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RYAN DOWNEY, on behalf of himself and others similarly situated Plaintiff, v. MCCORMICK & SCHMICK RESTAURANT CORP, Defendant.	:	PHILADELPHIA COUNTY COURT OF COMMON PLEAS CASE ID. 180103412

PLAINTIFF'S MEMORANDUM OF LAW IN OPPOSITION TO DEFENDANT'S PRELIMINARY OBJECTIONS TO THE AMENDED COMPLAINT

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Plaintiff Ryan Downey ("Plaintiff") pursues this class action lawsuit against Defendant McCormick & Schmick Restaurant Corp ("Defendant"), seeking all available relief under the Pennsylvania Minimum Wage Act ("PMWA"), 43 P.S. §§ 333.101, et seq., the Philadelphia Gratuity Protection Bill ("GPB"), Philadelphia Code § 9-614, and the Pennsylvania doctrine of unjust enrichment. On April 3, 2018, Plaintiff filed an Amended Complaint, and, on April 23, 2018, Defendant filed preliminary objections in the nature of demurrer. Plaintiff responds to the preliminary objections as follows:[1]

I. MATTER BEFORE THE COURT

Defendants' preliminary objections are in the nature of demurrer. As such, the question presented "is whether, on the facts averred, the law says with certainty that no recovery is possible." Bruno v. Erie Insurance Co., 630 Pa. 79, 106 A.3d 48, 56 (Pa. 2014). In making this determination, the Court must "accept as true all well-pleaded material facts set forth in the complaint and all inferences fairly deducible from those facts." Connor v. Archdiocese of Philadelphia, 601 Pa. 577, 580, 975 A.2d 1084, 1086 (Pa. 2009). "If any doubt exists as to whether a demurrer should be sustained, it should be resolved in favor of overruling the preliminary objections." Lenau v. Co-Exprise, Inc., 102 A.3d 423, 439 (Pa. Super. 2014).

II. STATEMENT OF QUESTIONS INVOLVED

1. Whether, accepting as true the facts asserted in the Amended Complaint and all inferences fairly deducible from those facts, the law says with certainty that Plaintiff cannot possibly prevail on his PMWA claim? Suggested Answer: No.

2. Whether, accepting as true the facts asserted in the Amended Complaint and all inferences fairly deducible from those facts, the law says with certainty that Plaintiff cannot possibly prevail on his GPB claim? Suggested Answer: No.

[1] Defendant's filing consists of a 26-page legal brief and a 186-paragraph document headed "Preliminary Objections." Thankfully, Local Civil Rule 1028(c)(3) excuses Plaintiff from filing a formal answer to the 186-paragraph document.

3. Whether, accepting as true the facts asserted in the Amended Complaint and all inferences fairly deducible from those facts, the law says with certainty that Plaintiff cannot possibly prevail on his unjust enrichment claim? Suggested Answer: No.

4. Whether Plaintiff's GPB and unjust enrichment claims are time-barred? Suggested Answer: No.

III. FACTS AND LEGAL CLAIMS

Plaintiff lives in Philadelphia, see Amended Complaint ("Am. Cpl.") at ¶ 3, and worked at Defendant's Philadelphia restaurant as a server until around November 2017, see id. at ¶¶ 2, 5, 8. Plaintiff and other servers "take customers' orders, serve food and drinks to customers, and otherwise wait on customers." Id. at ¶ 6.

Plaintiff makes the following allegations regarding the manner in which Defendant pays Plaintiff and other servers at the Philadelphia restaurant:

> 9. Defendant paid Plaintiff and other servers an hourly wage of $2.83 plus tips.
>
> 10. Defendant has implemented a tip-sharing program under which Plaintiff and the other servers contribute some of their tips to a "tip pool." In particular, at the end of a shift, each server contributes 3.5% of his/her total customer sales to the tip pool. These tip-pool proceeds are then paid to other restaurant staff as follows: 1.0% of total customer sales are paid to bartenders; 1.5% of total customer sales are paid to bussers; and 1.0% of total customer sales are paid to hosts.
>
> 11. The above tip-pool proceeds are distributed to bartenders, bussers, and hosts regardless of whether or how much they worked during the shift. For example, on September 5, 2017, Plaintiff contributed $13.29 to the tip pool based on his total customer sales during the shift. A portion of this tip pool contribution was paid to a restaurant host who did not even work during the particular shift.

Am. Cpl. at ¶¶ 9-11.

Plaintiff makes the following allegation regarding the bussers who receive some of the tips paid to Plaintiff and other restaurant servers:

> 7. Defendant employs bussers at the Restaurant. The bussers do not directly interact with customers and do not directly provide service to customers. In fact, Restaurant management has specifically instructed that bussers should stay away from tables until *after* the customers have departed. Thus, while Defendant's Busser "Job Description" requires bussers to clean and reset tables, it explicitly instructs that such activities must take place "once Guests have left." Other specific busser responsibilities include: pre-bussing tables before customers arrive, ensuring that Restaurant tables are clean and orderly before customers arrive and after customers leave, removing trash and garbage to the dumpster area, cleaning and restocking restrooms, ensuring that the outside of the Restaurant is clean. None of these activities entail interacting with customers or directly providing service to customers.

Am. Cpl. at ¶ 7.

Based on the above factual allegations, Plaintiff asserts three legal claims:

Count I asserts the following **PMWA** claim:

> 21. The PMWA entitles employees to a minimum hourly wage of $7.25.
>
> 22. While restaurants may utilize a tip credit to satisfy their minimum wage obligations to servers, they forfeit the right to do so when they require or permit servers to share tips with other restaurant employees who do not "customarily and regularly receive tips." *See* 43 P.S. § 333.103(d)(2). Thus, restaurants lose their right to utilize a tip credit when tips are shared with employees – such as Defendant's bussers – who rarely or never interact with customers. *See Ford v. Lehigh Valley Restaurant Group, Inc.*, 2015 Pa. Dist. & Cnty. Dec. LEXIS 11 (P.C.C.P., Lackawanna Cty. Apr. 24, 2015) (Nealon, J.).
>
> 23. By paying Plaintiff and other servers an hourly wage of only $2.83 and implementing a tip-pooling program under which server's tips are shared with bussers, Defendant has forfeited its right to utilize the tip credit in satisfying its minimum wage obligations to Plaintiff and other servers. As such, Defendant has violated the PMWA's minimum wage mandate by paying Plaintiff and other servers an hourly wage of $2.83 rather than $7.25.

Am. Cpl. at ¶¶ 21-23.

Count II asserts the following **GPB** claim:

> 25. The GPB requires that "[e]very gratuity shall be the sole property of the employee or employees to whom it was paid, given or left for, and shall be paid over in full to such employee or employees." Phila. Code § 9-614(2)(a).
>
> 26. Under the GPB, gratuities may only be "pooled and distributed among all employees who directly provide service to patrons." Phila. Code § 9-614(2)(c).
>
> 27. Defendant has violated the GPB by implementing a tip-pooling program under which server's tips are shared with bussers.
>
> 28. Also, Defendant has violated the GPB by implementing a tip-pooling program under which server's tips are shared with other restaurant employees (regardless of job title) who were not working at the restaurant at the time the tips were earned.

Am. Cpl. at ¶¶ 25-28.

Count III asserts the following **unjust enrichment** claim:

> 30. Defendant has received a monetary benefit from Plaintiff and other Restaurant servers by making them subsidize the pay of other Restaurant employees by (i) sharing tips with bussers who do not directly interact with customers and do not directly provide service to customers and (ii) sharing tips with other Restaurant employees (regardless of job title) who were not working at the time the tips were earned.
>
> 31. The above practices have resulted in Defendant realized significant profits to its own benefit and to the detriment of Plaintiff and other servers.
>
> 32. Defendant's acceptance and retention of such profits is inequitable and contrary to fundamental principles of justice, equity, and good conscience.

Am. Cpl. at ¶¶ 30-32.

IV. ARGUMENT

As discussed below, Defendants' preliminary objections lack merit and should be overruled:

A. Plaintiff states a claim under the PMWA.

The PMWA entitles workers to a minimum hourly wage of $7.25. See 43 P.S. § 333.104(a.1). However, under certain circumstances, restaurants are permitted to apply customer tips towards their minimum wage obligations to servers. See id. at § 333.103(d). This is called taking a "tip credit" because the restaurant gets to "credits" tips towards its minimum wage obligation.

In Ford v. Lehigh Valley Restaurant Group, Inc., 47 Pa. D. & C.5th 157 (P.C.C.P., Lacka. Cty. 2015), Judge Terrence R. Nealon provided a cogent summary of the circumstances in which a restaurant can utilize the tip credit. Judge Nealon explained that under the PMWA

> an employer may satisfy its minimum wage obligations by including an employee's tips in the minimum wage determination. Stated otherwise, an employer may pay an employee a cash wage below the stated minimum wage of $7.25 an hour, provided that the employer supplements that shortfall with the employee's tips. The employer may utilize such a "tip credit" toward the minimum wage only if the employer informs the employee of the "tip credit" practice and the employee retains all tips received by the employee. Notwithstanding that fact, the employee may receive tips pursuant to a tip pooling arrangement, but only if the tip pool is shared exclusively among employees who customarily and regularly receive tips.

Id. at 168-69.

After explaining the PMWA's general tip credit rules, Judge Nealon set out to determine the types of restaurant employees who "customarily and regularly receive tips," and, therefore, may participate in a tip pool without upsetting the restaurant's utilization of the tip credit. Judge Nealon undertook a scholarly analysis of the law, see Ford, 47 Pa. D. & C.5th at 169-81, and,

based on this analysis, "conclude[d] that ***direct customer interaction*** is a relevant factor in determining whether employees 'customarily and regularly receive tips' for purposes of tip pool eligibility under [the PMWA's tip credit provision]," id. at 181 (emphasis supplied). Thus, the Ford servers pled a PMWA claim by alleging that the restaurant (which utilized the tip credit) allowed employees who "***rarely interact with customers***" to share in the tip pool. Id. (emphasis supplied).

The legal principles described in Ford apply to Plaintiff's PMWA claim. Plaintiff alleges that Defendant: (i) utilizes the tip credit in paying him the minimum wage, see Am. Cpl. at ¶ 9; (ii) requires him to contribute some of his tips to a tip pool, see id. at ¶ 10; and (iii) distributes some of the tip pool proceeds to bussers, see id. Under Ford, the legality of including bussers in the tip pool depends on the bussers' "direct customer interaction." See Ford, 47 Pa. D. & C.5th at 181. If, as in Ford, the bussers "rarely interact with customers," id., then Plaintiff has stated a PMWA claim.

In this regard, Plaintiff's amended complaint clearly alleges that Defendant's bussers do ***not*** interact with restaurant customers. Paragraph 7 of the Amended Complaint reads:

> Defendant employs bussers at the Restaurant. *The bussers do not directly interact with customers and do not directly provide service to customers. In fact, Restaurant management has specifically instructed that bussers should stay away from tables until after the customers have departed.* Thus, while Defendant's Busser "Job Description" requires bussers to clean and reset tables, it explicitly instructs that such activities must take place "once Guests have left." Other specific busser responsibilities include: pre-bussing tables before customers arrive, ensuring that Restaurant tables are clean and orderly before customers arrive and after customers leave, removing trash and garbage to the dumpster area, cleaning and restocking restrooms, ensuring that the outside of the Restaurant is clean. *None of these activities entail interacting with customers or directly providing service to customers.*

Am. Cpl. at ¶ 7 (emphasis supplied).

Under Ford, the above factual allegations plead a PMWA claim. While Defendant may disagree with Plaintiff's factual assertion that the bussers did not interact with customers, see Defendant's Brief ("Def. Br.") at 6-10, such fact-intensive arguments are improper in a demurrer motion. The Court must "accept as true all well-pleaded material facts set forth in the complaint and all inferences fairly deducible from those facts." Connor, 601 Pa. at 580, 975 A.2d at 1086.

B. Plaintiff states a claim under the GPB.

Defendant next argues that Plaintiff's GPB claim should be dismissed because: (i) the GPB is preempted by the PMWA, see Def. Br. at 10-12; (ii) the GPB does not prohibit Defendant from diverting Plaintiff's gratuities to other restaurant employees who were not working at the restaurant when Plaintiff received the tips and to bussers who did not directly provide service to restaurant customers, see id. at 12-17; and (iii) Plaintiff fails to state a GPB claim because, in fact, Defendant's bussers "directly provide service" to restaurant customers, see id. at 17-20. As discussed below, each of these arguments should fail:

1. The GPB claim is not preempted.

The PMWA includes a section headed "Preemption" and stating that "this act shall preempt and supersede any local ordinance or rule *concerning the subject matter of this act*." 43 P.S. § 333.114a (emphasis supplied). Thus, in addressing preemption, we initially must understand the "subject matter" of the PMWA.

The PMWA's "subject matter" is straightforward: (i) ensuring that workers are paid a minimum wage (currently $7.25/hour) for all hours worked and (ii) ensuring that workers receive extra overtime premium pay for hours worked over 40 per week. See 43 P.S. §§ 333.101, et seq. That is the extent of the PMWA's subject matter. Defendant does not – and cannot – argue otherwise.

As already discussed, the PMWA allows restaurant employers to utilize a tip credit in fulfilling their minimum wage obligations and sets out various "tip-pooling" rules that restaurants utilizing the tip credit must follow. See Section IV.A supra. Crucially, however, the PMWA's tip credit rules exist within the strict confines of the PMWA's subject matter of safeguarding the minimum wage. The PMWA's tip-pooling rules apply *only if* the restaurant utilizes the tip credit to fulfill its minimum wage obligations.

Meanwhile, Plaintiff's GPB claim rests on statutory provisions that have nothing to do with the PMWA's minimum wage subject matter. Plaintiff primarily invokes the GPB's Sole Property Rule, which provides: "Every gratuity shall be the sole property of the employee or employees to whom it was paid, given, or left for, and shall be paid over in full to such employee or employees." Am. Cpl. at ¶ 25 (quoting Phila. Code § 9-614(2)(a)). Plaintiff also recognizes the Direct Service Exception to the Sole Property Rule. This exception provides that gratuities may be "pooled and distributed among all employees who directly provide service to patrons." Am. Cpl. at ¶ 26 (quoting Phila. Code § 9-614(2)(c)).

This brings us to the central question for purposes of preemption: Does the GPB's Sole Property Rule and Direct Service Exception "concern" the PMWA's "subject matter" of ensuring the payment of minimum wages and overtime premium compensation? The answer is a resounding "No." The GPB has nothing to do with minimum wages or overtime pay. Instead, the GPB provisions invoked by Plaintiff focus on the economic relationship between restaurant customers (who leave gratuities), restaurant servers (who wait on the customers), and restaurant owners (who have the economic power to divert gratuities away from servers and towards other restaurant employees).

The pertinent GPB provisions simply codify some common-sense principles of fairness with respect to the Philadelphia restaurant industry: (i) customers are assured that their gratuities are actually paid to the workers who directly wait on their tables; (ii) servers are assured that their hard-earned gratuities are not diverted to other employees who did not directly serve the customers; and (iii) restaurant owners may not use customer gratuities to subsidize general restaurant operations. *None of this has anything to do with the PMWA's "subject matter" of ensuring a minimum wage and overtime pay.*

In sum, the Court should reject Defendant's preemption argument. The City of Philadelphia has a thriving restaurant industry and has every right to regulate that industry. Defendant offers no evidence that, in enacting the PMWA, the state legislature sought to prevent the City of Philadelphia from passing laws that promote fairness and transparency in the Philadelphia restaurant industry. Accord Hoffman Mining Co. v. Zoning Hearing Board of Adams Township, 612 Pa. 598, 609-18, 32 A.3d 587, 593-98 (Pa. 2011) (express preemption provision in Pennsylvania Surface Mining and Reclamation Act did not preempt local zoning ordinance because the zoning ordinance was enacted for a different purpose than the Pennsylvania Act); Huntley & Huntley, Inc. v. Borough Council of Oakmont, 600 Pa. 207, 217-26, 964 A.2d 855, 861-66 (Pa. 2009) (express preemption provision in Pennsylvania Oil and Gas Act did not preempt local zoning ordinance because the two laws "serve[d] different purposes").

2. Plaintiff pleads a valid claim under the GPB's Sole Property Rule.

Next, Defendant argues that the GPB "simply does not prohibit the conduct that Plaintiff complains about." See Def. Br. at 12-17. Plaintiff disagrees for the following reason:

As already discussed, the GPB's Sole Property Rule provides: "Every gratuity shall be the sole property of the employee or employees to whom it was paid, given, or left for, and shall

be paid over in full to such employee or employees." Phila. Code § 9-614(2)(a). Plaintiff asserts that Defendant violated this rule by requiring him to share tips with "other restaurant employees (regardless of job title) who were not working at the restaurant at the time the tips were earned." Id. at ¶ 28. For example:

> on September 5, 2017, Plaintiff contributed $13.29 to the tip pool based on his total customer sales during the shift. A portion of this tip pool contribution was paid to a restaurant host who did not even work during the particular shift.

Id. at ¶ 11.

The above allegation pleads a claim under the GPB's Sole Property Rule. Unambiguous statutes are interpreted based on their plain language, see 1 P.S. § 1921(b), and the GPB plainly provides that gratuities "paid, given, or left for" Plaintiff are his "sole property." Phila. Code § 9-614(2)(a). As such, Defendant violated the GPB by diverting some of Plaintiff's gratuities to other employees who were not even at the restaurant when the patron left the gratuity. No restaurant patron would ever "pa[y], give[], or le[ave]" a tip for someone who was not even working during the patron's visit.[2]

Plaintiff also asserts that Defendant violated the GPB's Sole Property Rule by "implementing a tip-pooling program under which server's tips are shared with bussers." Am. Cpl. at ¶ 26. These bussers:

> *do not directly interact with customers and do not directly provide service to customers. In fact, Restaurant management has specifically instructed that bussers should stay away from tables until after the customers have departed.* Thus, while Defendant's Busser "Job Description" requires bussers to clean and reset tables, it explicitly instructs that such activities must take place "once Guests have left." Other specific busser responsibilities include: pre-bussing tables before

[2] Moreover, GPB's Direct Service Exception cannot apply because individuals who are absent from work cannot possibly "directly provide service to customers."

> customers arrive, ensuring that Restaurant tables are clean and orderly before customers arrive and after customers leave, removing trash and garbage to the dumpster area, cleaning and restocking restrooms, ensuring that the outside of the Restaurant is clean. *None of these activities entail interacting with customers or directly providing service to customers.*

Id. at ¶ 7 (emphasis supplied).

The above allegations sufficiently plead that bussers are not the types of employees for whom a gratuity would be "paid, given, or left for." Phila. Code § 9-614(2)(a). Restaurant patrons do not leave gratuities for employees with whom they have no contact. As such, the gratuities are the "sole property" of Plaintiff. Moreover, because the bussers do not "directly provide service to customers," the GPB's Direct Service Exception cannot apply.

In sum, the GPB language relied on by Plaintiff is clear and unambiguous: "Every gratuity shall be the sole property of the employee or employees to whom it was paid, given, or left for," Phila. Code § 9-614(2)(a), and servers cannot be required to share gratuities with other restaurant employees who do not "directly provide service to" restaurant patrons, id. § 9-614(2)(c). Defendant seeks to avoid these clear statutory mandates by selectively quoting individuals who spoke at a City Council hearing. See Def. Br. at 14-16. This tactic is unavailing. Where, as here, the GPB's language is "clear and free from all ambiguity, the letter of it is not to be disregarded under the pretext of pursuing its spirit." 1 P.S. § 1921(b); accord Commonwealth v. McCoy, 599 Pa. 599, 609-10, 962 A.2d 1160, 1166 (Pa. 2009); Dept. of Transportation v. Taylor, 576 Pa. 622, 628-29, 841 A.2d 108, 111-12 (Pa. 2004).

3. Plaintiff pleads around the GPB's Direct Service Exception.

Next, Defendant argues that Plaintiff fails to state a GPB claim because, in fact, Defendant's bussers do "directly provide service" to restaurant customers. See Def. Br. at 17-20.

Once again, Defendant refuses to "accept as true all well-pleaded material facts set forth in the complaint and all inferences fairly deducible from those facts." Connor, 601 Pa. at 580, 975 A.2d at 1086.

The Amended Complaint flatly alleges that Defendant's bussers do ***not*** "directly provide service to" restaurant customers:

> Defendant employs bussers at the Restaurant. *The bussers do not directly interact with customers and do not directly provide service to customers. In fact, Restaurant management has specifically instructed that bussers should stay away from tables until after the customers have departed.* Thus, while Defendant's Busser "Job Description" requires bussers to clean and reset tables, it explicitly instructs that such activities must take place "once Guests have left." Other specific busser responsibilities include: pre-bussing tables before customers arrive, ensuring that Restaurant tables are clean and orderly before customers arrive and after customers leave, removing trash and garbage to the dumpster area, cleaning and restocking restrooms, ensuring that the outside of the Restaurant is clean. *None of these activities entail interacting with customers or directly providing service to customers.*

Am. Cpl. at ¶ 7 (emphasis supplied).

Defendant's assertion that bussers "directly provide service" to restaurant customers is nothing more than a disagreement with Plaintiff over factual allegations. Such fact-intensive disputes are not ripe for resolution at the pleading stage.

D. Plaintiff states a claim for unjust enrichment.

In Pennsylvania, unjust enrichment claims are frequently pled alongside PMWA claims. See, e.g., Lugo v. Farmers Pride, Inc., 967 A.2d 963 (Pa. Super. 2009). Notwithstanding, Defendant seeks preliminary dismissal of Plaintiff's unjust enrichment claim, arguing that: (i) Defendant had a "contractual right" to share Plaintiff's tips with bussers, see Def. Br. at 20-22, and (ii) requiring Plaintiff to share tips with bussers could not have been "unjust" because

Defendant operated a "perfectly lawful tip pool," see id. at 22. As discussed below, these arguments should fail:

First, Defendant has not demonstrated a contractual basis for the challenged pay practices. Plaintiff's Amended Complaint makes no mention – either directly or indirectly – of a contract, and Defendant's preliminary objections fail to attach any contract or plead the existence of a contract. Defendant's unilateral requirement that Plaintiff share tips with bussers is not a contract, and Defendant fails to establish the basic elements – offer, acceptance, and consideration – of a real contractual agreement. See, e.g., Jones v. Washington Health System, 2018 U.S. Dist. LEXIS 52381 (W.D. Pa. Mar. 29, 2018) (compensation practices described in employee handbook do not form a contract).

Second, Defendant's argument that it could not have been "unjustly" enriched because it operated a "perfectly lawful tip pool," see id. at 22, is premature. As already discussed, Plaintiff has sufficiently pled that Defendant's pay practices are *illegal* under the PMWA and GPB. So Defendant "perfectly lawful tip pool" argument puts the cart before the horse.

E. Plaintiff's GPB and unjust enrichment claims are not time-barred.

Finally, Defendant ponders the limitations periods applicable to GPB and unjust enrichment claims and concludes that such claims carry a two-year limitations period. See Def. Br. at 22-25. But this discussion is irrelevant to Plaintiff's right to pursue GPB and unjust enrichment claims. Plaintiff worked as a server at Defendant's restaurant *until November 2017*. See Am. Cpl. at ¶ 8. So, even under the two-year limitations period advocated by Defendant, Plaintiff may proceed with his GPB and unjust enrichment claims.

At some later stage of this litigation, it might become necessary for the Court to address the statute of limitations issues raised by Defendant. For example, if class certification is

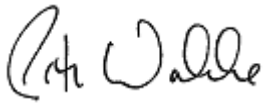
granted, the Court will need to define the temporal parameters of the GPB and unjust enrichment class claims. Until then, the resolution of such issues is neither ripe nor necessary.

V. CONCLUSION

For all of the above reasons, Plaintiff respectfully requests that the Court enter an order overruling Defendant's preliminary objections.

Date: June 6, 2018

Respectfully,



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CERTIFICATE OF SERVICE

I, Peter Winebrake, hereby certify that, on June 6, 2018, the accompanying document was filed electronically and is available for viewing by all counsel of record. In addition, the accompanying document has been sent by regular mail to:

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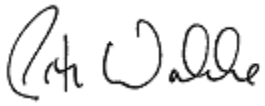

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