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Attorneys for Plaintiff

REBECCA ANTELL, individually and as  
personal representative of the ESTATE OF  
MICHAEL ANTELL,

Plaintiffs,

v.

NFL PRODUCTIONS, LLC d/b/a NFL  
FILMS, NATIONAL FOOTBALL LEAGUE;  
JOHN DOES 1-10 and ABC COMPANIES 1-  
10, unknown persons and entities,

Defendants.

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION: BURLINGTON COUNTY

Docket No.:

CIVIL ACTION

**COMPLAINT AND JURY DEMAND**

Plaintiff, Rebecca Antell, residing at 459 Fairfax Road, Drexel Hill, Pennsylvania 19026  
individually and as personal representative of the Estate of Michael Antell, by way of complaint  
against Defendants says:

**THE PARTIES**

1. Michael Antell was killed in a motor vehicle accident on December 16, 2022. This  
action is brought by the Estate of Michael Antell (“Mr. Antell” and “Estate”) by and through his  
widow and personal representative, Rebecca Antell (“Mrs. Antell” and “Plaintiff”). In addition to  
the claim asserted by Mrs. Antell as personal representative of the Estate, she also brings claims  
individually.

2. Defendant NFL Productions, LLC d/b/a NFL Films (“NFL Films”) is a television  
and films production business operating within the State of New Jersey and maintaining its  
corporate headquarters at One Sabol Way, Mount Laurel, New Jersey 08054. NFL Films is a

wholly owned subsidiary of Defendant National Football League. At all times relevant, NFL Films was Mr. Antell's employer.

3. Defendant National Football League ("NFL") is the parent company of NFL Films and all times relevant was a joint employer of Mr. Antell. The NFL maintains its corporate headquarters at 345 Park Avenue, New York, New York 10154.

4. Upon information and belief, at all times relevant hereto, defendants John Does 1-10, and ABC Corps. 1-10, were and are persons or entities whose true identities are unknown to Plaintiffs, but were responsible for the wrongful acts alleged herein. (NFL Films, the NFL, John Does 1-10, and ABC Corps 1-10, are collectively referred to as "Defendants").

#### **VENUE AND JURISDICTION**

5. Venue is properly laid in Burlington County pursuant to New Jersey Court Rule 4:3-2(a), by virtue of Burlington County being the county where the cause of action arose.

6. Jurisdiction over Defendants is vested in this Court by virtue of Defendants residing within this State and/or conducting business within this State.

#### **FACTS COMMON TO ALL COUNTS**

7. Defendant NFL operates the National Football League which is one of the major sports leagues in the United States and the highest professional level of American football in the world. The NFL is the most popular sports league in the United States. It is the wealthiest professional sports league in the world by revenue.

8. Defendant NFL Films is a wholly owned subsidiary of the NFL. NFL Films is the film and television production company of the NFL, producing commercials, television programs, feature films and documentaries about and for the NFL. NFL Films shares operations and management with the NFL, including human resources, legal and executive functions.

9. Since 2001, NFL Films has produced a reality sports documentary called *Hard Knocks*, which airs on Max, formerly known as HBO. Each season, the show follows an NFL team through its training camp and (starting in 2022) the regular season, depicting the lives of players, coaches and staff. *Hard Knocks* is one the NFL's most watched productions.

**Defendants Mischaracterize Mr. Antell's Employment to Avoid Paying Overtime and Benefits.**

10. Mr. Antell worked as a Production Assistant on the *Hard Knocks* production. At all times relevant, the terms and conditions of Mr. Antell's employment were controlled jointly by the NFL and NFL Films, including hiring, firing, promotion, discipline, compensation, scheduling, and work assignments.

11. According to Defendants' job posting for the *Hard Knocks* Production Assistant position, a Production Assistant is an "entry-level" position.

12. As a Production Assistant, Mr. Antell's duties included "[r]esearching, logging, organizing, and editing current & archival footage," "researching story lines" and assisting producers with additional duties as needed in connection with the *Hard Knocks* Production.

13. Defendants incorrectly characterized Mr. Antell's position as "overtime exempt" even though Mr. Antell's job responsibilities did not meet the statutory criteria for overtime exemption under the New Jersey Wage and Hour Law, N.J.S.A. 34:11-56a4, *inter alia*.

14. Specifically, Mr. Antell's offer letter states that the Production Assistant position is "an exempt-level position under federal and state wage and hour laws, [which] therefore, will not be eligible for overtime."

15. During Mr. Antell's employment, he worked extensive overtime hours, in office and out of office, for which he was not compensated at the rate of pay required under New Jersey law.

**Defendants Subject Mr. Antell to Unreasonable and Unsafe Working Conditions.**

16. During the 2022 to 2023 *Hard Knocks* season, Defendants scheduled Mr. Antell and the other Production Assistants to extended and unusual shifts, which continued overnight and during daytime hours, and which were required to be performed in-person, for sixty-one (61) straight days and which created a known risk of fatigue-related injuries and death, including the risks of impaired driving, falling asleep while driving, and resultant motor vehicle accidents while travelling to and from Defendants' office in Mount Laurel, New Jersey.

17. The working hours of the 2022-23 *Hard Knocks* season far exceeded those of previous seasons, because the production was covering the Arizona Cardinals from the East Coast (New Jersey), resulting in the work being "night shifted" due to the time difference.

18. In addition, the 2022-23 *Hard Knocks* season was the first season in which the production continued out of the preseason (August) and into the regular season and through the playoffs (potentially through February). As a result, the Production Assistants were required to work for months longer than they ever had before, exposing Mr. Antell (and his co-workers) to an increased risk of chronic fatigue and the attendant dangers of fatigue-related accidents.

19. Each day, Mr. Antell received video footage from Arizona in the late evening and was responsible for reviewing and editing the footage during the overnight hours, often finishing his work late at night or in the early morning. Mr. Antell regularly finished working after midnight and often after 3:00 a.m.

20. Mr. Antell's production team was referred to as the "Night Riders" because of their extended overnight hours.

21. All evening and overnight work was required to be performed in-person at Defendants' Mount Laurel headquarters, seven days per week.

22. Mr. Antell worked far in excess of forty hours (40) per week doing in-person nighttime work which Defendants tracked through a punch-in/punch-out clock.

23. In violation of New Jersey law, N.J.S.A. 34:11-56a4, *inter alia*, Defendants failed to pay Mr. Antell the required rate of pay for the overtime hours he worked during the nighttime and overnight shifts.

24. In addition to those in-person nighttime work requirements, Defendants also required Mr. Antell to work during the daytime. Specifically, he was required to remotely attend individual meetings, group meetings and conference calls, and to respond to emails and telephone calls, often beginning at 9:00 am or 10:00 a.m.

25. In violation of New Jersey law, N.J.S.A. 34:11-56a4, *inter alia*, Defendants failed to track Mr. Antell's daytime hours and failed to pay Mr. Antell the required rate of pay for those daytime hours.

26. As a result of Defendants requiring Mr. Antell to work both daytime and nighttime shifts, Mr. Antell received between 4-5 hours of sleep per night throughout the extended 2022-2023 *Hard Knocks* season.

27. Mr. Antell arrived home well after midnight most nights and often after 2:00 am to 4:00 am the following morning. Mr. Antell was then required to wake in the morning to perform his daytime responsibilities while the rest of Defendants' employees were working before reporting in-person at the NFL's office for evening and overnight shifts.

28. As a result of Defendants' requiring Mr. Antell to work both daytime and nighttime shifts, throughout the extended 2022-2023 *Hard Knocks* season, Mr. Antell (and his co-workers) became chronically and dangerously fatigued, creating the foreseeable risk of a fatigued-related motor vehicle accident during mandatory daily commute, including commutes home in the

overnight hours.

**Defendants Violated Their Own Published Workplace Policies to Expose Mr. Antell to Dangerous Work Requirements**

29. Defendants' excessive and dangerous work requirements violated Defendants' own published workplace policies.

30. In their workplace policies and job advertisements, Defendants falsely represented that Production Assistants were to work a 40-hour workweek, with a 5 day per week in-office requirement, and have access to remote work and flexible schedule.

31. In inducing Mr. Antell to accept employment as a *Hard Knocks* Production Assistant, Defendants represented that Mr. Antell was "expected to work from an NFL office five days a week, except in limited circumstances..." for a total of "+ / - 40 hours/week."

32. As set forth above, Mr. Antell was actually required to work both daytime and nighttime hours far in excess of 40 hours per week.

33. Further, Mr. Antell was required to work in-person *seven* days per week with all nighttime work performed in-office and only daytime work being performed remotely.

34. Upon hiring Mr. Antell, Defendants also represented that Mr. Antell was to have access to a "Flexible Workplace Policy that provides members of [Defendants'] workforce with opportunities to periodically work from a location of their choice...."

35. In violation of its Flexible Workplace Policy, Defendants required that Mr. Antell be in person at its Mount Laurel headquarters each day for his evening/overnight shift over sixty-one (61) consecutive days, culminating in his death.

36. Defendants' affirmative violations of their own published workplace policies and published representations augmented Mr. Antell's chronic fatigue and exhaustion and created a foreseeable risk of a fatigue related motor vehicle accident.

**The NFL Failed to Take Reasonable Steps to Ensure the Safety of its Employees.**

37. Having taken affirmative actions to create an increased danger of fatigue related motor vehicle accidents, Defendants took no steps to protect Mr. Antell from the foreseeable risk of harm.

38. Fatigued driving is estimated to be a factor in twenty (21%) percent of fatal accidents in the United States each year.<sup>1</sup>

39. The duration (consecutive workdays exceeding 8 hours without sufficient rest) and timing (overnight) of Mr. Antell's shifts are designated as "extended and unusual" by the United States Department of Labor ("DOL"), under the Occupational Safety and Health Act ("OSHA").<sup>2</sup>

40. These working conditions are known to "disrupt the body's regular schedule, leading to increased fatigue, stress, and lack of concentration [which] lead to an increased risk of operator error, injuries and/or accidents."

41. OSHA defines an Extended and Unusual Shift as follows:

A normal work shift is generally considered to be a work period of no more than eight consecutive hours during the day, five days a week with at least an eight-hour rest. Any shift that incorporates more continuous hours, requires more consecutive days of work, or requires work during the evening should be considered extended or unusual.

42. By definition, the shifts required of Mr. Antell and the Night Riders for sixty-one (61) consecutive days constituted "Extended and Unusual" shifts which were to be minimized and which posed a known risk of fatigue related harm to employees.

43. OSHA/DOL published information related to the dangers to employee safety arising from extended and unusual shifts:

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<sup>1</sup> Tefft, Brian C. (2014) Prevalence of Motor Vehicle Crashes Involving Drowsy Drivers, United States, 2009 – 2013. Washington, DC: AAA Foundation for Traffic Safety (cited by chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://aaafoundation.org/wp-content/uploads/2017/12/PrevalenceOfSelfReportedDrowsyDrivingReport.pdf)

<sup>2</sup> https://www.osha.gov/emergency-preparedness/guides/extended-unusual-work-shifts.

“OSHA has long been aware of the hazards of sleep deprivation from working night shifts and has addressed this serious issue in public forums. OSHA has also issued citations to companies when they ignored the human factor of employee fatigue from excessive overtime.”<sup>3</sup>

44. OSHA has published “Guidelines for Employers to Reduce Motor Vehicle Crashes” describing the known danger of fatigue-related motor vehicle accidents in greater detail.

“Fatigued or drowsy driving may be involved in more than 100,000 crashes each year, resulting in 40,000 injuries and 1,550 deaths. Sadly, these numbers represent only the tip of the iceberg since these crashes are seriously under-reported. These days, it’s more important than ever for employees to be well rested, alert and sober on the road so that they are in a position to defend themselves from drivers who do not make the same choice. Train employees to make smart decisions when they’re behind the wheel, on and off the job.”<sup>4</sup>

45. OSHA makes the following specific recommendations of appropriate steps for employers to address and minimize the dangers of fatigued driving for employees with extended and unusual work shifts:

- Managers should limit the use of extended shifts.
- Employers should have plans in place to assist and address workers experiencing serious or severe effects of fatigue.
- Additional break periods should be provided when shifts are extended past normal work periods.
- Managers and supervisors should learn to recognize signs and symptoms of the potential health effects associated with extended and unusual work shifts.
- Workers who are being asked to work extended or irregular shifts should be diligently monitored for the signs and symptoms of fatigue.
- Make efforts, whenever feasible, to ensure that unavoidable extended work shifts and shift changes allow affected employees time for adequate rest and recovery.
- Extended shifts should not be maintained for more than a few days, especially if they require heavy physical or mental exertion.

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<sup>3</sup> [https://www.osha.gov/laws-regs/standardinterpretations/2016-07-12#\\_ftn3](https://www.osha.gov/laws-regs/standardinterpretations/2016-07-12#_ftn3), referring to <https://www.osha.gov/news/newsreleases/region1/09132011>.

<sup>4</sup> [https://www.osha.gov/sites/default/files/publications/motor\\_vehicle\\_guide.pdf](https://www.osha.gov/sites/default/files/publications/motor_vehicle_guide.pdf).

- Plan to have an adequate number of personnel available in order to enable workers to take breaks, eat meals, relax, and sleep.

46. In addition to the above DOL/OSHA standards, the specific dangers of fatigue-related accident for overworked Production Assistants in the film and television industry has been reported on extensively by trade interests and industry publications.<sup>5</sup>

47. Defendants did not implement any programs, policies or practices which combatted the known fatigue of their employees and took no steps to minimize the foreseeable risk of fatigued driving which they had created through their own affirmative actions in violation of their own written policies and procedures.

**The Night Riders Openly Disclosed Their Concerns About Fatigued Driving and were Dismissed by Management.**

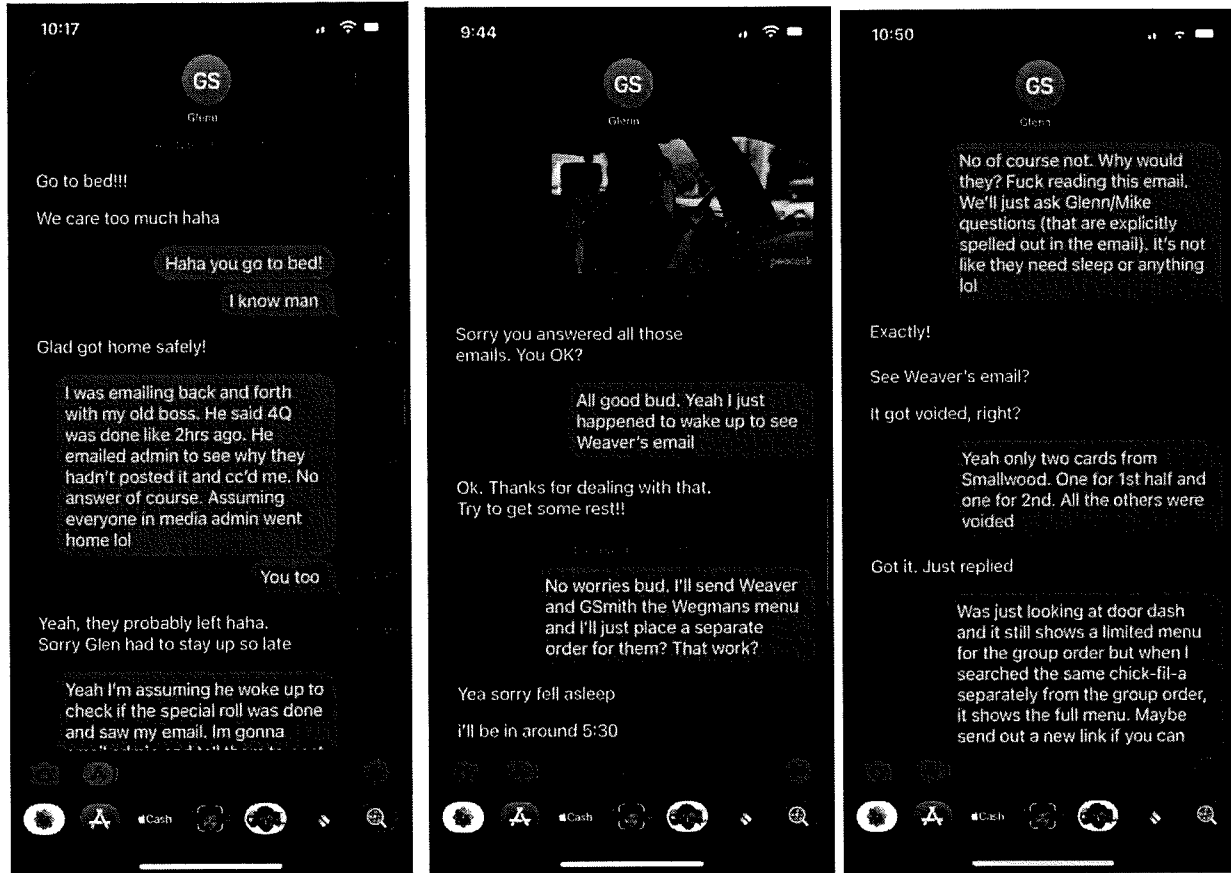
48. Mr. Antell and his co-workers openly disclosed that they were dangerously sleep deprived due to their extended and unusual work scheduled and were suffering from dangerous exhaustion and were aware of the heightened risk of fatigue related motor vehicle accidents occurring during commutes.

49. Particularly illustrative are text messages between Mr. Antell and co-workers in the days leading up to Mr. Antell's fatal car accident, several of which were exchanged when Mr. Antell returned home from work after 4 am.

50. Mr. Antell and his co-worker checked on each other's safety after driving home during the overnight shifts, and referenced falling asleep behind the wheel, specifically identifying the danger created by Defendants that ultimately caused Mr. Antell's death:

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<sup>5</sup> See, e.g., [uniglobal\\_behindthescenes\\_en\\_final.pdf \(uniglobalunion.org\)](#) ("28 per cent of respondents in independent television production said grave accidents have resulted from extreme fatigue."); [Hollywood's Grueling Hours & Drowsy Driving Problem: Crew Members Speak Out – Deadline](#) ("Actors, actresses and crew members now are speaking on the record about the dangers of long hours and sleep deprivation and are asking the film and television industries to finally do something about it."); [Film Industry Workers Are Fed Up With Long Hours \(jacobin.com\)](#) ("Safety is an issue — car crashes, specifically.")



51. In addition, Mr. Antell and his co-workers informed Defendants' management that they were dangerously exhausted, suffering from fatigue and needed to rest in order to safely travel to and from work following their extended and unusual overnight shifts.

52. Mr. Antell complained of fatigue to his supervisor and requested that he be permitted to perform a portion of his nighttime work remotely in accordance with Defendants' Flexible Workplace Policy.

53. Mr. Ryan rejected Mr. Antell's request to access Defendants' Flexible Workplace Policy, telling Mr. Antell that "we all had to go through" difficult working conditions early in their careers.

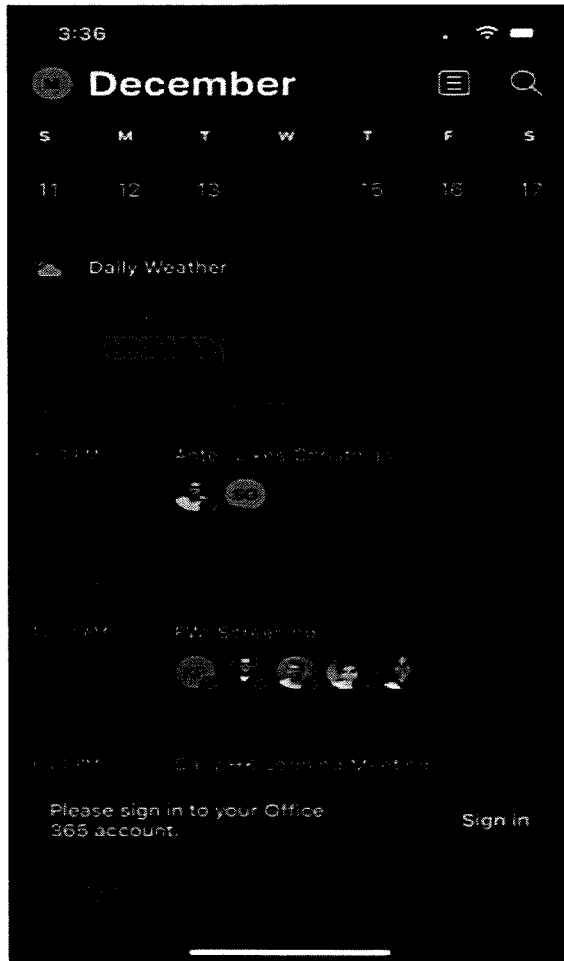
54. In response to Mr. Antell's reports of fatigue and request for rest, his supervisor stated that Mr. Antell's position working for the NFL was highly coveted and there was a "long

line” of willing replacements to take his place if he did not accept the work requirements.

**Defendants Haze and Mock Mr. Antell for Requesting a Single Break from Consecutive Work After Two Months.**

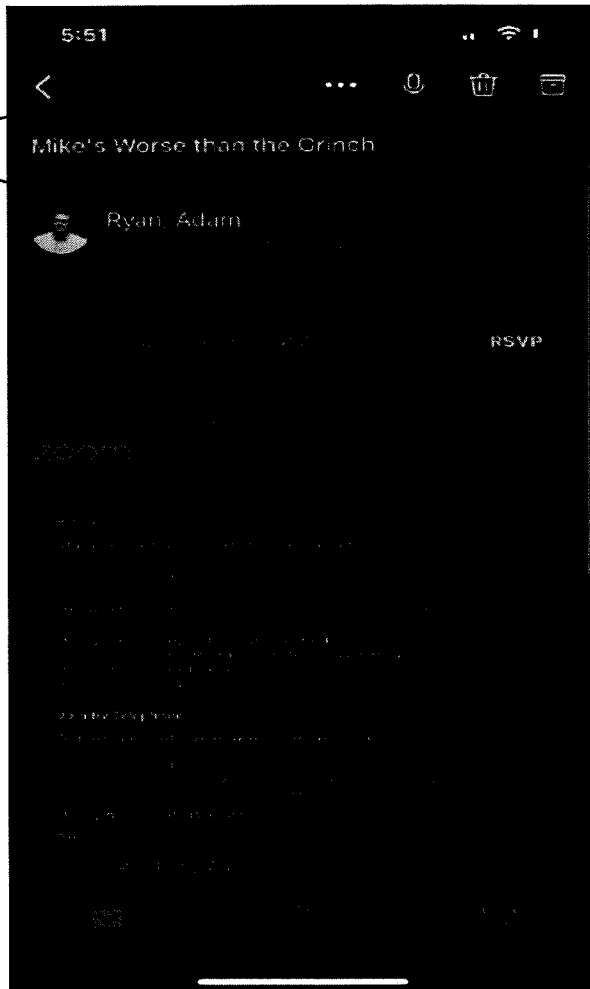
55. Mr. Antell requested to take the Christmas holiday off to be with his family and rest. Christmas Eve would have been Mr. Antell’s first day off since October, more than two months earlier. As Christmas approached, Mr. Antell received mockery and pressure from his managers.

56. On December 14, 2022 (the night before Mr. Antell’s death), Mr. Antell’s supervisor scheduled a meeting derisively entitled “**Antell Likes Christmas**” to mock him:



57. On December 15, 2022 (the night of Mr. Antell’s death), Mr. Antell was forced to

attend a meeting related to Mr. Antell's request for Christmas off which his supervisor, Adam Ryan, entitled "Mike's worse than the Grinch."



58. That mockery is emblematic of the constant and intense pressure that the NFL placed upon Mr. Antell and the other PAs to discourage them from getting even the minimal rest that would be required to operate a motor vehicle in an unimpaired fashion.

**NFL Employees are Involved in Repeated Fatigue Related Motor Vehicle Accidents.**

59. In the weeks leading up to Mr. Antell's death, Mr. Antell and several other fatigued and exhausted members of the Hard Knocks production team were involved in motor vehicle accidents of which the NFL was aware:

60. At approximately 2 am on November 18, 2022, Mr. Antell was involved in a motor  
{00225018}

vehicle accident at the intersection of 52nd Street and Walnut Street in Philadelphia while driving home from work at NFL Films. That was Mr. Antell's first motor vehicle accident since obtaining his driver's license sixteen (16) years earlier.

61. On or about December 5, 2022, Employee #1, was involved in a motor vehicle accident, which was described as "horrific" in contemporaneous communications. Employee #1 was required to undergo surgery for injuries he sustained.

62. On or about December 10, 2022, Employee #2 was involved in a motor vehicle accident in which he reportedly "totaled" his car.

63. Despite having actual knowledge of employee fatigue and resultant motor vehicle accidents, Defendants did not alter their seven-day per week, in-person, work requirements or reduce the overnight or day-time requirements of the job, to allow employees to rest.

**Defendants Have Actual Knowledge of Mr. Antell's Dangerous Exhaustion.**

64. On the evening of December 14, 2022 (the day prior to Mr. Antell's death), Defendants organized a holiday party for the "Night Riders." Mr. Antell and one other co-worker stayed behind to complete the work for the entire team to allow the (mostly younger) PAs to enjoy the activity.

65. Defendants had actual knowledge of Mr. Antell's excessive work on the night of December 14, yet did not provide him with an opportunity to rest in the morning.

66. The next morning, on December 15, 2022 (the day of Mr. Antell's death) Defendants required Mr. Antell to report to work, in-person, before noon.

67. Mr. Antell was then required to work a 12 hour shift which concluded at or near to midnight on December 16, 2022.

68. Mr. Antell was visibly impaired by exhaustion by the conclusion of his shift on

December 15, 2022, which continued into the morning of December 16, 2022.

69. Defendants knew or had reason to know of Mr. Antell's impairment at the conclusion of his December 15-December 16, 2022 shift.

70. Upon information and belief, Mr. Antell was observed by Defendants management in a visibly impaired state during his December 15-December 16, 2022 shift.

71. Mr. Antell was so impaired by fatigue by the time that he left NFL's headquarters at the conclusion of his December 15 -December 16, 2022 shift, that he failed to "punch out" of his shift.

72. Defendants failed to provide Mr. Antell an opportunity to rest, provide him alternative transportation home or take any steps ensure his safety.

**Mr. Antell Dies in a Preventable Fatigue Related Motor Vehicle Accident.**

73. While driving home from work in the early morning hours of December 16, 2022, Mr. Antell, impaired by exhaustion, drifted in front of a Peterbilt tractor trailer, resulting in a fatal collision.

74. Mr. Antell experienced conscious pain and suffering before his death.

75. The unreasonable conduct of Defendants in requiring Mr. Antell to work dangerously long consecutive, in-person, overnight shifts for a period of months, in violation its own policies and procedures, with actual knowledge of fatigue related accidents involving three employees, and with actual knowledge of Mr. Antell's exceptionally fatigued state on December 15 and 16, and without any reasonable precautionary measures which were readily available to Defendants, was a proximate cause of Mr. Antell's death

**FIRST COUNT**  
**(Wrongful Death - N.J.S.A. 2A:31-1 et seq.)**

76. Plaintiff reiterates and incorporates by reference all preceding paragraphs as if fully set forth herein.

77. Defendants imposed unreasonable and unsafe working conditions upon Michael Antell, requiring him to work sixty-one (61) consecutive days of in-person, extended and unusual shifts, including overnight and daytime work obligations, without adequate rest periods, contravening Defendants' established policies and affirmative representations.

78. Defendants exerted authoritative control over Mr. Antell's work itinerary and the conditions under which he was employed.

79. Defendants knew or should have known of the dangerous fatigue and exhaustion Mr. Antell suffered due to Defendants' affirmative actions and imposition of said work schedule and other violations of policy which affirmatively augmented the known risk of fatigued driving.

80. Defendants violated their own work protocols by setting Mr. Antell's unreasonable and unsafe schedule, denying him the access to Defendants' remote work policy, and compelling his daily commutes in a state of chronic fatigue.

81. Defendants willfully ignored repeated incidences of fatigue related accidents by employees and mocked and intimidated their employees to prevent them from obtaining the rest they required to safely operate a motor vehicle during mandatory overnight commutes.

82. Defendants knew or should have known that the chronic fatigue that Mr. Antell developed due to Defendants' unreasonable and unsafe work requirements impaired his cognitive abilities and his capacity to operate a vehicle safely.

83. Defendants had actual and constructive knowledge that Mr. Antell's work-induced exhaustion exposed him to undue risk of injury during his vehicular commute between his

residence and workplace.

84. Defendants neglected to take reasonable and necessary measures to mitigate the heightened peril of fatigue-induced incidents which Defendants created through their own affirmative conduct.

85. Notwithstanding the availability of internal policies aimed at curtailing fatigue, Defendants obstructed Mr. Antell's access to such corrective measures.

86. Defendants disparaged and obstructed Mr. Antell's efforts to adopt strategies to alleviate the risks associated with exhaustion, directly emanating from Defendants' affirmative acts.

87. Defendants were under a duty of care to avoid affirmative actions which could foreseeably increase the risk of harm to Michael Antell.

88. Defendants, after having taken affirmative actions to expose Mr. Antell to a heightened risk of harm, were under a duty to protect Mr. Antell from those foreseeable dangers.

89. Defendants' actions, both in causing Mr. Antell's employment-linked chronic fatigue and obstructing his access to mitigative policies, foreseeably endangered Mr. Antell, and exacerbated the risk of injury.

90. Upon information and belief, Defendants observed Michael Antell in a visibly impaired state on the night of his death but failed to intervene to protect Mr. Antell from the foreseeable risk of harm from operating a motor vehicle.

91. There was no lengthy gap between Michael Antell's work shifts and the fatal accident.

92. Defendants failed to act with due care and their negligence.

93. Defendants' actions and inactions as described herein were a proximate cause of

Michael Antell's fatal accident that occurred while he was driving home from work, impaired by his exhaustion and chronic fatigue.

94. Defendants' conduct as aforesaid was malicious and/or Defendants acted in wanton and willful disregard of the rights of Michael Antell and plaintiff.

95. As a direct and proximate result of Defendants' actions and inactions as described herein, plaintiff has suffered injuries and damages and will continue to suffer injuries and damages in the future.

**WHEREFORE**, Plaintiff demands judgment against defendants, jointly and severally, for compensatory and punitive damages, together with interest and costs of suit and for such other damages as may be recoverable under the New Jersey Wrongful Death statute, N.J.S.A. 2A:31-1 et seq. and such further relief as the court deems just, proper and equitable.

**SECOND COUNT**  
**(New Jersey Survival Act - N.J.S.A. 2A:15-3)**

96. Plaintiff reiterates and incorporates by reference all preceding paragraphs as if fully set forth herein.

97. Prior to Michael Antell's death and as a result of the actions and inactions of the defendants, Mr. Antell endured physical and emotional pain and suffering prior to succumbing to his injuries, for which damages are hereby sought.

**WHEREFORE**, Plaintiff demands judgment against defendants, jointly and severally, for compensatory and punitive damages, together with interest and costs of suit and for such other damages as may be recoverable under the New Jersey Survival Act, N.J.S.A. 2A:15-3.

**COUNT THREE**  
**(Wage Theft/Violations of the New Jersey Wage & Hour Law)**

98. Plaintiff reiterates and incorporates by reference all preceding paragraphs as if fully set forth

herein.

99. Defendants NFL Productions, LLC d/b/a NFL Films and National Football League are considered, and are liable as, employers as defined by the New Jersey Wage & Hour Law, N.J.S.A. 34:11-56(a) et seq.

100. Further, in accordance with N.J.S.A. 34:11-58.2, Defendants are subject to joint and several liability as client employers, labor contractors, and/or persons acting on behalf of an employer, as defined in said statute, for violations of the New Jersey Wage & Hour Law.

101. Mr. Antell was a non-exempt employee of Defendants as defined by the New Jersey Wage & Hour Law for a period of seven years.

102. The overtime wage provisions of New Jersey Wage and Hour Law, N.J.S.A. 34:11-56a, et seq. (“WHL”), apply to Defendants and protected Mr. Antell during his lifetime.

103. Pursuant to the WHL, a nonexempt employee working more than 40 hours in any workweek must be paid overtime at a rate of 1.5 times the employee's regular hourly wage. N.J.S.A. 34:11-56(a)(4).

104. Defendants incorrectly characterized Mr. Antell ‘s position as “overtime exempt” even though Mr. Antell’s job responsibilities did not meet the statutory criteria for overtime exemption under the New Jersey Wage and Hour Law, N.J.S.A. 34:11-56a4, *inter alia*.

105. Mr. Antell regularly performed services for Defendants in excess of 40 hours in a week; however, Mr. Antell was never paid the overtime rate of time-and-a-half for his overtime work.

106. Defendants failed to pay Mr. Antell required overtime in violation of New Jersey law over a period of years as a result of its deliberate misclassification of his employment status.

107. Defendants’ failure to pay Mr. Antell’s overtime wages constituted numerous violations of the New Jersey Wage & Hour Law.

108. Defendants’ violations of New Jersey law were willful and part of a deliberate plot to exploit

Mr. Antell and other lower-level employees by misclassifying their employment to avoid paying overtime and to unlawfully reduce Defendants' labor costs and to increase Defendants' profits at the expense of Mr. Antell and other employees.

109. To facilitate this wage theft, Defendants used their clout as high-profile employers within the sports entertainment industry to intimidate and threaten employees into accepting unlawful terms of employment and induced Mr. Antell and other employees with illusory promises of future career opportunities to perpetuate their unlawful conduct.

110. As a result of those wage and hour violations, Mr. Antell and his Estate have suffered significant damages.

111. Mr. Antell and now, his Estate, widow and children, have been denied the lawful benefits of the labor Mr. Antell provided to Defendants during his lifetime, without financial compensation, the fruits of which have been retained by the Defendants for their own benefits and enrichment.

**WHEREFORE**, pursuant to the New Jersey Wage & Hour Law, under N.J.S.A. 34:11-56(a) et seq., and/or any other applicable statutory or case law, Plaintiff demands judgment against Defendants, jointly and/or severally, for all available damages by law or equity together with interest, including actual lost wages and statutory liquidated damages of 200 percent of the wages due, costs, and attorney's fees; punitive damages; injunctive relief, including all appropriate measures to force compliance with all state and federal wage laws; and such other relief as the Court may deem appropriate.

#### **DEMAND FOR DISCOVERY**

Plaintiffs demand answers to Form Interrogatories, as mandated by the Court Rules, within the time required for service of same.

#### **DEMAND FOR TRIAL BY JURY**

Plaintiffs hereby demand a trial by jury on all issues.

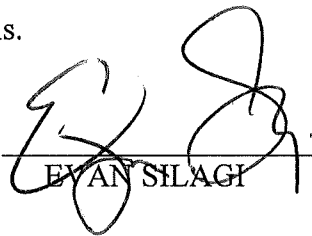
**DESIGNATION OF TRIAL COUNSEL**

Pursuant to the provisions of R. 4:25-4, the Court is advised that Evan Silagi is hereby designated as trial counsel on behalf of Plaintiffs.

**TIME-UNIT NOTICE**

Notice is hereby given that plaintiffs may suggest to the trier of fact that unliquidated damages be calculated on a time-unit basis.

Dated: 9/30/24

By:   
EVAN SILAGI