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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

MEI YING LIU and SHU FANG CHEN,

Plaintiffs,

v.

ORIENTAL BUFFET, INC., d/b/a KING CHEF
BUFFET; METROPOLITAN BUFFET
CORPORATION, d/b/a METROPOLITAN
BUFFET; AN NA ZHENG; XIAO YANG
ZHENG; BEN LIANG ZHU; FRANK CHAN,
a/k/a KAI TUNG CHEN, a/k/a KAI TONG
CHEN, a/k/a KAI CHIANG CHAN, a/k/a KAI
CHEUNG CHAN, a/k/a KAI CHEONG CHAN;
and DE GI CHING, a/k/a TEH QI CHING, a/k/a
JIMMY CHING,

Defendants.

Civil Action No. 03-2406 (KSH)

Honorable Katharine S. Hayden, U.S.D.J.

**STATEMENT OF DAMAGES
FOR COUNTS 1 THROUGH 5
OF THE ORIGINAL COMPLAINT**

Mei Ying Liu

Counts 1 and 2	\$77,846.60
Unpaid minimum wages (\$5.15 X 3040 hours)	\$15,656.00
Unpaid overtime (\$7.73 X 3010 hours)	\$23,267.30
Subtotal	\$38,923.30
Federal liquidated damages	\$38,923.30
Counts 3 and 4 (state and federal Equal Pay Acts)	\$45,500.00
Average difference compared to male waiters (\$13000 X 17.5 months)	\$22,750.00

Federal liquidated damages	\$22,750.00
Count 5 (kickbacks)	\$7,512.00
(\$108 X 39 weeks) + (\$90 X 35 weeks) + (\$75 X 2 weeks)	\$7,512.00
Subtotal	\$130,858.60
<u>Shu Fang Chen</u>	
Counts 1 and 2	\$17,053.00
Unpaid minimum wages (\$5.15 X 680 hours)	\$3,502.00
Unpaid overtime (\$7.73 X 650 hours)	\$5,024.50
Subtotal	\$8,526.50
Federal liquidated damages	\$8,526.50
Counts 3 and 4 (state and federal Equal Pay Acts)	\$8,000.00
Average difference compared to male waiters (\$1000 X 4 months)	\$4,000.00
Federal liquidated damages	\$4,000.00
Count 5 (kickbacks)	\$1,500.00
(\$90 X 15 weeks) + (\$75 X 2 weeks)	\$1,500.00
Subtotal	\$26,553.00

TOTAL

\$157,411.60

Date: _____

Respectfully submitted,

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