Quiles v. Wal-Mart Stores, Inc., Case No. 2:16-cv-9479 (D.N.J. Apr. 24, 2020)

The District Court of New Jersey denied Plaintiffs’ motion for class certification. Plaintiffs alleged Defendant Wal-Mart Stores, Inc. misclassified its Overnight Assistant Store Managers (“ASMs”) as exempt executive and administrative employees under the New Jersey Wage and Hour Law and New York Labor Law. While plaintiffs were able to sufficiently establish numerosity, typicality and adequacy of representation under The record demonstrated significant differences in the Overnight ASMs’ primary duties, showing individual issues would predominate. In evaluating superiority and liability, the Court considered the likely difficulties in managing a class action and found there would be significant difficulties in adjudicating the matter on a class-wide basis. Thus, while plaintiffs argued there were several issues common to the class including appropriate measure of damages, the court held there were significant differences in the actual duties of Overnight ASMs such that class treatment was inappropriate and unwarranted.