

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

REBECCA SANDERS, JEFFREY MILLAR,)	Class Action.
and MOLLY SIMONS, on behalf of themselves)	
and all others similarly situated,)	No.: 1:12-cv-853
)	
Plaintiffs,)	
)	
v.)	
)	CLASS ACTION COMPLAINT
HYUNDAI MOTOR COMPANY, HYUNDAI)	WITH JURY DEMAND
MOTOR AMERICA, KIA MOTORS)	
CORPORATION, and KIA MOTORS)	
AMERICA, INC.)	
)	
)	
Defendants.)	

Plaintiffs, by their undersigned attorneys, bring this action on behalf of themselves and all other persons similarly situated, and allege upon personal knowledge as to themselves and their own acts, and upon information and belief (based on the investigation of counsel) as to all other matters, as follows:

NATURE OF THIS ACTION

1. This is a proposed class action brought on behalf of a class composed of all persons in the United States who own or lease a vehicle manufactured by Hyundai Motor Company, Hyundai Motor America, Kia Motors Corporation, and/or Kia Motors America, Inc. (collectively, “Defendants”) that was sold or leased with a manufacturer’s window sticker that contained false and overstated gas mileage estimates and fuel economy rating information (a “Subject Vehicle”).

2. Subject Vehicles include, but are not limited to, the following vehicles:

2012-2013 Hyundai Accent	2012-2013 Hyundai Elantra
2012-2013 Hyundai Genesis	2012-2013 Hyundai Azera
2012-2013 Hyundai Santa Fe	2012-2013 Hyundai Tucson
2012-2013 Hyundai Veloster	2012-2013 Kia Rio
2012-2013 Kia Sorento	2012-2013 Kia Soul
2012-2013 Kia Soul	2012-2013 Kia Sportage
2012 Kia Optima Hybrid	2012 Hyundai Sonata Hybrid

3. Plaintiffs assert claims for breach of contract, breach of express warranty, and violation of Ohio's Consumer Sales Practices Act (Ohio Rev. Code § 1345.01, et seq.), on behalf of themselves and others similarly situated.

JURISDICTION AND VENUE

4. This Court has subject matter jurisdiction under 28 U.S.C. §1332(d)(2) because the amount in controversy exceeds \$5,000,000, exclusive of interest and costs, and this is a class action in which the Class members and Defendants are citizens of different states.
5. Venue is proper in this judicial district under 28 U.S.C. §1391, because Defendants do business throughout this district and a substantial part of the events or omissions giving rise to Plaintiffs' claims occurred in this district. At all pertinent times, Defendants were and are in the business of marketing, advertising, distributing, and selling Subject Vehicles throughout the nation and Ohio and this judicial district, by and through various authorized dealers. The Subject Vehicles that form the basis of this Complaint were

purchased from Defendants' authorized dealers and placed in the stream of commerce by Defendants.

PARTIES

6. Plaintiffs Rebecca Sanders and Jeffrey Millar are Canadian citizens and residents of Cincinnati, Ohio who purchased a 2013 Hyundai Elantra from Performance Hyundai in Butler County, Ohio in October 2012.
7. Plaintiff Molly Simons is a resident of Warren County, Ohio, who purchased a 2012 Kia Rio from Kings' Kia in Hamilton, Ohio in the spring of 2012.
8. On information and belief, Hyundai Motor Company is a Korean company with a principal place of business at 231 Yangjae, Seocho-gu, Seoul, South Korea 137-938.
9. On information and belief, Kia Motors Corporation is a Korean company with a principal place of business at 231 Yangjae, Seocho-gu, Seoul, South Korea 137-938.
10. On information and belief, Hyundai Motor America is a California corporation with a principal place of business at 10550 Talbert Ave., Fountain Valley, CA 92728.
11. On information and belief, Kia Motors America, Inc. is a California corporation with a principal place of business at 111 Peters Canyon Rd., Irvine, CA 92606. Kia Motors America, Inc. is jointly owned by Hyundai Motor Company and Kia Motors Corporation.

FACTUAL ALLEGATIONS

12. Generally, every new vehicle sold in the United States must have a window sticker (also known as a Monroney sticker) affixed to the window or windshield. The window sticker must contain certain essential information about the vehicle, including its manufacturer's suggested retail price, its engine and transmission specifications, its standard and optional equipment, warranty information, crash test ratings, and fuel economy ratings.

13. The Environmental Protection Agency (the “E.P.A.”) requires all automakers to use certain standard testing procedures to determine a vehicle’s mileage estimates, which can be then displayed on the vehicle’s mandatory window sticker. These tests measure various aspects of the vehicle’s design, including aerodynamics and road resistance.
14. With fuel costs rising to unprecedented levels, fuel mileage has become one of the most important considerations for new-vehicle shoppers; even a small improvement in miles per gallon performance can add up to large saving over the life of a vehicle.
15. Well aware of the importance of fuel mileage to the public, in addition to including the fuel economy ratings on window stickers, Defendants widely tout their vehicles’ “superior” gas mileage estimates and fuel economy ratings in advertisements, especially where their vehicles allegedly achieve better fuel economy ratings than their competitors.
16. Consumers reasonably rely on the gas mileage estimates and fuel economy ratings contained on vehicle window stickers and featured in manufacturers’ websites, brochures, and advertisements, to help them make informed choices about the vehicles they purchase.
17. Plaintiffs Rebecca Sanders and Jeffrey Millar purchased their 2013 Hyundai from Superior Hyundai in Fairfield, Ohio in October 2012.
18. Plaintiff Molly Simons purchased a 2012 Kia Rio from Kings’ Kia in Cincinnati, Ohio in the Spring of 2012.
19. After it received a number of complaints from consumers, the E.P.A. launched an investigation into Hyundai’s advertised mileage estimates. When its independent tests found a difference between the stated and actual fuel economy mileage of the Hyundai

Elantra, the E.P.A. expanded its investigation to cover other Hyundai and Kia brand vehicles.

20. On or about November 2, 2013, the E.P.A. announced the results of its investigation and revealed its findings that Defendants had issued incorrect mileage estimates for the majority of their 2012 and 2013 model-year vehicles.
21. According to the E.P.A., the Subject Vehicles' actual mileage ratings varied from the advertised ratings by as much as six miles per gallon, depending on the particular model. Overall, the fleet average of all Hyundai and Kia models combined is actually 3% worse than what Defendants had represented.
22. Upon information and belief, Defendants have sold or leased at least 90,000 Subject Vehicles containing window stickers that falsely overstated the estimated gas mileage and fuel economy rating information for the vehicle.
23. Plaintiffs purchased Subject Vehicles based on their reasonable expectations that the vehicles would perform consistent with the estimated gas mileage and fuel economy rating information contained on the window stickers, and have been harmed by the Subject Vehicles' inability to achieve the advertised mileage estimates.

CLASS ACTION ALLEGATIONS

24. Plaintiffs bring this action on behalf of themselves and all others similarly situated, as members of the proposed plaintiff class, pursuant to Civil Rule 23. The requirements of subparts 23(a) and 23(b)(2) and (3) are met with respect to the class defined below.
25. Plaintiffs seek to represent the following Nationwide Class:

All persons living in the United States who lease or own a vehicle manufactured by a Defendant that was originally sold or leased with a manufacturer's window sticker that contained overstated estimated gas mileage and fuel economy rating information.

Excluded from the class are the Defendants in this action, any entity in which the Defendants have a controlling interest, any employees, officers, or directors of Defendants, and the legal representatives, heirs, successors, and assigns of Defendants.¹

26. Plaintiffs also bring this action on behalf of the following Sub-Class, as more fully set forth below, and, to the extent appropriate, in the alternative to the claims asserted on behalf of the Nationwide Class:

All persons and entities in the State of Ohio who lease or own a vehicle manufactured by a Defendant that was originally sold or leased with a manufacturer's window sticker that contained overstated estimated gas mileage and fuel economy rating information. Excluded from the class are the Defendants in this action, any entity in which the defendants have a controlling interest, any employees, officers, or directors of Defendants, and the legal representatives, heirs, successors, and assigns of Defendants.

27. Numerosity of the Classes — Members of the classes are so numerous that their individual joinder herein is impracticable. At least 90,000 Subject Vehicles have been sold since 2010.
28. Plaintiffs are members of the Classes – As the above paragraphs demonstrate, Plaintiffs are members of the Class and Sub-Class.
29. Existence and Predominance of Common Questions of Fact and Law — Common questions of law and fact exist as to all members of the Classes. These questions predominate over the questions affecting only individual Class members such that a class action is superior to other available methods for the fair and efficient adjudication of the controversy. These common legal and factual questions include:

¹ Plaintiffs reserve the right to amend this class definition at any time prior to trial.

- a) whether Defendants advertised, marketed, and sold the Subject Vehicles using false and overstated gas mileage estimates and fuel economy rating information;
 - b) whether Defendants knew that they advertised, marketed, and sold the Subject Vehicles using false gas mileage estimates and fuel economy rating information, and if so, when;
 - c) whether the Subject Vehicles' actual, inferior gas mileage estimates and fuel economy ratings reduce the value of the vehicles;
 - d) whether Defendants breached their contracts with Plaintiffs, the Class, and the Sub-Class;
 - e) whether Defendants breached express warranties made to Plaintiffs, the Class, and the Sub-Class;
 - f) whether Defendants violated Ohio's Consumer Sales Practices Act, Ohio Rev. Code § 1345.01, et seq.
 - g) whether Plaintiffs and the members of the Class and Sub-Class have suffered damages as a result of the conduct alleged herein, and if so, the measure of such damages.
30. Typicality — Plaintiffs' claims are typical of the claims of the Class and Sub-Class because Plaintiffs and all members of the Classes purchased or leased a Subject Vehicle that was marketed and sold to them with false estimated gas mileage and fuel economy rating information.
31. Adequacy — Plaintiffs are adequate representatives of the Classes because their interests do not conflict with the interests of the members of the Classes they seek to represent. Plaintiffs have retained counsel competent and experienced in complex class action

litigation, and Plaintiffs intend to prosecute this action vigorously. The interests of members of the Classes will be fairly and adequately protected by Plaintiffs and their counsel.

32. Rule 23(b)(3) Predominance and Superiority. Questions of law and fact common to the members of the Class and Sub-Class predominate over any questions affecting only individual members and a class action is superior to all other available means for fairly and efficiently adjudicating the controversy. In this regard, the Class members' interests in individually controlling the prosecution of separate actions is low given the magnitude, burden, and expense of individual prosecutions against corporations as large as Defendants. Further, other than an action recently filed in federal court in California, Plaintiffs and their Counsel are not aware of any other current class litigation concerning this controversy already begun by members of the Classes. And, it is desirable to concentrate this litigation in this forum to avoid burdening the courts with individual lawsuits. Individualized litigation presents a potential for inconsistent or contradictory judgments, and also increases the delay and expense to all parties and the court system presented by the legal and factual issues of this case. By contrast, the class action procedure here will have no management difficulties. Defendants' records and the records available publicly will easily identify the members of the Class and Sub-Class. And, because the misrepresentations are common to all Subject Vehicles, the same common documents and testimony will be used to prove the Plaintiffs' claims as well as the claims of the Class and Sub-Class. Finally, proceeding as a class action provides the benefits of single adjudication, economies of scale, and comprehensive supervision by a single court.

33. Rule 23(b)(2) Certification. Certification is also appropriate under Rule 23(b)(2) because Defendants have acted or refused to act on grounds that apply generally to the Class and Sub-Classes, so that final injunctive relief or corresponding declaratory relief is appropriate respecting the Class and Sub-Classes as a whole.

FIRST CAUSE OF ACTION

BREACH OF CONTRACT

34. Plaintiffs incorporate by reference and re-allege all paragraphs previously alleged herein.
35. Defendants, through the Subject Vehicles' window stickers, advertisements, brochures, website, and other marketing materials, made uniform representations and offers regarding the quality and capabilities of the Subject Vehicles, including that they meet the represented gas mileage estimate levels and achieved the represented fuel economy ratings.
36. Plaintiffs and members of the Classes, by purchasing or leasing their Subject Vehicles, accepted Defendants' offer and paid the consideration of the purchase or lease price.
37. Defendants, Plaintiffs, and Class members had the legal capacity to enter into such contracts.
38. Defendants breached the contracts by not upholding their end of the bargain, namely by providing a product that does not meet the represented gas mileage estimate levels or achieve the represented fuel economy ratings.
39. As a direct and proximate cause of Defendants' breach, Plaintiffs and the Class members were damaged through higher fuel costs and loss of resale value in an amount that will be proven at trial.

SECOND CAUSE OF ACTION

BREACH OF EXPRESS WARRANTY

40. Plaintiffs incorporate by reference and re-allege all paragraphs previously alleged herein.
41. Defendants, through the Subject Vehicles' window stickers, advertisements, brochures, website, and other marketing materials, made representations to Plaintiffs and members of Class and Sub-Class about the estimated gas mileage and fuel economy ratings of the Subject Vehicles.
42. These representations were aimed at consumers, including Plaintiffs and members of the Class and Sub-Class, to entice them to purchase the Subject Vehicles.
43. Defendants' representations were part of the basis of the bargain because fuel economy is one of the most important considerations facing vehicle purchasers, and Plaintiffs and members of the Class and Sub-Class purchased the Subject Vehicles based on the reasonable expectation that the vehicles would achieve the represented gas mileage and fuel economy ratings.
44. Because the Subject Vehicles cannot achieve the fuel efficiency levels Defendants represented them to have, Plaintiffs and members of the Class and Sub-Class have been injured through higher fuel costs and loss of resale value of their vehicles, and these injuries were directly and proximately caused by Defendants' false representations.
45. Accordingly, Plaintiffs and members of the Class and Sub-Class are entitled to recover damages they suffered as a result of Defendants' actions.

THIRD CAUSE OF ACTION

**UNFAIR, DECEPTIVE AND UNCONSCIONABLE ACTS AND PRACTICES
IN CONNECTION WITH A CONSUMER TRANSACTION
(Ohio Sub-Class)**

46. Plaintiffs incorporate by reference and re-allege all paragraphs previously alleged herein.
47. The Ohio Consumer Sales Practices Act, O.R.C. § 1345.02, prohibits unfair or deceptive acts or practices in connection with a consumer transaction. For example, the Act prohibits suppliers from representing that goods have characteristics or uses or benefits which they do not have. The Act also prohibits suppliers from representing that their products or goods are of a particular standard, quality, or grade they are not; or that the products or goods have been supplied in accordance with a previous representation, if it has not. Defendants' actions as described throughout this Complaint violate each of these provisions. The Ohio Consumer Sales Practices Act, O.R.C. § 1345.03, also prohibits unconscionable acts or practices in connection with a consumer transaction which includes the circumstances at issue here, where Defendants knowingly or recklessly exaggerated estimated gas mileage and fuel economy rating information for the Subject Vehicles in order to entice Plaintiffs and members of the Ohio Sub-Class to purchase their vehicles.
48. Defendants are all "suppliers" as that term is defined in O.R.C. § 1345.01(C).
49. Plaintiffs are "consumers" as that term is defined in O.R.C. § 1345.01(D).
50. Defendants' conduct alleged above constitutes unfair, deceptive, and unconscionable acts and practices in connection with a consumer transaction in violation of O.R.C. § 1345.02 and § 1345.03. The unfair, deceptive, and unconscionable acts and practices occurred before, during, and after the transactions.

51. Defendants' conduct as alleged above constitutes an act or practice previously declared to be deceptive or unconscionable by rule adopted under division (B)(2) of section 1345.05 and previously determined by Ohio courts to violate Ohio's Consumer Sales Practices Act and was committed after the decisions containing these determinations were made available for public inspection under division (A)(3) of O.R.C. § 1345.05. The applicable rule and Ohio court opinions include, but are not limited to: OAC 109:4-3-16; *Mason v. Mercedes-Benz USA, LLC*, 2005 Ohio 4296; *Khoury v. Lewis*, Cuyahoga Common Pleas No. 342098 (2001); *State ex rel Montgomery v. Canterbury*, Franklin App. No. 98CVH054085 (2000); and *Fribourg v. Vandemark* (July 26, 1999), Clermont App. No. CA99-02-017, unreported (PIF # 10001874).
52. Defendants' conduct caused damages to Plaintiffs and the consumers in the Ohio Sub-Class as alleged.
53. Accordingly, Plaintiffs and the members of the Ohio Sub-Class are entitled to (1) rescind their transactions, (2) recover damages, and/or (3) receive reimbursement for attorneys' fees pursuant to O.R.C. § 1345.09.

DEMAND

WHEREFORE, Plaintiffs, on their own behalf and on behalf of the Class and Sub-Class, respectfully request judgment against Defendants:

- (a) Certifying the Class and Sub-Class and appointing Plaintiffs and their counsel to represent the Class and Sub-Class;
- (b) Ordering Defendants to provide notice to the Class and the Sub-Class of the Subject Vehicles' actual estimated gas mileage and fuel economy ratings;

- (c) Permitting Plaintiffs and members of the Sub-Class to rescind their vehicle purchase or lease transactions;
- (d) Awarding damages which include but are not limited to diminution of value;
- (e) Awarding pre-judgment and post-judgment interest;
- (f) Awarding attorneys' fees and costs; and
- (g) Awarding such other relief as this Court may deem just and proper.

Respectfully submitted,

/s/ Jeffrey S. Goldenberg

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ENDORSEMENT FOR A JURY DEMAND

Plaintiffs demand a trial by jury of all issues so triable.

Respectfully submitted,

/s/ Jeffrey S. Goldenberg

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CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I. (a) PLAINTIFFS

Rebecca Sanders, Jeffrey Millar, Molly Simons

(b) County of Residence of First Listed Plaintiff Butler (EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorney's (Firm Name, Address, and Telephone Number)

Jeffrey S. Goldenberg; Goldenberg Schneider, LPA, One West Fourth Street, 18th Flr., Cincinnati, OH 45202-2012

DEFENDANTS

Hyundai Motor Company, Hyundai Motor America, Kia Motors, Kia Motors America, Inc.

County of Residence of First Listed Defendant (IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff, 2 U.S. Government Defendant, 3 Federal Question (U.S. Government Not a Party), 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

Table with columns for Plaintiff (PTF) and Defendant (DEF) citizenship: Citizen of This State, Citizen of Another State, Citizen or Subject of a Foreign Country, Incorporated or Principal Place of Business In This State, Incorporated and Principal Place of Business In Another State, Foreign Nation.

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Large table with categories: CONTRACT, REAL PROPERTY, TORTS, CIVIL RIGHTS, PRISONER PETITIONS, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES.

V. ORIGIN (Place an "X" in One Box Only)

- 1 Original Proceeding, 2 Removed from State Court, 3 Remanded from Appellate Court, 4 Reinstated or Reopened, 5 Transferred from another district (specify), 6 Multidistrict Litigation, 7 Appeal to District Judge from Magistrate Judgment

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): 28 U.S.C. §1332(d)(2) - diversity

Brief description of cause: Automaker overstated gas mileage of vehicles, breaching contract with consumers

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23, DEMAND \$, CHECK YES only if demanded in complaint: JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY

(See instructions): JUDGE, DOCKET NUMBER

DATE, SIGNATURE OF ATTORNEY OF RECORD

11/04/2012, /s/ Jeffrey S. Goldenberg

FOR OFFICE USE ONLY

RECEIPT #, AMOUNT, APPLYING IFP, JUDGE, MAG. JUDGE

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

I. (a) Plaintiffs-Defendants. Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.

(b) County of Residence. For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)

(c) Attorneys. Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".

II. Jurisdiction. The basis of jurisdiction is set forth under Rule 8(a), F.R.C.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.

United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.

United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.

Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.

Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; federal question actions take precedence over diversity cases.)

III. Residence (citizenship) of Principal Parties. This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.

IV. Nature of Suit. Place an "X" in the appropriate box. If the nature of suit cannot be determined, be sure the cause of action, in Section VI below, is sufficient to enable the deputy clerk or the statistical clerks in the Administrative Office to determine the nature of suit. If the cause fits more than one nature of suit, select the most definitive.

V. Origin. Place an "X" in one of the seven boxes.

Original Proceedings. (1) Cases which originate in the United States district courts.

Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441. When the petition for removal is granted, check this box.

Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.

Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.

Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.

Multidistrict Litigation. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407. When this box is checked, do not check (5) above.

Appeal to District Judge from Magistrate Judgment. (7) Check this box for an appeal from a magistrate judge's decision.

VI. Cause of Action. Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553
Brief Description: Unauthorized reception of cable service

VII. Requested in Complaint. Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.

Demand. In this space enter the dollar amount (in thousands of dollars) being demanded or indicate other demand such as a preliminary injunction.

Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.

VIII. Related Cases. This section of the JS 44 is used to reference related pending cases if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

Date and Attorney Signature. Date and sign the civil cover sheet.