

IN THE SUPERIOR COURT OF THE DISTRICT OF COLUMBIA  
CIVIL DIVISION

DISTRICT OF COLUMBIA,  
a municipal corporation  
400 6th Street NW  
Washington, D.C. 20001,

Plaintiff,

v.

AZURE HEALTHCARE SERVICES, LLC,  
5136 8th Street, NW  
Washington, DC 20011,

BETH HENSON,  
2717 Unicorn Lane NW  
Washington, D.C. 20015,

and

CYNTHIA WARREN,  
1024 36th Street  
Baltimore, MD 21218

Defendants.

Case No.:

Judge:

**JURY TRIAL DEMANDED**

**COMPLAINT**

Plaintiff the District of Columbia (“District”), through the Office of the Attorney General, brings this enforcement action against Defendants Azure Healthcare Services, LLC (“Azure”), Beth Henson, and Cynthia Warren for violations of the District’s Minimum Wage Revision Act (“MWRA”), D.C. Code §§ 32-1001, *et seq.* The District’s minimum wage law requires every employer who chooses to do business in the District to guarantee fair payment to all workers. Defendants Azure, Henson, and Warren ignored this requirement at the height of the COVID-19 pandemic, depriving frontline healthcare workers of their full hard-earned wages. The District

brings this action to recover wages owed to those workers as well as all applicable penalties for violations of District law.

### **JURISDICTION**

1. The Court has jurisdiction over the subject matter of this case pursuant to D.C. Code § 11-921 and D.C. Code § 32-1306(a)(2).

2. This Court has personal jurisdiction over Defendants Azure , Beth Henson, and Cynthia Warren pursuant to D.C. Code § 13-423(a).

### **PARTIES**

3. Plaintiff the District of Columbia, a municipal corporation empowered to sue and be sued, is the local government for the territory constituting the seat of the federal government. The District is represented by and through its chief legal officer, the Attorney General for the District of Columbia. The Attorney General has general charge and conduct of all legal business of the District and all suits initiated by and against the District and is responsible for upholding the public interest. The Attorney General is also charged with enforcing violations of the District's wage laws, including the MWRA, pursuant to D.C. Code § 32-1306(a)(2)(A).

4. Defendant Azure Healthcare Services, LLC is a District corporation with a business address at 5136 8th Street, NW, Washington, D.C. Azure operated group homes in the District for individuals living with intellectual and developmental disabilities at all times relevant to the Complaint until they sold their Washington, D.C. assets and ceased operating on June 1, 2021.

5. Defendant Beth Henson was the Chief Executive Officer and co-owner of Azure during the times relevant to this Complaint. She exercised control over Azure's business, including its human resources and payroll decisions.

6. Defendant Cynthia Warren was the President, Chief Operating Officer, and co-owner of Azure during the times relevant to this Complaint. She exercised control over Azure's business, including its human resources and payroll decisions.

### **FACTUAL ALLEGATIONS**

7. Azure is a healthcare services company that operated six supported-living residences in Washington, D.C. for individuals living with intellectual and developmental disabilities until the sale of their significant assets on June 1, 2021.

8. Beth Henson was the Chief Executive Officer and co-owner of Azure during the times relevant to this Complaint. She also served as Azure's Clinical Director and Chief Public Health Officer. In these roles, Henson was responsible for Azure's operations, clinical services, administration, and delivery of services for the organization. Cynthia Warren was the President and Chief Operating Officer of Azure during the times relevant to this complaint. In these roles, Warren directed all corporate and residential operations for all of Azure's facilities and managed their operations in accordance with relevant regulations. Warren directly supervised the Human Resources Director.

9. Azure employed approximately 50 individuals as Direct Support Professionals and in other caregiving, counseling, and support roles for the residents at its six facilities. These individuals assisted residents with their activities of daily living and hygiene, and facilitated community activities. These employees were paid on an hourly basis and were not exempt from the District's minimum wage and overtime laws. The overtime law required Defendants to pay them 1.5 times their normal rate of pay for the hours they worked more than 40 hours each workweek.

10. Early in the COVID-19 pandemic, Defendants decided to “lock down” the six facilities by requiring staff to work for two-week continuous shifts during which they remained in their facility 24 hours a day. These two-week shifts were followed by two weeks off, and each staff member had to test negative for COVID-19 before returning for their next two-week shift.

11. Henson informed employees of this plan during a Zoom call, telling employees that they would be paid for only 18 of the 24 hours of each day of their two-week shift, but that they would be paid an additional \$3 per hour as hazard pay.

12. Employees were expected to be working and available to residents for the full 24 hours of each day of their two-week shift.

13. When employees began receiving paychecks for their two-week shifts, their paychecks reflected 80 hours at their regular rate of pay and 154 hours at their overtime rate, for a total of 252 hours of paid time, despite the fact that the employees worked 238 overtime hours and 336 total hours. Defendants did not pay them the promised \$3 per hour in hazard pay.

14. Defendants failed to pay employees for 6 hours of work each day of their two-week shift, totaling 84 hours of unpaid labor per employee per two-week shift. Given the amount of time these employees worked each week on their two-week shifts, all of these unpaid hours are owed at the overtime pay rate of 1.5 times the regular wage.

15. In April 2021, Henson held a Zoom meeting during which she told employees they would be receiving backpay for the \$3 per hour hazard pay they had been promised from March 2020 through April 2021.

16. The following week, Henson held another Zoom meeting during which she told employees she and Warren had sold Azure. She said she would not be paying the backpay owed to employees, nor would the purchaser.

17. The transition period from Henson and Warren's ownership to the purchaser occurred between April and June 2021, with the purchaser taking over on June 1, 2021.

18. To date, employees have not received the \$3 per hour hazard pay they were promised. They also have not received payment owed for 6 hours per day they worked but were never compensated.

19. Azure sold many of its assets and ceased operating these facilities in June 2021, but maintains an active corporate registration.

**COUNT ONE**  
**Failure to Pay Wages Owed**  
**D.C. Code § 32-1302.**

20. The District re-alleges paragraphs 1-19 of this Complaint as if fully set forth herein.

21. Defendants were employers under D.C. Code § 32-1301(1B).

22. The individuals working for Defendants were their employees under D.C. Code § 32-1301(2).

23. D.C. Code § 32-1301(3)(E) defines wages as "all monetary compensation after lawful deductions, owed by an employer, whether the amount owed is determined on a time, task, piece, commission, or other basis of calculation" and states that wages include bonuses, commissions, fringe benefits paid in cash, overtime premiums, and "other remuneration promised or owed [] pursuant to a contract for employment, whether written or oral."

24. The \$3 per hour in hazard pay that Defendants promised to employees for working during the COVID-19 pandemic constitutes wages that Defendants' employees earned under D.C. Code § 32-1301(3)(E). In promising employees the \$3 per hour hazard pay for working during the COVID-19 pandemic, Defendants created an oral contract with their

employees in which they offered this hazard pay in consideration for the risk of working during the pandemic. Defendants ultimately failed to pay employees this wage that they had promised their employees.

25. Similarly, because Defendants' employees were required to be on call during their entire 24-hour shift, workers earned wages for the entire 24 hours of each day of their two-week shifts under D.C. Code § 32-1301(3)(E)(1). Defendants paid employees for only 18 hours of each day, though employees worked the full 24 hours. Each employee was not paid for 6 hours of work each day, or 84 hours per two-week shift.

26. Defendants violated D.C. Code § 32-1302 because they did not pay employees the wages owed to them for the hours they worked.

**COUNT TWO**  
**Failure to Pay Overtime Wages**  
**D.C. Code § 32-1003(c)**

27. The District re-alleges paragraphs 1-26 of this Complaint as if fully set forth herein.

28. Defendants were employers under the MWRA. D.C. Code § 32-1002(3).

29. The individuals working for Defendants were their employees under the MWRA. D.C. Code § 32-1002(2).

30. Defendants failed to pay employees all of the overtime wages employees earned during their 24 hour per day, two-week shifts. Employees' paychecks for these two-week pay periods show employees compensated for working 18 hours per day, with 80 hours paid at regular rate, and 154 hours paid at the overtime rate for a total of 252 hours of paid wages. With the 80 hours permitted at regular rates already met during these pay periods, Defendants were

required to pay 1.5 times the employees' regular rate of pay for the additional unpaid 6 hours worked each day.

31. The failure to pay these overtime wages violated the MWRA. D.C. Code § 32-1003(c).

### **PRAYER FOR RELIEF**

WHEREFORE, the District of Columbia respectfully requests:

- a. A declaratory judgment against Defendants that (1) Defendants' failure to pay employees for all hours work and the promised \$3 per hour hazard pay violates D.C. Code § 32-1302 and (2) Defendants' failure to pay employees overtime wages for 6 hours worked each day during their 24 hour shifts constitutes a violation of the MWRA;
- b. An injunction against further violations of D.C. Code § 32-1302 and the MWRA;
- c. An award of back wages against Defendants due to their failure to pay promised hazard pay and overtime payments, in an amount to be proven at trial;
- d. Liquidated damages against Defendants equal to treble the back wages unlawfully withheld;
- e. Statutory penalties against Defendants for each violation of D.C. Code § 32-1302 and the MWRA in an amount to be proven at trial;
- f. An award of reasonable attorneys' fees and costs as authorized by D.C. Code § 32-1306(a)(2)(A)(i); and
- g. Such other further relief as this Court deems just and proper.

### **JURY DEMAND**

The District of Columbia demands a trial by jury by the maximum number of jurors permitted by law.

Respectfully submitted,

Dated: December 7, 2021

KARL A. RACINE  
Attorney General for the District of Columbia

KATHLEEN KONOPKA  
Deputy Attorney General  
Public Advocacy Division

JIMMY R. ROCK  
WILLIAM F. STEPHENS  
Assistant Deputy Attorneys General  
Public Advocacy Division

/s/ James Graham Lake  
JAMES GRAHAM LAKE (D.C. Bar No. 1028853)  
Chief, Workers' Rights and Antifraud Section

/s/ Nicole Tortoriello  
NICOLE TORTORIELLO (D.C. Bar No. 1027162)  
Assistant Attorney General  
Public Advocacy Division  
Office of the Attorney General  
400 6th Street N.W.  
Washington, D.C. 20001  
Phone: (202) 251-4499  
Email: nicole.tortoriello@dc.gov

*Attorneys for the District of Columbia*



# Superior Court of the District of Columbia

## CIVIL DIVISION- CIVIL ACTIONS BRANCH INFORMATION SHEET

District of Columbia

vs

Case Number: \_\_\_\_\_

Azure Healthcare Services, LLC;  
Beth Henson; and Cynthia Warren

Date: December 7, 2021

☐ One of the defendants is being sued  
in their official capacity.

Name: <i>(Please Print)</i> Nicole Tortoriello, Assistant Attorney General	Relationship to Lawsuit
Firm Name: Office of the Attorney General for the District of Columbia	<input checked="" type="checkbox"/> Attorney for Plaintiff
Telephone No.: _____ Six digit Unified Bar No.: _____ 202-251-4499 1027162	<input type="checkbox"/> Self (Pro Se) <input type="checkbox"/> Other: _____

TYPE OF CASE: ☐ Non-Jury ☐ 6 Person Jury ☒ 12 Person Jury  
Demand: \$ Restitution and civil penalties Other: Injunctive relief

### PENDING CASE(S) RELATED TO THE ACTION BEING FILED

Case No.: \_\_\_\_\_ Judge: \_\_\_\_\_ Calendar #: \_\_\_\_\_

Case No.: \_\_\_\_\_ Judge: \_\_\_\_\_ Calendar#: \_\_\_\_\_

### NATURE OF SUIT: *(Check One Box Only)*

#### A. CONTRACTS

#### COLLECTION CASES

- |   |   |   |
|---|---|---|
| <input type="checkbox"/> 01 Breach of Contract        | <input type="checkbox"/> 14 Under \$25,000 Pltf. Grants Consent | <input type="checkbox"/> 16 Under \$25,000 Consent Denied |
| <input type="checkbox"/> 02 Breach of Warranty        | <input type="checkbox"/> 17 OVER \$25,000 Pltf. Grants Consent  | <input type="checkbox"/> 18 OVER \$25,000 Consent Denied  |
| <input type="checkbox"/> 06 Negotiable Instrument     | <input type="checkbox"/> 27 Insurance/Subrogation               | <input type="checkbox"/> 26 Insurance/Subrogation         |
| <input type="checkbox"/> 07 Personal Property         | Over \$25,000 Pltf. Grants Consent                              | Over \$25,000 Consent Denied                              |
| <input type="checkbox"/> 13 Employment Discrimination | <input type="checkbox"/> 07 Insurance/Subrogation               | <input type="checkbox"/> 34 Insurance/Subrogation         |
| <input type="checkbox"/> 15 Special Education Fees    | Under \$25,000 Pltf. Grants Consent                             | Under \$25,000 Consent Denied                             |
|   | <input type="checkbox"/> 28 Motion to Confirm Arbitration       |   |
|   | Award (Collection Cases Only)                                   |   |

#### B. PROPERTY TORTS

- |   |   |                                      |
|---|---|--------------------------------------|
| <input type="checkbox"/> 01 Automobile                          | <input type="checkbox"/> 03 Destruction of Private Property | <input type="checkbox"/> 05 Trespass |
| <input type="checkbox"/> 02 Conversion                          | <input type="checkbox"/> 04 Property Damage                 |                                      |
| <input type="checkbox"/> 07 Shoplifting, D.C. Code § 27-102 (a) |   |                                      |

#### C. PERSONAL TORTS

- |   |  |  |
|---|--|--|
| <input type="checkbox"/> 01 Abuse of Process            | <input type="checkbox"/> 10 Invasion of Privacy                            | <input type="checkbox"/> 17 Personal Injury- (Not Automobile, Not Malpractice) |
| <input type="checkbox"/> 02 Alienation of Affection     | <input type="checkbox"/> 11 Libel and Slander                              | <input type="checkbox"/> 18 Wrongful Death (Not Malpractice)                   |
| <input type="checkbox"/> 03 Assault and Battery         | <input type="checkbox"/> 12 Malicious Interference                         | <input type="checkbox"/> 19 Wrongful Eviction                                  |
| <input type="checkbox"/> 04 Automobile- Personal Injury | <input type="checkbox"/> 13 Malicious Prosecution                          | <input type="checkbox"/> 20 Friendly Suit                                      |
| <input type="checkbox"/> 05 Deceit (Misrepresentation)  | <input type="checkbox"/> 14 Malpractice Legal                              | <input type="checkbox"/> 21 Asbestos   |
| <input type="checkbox"/> 06 False Accusation            | <input type="checkbox"/> 15 Malpractice Medical (Including Wrongful Death) | <input type="checkbox"/> 22 Toxic/Mass Torts                                   |
| <input type="checkbox"/> 07 False Arrest                | <input type="checkbox"/> 16 Negligence- (Not Automobile, Not Malpractice)  | <input type="checkbox"/> 23 Tobacco  |
| <input type="checkbox"/> 08 Fraud                       |  | <input type="checkbox"/> 24 Lead Paint   |

SEE REVERSE SIDE AND CHECK HERE IF USED

# Information Sheet, Continued

## C. OTHERS

- |   |   |
|---|---|
| <input type="checkbox"/> 01 Accounting                                  | <input type="checkbox"/> 17 Merit Personnel Act (OEA)   |
| <input type="checkbox"/> 02 Att. Before Judgment                        | (D.C. Code Title 1, Chapter 6)  |
| <input type="checkbox"/> 05 Ejectment                                   | <input type="checkbox"/> 18 Product Liability   |
| <input type="checkbox"/> 09 Special Writ/Warrants<br>(DC Code § 11-941) | <input type="checkbox"/> 24 Application to Confirm, Modify,<br>Vacate Arbitration Award (DC Code § 16-4401) |
| <input type="checkbox"/> 10 Traffic Adjudication                        | <input type="checkbox"/> 29 Merit Personnel Act (OHR)   |
| <input type="checkbox"/> 11 Writ of Replevin                            | <input type="checkbox"/> 31 Housing Code Regulations  |
| <input type="checkbox"/> 12 Enforce Mechanics Lien                      | <input type="checkbox"/> 32 Qui Tam   |
| <input checked="" type="checkbox"/> 16 Declaratory Judgment             | <input type="checkbox"/> 33 Whistleblower   |

## II.

- |  |   |  |
|--|---|--|
| <input type="checkbox"/> 03 Change of Name                                 | <input type="checkbox"/> 15 Libel of Information                                    | <input type="checkbox"/> 21 Petition for Subpoena<br>[Rule 28-I (b)] |
| <input type="checkbox"/> 06 Foreign Judgment/Domestic                      | <input type="checkbox"/> 19 Enter Administrative Order as<br>Judgment [ D.C. Code § | <input type="checkbox"/> 22 Release Mechanics Lien                   |
| <input type="checkbox"/> 08 Foreign Judgment/International                 | 2-1802.03 (h) or 32-151 9 (a)]  | <input type="checkbox"/> 23 Rule 27(a)(1)<br>(Perpetuate Testimony)  |
| <input type="checkbox"/> 13 Correction of Birth Certificate                | <input type="checkbox"/> 20 Master Meter (D.C. Code §                               | <input type="checkbox"/> 24 Petition for Structured Settlement       |
| <input type="checkbox"/> 14 Correction of Marriage<br>Certificate          | 42-3301, et seq.)   | <input type="checkbox"/> 25 Petition for Liquidation                 |
| <input type="checkbox"/> 26 Petition for Civil Asset Forfeiture (Vehicle)  |   |  |
| <input type="checkbox"/> 27 Petition for Civil Asset Forfeiture (Currency) |   |  |
| <input type="checkbox"/> 28 Petition for Civil Asset Forfeiture (Other)    |   |  |

## D. REAL PROPERTY

- |  |  |
|--|--|
| <input type="checkbox"/> 09 Real Property-Real Estate                | <input type="checkbox"/> 08 Quiet Title                                  |
| <input type="checkbox"/> 12 Specific Performance                     | <input type="checkbox"/> 25 Liens: Tax / Water Consent Granted           |
| <input type="checkbox"/> 04 Condemnation (Eminent Domain)            | <input type="checkbox"/> 30 Liens: Tax / Water Consent Denied            |
| <input type="checkbox"/> 10 Mortgage Foreclosure/Judicial Sale       | <input type="checkbox"/> 31 Tax Lien Bid Off Certificate Consent Granted |
| <input type="checkbox"/> 11 Petition for Civil Asset Forfeiture (RP) |  |

/s/ Nicole Tortoriello

Attorney's Signature

December 7, 2021

Date



**Superior Court of the District of Columbia**  
**CIVIL DIVISION**  
**Civil Actions Branch**  
**500 Indiana Avenue, N.W., Suite 5000 Washington, D.C. 20001**  
**Telephone: (202) 879-1133 Website: www.dccourts.gov**

District of Columbia

400 6th Street NW  
Washington, DC 20001

Plaintiff

vs.

Case Number \_\_\_\_\_

Azure Healthcare Services, LLC

5136 8th Street, NW  
Washington, DC 20011

Defendant

**SUMMONS**

To the above named Defendant:

You are hereby summoned and required to serve an Answer to the attached Complaint, either personally or through an attorney, within twenty one (21) days after service of this summons upon you, exclusive of the day of service. If you are being sued as an officer or agency of the United States Government or the District of Columbia Government, you have sixty (60) days after service of this summons to serve your Answer. A copy of the Answer must be mailed to the attorney for the plaintiff who is suing you. The attorney's name and address appear below. If plaintiff has no attorney, a copy of the Answer must be mailed to the plaintiff at the address stated on this Summons.

You are also required to file the original Answer with the Court in Suite 5000 at 500 Indiana Avenue, N.W., between 8:30 a.m. and 5:00 p.m., Mondays through Fridays or between 9:00 a.m. and 12:00 noon on Saturdays. You may file the original Answer with the Court either before you serve a copy of the Answer on the plaintiff or within seven (7) days after you have served the plaintiff. If you fail to file an Answer, judgment by default may be entered against you for the relief demanded in the complaint.

Nicole Tortoriello

*Clerk of the Court*

Name of Plaintiff's Attorney

400 6th St. N.W., 10th Floor

Address

Washington, DC 20001

202-251-4499

Telephone

By \_\_\_\_\_

Deputy Clerk

Date \_\_\_\_\_

如需翻译, 请打电话 (202) 879-4828

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የአማርኛ ትርጉም ለማግኘት (202) 879-4828 ይደውሉ

**IMPORTANT: IF YOU FAIL TO FILE AN ANSWER WITHIN THE TIME STATED ABOVE, OR IF, AFTER YOU ANSWER, YOU FAIL TO APPEAR AT ANY TIME THE COURT NOTIFIES YOU TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY DAMAGES OR OTHER RELIEF DEMANDED IN THE COMPLAINT. IF THIS OCCURS, YOUR WAGES MAY BE ATTACHED OR WITHHELD OR PERSONAL PROPERTY OR REAL ESTATE YOU OWN MAY BE TAKEN AND SOLD TO PAY THE JUDGMENT. IF YOU INTEND TO OPPOSE THIS ACTION, DO NOT FAIL TO ANSWER WITHIN THE REQUIRED TIME.**

If you wish to talk to a lawyer and feel that you cannot afford to pay a fee to a lawyer, promptly contact one of the offices of the Legal Aid Society (202-628-1161) or the Neighborhood Legal Services (202-279-5100) for help or come to Suite 5000 at 500 Indiana Avenue, N.W., for more information concerning places where you may ask for such help.

See reverse side for Spanish translation

Vea al dorso la traducción al español



**TRIBUNAL SUPERIOR DEL DISTRITO DE COLUMBIA**  
**DIVISIÓN CIVIL**  
**Sección de Acciones Civiles**  
**500 Indiana Avenue, N.W., Suite 5000, Washington, D.C. 20001**  
**Teléfono: (202) 879-1133 Sitio web: www.dccourts.gov**

District of Columbia

400 6th Street NW  
 Washington, DC 20001

contra

Demandante

Azure Healthcare Services, LLC

5136 8th Street, NW  
 Washington, DC 20011

Demandado

Número de Caso: \_\_\_\_\_

**CITATORIO**

Al susodicho Demandado:

Por la presente se le cita a comparecer y se le requiere entregar una Contestación a la Demanda adjunta, sea en persona o por medio de un abogado, en el plazo de veintiún (21) días contados después que usted haya recibido este citatorio, excluyendo el día mismo de la entrega del citatorio. Si usted está siendo demandado en calidad de oficial o agente del Gobierno de los Estados Unidos de Norteamérica o del Gobierno del Distrito de Columbia, tiene usted sesenta (60) días, contados después que usted haya recibido este citatorio, para entregar su Contestación. Tiene que enviarle por correo una copia de su Contestación al abogado de la parte demandante. El nombre y dirección del abogado aparecen al final de este documento. Si el demandado no tiene abogado, tiene que enviarle al demandante una copia de la Contestación por correo a la dirección que aparece en este Citatorio.

A usted también se le requiere presentar la Contestación original al Tribunal en la Oficina 5000, sito en 500 Indiana Avenue, N.W., entre las 8:30 a.m. y 5:00 p.m., de lunes a viernes o entre las 9:00 a.m. y las 12:00 del mediodía los sábados. Usted puede presentar la Contestación original ante el Juez ya sea antes que usted le entregue al demandante una copia de la Contestación o en el plazo de siete (7) días de haberle hecho la entrega al demandante. Si usted incumple con presentar una Contestación, podría dictarse un fallo en rebeldía contra usted para que se haga efectivo el desagravio que se busca en la demanda.

Nicole Tortoriello

*SECRETARIO DEL TRIBUNAL*

Nombre del abogado del Demandante

400 6th St. N.W., 10th Floor

Dirección

Washington, DC 20001

Por:

Subsecretario

202-251-4499

Teléfono

Fecha

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**IMPORTANTE: SI USTED INCUMPLE CON PRESENTAR UNA CONTESTACIÓN EN EL PLAZO ANTES MENCIONADO O, SI LUEGO DE CONTESTAR, USTED NO COMPARECE CUANDO LE AVISE EL JUZGADO, PODRÍA DICTARSE UN FALLO EN REBELDÍA CONTRA USTED PARA QUE SE LE COBRE LOS DAÑOS Y PERJUICIOS U OTRO DESAGRAVIO QUE SE BUSQUE EN LA DEMANDA. SI ESTO OCURRE, PODRÍA RETENÉRSELE SUS INGRESOS, O PODRÍA TOMÁRSELE SUS BIENES PERSONALES O BIENES RAÍCES Y SER VENDIDOS PARA PAGAR EL FALLO. SI USTED PRETENDE OPONERSE A ESTA ACCIÓN, NO DEJE DE CONTESTAR LA DEMANDA DENTRO DEL PLAZO EXIGIDO.**

Si desea conversar con un abogado y le parece que no puede pagarle a uno, llame pronto a una de nuestras oficinas del Legal Aid Society (202-628-1161) o el Neighborhood Legal Services (202-279-5100) para pedir ayuda o venga a la Oficina 5000 del 500 Indiana Avenue, N.W., para informarse sobre otros lugares donde puede pedir ayuda al respecto.

Vea al dorso el original en inglés  
 See reverse side for English original



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District of Columbia

400 6th Street NW  
Washington, DC 20001

Plaintiff

vs.

Case Number \_\_\_\_\_

Beth Henson

2717 Unicorn Lane NW  
Washington, DC 20015

Defendant

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Nicole Tortoriello

*Clerk of the Court*

Name of Plaintiff's Attorney

400 6th St. N.W., 10th Floor

Address

Washington, DC 20001

202-251-4499

Telephone

By \_\_\_\_\_

Deputy Clerk

Date \_\_\_\_\_

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# TRIBUNAL SUPERIOR DEL DISTRITO DE COLUMBIA

## DIVISIÓN CIVIL

### Sección de Acciones Civiles

500 Indiana Avenue, N.W., Suite 5000, Washington, D.C. 20001

Teléfono: (202) 879-1133 Sitio web: [www.dccourts.gov](http://www.dccourts.gov)

District of Columbia

400 6th Street NW  
Washington, DC 20001

contra

Demandante

Número de Caso: \_\_\_\_\_

Beth Henson

2717 Unicorn Lane NW  
Washington, DC 20015

Demandado

### CITATORIO

Al susodicho Demandado:

Por la presente se le cita a comparecer y se le requiere entregar una Contestación a la Demanda adjunta, sea en persona o por medio de un abogado, en el plazo de veintiún (21) días contados después que usted haya recibido este citatorio, excluyendo el día mismo de la entrega del citatorio. Si usted está siendo demandado en calidad de oficial o agente del Gobierno de los Estados Unidos de Norteamérica o del Gobierno del Distrito de Columbia, tiene usted sesenta (60) días, contados después que usted haya recibido este citatorio, para entregar su Contestación. Tiene que enviarle por correo una copia de su Contestación al abogado de la parte demandante. El nombre y dirección del abogado aparecen al final de este documento. Si el demandado no tiene abogado, tiene que enviarle al demandante una copia de la Contestación por correo a la dirección que aparece en este Citatorio.

A usted también se le requiere presentar la Contestación original al Tribunal en la Oficina 5000, sito en 500 Indiana Avenue, N.W., entre las 8:30 a.m. y 5:00 p.m., de lunes a viernes o entre las 9:00 a.m. y las 12:00 del mediodía los sábados. Usted puede presentar la Contestación original ante el Juez ya sea antes que usted le entregue al demandante una copia de la Contestación o en el plazo de siete (7) días de haberle hecho la entrega al demandante. Si usted incumple con presentar una Contestación, podría dictarse un fallo en rebeldía contra usted para que se haga efectivo el desagravio que se busca en la demanda.

Nicole Tortoriello

SECRETARIO DEL TRIBUNAL

Nombre del abogado del Demandante

400 6th St. N.W., 10th Floor

Por:

Dirección

Washington, DC 20001

Subsecretario

202-251-4499

Fecha

Teléfono

如需翻译, 请打电话 (202) 879-4828

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የአማርኛ ትርጉም ለማግኘት (202) 879-4828 ይደውሉ

**IMPORTANTE:** SI USTED INCUMPLE CON PRESENTAR UNA CONTESTACIÓN EN EL PLAZO ANTES MENCIONADO O, SI LUEGO DE CONTESTAR, USTED NO COMPARECE CUANDO LE AVISE EL JUZGADO, PODRÍA DICTARSE UN FALLO EN REBELDÍA CONTRA USTED PARA QUE SE LE COBRE LOS DAÑOS Y PERJUICIOS U OTRO DESAGRAVIO QUE SE BUSQUE EN LA DEMANDA. SI ESTO OCURRE, PODRÍA RETENÉRSELE SUS INGRESOS, O PODRÍA TOMÁRSELE SUS BIENES PERSONALES O BIENES RAÍCES Y SER VENDIDOS PARA PAGAR EL FALLO. SI USTED PRETENDE OPONERSE A ESTA ACCIÓN, NO DEJE DE CONTESTAR LA DEMANDA DENTRO DEL PLAZO EXIGIDO.

Si desea conversar con un abogado y le parece que no puede pagarle a uno, llame pronto a una de nuestras oficinas del Legal Aid Society (202-628-1161) o el Neighborhood Legal Services (202-279-5100) para pedir ayuda o venga a la Oficina 5000 del 500 Indiana Avenue, N.W., para informarse sobre otros lugares donde puede pedir ayuda al respecto.

Vea al dorso el original en inglés  
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**Superior Court of the District of Columbia**  
**CIVIL DIVISION**  
**Civil Actions Branch**  
**500 Indiana Avenue, N.W., Suite 5000 Washington, D.C. 20001**  
**Telephone: (202) 879-1133 Website: www.dccourts.gov**

District of Columbia

400 6th Street NW  
Washington, DC 20001

vs.

Plaintiff

Case Number \_\_\_\_\_

Cynthia Warren

1024 36th Street  
Baltimore, MD 21218

Defendant

**SUMMONS**

To the above named Defendant:

You are hereby summoned and required to serve an Answer to the attached Complaint, either personally or through an attorney, within twenty one (21) days after service of this summons upon you, exclusive of the day of service. If you are being sued as an officer or agency of the United States Government or the District of Columbia Government, you have sixty (60) days after service of this summons to serve your Answer. A copy of the Answer must be mailed to the attorney for the plaintiff who is suing you. The attorney's name and address appear below. If plaintiff has no attorney, a copy of the Answer must be mailed to the plaintiff at the address stated on this Summons.

You are also required to file the original Answer with the Court in Suite 5000 at 500 Indiana Avenue, N.W., between 8:30 a.m. and 5:00 p.m., Mondays through Fridays or between 9:00 a.m. and 12:00 noon on Saturdays. You may file the original Answer with the Court either before you serve a copy of the Answer on the plaintiff or within seven (7) days after you have served the plaintiff. If you fail to file an Answer, judgment by default may be entered against you for the relief demanded in the complaint.

Nicole Tortoriello

*Clerk of the Court*

Name of Plaintiff's Attorney

400 6th St. N.W., 10th Floor

Address

Washington, DC 20001

202-251-4499

Telephone

By \_\_\_\_\_

Deputy Clerk

Date \_\_\_\_\_

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번역을 원하시면, (202) 879-4828로 전화하십시오

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**IMPORTANT: IF YOU FAIL TO FILE AN ANSWER WITHIN THE TIME STATED ABOVE, OR IF, AFTER YOU ANSWER, YOU FAIL TO APPEAR AT ANY TIME THE COURT NOTIFIES YOU TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY DAMAGES OR OTHER RELIEF DEMANDED IN THE COMPLAINT. IF THIS OCCURS, YOUR WAGES MAY BE ATTACHED OR WITHHELD OR PERSONAL PROPERTY OR REAL ESTATE YOU OWN MAY BE TAKEN AND SOLD TO PAY THE JUDGMENT. IF YOU INTEND TO OPPOSE THIS ACTION, DO NOT FAIL TO ANSWER WITHIN THE REQUIRED TIME.**

If you wish to talk to a lawyer and feel that you cannot afford to pay a fee to a lawyer, promptly contact one of the offices of the Legal Aid Society (202-628-1161) or the Neighborhood Legal Services (202-279-5100) for help or come to Suite 5000 at 500 Indiana Avenue, N.W., for more information concerning places where you may ask for such help.

See reverse side for Spanish translation

Vea al dorso la traducción al español





# TRIBUNAL SUPERIOR DEL DISTRITO DE COLUMBIA

## DIVISIÓN CIVIL

### Sección de Acciones Civiles

500 Indiana Avenue, N.W., Suite 5000, Washington, D.C. 20001

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Nicole Tortoriello

SECRETARIO DEL TRIBUNAL

Nombre del abogado del Demandante

400 6th St. N.W., 10th Floor

Dirección

Washington, DC 20001

Por:

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