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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF KING

DESTINEE MOLIGA, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

HOME DEPOT U.S.A., INC., a Delaware
corporation; HOME DEPOT MANAGMENT
COMPANY, LLC, a Delaware limited
liability company; HOME DEPOT STORE
SUPPORT, INC., a Delaware corporation; and
DOES 1-20,

Defendants.

No.

CLASS ACTION COMPLAINT FOR
DAMAGES, INJUNCTIVE RELIEF,
AND DECLARATORY RELIEF

Plaintiffs Destinee Moliga, on behalf of herself and all others similarly situated (the
“Class”), by and through counsel, brings this Class Action Complaint against the above-captioned
Defendants (“Defendants”) upon personal knowledge as to Plaintiff’s own actions and Plaintiff’s
counsel’s investigations, and upon information and belief as to all other matters, as follows:

I. NATURE OF THE CASE

1. Effective January 1, 2023, employers must disclose in each posting for each job
opening, the wage scale or salary range and a general description of all of the benefits and other
compensation to be offered to the hired applicant. RCW 49.58.110(1).

1 injuries to Plaintiff and the Class occurred within Washington; and (e) during the three-year period
2 preceding the filing of this action, no other class action has been filed asserting the same or similar
3 factual allegations against Defendants on behalf of the same persons. Alternatively, federal
4 jurisdiction is inappropriate under the Class Action Fairness Act because: (a) pursuant to 28 U.S.C.
5 § 1332(d)(4)(B), more than two-thirds of the Class reside in Washington; and (b) pursuant to 28
6 U.S.C. § 1332(2), the amount in controversy does not exceed the sum or value of \$5,000,000,
7 exclusive of interest and costs.

8 III. PARTIES

9 8. Plaintiff Destinee Moliga is a resident of King County, Washington, and applied to
10 work at the Defendants' Home Depot store located at 1145 W Washington St, Sequim, Clallam
11 County, Washington 98382.

12 9. Defendant Home Depot U.S.A., Inc. is a foreign profit corporation that regularly
13 transacts business in King County, Washington, and has multiple retail locations for the
14 transaction of business throughout King County, Washington including at 11616 Aurora Avenue
15 North, Seattle, Washington 98133 and 2701 Utah Avenue South, Seattle, Washington 98134.

16 10. Defendant Home Depot Management Company, LLC is a foreign limited liability
17 company that regularly transacts business in King County, Washington and has multiple retail
18 locations for the transaction of business throughout King County, Washington including at 11616
19 Aurora Avenue North, Seattle, Washington 98133 and 2701 Utah Avenue South, Seattle,
20 Washington 98134.

21 11. Defendant Home Depot Store Support, Inc. is a foreign profit corporation that
22 regularly transacts business in King County, Washington, and has multiple retail locations for the
23 transaction of business throughout King County, Washington including at 11616 Aurora Avenue
24 North, Seattle, Washington 98133 and 2701 Utah Avenue South, Seattle, Washington 98134.

25 12. Plaintiff is currently unaware of the true names and capacities, whether individual,
26 corporate, associate, or otherwise, of the defendants sued herein under fictitious names Does 1-

1 20, inclusive, and therefore sues such defendants by such fictitious names. Plaintiff will seek leave
2 to amend this Complaint to allege the true names and capacities of the fictitiously named
3 defendants when their true names and capacities have been ascertained. Plaintiff is informed and
4 believes, and thereon alleges, each of the fictitiously named defendants is legally responsible in
5 some manner for the events and occurrences alleged herein, and for the damages suffered by
6 Plaintiff and the Class.

7 **IV. FACTS APPLICABLE TO THE CLASS AND ALL CAUSES OF ACTION**

8 13. Effective January 1, 2023, all Washington employers are required to disclose in
9 each posting for each job opening the wage scale or salary range, and a general description of all
10 of the benefits and other compensation to be offered to the hired applicant. RCW 49.58.110.

11 14. For the purposes of RCW 49.58.110, “posting” means any solicitation intended to
12 recruit job applicants for a specific available position, including recruitment done directly by an
13 employer or indirectly through a third party, and includes any postings done electronically, or with
14 a printed hard copy, that includes qualifications for desired applicants. RCW 49.58.110(1).

15 15. Each Defendant employs more than 15 individuals.

16 16. From January 1, 2023 to the present, Plaintiff and more than 40 Class members
17 applied to job openings with Defendants for positions located in Washington state where the
18 postings did not disclose the wage scale or salary range.

19 17. On or about February 28, 2023, Plaintiff applied for a job opening in Washington
20 state with Defendants. The posting for the job opening did not disclose the wage scale or salary
21 range. A true and correct copy of Defendants’ job posting is attached hereto as Exhibit 1.

22 18. Plaintiff and the Class members lost valuable time applying for jobs with
23 Defendants for which the wage scale or salary range was not disclosed to them.

24 19. As a result of Plaintiff’s and Class members’ inability to evaluate the pay for the
25 position, negotiate that pay, and compare that pay to other available positions in the marketplace,
26 Plaintiff and the Class members were harmed.

EXHIBIT 1

**LOCATION**

Sequim, WA

CATEGORY

Support

TYPE

In-store and Distribution Center Hourly

JOB ID

118648BR

 **OVERVIEW**

Job Description

Lot Associates assist customers with the loading of their vehicles and also monitor and maintain the entrance of the store. Lot



TYPE

In-store and Distribution Center Hourly

JOB ID

118648BR

 **OVERVIEW****Job Description**

Lot Associates assist customers with the loading of their vehicles and also monitor and maintain the entrance of the store. Lot Associates also are responsible for maintaining a sufficient quantity of carts near the entrance of the store. This position interacts with Home Depot associates and customers. Because the Lot Associate is often the first and last associate to interact with customers as they enter or leave the store, customer service plays a vital role in this position. Direct customer interaction is frequently required for some positions and excellent customer service skills are required.

[View Video Transcript](#)



BENEFITS



Healthcare Options



Profit-Sharing
Bonuses



Tuition
Reimbursement



Discounts on Cell
Phones, Gyms, and
More



[See All Benefits](#)

STORE LOCATION

8998 – SEQUIM

1145 W WASHINGTON ST
Sequim, WA

Once you've applied, please come back and apply for other jobs at this store and any store near you.

