*, 203 F. Supp. 3d at 846 ("plaintiff shall deliver notice promptly to putative class members by United States mail, email, or both."); *Atkinson v. TeleTech Holdings, Inc.*, 2015 U.S. Dist. LEXIS 23630, *11 (S.D. Ohio, February 26, 2015) (approving e-mail notice to employees and observing that it "appears to be in line with the current nationwide trend").

Likewise, courts have also approved distribution of collective action notices via text message, as Plaintiffs request here. *See e.g.*, *Owens v. GLH Capital Ent.*, *Inc.*, *et al.*, 2017 U.S. Dist. LEXIS 108808, at *13 (S.D. Ill. July 13, 2017) (approving the circulation of "notice via U.S. Mail, email and text."); *Bhumithanarn v. 22 Noodle Mkt. Corp.*, No. 14-cv-3624 (RJS), 2015 U.S. Dist. LEXIS 90616, at *11-13 (S.D.N.Y. July 13, 2015) (collecting cases).

E. The Court Should Provide a Sixty (60) Day Opt-in Period for Potential Collective Members to Join this Litigation.

With respect to the length of the opt-in period, Plaintiffs anticipate significant difficulties in locating potential opt-in plaintiffs, noting that due to the nature of the industry, many of the Servers no longer employed by Defendant may

have moved to a different address. Under the circumstances, Plaintiffs believe the opt-in period should last at least sixty (60) days. *See e.g.*, *Gaffers*, 203 F. Supp. 3d 846 (60 days); *Shipes v. Amurcon Corp.*, 2012 U.S. Dist. LEXIS 39794, *34–35 (E.D. Mich. Mar. 23, 2012) (90 days). At the same time, sixty (60) days does not unreasonably prolong or delay the proceedings, especially if the parties commence discovery during the notice period.

IV. CONCLUSION

For the above reasons, Plaintiffs request that the Court grant this Motion and authorize their proposed notice (*Exhibit A*) to the FLSA collective.

Dated: June 29, 2018 Respectfully submitted,

/s/ Jason S. Rathod
Jason S. Rathod, Esq.
Nicholas A. Migliaccio, Esq.
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/s/ Jesse L. Young
Jesse L. Young, Esq.
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P.O. Box. 4010
Kalamazoo, Michigan 49003-4010
(269) 324-3000 (Tel.)

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Dresher, PA 19025
Tel: (215) 884-2491
pwinebrake@winebrakelaw.com
asantillo@winebrakelaw.com
mgottesfeld@winebrakelaw.com

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on June 29, 2018, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system, thereby serving all counsel of record.

/s/ Jason S. Rathod
Jason S. Rathod, Esq.
Nicholas A. Migliaccio, Esq.
MIGLIACCIO & RATHOD LLP
412 H St., NE
Suite 302
Washington, DC 20002
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jrathod@classlawdc.com
nmigliaccio@classlawdc.com

COURT-AUTHORIZED NOTICE

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MICHIGAN

If you have been employed as a server at an IHOP restaurant operated by Trinity Restaurant Group LLC, please read this notice.

A court authorized this notice. This is not a solicitation from a lawyer.

In March 2018, Mercedes Whitfield ("Plaintiff") started this lawsuit against Trinity Restaurant Group LLC ("Trinity"). The lawsuit is proceeding in the United States District Court in Detroit, MI and is assigned to United States District Judge David M. Lawson.

The lawsuit alleges that Trinity violated federal wage law by failing to pay servers the full minimum wage of \$7.25 per hour. The Plaintiff alleges that this is a result of two impermissible practices by Trinity. First, the Plaintiff alleges Trinity required servers, waiters, and waitresses at its IHOP Restaurants spend more than 20% of their time doing non-tip producing "side work," while still paying them a minimum wage below \$7.25 per hour. Examples of this side work include stocking condiments, wiping the tables, rolling silverware, refilling the soda machine and cleaning the restaurant. Second, the Plaintiff alleges that Trinity required servers to share tips with expediters who did not have sufficient customer interaction to receive some of the servers' tips. The lawsuit seeks to recover approximately \$4.02 for each hour worked by servers, waiters, and waitresses for the past three years, plus unpaid overtime. The lawsuit also seeks the recovery of liquidated damages and attorney's fees and expenses.

Trinity denies liability, asserts that its pay practices are legal, and claims that it paid all employees what they are owed.

The court has conditionally certified this case as a collective action, allowing this notice to be sent so that you can decide whether to join this case or not. The court has not decided who will win the case. The Court may ultimately rule that the case should not proceed as a collective action and, therefore, decertify the class. Once the evidence is in, the court may decide the case in favor of either party – Plaintiff or Trinity.

This notice contains information that affects your rights. Please read it carefully.

TO: Current and former IHOP Restaurant Servers, Waiters and Waitresses who have worked for Trinity at any time in the past three years. If your address was on the envelope with this notice, then you qualify as someone who can join this case.

RE:

Fair Labor Standards Act ("FLSA") lawsuit against Trinity seeking minimum wage compensation for hours worked as servers, waiters and waitresses at IHOP Restaurants.

You Have a Choice to Make Now

(turn page)

YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT		
ASK TO BE INCLUDED	If you choose to be included, you will share in any monetary recovery that might come from a trial or a settlement in this lawsuit. You give up any rights to sue Trinity on your own for the same claims in this lawsuit.	
	If you want to be included, you must complete and return the "Consent to Join" form included with this Notice by no later than [a date 60 days from notice, the notice period re-starts if the notice is returned undeliverable and a new address is located]. By doing so, you will "opt in" and become a member of the Collective.	
DO NOTHING	By doing nothing, you will not be included in this lawsuit. This means that you give up the possibility of a monetary recovery that may come from a trial or settlement if those bringing the lawsuit are successful. You keep any rights to sue Trinity separately about the same legal claims in this lawsuit. You should be aware that your time to bring FLSA claims is limited by a two- or three-year statute of limitations.	

1. Why did I get this notice?

You are getting this notice because Trinity's records show that you worked at an IHOP Restaurant for Trinity as a server, waiter or waitress during the last three years. The purpose of this notice is to notify you of your right to join this case. Please note that the Court has not ruled on the merits of the lawsuit.

The Honorable David M. Lawson, United States District Court Judge in the Eastern District of Michigan, is overseeing this collective action. The lawsuit is known as *Whitfield v. Trinity Restaurant Group*, LLC, 2:18-cv-10973.

2. What is this lawsuit about?

The lawsuit alleges that Trinity violated federal wage law by failing to pay servers the full minimum wage of \$7.25 per hour. The Plaintiff alleges that this is a result of two impermissible

practices by Trinity. First, the Plaintiff alleges Trinity required servers, waiters, and waitresses at its IHOP Restaurants spend more than 20% of their time doing non-tip producing "side work," while still paying them a minimum wage below \$7.25 per hour. Examples of this side work include stocking condiments, wiping the tables, rolling silverware, refilling the soda machine and cleaning the restaurant. Second, the Plaintiff alleges that Trinity required servers to share tips with expediters who did not have sufficient customer interaction to receive some of the servers' tips. The lawsuit seeks to recover approximately \$4.02 for each hour worked by servers, waiters, and waitresses for the past three years, plus unpaid overtime. The lawsuit also seeks the recovery of liquidated damages and attorney's fees and expenses..

3. What is the position of Trinity?

Trinity denies that it has improperly paid its employees, and denies that any current or former employee is entitled to compensation or any other relief in this lawsuit.

4. Has the Court decided who is right?

The Court has not decided whether Plaintiff is correct. The Court has simply conditionally certified this case as a collective action. The Court may ultimately rule that the Opt-Ins are not similarly situated to Plaintiff or to each other in their job duties and responsibilities and, therefore, decertify the class. Once the evidence is in, the Court may decide in favor of the servers, or it may decide in favor of Trinity, and rule that no additional wages are due.

5. What is a collective action and who is involved?

A collective action lawsuit allows the court to decide multiple workers' similar claims together in one proceeding. All servers, waiters and waitresses who decide to participate in the case are Opt-In Plaintiffs or part of a "Collective." The employees who brought this lawsuit are called the Named Plaintiffs. The company that they have sued – Trinity – is called the Defendant. One court resolves the claims of everyone who decides to join the case.

Here, the court has conditionally authorized this case to proceed as a collective action. Specifically, the Court preliminarily found that the Plaintiff who filed this lawsuit is "similarly situated" to other Trinity servers. The Court may later decertify this Collective based on a more searching analysis of whether members are truly "similarly situated" after the discovery process closes.

6. Can I join this lawsuit?

Yes, if you are or were a Server, waiter or waitress at an IHOP Restaurant, you may choose to join this suit (that is, you may "opt in"). Based on Trinity's records, you are eligible to join this case if you want to. To opt in, you must submit a "Consent to Join" form. The Consent to Join form is enclosed with this notice. You may use the enclosed envelope to mail your form, or you may fax it or e-mail it to Plaintiffs' counsel (whose information is available at www.trinitywages.com and in Section 10, below), or you may submit your form online at www.trinitywages.com. The Consent to Join form must be returned no later than ____ [a date 60 days from notice, the notice period re-starts if the notice is returned undeliverable and a new address is located].

7. What happens if I join the lawsuit?

If you file a Consent to Join form by following the instructions, you will be bound by the judgment (the final result of the lawsuit), whether favorable or unfavorable (that is, whether the Plaintiff wins or loses its case against Trinity).

If you join this lawsuit, you are choosing to be represented by Plaintiffs' counsel and the Named Plaintiff who brought this case to make decisions and agreements on your behalf concerning the lawsuit. These decisions and agreements will then be binding on you.

If you join this lawsuit, you may be asked to provide information, documents, and/or testimony at a deposition and/or trial regarding the issues in the case. If so, Plaintiffs' counsel will assist you.

8. What happens if I do nothing?

If you choose not to join this lawsuit, you will not be affected by any ruling, judgment, or settlement rendered in this case, whether favorable or unfavorable. You will not be entitled to share any money recovered in this lawsuit. You also will be free to independently retain your own counsel and file your own individual lawsuit, subject to any defenses that might be asserted. If you proceed separately, you may also have to pay your own lawyer.

You should be aware that your federal wage and hour claims are limited by a two or three-year statute of limitations. Delay in joining this action, or proceeding separately, may result in some or all of your claims expiring as a matter of law.

9. How do I join the case?

Enclosed is a "Consent to Join" Form. If you wish to join this lawsuit, it is very important that you read, sign, and promptly return the Consent to Join form. An addressed and postage-paid envelope is enclosed for your convenience. The Consent to Join Form must be sent to:

[mailing address] [fax number] [email address]

Alternatively, you may submit your form online at www.trinitywages.com. The signed Consent to Join form must be postmarked by [a date 60 days from notice, the notice period re-starts if the notice is returned undeliverable and a new address is located]. If your signed Consent to Join form is not postmarked by then, you will not be allowed to participate in this lawsuit, or share in any recovery, and you will not be bound by any settlement or judgment.

10. No retaliation permitted

It would be a violation of federal law for Trinity to fire, discipline, or in any manner discriminate or retaliate against anyone for taking part in this case. If you believe that you have been penalized, discriminated against, or disciplined in any way as a result of your receiving this notification, considering whether to join this lawsuit, or actually joining this lawsuit, you may contact Plaintiffs' lawyers or any other lawyer of your choosing.

Do I have a lawyer in this case? 11.

If you choose to join this suit, you will be represented by the Named Plaintiff through her attorneys. They are:

MIGLIACCIO & RATHOD LLP

Nicholas A. Migliaccio, Esq. Jason S. Rathod, Esq. 412 H Street N.E., Ste. 302 Washington, DC 20002 Telephone: (202) 470-3520

Email: jrathod@classlawdc.com

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R. Andrew Santillo, Esq. Mark J. Gottesfeld, Esq. 715 Twining Road, Ste. 211 Dresher, PA 19025

Telephone: (215) 884-2491

Email: asantillo@winebrakelaw.com

www.trinitywages.com

If you want further information about this lawsuit, or have questions about the procedure or deadline for filing a "Consent to Join," please contact Plaintiffs' counsel.

12. How will the lawyers be paid?

Plaintiffs' counsel will not charge you directly for their work in this case. If the Plaintiffs recover nothing from Trinity, you will not have to pay the attorneys for any of their work. If there is a recovery, Plaintiffs' counsel will receive whatever attorneys' fees the Court orders. Those fees may be subtracted from the recovery obtained from Trinity, or they may be paid separately by Trinity, or they may be a combination of the two.

This notice has been authorized by the Court. 13.

This notice and its contents have been authorized by the United States District Court for the Eastern District of Michigan, the Honorable David M. Lawson presiding.

DO NOT CONTACT THE COURT ABOUT THIS NOTICE

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

MERCEDES WHITFIELD, on behalf of herself and similarly situated employees,

Case No. 2:18-cv-10973-DML-EAS

Plaintiffs,

v.

Hon. David M. Lawson

TRINITY RESTAURANT GROUP, LLC,

Defendant.

DECLARATION BY MERCEDES WHITFIELD

- I, Mercedes Whitfield, an adult resident of the state of Michigan, hereby declare, subject to penalty of perjury, that the following facts are true and correct to the best of my knowledge, information, and belief:
- I worked for Trinity Restaurant Group as a server at its IHOP restaurant located at
 2701 East Jefferson Ave. in Detroit, Michigan from approximately February 2015 to December
 2016. I was paid \$3.23 an hour when my employment with Trinity ended.
- 2. During my time at Trinity as a server, I was scheduled to work nights for the first four months, which usually started the shifts at 5 p.m. and lasted until 10 p.m. (weekdays) or later (weekends). I then transferred to morning shifts, which usually started at 6 a.m. and lasted until between 3:00 and 5:00 p.m. This is because, at the end of my scheduled shift, I was almost always required to stay late and perform sidework. Examples of this work included sweeping and mopping the floors; refilling and stocking condiments; wiping down tables and chairs; cleaning light fixtures; doing other deep cleaning; and rolling silverware.

- 3. Throughout my shifts, I was also required to do a lot of sidework like the tasks above as well as cutting and cupping fruit, mixing salsa, making coffee, doing dishes, and getting ice.
- 4. While employed by Trinity as a server, I spent well over 20 percent of my time in a week as a server performing sidework. Based on my memory of my daily routine, I spent about 50 percent of my shifts performing sidework.
- 5. I was required to perform the sidework during and after my shift and, if I did not, I would be disciplined and eventually fired. All of the servers were required to have a manager check their sidework before leaving and, if they had not completed the side work to the supervisor's satisfaction, could be disciplined.
- 6. Regardless of the amount of time I spent doing side work during my time as a server at Trinity, I was just paid \$3.23 an hour.
- 7. The servers also had to participate in a tip pool on the weekends, holidays and special promotion days (like "Free Pancake Day"), where were required to "tip out," or share our tips with the food expediters. Based on my personal observations, the expediter did not interact with restaurant customers. Instead, he or she just brought food from the kitchen to an "expotable" near the kitchen where the server picked it up and would bring it to the table where the customers are sitting.
- 8. When my shifts ended and I went to clock out, the system asked me to enter how much I made in tips that day. Often when I entered the amount of tips I made, the system said that I did not enter a high enough amount. To clock out, I had to keep punching in a higher number until the system accepted the number. As a result I was forced to over-report the amount of tips I made in a shift. That amount, then, caused more money to come out in taxes. A

manager could override the system so that I could clock out by entering the correct amount in tips, but they were not willing to do that

- 9. Based on working side-by-side with several other servers at the Trinity IHOP location where I worked, I believe the work that other servers performed, the amount Trinity IHOP paid them, the tip pool, and the tip reporting practices were similar, regardless of the shift servers have, the location they work, or the supervisor who is working.
- 10. During my time at Trinity, I worked with anywhere from seven (7) to thirteen (13) other servers, depending on how busy the restaurant was at the time.

As stated above, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated:	
	Mercedes Whitfield

Select Jobs



IHOP 3592 Jackson - 1213 N. West Avenue

Assistant General Manager		
Assistant Manager		
Combo		
Cook		
Crew Chief		
General Manager		
Host/Hostess		
Kitchen Manager		
Server		
Server-T		
IHOP 5307 East Lansing - 2771 E. Grand River Avenue		
Assistant General Manager		
Assistant Manager		
Combo		
Cook		

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District Manager

General Manager

Host/Hostess

Description

Server

Provide prompt, efficient,

courteous service to all guests. Service includes greeting, seating, taking and serving orders, clearing dishes and resetting tables. Develop and maintain professional functional working relationships with restaurant employees and guests. Execute the "Service Success Steps" per the restaurant SOP to ensure a high-quality guest experience. Handle guest complaints in a timely manner, inquire about the quality of the dining experience, thank guests, and invite them to return. Communicate guest food orders and service requests in an accurate and timely manner. Memorize and apply restaurant terminology, abbreviations, methodologies, and plating and menu knowledge. Comply with SOP methods in regard to guest checks and maintaining cash control. Stock and rotate all needed supplies in the service areas and dining room. Comply with all local and SOP health, sanitation, and safety guidelines. Clear, clean, and reset tables and clean chairs, booths, and floors after guests leave. Perform all cleaning duties according to posted cleaning charts. Comply with restaurant uniform and appearance standards per SOP guidelines. Perform other assignments or tasks as assigned by the General Manager, Assistant Manager, or acting supervisor.

Requirements

Education, Experience required: High School Student or High School degree or equivalent

Additional Information

Previous Next

Powered by Snagajob, the #1 marketplace for hourly work.

IHOP Restaurants uses PeopleMatter to make the application process simple.

Visit PeopleMatter Support



IHOP 3592 Jackson - 1213 N. West Avenue

Assistant General Manager	
Assistant Manager	
Combo	
Cook	
Crew Chief	
General Manager	
Host/Hostess	
Kitchen Manager	
Server	

Description

Provide prompt, efficient,

courteous service to all guests. Service includes greeting, seating, taking and serving orders, clearing dishes and resetting tables. Develop and maintain professional functional working relationships with restaurant employees and guests. Execute the "Service Success Steps" per the restaurant SOP to ensure a high-quality guest experience. Handle guest complaints in a timely manner, inquire about the quality of the dining experience, thank guests, and invite them to return. Communicate guest food orders and service requests in an accurate and timely manner. Memorize and apply restaurant terminology, abbreviations, methodologies, and plating and menu knowledge. Comply with SOP methods in regard to guest checks and maintaining cash control. Stock and rotate all needed supplies in the service areas and dining room. Comply with all local and SOP health, sanitation, and safety guidelines. Clear, clean, and reset tables and clean chairs, booths, and floors after guests leave. Perform all

Get JobOpenings Page 2 of 2

Case 2:18-cv-10973-DML-EAS ECF No. 16-4 filed 06/29/18 PageID.113 Page 4 of 75

cleaning duties according to posted cleaning charts. Comply with restaurant uniform and appearance standards per SOP guidelines. Perform other assignments or tasks as assigned by the General Manager, Assistant Manager, or acting supervisor.

Requirements

Education, Experience required: High School Student or High School degree or equivalent

Additional Information

Server-T	
IHOP 5307 East Lansing - 2771 E. Grand River Avenue	
Assistant General Manager	

Combo

Assistant Manager

Cook

District Manager

General Manager

Host/Hostess

Server

Previous

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IHOP Restaurants uses PeopleMatter to make the application process simple.

Case 2:18-cv-10973-DML-EAS ECF No. 16-4 filed 06/29/18 PageID.114 Page 5 of 75

Select Jobs

1	
	IHOP

3166 Mt. Pleasant - 5245 E. Pickard Street

Assistant General Manager
Assistant Manager
Combo
Cook
District Manager
General Manager
Host/Hostess
Server
IHOP 3363 Saginaw - 2255 Tittabawassee Road
Assistant General Manager
Assistant Manager
Combo
Cook
District Manager

Get JobOpenings Page 2 of 2

Case 2:18-cv-10973-DML-EAS ECF No. 16-4 filed 06/29/18 PageID.115 Page 6 of 75

Host/Hostess

Server

Description

Provide prompt, efficient,

courteous service to all guests. Service includes greeting, seating, taking and serving orders, clearing dishes and resetting tables. Develop and maintain professional functional working relationships with restaurant employees and guests. Execute the "Service Success Steps" per the restaurant SOP to ensure a high-quality guest experience. Handle guest complaints in a timely manner, inquire about the quality of the dining experience, thank guests, and invite them to return. Communicate guest food orders and service requests in an accurate and timely manner. Memorize and apply restaurant terminology, abbreviations, methodologies, and plating and menu knowledge. Comply with SOP methods in regard to guest checks and maintaining cash control. Stock and rotate all needed supplies in the service areas and dining room. Comply with all local and SOP health, sanitation, and safety guidelines. Clear, clean, and reset tables and clean chairs, booths, and floors after guests leave. Perform all cleaning duties according to posted cleaning charts. Comply with restaurant uniform and appearance standards per SOP guidelines. Perform other assignments or tasks as assigned by the General Manager, Assistant Manager, or acting supervisor.

Requirements

Education, Experience required: High School Student or High School degree or equivalent

Additional Information

Previous

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IHOP Restaurants uses PeopleMatter to make the application process simple.



IHOP 1284 Detroit - 2701 E. Jefferson Avenue

Assistant Conoral Managor
Assistant General Manager
Assistant Manager
Combo
Cook
District Manager
General Manager
Host/Hostess
Server
IHOP 3222 Dearborn Heights - 24140 Ford Road
Assistant General Manager
Assistant Manager
Combo
Cook
District Manager
General Manager

Get JobOpenings Page 2 of 7

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Host/Hostess	
Server	



IHOP 1233 Royal Oak - 29202 Woodward Avenue

Assistant General Manager
Assistant Manager
Combo
Cook
District Manager
General Manager
Host/Hostess

Server

Description

Provide prompt, efficient,

courteous service to all guests. Service includes greeting, seating, taking and serving orders, clearing dishes and resetting tables. Develop and maintain professional functional working relationships with restaurant employees and guests. Execute the "Service Success Steps" per the restaurant SOP to ensure a high-quality guest experience. Handle guest complaints in a timely manner, inquire about the quality of the dining experience, thank guests, and invite them to return. Communicate guest food orders and service requests in an accurate and timely manner. Memorize and apply restaurant terminology, abbreviations, methodologies, and plating and menu knowledge. Comply with SOP methods in regard to guest checks and maintaining cash control. Stock and rotate all needed supplies in the service areas and dining room. Comply with all local and SOP health, sanitation, and safety guidelines. Clear, clean, and reset tables and clean chairs, booths, and floors after guests leave. Perform all

Get JobOpenings Page 3 of 7

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cleaning duties according to posted cleaning charts. Comply with restaurant uniform and appearance standards per SOP guidelines. Perform other assignments or tasks as assigned by the General Manager, Assistant Manager, or acting supervisor.

Requirements

Education, Experience required: High School Student or High School degree or equivalent

Additional Information



IHOP 5312 Roseville - 31117 Little Mack Road

Assistant General Manager
Assistant Manager
Combo
Cook
District Manager
General Manager
Host/Hostess
Server
IHOP 3341 Lakeside - 13785 Lakeside Circle
Assistant General Manager
Assistant Manager
Combo

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Cook
District Manager
General Manager
Host/Hostess
Server
IHOP 3476 Canton - 5946 North Sheldon Road
Assistant General Manager
Assistant Manager
Combo
Cook
District Manager
General Manager
Host/Hostess
Server
IHOP 5322 Bloomfield Hills - 2187 S. Telegraph Road
Assistant General Manager
Assistant Manager

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Combo
Cook
District Manager
General Manager
Host/Hostess
Server
IHOP 3449 Novi - 43317 Grand River Avenue
IHOP 3449 Novi - 43317 Grand River Avenue Assistant General Manager
Assistant General Manager
Assistant General Manager Assistant Manager

General Manager

Host/Hostess

Server



IHOP 3484 Monroe - 1240 N Dixie Hwy

Assistant General Manager

Get JobOpenings Page 6 of 7 Case 2:18-cv-10973-DML-EAS ECF No. 16-4 filed 06/29/18 PageID.121 Page 12 of 75

Assistant Manager	
Combo	
Cook	
District Manager	
General Manager	
Host/Hostess	
Server	
IHOP 3541 Flint - 3227 Miller Rd.	
Assistant General Manager	
Assistant General Manager	
Assistant General Manager Assistant Manager	
Assistant General Manager Assistant Manager Combo	
Assistant General Manager Assistant Manager Combo Cook	

Previous Next

Host/Hostess

Server

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IHOP 1284 Detroit - 2701 E. Jefferson Avenue

Assistant General Manager
Assistant Manager
Combo
Cook
District Manager
General Manager
Host/Hostess
Server
IHOP 3222 Dearborn Heights - 24140 Ford Road
Assistant General Manager
Assistant Manager
Combo
Cook
District Manager
General Manager

Host/Hostess
Server
IHOP 1233 Royal Oak - 29202 Woodward Avenue
Assistant General Manager
Assistant Manager
Combo
Cook
District Manager
General Manager
Host/Hostess
Server
IHOP 5312 Roseville - 31117 Little Mack Road
Assistant General Manager
Assistant Manager
Combo
Cook
District Manager

Get JobOpenings Page 3 of 7 Case 2:18-cv-10973-DML-EAS ECF No. 16-4 filed 06/29/18 PageID.125 Page 16 of 75

General Manager
Host/Hostess
Server

Description

Provide prompt, efficient,

courteous service to all guests. Service includes greeting, seating, taking and serving orders, clearing dishes and resetting tables. Develop and maintain professional functional working relationships with restaurant employees and guests. Execute the "Service Success Steps" per the restaurant SOP to ensure a high-quality guest experience. Handle guest complaints in a timely manner, inquire about the quality of the dining experience, thank guests, and invite them to return. Communicate guest food orders and service requests in an accurate and timely manner. Memorize and apply restaurant terminology, abbreviations, methodologies, and plating and menu knowledge. Comply with SOP methods in regard to guest checks and maintaining cash control. Stock and rotate all needed supplies in the service areas and dining room. Comply with all local and SOP health, sanitation, and safety guidelines. Clear, clean, and reset tables and clean chairs, booths, and floors after guests leave. Perform all cleaning duties according to posted cleaning charts. Comply with restaurant uniform and appearance standards per SOP guidelines. Perform other assignments or tasks as assigned by the General Manager, Assistant Manager, or acting supervisor.

Requirements

Education, Experience required: High School Student or High School degree or equivalent

Additional Information



IHOP 3341 Lakeside - 13785 Lakeside Circle

Assistant General Manager
Assistant Manager
Combo

Cook
District Manager
District Manager
General Manager
Host/Hostess
Server
IHOP 3476 Canton - 5946 North Sheldon Road
Assistant General Manager
Assistant Manager
Combo
Cook
District Manager
General Manager
Host/Hostess
Server
IHOP 5322 Bloomfield Hills - 2187 S. Telegraph Road
Assistant General Manager
Assistant Manager

Get JobOpenings Page 5 of 7 Case 2:18-cv-10973-DML-EAS ECF No. 16-4 filed 06/29/18 PageID.127 Page 18 of 75

Combo
Cook
District Manager
General Manager
Host/Hostess
Server
IHOP 3449 Novi - 43317 Grand River Avenue
Assistant General Manager
Assistant Manager
Combo
Cook
District Manager
General Manager
Host/Hostess
Server
IHOP 3484 Monroe - 1240 N Dixie Hwy



IHOP 3484 Monroe - 1240 N Dixie Hwy

Assistant General Manager

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Assistant Manager
Combo
Cook
District Manager
General Manager
Host/Hostess
Server
IHOP 3541 Flint - 3227 Miller Rd.
Assistant General Manager
Assistant Manager
Combo
Cook
District Manager
General Manager
Host/Hostess
Server

Previous Next

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IHOP 3449 Novi - 43317 Grand River Avenue

Assistant General Manager
Assistant Manager
Combo
Cook
District Manager
General Manager
Host/Hostess
Server

Description

Provide prompt, efficient,

courteous service to all guests. Service includes greeting, seating, taking and serving orders, clearing dishes and resetting tables. Develop and maintain professional functional working relationships with restaurant employees and guests. Execute the "Service Success Steps" per the restaurant SOP to ensure a high-quality guest experience. Handle guest complaints in a timely manner, inquire about the quality of the dining experience, thank guests, and invite them to return. Communicate guest food orders and service requests in an accurate and timely manner. Memorize and apply restaurant terminology, abbreviations, methodologies, and plating and menu knowledge. Comply with SOP methods in regard to guest checks and maintaining cash control. Stock and rotate all needed supplies in the service areas and dining room. Comply with all local and SOP health, sanitation, and safety guidelines. Clear, clean, and reset tables and clean chairs, booths, and floors after guests leave. Perform all cleaning duties according to posted cleaning charts. Comply with restaurant uniform and appearance standards per SOP guidelines. Perform other assignments

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or tasks as assigned by the General Manager, Assistant Manager, or acting supervisor.

Requirements

Education, Experience required: High School Student or High School degree or equivalent

Additional Information

Previous Next

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Select Jobs



IHOP 3166 Mt. Pleasant - 5245 E. Pickard Street

Assistant General Manager
Assistant Manager
Combo
Cook
District Manager
General Manager
Host/Hostess
Server

Description

Provide prompt, efficient,

courteous service to all guests. Service includes greeting, seating, taking and serving orders, clearing dishes and resetting tables. Develop and maintain professional functional working relationships with restaurant employees and guests. Execute the "Service Success Steps" per the restaurant SOP to ensure a high-quality guest experience. Handle guest complaints in a timely manner, inquire about the quality of the dining experience, thank guests, and invite them to return. Communicate guest food orders and service requests in an accurate and timely manner. Memorize and apply restaurant terminology, abbreviations, methodologies, and plating and menu knowledge. Comply with SOP methods in regard to guest checks and maintaining cash control. Stock and rotate all needed supplies in the service areas and dining room. Comply with all local and SOP health, sanitation, and safety guidelines. Clear, clean, and reset tables and clean chairs, booths, and floors after guests leave. Perform all cleaning duties according to posted cleaning charts. Comply with restaurant uniform and appearance standards per SOP guidelines. Perform other assignments

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or tasks as assigned by the General Manager, Assistant Manager, or acting supervisor.

Requirements

Education, Experience required: High School Student or High School degree or equivalent

Additional Information



IHOP 3363 Saginaw - 2255 Tittabawassee Road

Assistant General Manager
Assistant Manager
Combo
Cook
District Manager
General Manager
Host/Hostess
Server

Previous Next

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IHOP 1284 Detroit - 2701 E. Jefferson Avenue

Assistant General Manager
Assistant Manager
Combo
Cook
District Manager
General Manager
Host/Hostess
Server
IHOP 3222 Dearborn Heights - 24140 Ford Road
Assistant General Manager
Assistant Manager
Combo
Cook
District Manager

Host/Hostess
Server
IHOP 1233 Royal Oak - 29202 Woodward Avenue
Assistant General Manager
Assistant Manager
Combo
Cook
District Manager
General Manager
Host/Hostess
Server
IHOP 5312 Roseville - 31117 Little Mack Road
Assistant General Manager
Assistant Manager
Combo
Cook
District Manager

General Manager
Host/Hostess
Server
IHOP 3341 Lakeside - 13785 Lakeside Circle
Assistant General Manager
Assistant Manager
Combo
Cook
District Manager
General Manager
Host/Hostess
Server
IHOP 3476 Canton - 5946 North Sheldon Road
Assistant General Manager
Assistant Manager
Combo
Cook

District Manager
General Manager
Host/Hostess
Server
IHOP 5322 Bloomfield Hills - 2187 S. Telegraph Road
Assistant General Manager
Assistant Manager
Combo
Cook
District Manager
General Manager
Host/Hostess
Server
IHOP 3449 Novi - 43317 Grand River Avenue
Assistant General Manager
Assistant Manager
Combo

Get JobOpenings Page 5 of 7
Case 2:18-cv-10973-DML-EAS ECF No. 16-4 filed 06/29/18 PageID.138 Page 29 of 75

Cook District Manager General Manager Host/Hostess Server IHOP 3484 Monroe - 1240 N Dixie Hwy Assistant General Manager Assistant Manager Combo	
General Manager Host/Hostess Server IHOP 3484 Monroe - 1240 N Dixie Hwy Assistant General Manager Assistant Manager	Cook
Host/Hostess Server IHOP 3484 Monroe - 1240 N Dixie Hwy Assistant General Manager Assistant Manager	District Manager
Server IHOP 3484 Monroe - 1240 N Dixie Hwy Assistant General Manager Assistant Manager	General Manager
IHOP 3484 Monroe - 1240 N Dixie Hwy Assistant General Manager Assistant Manager	Host/Hostess
Assistant General Manager Assistant Manager	Server
Assistant Manager	IHOP 3484 Monroe - 1240 N Dixie Hwy
	Assistant General Manager
Combo	Assistant Manager
	Combo

District Manager

Cook

General Manager

Host/Hostess

Server

Description

Provide prompt, efficient,

courteous service to all guests. Service includes greeting, seating, taking and serving orders, clearing dishes and resetting tables. Develop and maintain professional functional working relationships with restaurant employees and guests. Execute the "Service Success Steps" per the restaurant SOP to ensure a high-quality guest experience. Handle guest complaints in a timely manner,

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inquire about the quality of the dining experience, thank guests, and invite them to return. Communicate guest food orders and service requests in an accurate and timely manner. Memorize and apply restaurant terminology, abbreviations, methodologies, and plating and menu knowledge. Comply with SOP methods in regard to guest checks and maintaining cash control. Stock and rotate all needed supplies in the service areas and dining room. Comply with all local and SOP health, sanitation, and safety guidelines. Clear, clean, and reset tables and clean chairs, booths, and floors after guests leave. Perform all cleaning duties according to posted cleaning charts. Comply with restaurant uniform and appearance standards per SOP guidelines. Perform other assignments or tasks as assigned by the General Manager, Assistant Manager, or acting supervisor.

Requirements

Education, Experience required: High School Student or High School degree or equivalent

Additional Information



IHOP 3541 Flint - 3227 Miller Rd.

Assistant General Manager
Assistant Manager
Combo
Cook
District Manager
General Manager
Host/Hostess
Server

Previous Next

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IHOP 1284 Detroit - 2701 E. Jefferson Avenue

Assistant General Manager
Assistant Manager
Combo
Cook
District Manager
General Manager
Host/Hostess
Server
IHOP 3222 Dearborn Heights - 24140 Ford Road
IHOP 3222 Dearborn Heights - 24140 Ford Road
IHOP 3222 Dearborn Heights - 24140 Ford Road Assistant General Manager
IHOP 3222 Dearborn Heights - 24140 Ford Road Assistant General Manager Assistant Manager
IHOP 3222 Dearborn Heights - 24140 Ford Road Assistant General Manager Assistant Manager Combo

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Host/Hostess
Server
IHOP 1233 Royal Oak - 29202 Woodward Avenue
Assistant General Manager
Assistant Manager
Combo
Cook
District Manager
General Manager
Host/Hostess
Server
IHOP 5312 Roseville - 31117 Little Mack Road
Assistant General Manager
Assistant Manager
Combo
Cook
District Manager

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General Manager Host/Hostess Server IHOP 3341 Lakeside - 13785 Lakeside Circle



Assistan	t General Manager
Assistan	t Manager
Combo	
Cook	
District N	lanager
General	Manager
Host/Hos	stess
Server	

Description

Provide prompt, efficient,

courteous service to all guests. Service includes greeting, seating, taking and serving orders, clearing dishes and resetting tables. Develop and maintain professional functional working relationships with restaurant employees and guests. Execute the "Service Success Steps" per the restaurant SOP to ensure a high-quality guest experience. Handle guest complaints in a timely manner, inquire about the quality of the dining experience, thank guests, and invite them to return. Communicate guest food orders and service requests in an accurate and timely manner. Memorize and apply restaurant terminology, abbreviations, methodologies, and plating and menu knowledge. Comply with SOP methods in regard to guest checks and maintaining cash control. Stock and rotate

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all needed supplies in the service areas and dining room. Comply with all local and SOP health, sanitation, and safety guidelines. Clear, clean, and reset tables and clean chairs, booths, and floors after guests leave. Perform all cleaning duties according to posted cleaning charts. Comply with restaurant uniform and appearance standards per SOP guidelines. Perform other assignments or tasks as assigned by the General Manager, Assistant Manager, or acting

Requirements

supervisor.

Education, Experience required: High School Student or High School degree or equivalent

Additional Information



IHOP 3476 Canton - 5946 North Sheldon Road

Assistant General Manager
Assistant Manager
Combo
Cook
District Manager
General Manager
Host/Hostess
Server
IHOP 5322 Bloomfield Hills - 2187 S. Telegraph Road
Assistant General Manager
Assistant Manager

Combo
Cook
District Manager
General Manager
Host/Hostess
Server
IHOP 3449 Novi - 43317 Grand River Avenue
Assistant General Manager
Assistant Manager
Combo
Cook
District Manager
General Manager
Host/Hostess
Server
IHOP 3484 Monroe - 1240 N Dixie Hwy

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Assistant General Manager
Assistant Manager
Combo
Cook
District Manager
General Manager
Host/Hostess
Server
IHOP 3541 Flint - 3227 Miller Rd.
Assistant General Manager
Assistant Manager
Combo
Cook
District Manager
General Manager
Host/Hostess
Server

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Select Jobs



IHOP 3592 Jackson - 1213 N. West Avenue

Assistant General Manager
Assistant Manager
Combo
Cook
Crew Chief
General Manager
Host/Hostess
Kitchen Manager
Server

Description

Provide prompt, efficient,

courteous service to all guests. Service includes greeting, seating, taking and serving orders, clearing dishes and resetting tables. Develop and maintain professional functional working relationships with restaurant employees and guests. Execute the "Service Success Steps" per the restaurant SOP to ensure a high-quality guest experience. Handle guest complaints in a timely manner, inquire about the quality of the dining experience, thank guests, and invite them to return. Communicate guest food orders and service requests in an accurate and timely manner. Memorize and apply restaurant terminology, abbreviations, methodologies, and plating and menu knowledge. Comply with SOP methods in regard to guest checks and maintaining cash control. Stock and rotate all needed supplies in the service areas and dining room. Comply with all local and SOP health, sanitation, and safety guidelines. Clear, clean, and reset tables and clean chairs, booths, and floors after guests leave. Perform all

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cleaning duties according to posted cleaning charts. Comply with restaurant uniform and appearance standards per SOP guidelines. Perform other assignments or tasks as assigned by the General Manager, Assistant Manager, or acting supervisor.

Requirements

Education, Experience required: High School Student or High School degree or equivalent

Additional Information

Server-T
IHOP 5307 East Lansing - 2771 E. Grand River Avenue
Assistant General Manager
Assistant Manager
Combo
Cook
District Manager
General Manager
Host/Hostess
Server

Previous

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Select Jobs



IHOP 1284 Detroit - 2701 E. Jefferson Avenue

Assistant General Manager
Assistant Manager
Combo
Cook
District Manager
General Manager
Host/Hostess
O a minor
Server
IHOP 3222 Dearborn Heights - 24140 Ford Road
IHOP 3222 Dearborn Heights - 24140 Ford Road
IHOP 3222 Dearborn Heights - 24140 Ford Road Assistant General Manager
IHOP 3222 Dearborn Heights - 24140 Ford Road Assistant General Manager Assistant Manager
IHOP 3222 Dearborn Heights - 24140 Ford Road Assistant General Manager Assistant Manager Combo

Host/Hostess
Server
IHOP 1233 Royal Oak - 29202 Woodward Avenue
Assistant General Manager
Assistant Manager
Combo
Cook
District Manager
General Manager
Host/Hostess
Server
IHOP 5312 Roseville - 31117 Little Mack Road
Assistant General Manager
Assistant Manager
Combo
Cook
District Manager

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General Manager
Host/Hostess
Server
IHOP 3341 Lakeside - 13785 Lakeside Circle
Assistant General Manager
Assistant Manager
Combo
Cook
District Manager
General Manager
Host/Hostess
Server
IHOP 3476 Canton - 5946 North Sheldon Road
Assistant General Manager
Assistant Manager
Combo
Cook

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District Manager
General Manager
Host/Hostess
Server
IHOP 5322 Bloomfield Hills - 2187 S. Telegraph Road
Assistant General Manager
Assistant Manager
Combo
Cook
District Manager
General Manager
Host/Hostess
Server
IHOP 3449 Novi - 43317 Grand River Avenue
Assistant General Manager
Assistant Manager
Combo

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Cook
District Manager
General Manager
Host/Hostess
Server
IHOP 3484 Monroe - 1240 N Dixie Hwy
Assistant General Manager
Assistant Manager
Combo
Cook
District Manager
General Manager
Host/Hostess
Server
IHOP 3541 Flint - 3227 Miller Rd.
Assistant General Manager
Assistant Manager

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Combo
Cook
District Manager
General Manager
Host/Hostess
Server

Description

Provide prompt, efficient,

courteous service to all guests. Service includes greeting, seating, taking and serving orders, clearing dishes and resetting tables. Develop and maintain professional functional working relationships with restaurant employees and guests. Execute the "Service Success Steps" per the restaurant SOP to ensure a high-quality guest experience. Handle guest complaints in a timely manner, inquire about the quality of the dining experience, thank guests, and invite them to return. Communicate guest food orders and service requests in an accurate and timely manner. Memorize and apply restaurant terminology, abbreviations, methodologies, and plating and menu knowledge. Comply with SOP methods in regard to guest checks and maintaining cash control. Stock and rotate all needed supplies in the service areas and dining room. Comply with all local and SOP health, sanitation, and safety guidelines. Clear, clean, and reset tables and clean chairs, booths, and floors after guests leave. Perform all cleaning duties according to posted cleaning charts. Comply with restaurant uniform and appearance standards per SOP guidelines. Perform other assignments or tasks as assigned by the General Manager, Assistant Manager, or acting supervisor.

Requirements

Education, Experience required: High School Student or High School degree or equivalent

Additional Information

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Select Jobs



IHOP 1284 Detroit - 2701 E. Jefferson Avenue

Assistant General Manager
Assistant Manager
Combo
Cook
District Manager
General Manager
Host/Hostess
Server

Description

Provide prompt, efficient,

courteous service to all guests. Service includes greeting, seating, taking and serving orders, clearing dishes and resetting tables. Develop and maintain professional functional working relationships with restaurant employees and guests. Execute the "Service Success Steps" per the restaurant SOP to ensure a high-quality guest experience. Handle guest complaints in a timely manner, inquire about the quality of the dining experience, thank guests, and invite them to return. Communicate guest food orders and service requests in an accurate and timely manner. Memorize and apply restaurant terminology, abbreviations, methodologies, and plating and menu knowledge. Comply with SOP methods in regard to guest checks and maintaining cash control. Stock and rotate all needed supplies in the service areas and dining room. Comply with all local and SOP health, sanitation, and safety guidelines. Clear, clean, and reset tables and clean chairs, booths, and floors after guests leave. Perform all cleaning duties according to posted cleaning charts. Comply with restaurant uniform and appearance standards per SOP guidelines. Perform other assignments

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or tasks as assigned by the General Manager, Assistant Manager, or acting supervisor.

Requirements

Education, Experience required: High School Student or High School degree or equivalent

Additional Information



IHOP 3222 Dearborn Heights - 24140 Ford Road

Assistant General Manager
Assistant Manager
Combo
Cook
District Manager
General Manager
Host/Hostess
Server
IHOP 1233 Royal Oak - 29202 Woodward Avenue
Assistant General Manager
Assistant Manager
Combo

Cook
District Manager
General Manager
Host/Hostess
Server
IHOP 5312 Roseville - 31117 Little Mack Road
Assistant General Manager
Assistant Manager
Combo
Cook
District Manager
General Manager
Host/Hostess
Server
IHOP 3341 Lakeside - 13785 Lakeside Circle
Assistant General Manager
Assistant Manager

Get JobOpenings
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Case 2:18-cv-10973-DML-EAS ECF No. 16-4 filed 06/29/18 PageID.160 Page 51 of 75

Combo Cook District Manager General Manager Host/Hostess Server IHOP 3476 Canton - 5946 North Sheldon Road Assistant General Manager **Assistant Manager** Combo Cook

District Manager

General Manager

Host/Hostess

Server



IHOP 5322 Bloomfield Hills - 2187 S. Telegraph Road

Assistant General Manager

Assistant Manager
Combo
Cook
District Manager
General Manager
Host/Hostess
Server
IHOP 3449 Novi - 43317 Grand River Avenue
Assistant General Manager
Assistant General Manager Assistant Manager
Assistant Manager
Assistant Manager Combo
Assistant Manager Combo Cook
Assistant Manager Combo Cook District Manager



IHOP 3484 Monroe - 1240 N Dixie Hwy

Get JobOpenings

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Assistant General Manager
Assistant Manager
Combo
Cook
District Manager
General Manager
Host/Hostess
Server
IHOP 3541 Flint - 3227 Miller Rd.
Assistant General Manager
Assistant General Manager Assistant Manager
Assistant Manager
Assistant Manager Combo
Assistant Manager Combo Cook
Assistant Manager Combo Cook District Manager

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Select Jobs



IHOP 1284 Detroit - 2701 E. Jefferson Avenue

Assistant General Manager
Assistant Manager
Combo
Cook
District Manager
General Manager
Host/Hostess
Server
IHOP 3222 Dearborn Heights - 24140 Ford Road
Assistant General Manager
Assistant Manager
Combo
Cook
District Manager
General Manager

Get JobOpenings Page 2 of 7

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ш	00+	/Ш	ostess
п	()SI	/ \square	051255

Server

Description

Provide prompt, efficient,

courteous service to all guests. Service includes greeting, seating, taking and serving orders, clearing dishes and resetting tables. Develop and maintain professional functional working relationships with restaurant employees and guests. Execute the "Service Success Steps" per the restaurant SOP to ensure a high-quality guest experience. Handle guest complaints in a timely manner, inquire about the quality of the dining experience, thank guests, and invite them to return. Communicate guest food orders and service requests in an accurate and timely manner. Memorize and apply restaurant terminology, abbreviations, methodologies, and plating and menu knowledge. Comply with SOP methods in regard to guest checks and maintaining cash control. Stock and rotate all needed supplies in the service areas and dining room. Comply with all local and SOP health, sanitation, and safety guidelines. Clear, clean, and reset tables and clean chairs, booths, and floors after guests leave. Perform all cleaning duties according to posted cleaning charts. Comply with restaurant uniform and appearance standards per SOP guidelines. Perform other assignments or tasks as assigned by the General Manager, Assistant Manager, or acting supervisor.

Requirements

Education, Experience required: High School Student or High School degree or equivalent

Additional Information



IHOP 1233 Royal Oak - 29202 Woodward Avenue

Assistant General Manager
Assistant Manager
Combo
Cook

District Manager
General Manager
Host/Hostess
Server
IHOP 5312 Roseville - 31117 Little Mack Road
Assistant General Manager
Assistant Manager
Combo
Cook
District Manager
General Manager
Host/Hostess
Server
IHOP 3341 Lakeside - 13785 Lakeside Circle
Assistant General Manager
Assistant Manager
Combo

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Cook
District Manager
General Manager
Host/Hostess
Server
IHOP 3476 Canton - 5946 North Sheldon Road
Assistant General Manager
Assistant Manager
Combo
Cook
District Manager
General Manager
Host/Hostess
Server
IHOP 5322 Bloomfield Hills - 2187 S. Telegraph Road
Assistant General Manager
Assistant Manager

Combo
Cook
District Manager
General Manager
Host/Hostess
Server
IHOP 3449 Novi - 43317 Grand River Avenue
Assistant General Manager
Assistant Manager
Combo
Cook
District Manager
General Manager
Host/Hostess
Server
IHOP 3484 Monroe - 1240 N Dixie Hwy

Assistant General Manager

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Assistant Manager
Combo
Cook
District Manager
General Manager
Host/Hostess
Server
IHOP 3541 Flint - 3227 Miller Rd.
Assistant General Manager
Assistant General Manager Assistant Manager
Assistant Manager
Assistant Manager Combo
Assistant Manager Combo Cook
Assistant Manager Combo Cook District Manager

Previous Next

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Select Jobs

IHOP 1284 Detroit - 2701 E. Jefferson Avenue

Assistant General Manager
Assistant Manager
Combo
Cook
District Manager
General Manager
Host/Hostess
Server
IHOP 3222 Dearborn Heights - 24140 Ford Road
Assistant General Manager
Assistant Manager
Combo
Cook
District Manager
General Manager

Host/Hostess
Server
IHOP 1233 Royal Oak - 29202 Woodward Avenue
Assistant General Manager
Assistant Manager
Combo
Cook
District Manager
General Manager
Host/Hostess
Server
IHOP 5312 Roseville - 31117 Little Mack Road
Assistant General Manager
Assistant Manager
Combo
Cook
District Manager

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General Manager
Host/Hostess
Server
IHOP 3341 Lakeside - 13785 Lakeside Circle
Assistant General Manager
Assistant Manager
Combo
Cook
District Manager
General Manager
Host/Hostess
Server
IHOP 3476 Canton - 5946 North Sheldon Road
Assistant General Manager
Assistant Manager
Combo
Cook

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District Manager
General Manager
Host/Hostess
Server

Description

Provide prompt, efficient,

courteous service to all guests. Service includes greeting, seating, taking and serving orders, clearing dishes and resetting tables. Develop and maintain professional functional working relationships with restaurant employees and guests. Execute the "Service Success Steps" per the restaurant SOP to ensure a high-quality guest experience. Handle guest complaints in a timely manner, inquire about the quality of the dining experience, thank guests, and invite them to return. Communicate guest food orders and service requests in an accurate and timely manner. Memorize and apply restaurant terminology, abbreviations, methodologies, and plating and menu knowledge. Comply with SOP methods in regard to guest checks and maintaining cash control. Stock and rotate all needed supplies in the service areas and dining room. Comply with all local and SOP health, sanitation, and safety guidelines. Clear, clean, and reset tables and clean chairs, booths, and floors after guests leave. Perform all cleaning duties according to posted cleaning charts. Comply with restaurant uniform and appearance standards per SOP guidelines. Perform other assignments or tasks as assigned by the General Manager, Assistant Manager, or acting supervisor.

Requirements

Education, Experience required: High School Student or High School degree or equivalent

Additional Information



IHOP 5322 Bloomfield Hills - 2187 S. Telegraph Road

Assistant General Manager

Assistant Manager

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Combo
Cook
District Manager
General Manager
Host/Hostess
Server
IHOP 3449 Novi - 43317 Grand River Avenue
Assistant General Manager
Assistant Manager
Combo
Cook
District Manager
General Manager
Host/Hostess
Server
IHOP 3484 Monroe - 1240 N Dixie Hwy

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	Assistant Manager
	Assistant Manager
	Combo
	Cook
	District Manager
	General Manager
	Host/Hostess
	Server
Q	IHOP 3541 Flint - 3227 Miller Rd.
	Assistant General Manager
	Assistant General Manager Assistant Manager
	Assistant Manager
	Assistant Manager Combo
	Assistant Manager Combo Cook
	Assistant Manager Combo Cook District Manager

Previous Next

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Select Jobs



IHOP 1284 Detroit - 2701 E. Jefferson Avenue

Assistant General Manager
Assistant Manager
Combo
Cook
District Manager
General Manager
Host/Hostess
Server
IHOP 3222 Dearborn Heights - 24140 Ford Road
Assistant General Manager
Assistant Manager
Combo
Cook
District Manager
General Manager

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Host/Hostess
Server
IHOP 1233 Royal Oak - 29202 Woodward Avenue
Assistant General Manager
Assistant Manager
Combo
Cook
District Manager
General Manager
Host/Hostess
Server
IHOP 5312 Roseville - 31117 Little Mack Road
Assistant General Manager
Assistant Manager
Combo
Cook
District Manager

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General Manager
Host/Hostess
Server
IHOP 3341 Lakeside - 13785 Lakeside Circle
Assistant General Manager
Assistant Manager
Combo
Cook
District Manager
General Manager
Host/Hostess
Server
IHOP 3476 Canton - 5946 North Sheldon Road
Assistant General Manager
Assistant Manager
Combo
Cook

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District Manager

General Manager

Host/Hostess

Server

IHOP 5322 Bloomfield Hills - 2187 S. Telegraph Road

Assistant General Manager

Combo

Cook

District Manager

Assistant Manager

General Manager

Host/Hostess

Server

Description

Provide prompt, efficient,

courteous service to all guests. Service includes greeting, seating, taking and serving orders, clearing dishes and resetting tables. Develop and maintain professional functional working relationships with restaurant employees and guests. Execute the "Service Success Steps" per the restaurant SOP to ensure a high-quality guest experience. Handle guest complaints in a timely manner, inquire about the quality of the dining experience, thank guests, and invite them to return. Communicate guest food orders and service requests in an accurate and timely manner. Memorize and apply restaurant terminology,

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abbreviations, methodologies, and plating and menu knowledge. Comply with SOP methods in regard to guest checks and maintaining cash control. Stock and rotate all needed supplies in the service areas and dining room. Comply with all local and SOP health, sanitation, and safety guidelines. Clear, clean, and reset tables and clean chairs, booths, and floors after guests leave. Perform all cleaning duties according to posted cleaning charts. Comply with restaurant uniform and appearance standards per SOP guidelines. Perform other assignments or tasks as assigned by the General Manager, Assistant Manager, or acting

Requirements

supervisor.

Education, Experience required: High School Student or High School degree or equivalent

Additional Information



IHOP 3449 Novi - 43317 Grand River Avenue

Assistant General Manager
Assistant Manager
Combo
Cook
District Manager
General Manager
Host/Hostess
Server
IHOP 3484 Monroe - 1240 N Dixie Hwy
Assistant General Manager

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Assistant Manager
Combo
Cook
District Manager
General Manager
Host/Hostess
Server
IHOP 3541 Flint - 3227 Miller Rd.
Assistant General Manager
Assistant General Manager Assistant Manager
Assistant Manager
Assistant Manager Combo
Assistant Manager Combo Cook
Assistant Manager Combo Cook District Manager

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