

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION**

MARTIN J. WALSH, Secretary of Labor,)
U.S. Department of Labor,)
)
Plaintiff,)
)
v.)
)
HEAVENLY HANDS HOME)
HEALTHCARE, LLC)
d/b/a HEAVENLY HANDS)
HOME HEALTHCARE, and)
LAUREN WILSON, an individual)
)
Defendants.)

Civil Action No. 2:22-cv-237

**PLAINTIFF’S MOTION FOR TEMPORARY RESTRAINING ORDER AND
PRELIMINARY INJUNCTION**

Plaintiff, the Secretary of Labor (“Secretary”), United States Department of Labor, hereby moves this Court under Federal Rule of Civil Procedure 65 and Section 17 of the Fair Labor Standards Act, 29 U.S.C. § 217 (the “Act” or “FLSA”) for a preliminary injunction and temporary restraining order to prevent Heavenly Hands Home Healthcare, LLC d/b/a Heavenly Hands Home Healthcare (“Heavenly Hands”) and Lauren Wilson (collectively, “Defendants”) from obstructing the Secretary’s investigation of violations of the Act and retaliating against cooperating employees in violation of Sections 11(a) and 15(a)(3) of the FLSA, 29 U.S.C. §§ 211(a), 215(a)(3).

As discussed in the accompanying Memorandum of Law, Defendants have unlawfully interfered with and obstructed the Secretary’s investigation by (1) instructing employees to lie to the United States Department of Labor (the “Department”) regarding payment of unpaid wages and liquidated damages; (2) soliciting employees to sign a government form with false

statements about their pay; (3) submitting said forms to the Department with fraudulent signatures; and (4) producing fabricated payroll statements to the Department. These actions deter employees for asserting their rights under the FLSA and undermine the Secretary's ability to fulfill his statutory obligation to fully investigate Defendants' compliance with the Act.

Therefore, the Secretary seeks an order enjoining Defendants from retaliating against employees and interfering with the Secretary's investigation of violations of the FLSA, enjoining them from violating Sections 11(a) or 15(a)(3) of the FLSA, and tolling the statute of limitations.¹

A Proposed Order is being submitted with this Motion.

Respectfully submitted,

Mailing Address:

UNITED STATES DEPARTMENT OF LABOR

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/s/ Aditi Kumar

Aditi Kumar
Trial Attorney
NY Bar No. 5771928
Pro Hac Vice application to be filed

¹ I certify that I provided notice of this filing to Defendant Wilson on April 13, 2022. I further certify that I attempted to confer with Defendant Wilson again on April 15, 2022 via phone call and e-mail and was unsuccessful.

Certificate of Service

I hereby certify that the foregoing Motion, attachments, and related brief were served upon Defendants via first class mail and email on June 1, 2022, at the address noted below. I further certify that I spoke with Lauren Wilson, the owner of Heavenly Hands Home Healthcare, LLC, on April 13, 2022 and provided notice of this filing.

Heavenly Hands Home Healthcare, LLC
c/o Lauren Wilson
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Email: fourhllc@gmail.com
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By:

/s/Aditi Kumar
Aditi Kumar
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Pro Hac Vice application to be filed