## IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

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FRANCIS CREVATAS, et al.

3:15-cy-02307-MEM

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SMITH MANAGEMENT AND CONSULTING, LLC

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## PLAINTIFFS' MOTION FOR CONDITIONAL CERTIFICATION

Originating Plaintiff Francis Crevatas and Opt-In Plaintiff Christopher Bice respectfully move, pursuant to § 16(b) of the Fair Labor Standards Act ("FLSA"), 29 U.S.C. §216(b), for conditional certification of the following collective:

All individuals who during any workweek since November 30, 2012, were paid (in-whole or in-part) on a day-rate basis by Defendant Smith Management and Consulting, LLC.

Such relief is warranted for the reasons described in Plaintiffs' brief which will be filed separately pursuant to Local Civil Rule 7.5. A proposed order is attached.

**WHEREFORE**, Plaintiffs respectfully request that the Court grant this motion and sign and enter the accompanying proposed order.

Date: June 10, 2016 Respectfully,

/s/ R. Andrew Santillo
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For Plaintiffs