

**STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE**

**MICHELLE MEADE, and
ALI BAZZI,**

NO

Individually and on behalf of
all others similarly situated,
Plaintiffs,

vs.

**LITTLE CAESAR PIZZA,
LITTLE CAESAR ENTERPRISE, INC.
JOHN DOE and JANE DOE, employees,**
Defendants,

LAW OFFICES OF MAJED A. MOUGHNI, PLLC
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Moughni@aol.com
Counsel for Plaintiffs

A prior action was filed in the Wayne County Circuit Court.
That case is before the Honorable Susan L. Hubbard and
it was assigned case # 17-007931-NO. That case is still pending.

/s/ Majed A. Moughni
Majed A. Moughni

COMPLAINT

GENERAL ALLEGATIONS

NOW COMES Plaintiffs, **MICHELLE MEADE, and ALI BAZZI,** on
behalf of themselves and all others similarly situated, and by their attorney,

Law Offices of Majed A. Moughni, PLLC, brings this class action case against

LITTLE CAESAR PIZZA, LITTLE CAESAR ENTERPRISE, INC., JOHN

DOE and JANE DOE, employees of defendants and alleges the following:

INTRODUCTION

1. Plaintiffs, are residents of the city of Dearborn and are devote Muslims, who bring this class action lawsuit on behalf of themselves and all others similarly situated after it was discovered that Defendants **LITTLE CAESAR PIZZA, LITTLE CAESAR ENTERPIRESES, and its employees, JOHN DOE and JANE DOE,** sold “Pork” pepperoni pizza when Plaintiffs ordered “Halal Pepperoni” pizza, a strict violation of Michigan state Law (MCL 750.297f), Wayne County Ordinance, the “Wayne County Halal and Kosher Anti-Fraud and Truth-In-Labeling Ordinance” (Chapter 159-1), and most importantly, the Islamic Law that prohibits Muslims from eating “Pork”! Plaintiffs bring this action as the public has a right to know about this fraud that is being perpetrated against the residents living in the area of Dearborn, Michigan, a community that has the highest concentration of Muslims in North America.

2. That Defendants, **LITTLE CAESAR PIZZA, and LITTLE CAESAR ENTERPRISE, INC.** are Michigan corporations, doing business in the County of Wayne, State of Michigan. That the remaining defendants, **JOHN DOE and JANE DOE, are employees,** of defendants **LITTLE CAESAR PIZZA and LITTLE CAESAR ENTERPRISES, INC.**

3. That the amount in controversy exceeds the sum of **One Hundred Million (\$100,000,000.00) Dollars (where the number of injured class members are believed to be in the thousands).**

CLASS ACTION

4. Plaintiffs incorporate by reference paragraph 1 through 3.

5. That Defendants **LITTLE CAESAR PIZZA, and LITTLE CAESAR ENTERPRISE, INC.** operate a pizza business, wocated at 7315 Schaefer Road, in the city of Dearborn, State of Michigan.

6. That Defendants caters to a large number of Muslim consumers by offering **"Halal Pepperoni"**.

7. That a **"Halal"** sign is advertised on the window of Defendants place of business.



8. That Plaintiffs and class members have relied on the representation that the meat that Defendants sold was in-fact **"Halal"**, and Plaintiffs and other class members have never had to second guess, what they were buying, and what they were receiving was in fact **"Halal"**.

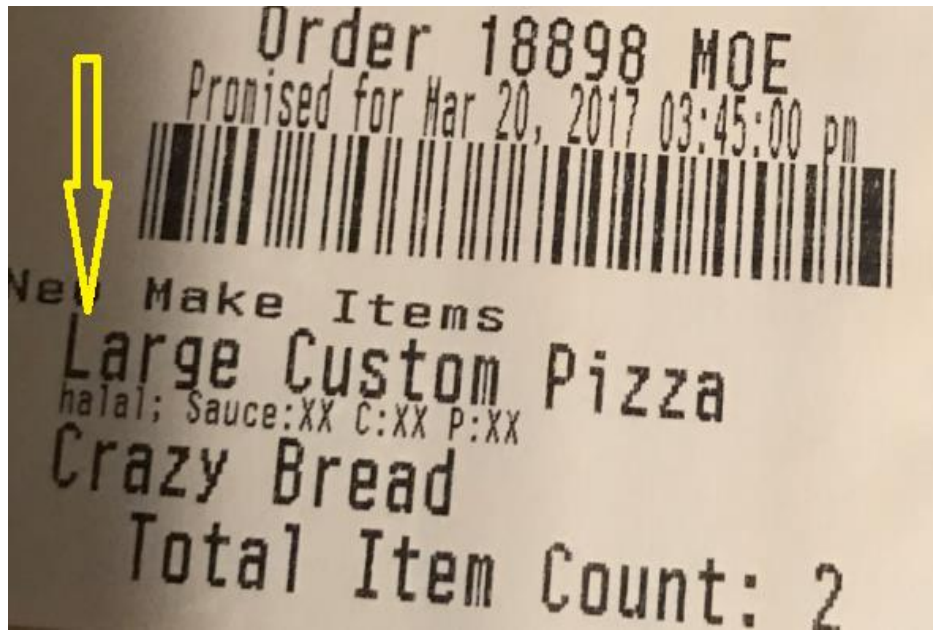
FACTUAL ALLEGATIONS
PLAINTIFF MICHELLE MEADE

9. On March 20, 2017 at approximately 3:30 p.m., Plaintiff Michelle Meade was waiting for her husband, Mohamad Bazzi to bring home a Large Pizza with "Halal Pepperoni" that he had ordered from the Little Caesars Pizza located at 7315 Schaefer Road, in the city of Dearborn, Michigan.

(Here is the receipt that was generated by the cash register, at the time that Mohamad Bazzi picked up his pizza).



10. That Mohamad Bazzi received his order at or about 3:45 pm. The pizza box had a label affixed to it that read: **Large Custom Pizza "Halal"**.



11. That Mohamad Bazzi took the **"Halal"** pizza home and he and his wife, Plaintiff Michelle Meade began to eat it. (This is the photo that of the pizza that Plaintiff Michelle Meade and her husband, Mohamad Bazzi ate).



12. That after a few bites, plaintiff Michelle Meade realized that the pizza didn't taste right and knew that what she was eating wasn't a **"Halal pepperoni" pizza**, rather plaintiff Michelle Meade was consuming **"Pork"**!

13. That plaintiff Michelle Meade became sick to her stomach, knowing that what she had consumed was in fact "Pork", forbidden in Islam.

14. That plaintiff could not believe that she was defrauded and wondered how many other Muslims may have unknowingly eaten **"Pork"** that defendants sold as **"Halal"**.

15. On March 23, 2017, Plaintiff Michelle Meade and her husband Mohamad Bazzi, went to the Dearborn Police Department and filed a complaint as it is a crime under local and state law to defraud consumers and mislabel meat as **"Halal"** when in reality it wasn't.

DEARBORN POLICE DEPARTMENT

INCIDENT NUMBER 17-17353
DATE 3-23-17

When making an inquiry or providing additional information concerning this case, refer to the above number. Copies of reports will not be available for at least 72 hours. Inquiries can be made by **contacting** the Records Bureau at (313) 943-2230 Monday thru Friday 8:00 a.m. to 11:30 a.m. and 12:30 p.m. to 4:30 p.m.
There are applicable fees for incident and accident copies.

For inquiries, Call:

Report Information	943-2230
Detective Bureau	943-2255
Youth Bureau	943-2265
Accident Investigation Bureau	943-2211
19 th District Court	943-2060

Officer: CLARK 553
DEARBORN POLICE DEPARTMENT

Form 183

FACTUAL ALLEGATIONS
PLAINTIFF ALI BAZZI

16. Plaintiff Ali Bazzi is a former police officer who worked for the Huron Clinton Metro Park Police Department, City of Dearborn Police Department and Wayne County Sheriff's Department.

17. That Plaintiff has been purchasing Little Caesar's Pizza from the 7315 Schaefer, Dearborn Michigan location for about 5 years.

18. That when Plaintiff would walk in to place an order for "Halal" pepperoni, he would ask the cashier, "Can I get a Hot and Ready 'Halal' pepperoni?"

19. That Plaintiff would be charged \$5.30 for the "Hot and Ready 'Halal' pepperoni" pizza.

20. That Plaintiff would take the "Halal" pepperoni pizza home and consume it.

21. That at other times, Plaintiff would call in his order or even walk in to place his order, and during those times, Plaintiff would be charged a different price, "around \$7 for the 'Halal' pepperoni" pizza.

22. That when Plaintiff heard about the lawsuit that had been filed, it brought back memories of the times that he had ordered "Halal" pepperoni pizza.

23. That all these years, Plaintiff had doubts that his pizza was "Halal".

24. That the reason Plaintiff had doubts was "there were times the pepperoni would be shrunk and crispy and looked like a bowl on top of the pizza. At other times, the pepperoni would be flat, soggy, and thicker than usually and it had a fatty taste."

25. That Plaintiff now knows that the "Pork" pepperoni was the one that was "flat, soggy, and thicker than usually and it had a fatty taste."

26. That here is a snap shot photo of the difference between "Halal" and "Pork" pepperoni.



May 26, 2017. A snap shot of a news report video taken after Josh Landon, reporter with Fox 2 News, displayed a 1/2 "Halal" and 1/2 "Pork" pepperoni that he had purchased from the Little Caesar's Pizza on Schaefer road in Dearborn. <http://www.fox2detroit.com/news/local-news/257146585-story>

27. That what Plaintiff was purchasing, "Hot and Ready 'Halal' pepperoni, was in fact a "Hot and Ready 'Pork'" pizza.

28. That Defendants **LITTLE CAESAR PIZZA, and LITTLE CAESAR ENTERPRISE, INC.** with their employees JOHN DOE, and JANE DOE, together engaged in the practice of misrepresentation and Fraud, by selling Plaintiffs and other class members **"Pork"** pepperoni, falsely advertised as **"Halal"** pepperoni.

29. Plaintiffs brings this class action on behalf of themselves and all similarly situated Consumers in the state of Michigan who may have purchased **"Pork"** pepperoni, falsely labeled as **"Halal"** pepperoni. Plaintiffs seeks damages, restitution, and injunctive relief for the Class against defendants' false and misleading representations.

30. That at times, consumers would be charged pay \$6 for a **"Halal"** pepperoni pizza. (\$1 more than the **"Pork"** pepperoni pizza).

31. That upon information and belief, thousands of consumers have ordered **"Halal"** pepperoni pizza and thousand are shocked and outraged to discover that defendants served **"Non-Halal"** pizza on numerous occasions.

32. That defendants **LITTLE CAESAR PIZZA, and LITTLE CAESAR ENTERPRISE, INC.** have failed to provide proper training to their employees on the magnitude and emotional distress that is caused by feeding **"Pork"** to Muslims, under the guise that it is **"Halal"**.

33. That defendants **LITTLE CAESAR PIZZA, and LITTLE CAESAR ENTERPRISE, INC.** have caused irreparable harm to Plaintiffs and thousands of other class members.

34. Plaintiffs and the Class seek economic and punitive damages in excess of \$100,000,000.00 (One Hundred Million Dollars).

35. Plaintiffs and the Class seek reasonable attorney fees as this lawsuit seeks enforcement of an important right affecting the public interest and satisfies the statutory requirements for an award of attorney fees.

36. Plaintiffs and Class members rely on the representation of Defendants that they were getting **"Halal"** pizza, when in fact they weren't.

37. In purchasing the **"Halal"** pepperoni, Plaintiffs relied on defendants misrepresentations of material facts they were in fact getting **"Halal"** pepperoni.

38. That Defendants misrepresentation has caused great emotional harm as Plaintiffs and class members have consuming **"Pork"**, or pizza contaminated with **"Pork"** which is a violation of the Islamic beliefs. (The pizzas were contaminated with "Pork" due to defendants' defective production line and negligent employees),

CLASS ACTION ALLEGATIONS

39. Plaintiffs brings this action individually and as a class action on behalf of the following Class: All persons in the state of Michigan who purchased **"Halal"** pepperoni from the Little Caesars located at 7315 Schaefer, Dearborn, Michigan at any time since their inception or since they began to offer **"Halal"** pepperoni as a menu item.

40. Plaintiffs reserve the right to redefine the Class prior to

certification.

41. The Class is so numerous that the individual joinder of all its members is impracticable. The exact number and identities of members of the Class is unknown to Plaintiff at this time and can be ascertained through appropriate discovery.

42. Common questions of law and fact exist as to all members of the Class, which predominate over any questions affecting only individual members of the Class. These common legal and factual questions, which do not vary from Class member to Class member, and which may be determined without reference to the individual circumstances of any Class member include, but are not limited to, the following:

a. Whether Defendants sold **"Halal"** pepperoni and provided **"Pork"** pepperoni instead;

b. Whether Defendants have a barrier between **"Halal"** foods and **"Pork"** foods, which would invalidate the **"Halal"** and make all pizza sold **"non-Halal"**;

c. Whether Defendants used the same pizza cutter for **"Pork"** food and **"Halal"** food, which would invalidate the **"Halal"** and make all pizza sold **"non-Halal"**;

d. Whether Defendants had a warning system in place to alert other employees if a mistake was made in making a **"Halal"** pizza;

e. Whether Defendants conduct constitutes negligent

misrepresentation;

f. Whether Defendants conduct resulted in unjust enrichment;

g. Whether Plaintiffs and the Class are entitled to compensatory damages, and if so, the nature of such damages;

h. Whether Plaintiffs and the Class are entitled to restitutionary relief, and

i. Whether Plaintiffs and the Class are entitled to injunctive relief.

43. Plaintiffs claim are typical of the claims of the members of the Class. Plaintiffs and all members of the Class have been similarly affected by Defendants common Course of conduct since they all relied on Defendants representation that they purchased "**Halal**" pepperoni when in fact they were sold "**Pork**" pepperoni or "**non-Halal**" pizza.

44. Plaintiffs will fairly and adequately represent and protect the interests of the Class.

45. A Class Action is superior to other available means for the fair and efficient Adjudication of the claims of the Class and Subclass. Each individual Class member may lack the resources to undergo the burden and expense associated with individually prosecuting the complex, expensive, and extensive litigation necessary to establish Defendants liability and obtain adequate compensation for the injuries sustained. Individualized litigation increases the expense and delay for all parties and multiplies the burden on the judicial system in handling the complex legal and factual

issues present in this case. Individualized litigation also presents the potential for inconsistent and contradictory judgments. Conversely, a class action presents far fewer practical difficulties and provides several benefits, including single and efficient adjudication. Class treatment of the issues present in this case will ensure that each claimant receives a fair and consistent adjudication.

COUNT I
BREACH OF CONTRACT

46. Plaintiffs incorporates by reference paragraphs 1-45.

47. Plaintiffs brings this claim individually and on behalf of the proposed Class against Defendants.

49. On or about **March 20, 2017 (Plaintiff Michelle Meade)** and at many other times during the past 5 years (Plaintiff Ali Bazzi) Plaintiffs ordered a large **"Halal"** pepperoni pizza (Plaintiff Michelle Meade); or a "Hot and Ready 'Halal' pepperoni pizza" (Plaintiff Ali Bazzi) and at times paid an extra \$1 for it, while other times plaintiff Ali Bazzi was charged the \$5.30 price.

50. Defendants accepted the order and Defendants failed to deliver **"Halal"** pepperoni pizza, but, instead sold Plaintiff **"Pork"** pepperoni pizza.

51. That Plaintiff paid consideration for the **"Halal"** pepperoni pizza.

52. That Defendant Breached the contract by selling Plaintiff **"Pork"** pepperoni pizza.

53. That Plaintiffs and Class members are entitled to a full refund of

all "Halal" pizzas purchased from the date of inception through the present.

WHEREFORE, Plaintiffs requests that the Court enter judgment in their favor and in favor of the class members and against Defendants as follows:

- a. For compensatory damages.
- b. For an injunction halting the practices complained of.
- c. For attorney's fees, litigation expenses and costs.
- d. For such other or further relief as the Court deems appropriate.

COUNT II
NEGLIGENT MISREPRESENTATION

54. Plaintiffs incorporate by reference paragraphs 1-53.

55. Plaintiffs brings this claim individually and on behalf of the proposed Class against Defendants.

56. Defendants **LITTLE CAESAR PIZZA, and LITTLE CAESAR ENTERPRISE, INC.** were in the market of selling pizzas in the city of Dearborn, state of Michigan.

57. Defendants **LITTLE CAESAR PIZZA, and LITTLE CAESAR ENTERPRISE, INC.** represented to Plaintiffs and other Class members that they offered "**Halal**" pepperoni pizza.

58. Defendants **LITTLE CAESAR PIZZA, and LITTLE CAESAR ENTERPRISE, INC.** through its employees and agents failed to provide "**Halal**" pepperoni by misrepresenting the "**Pork**" pepperoni as "**Halal**"

or negligently cross-contaminating the work environment (production line) with **"Pork"** products, making the entire product **"non-Halal"**.

59. Defendants **LITTLE CAESAR PIZZA, and LITTLE CAESAR ENTERPRISE, INC.** owed a duty of care to Plaintiffs and other Class members by making sure that what they were purchasing was in fact **"Halal"** pepperoni and or a **"Halal"** pizza not contaminated with **"Pork"**, through the production line.

60. Defendants **LITTLE CAESAR PIZZA, and LITTLE CAESAR ENTERPRISE, INC.** breached that duty by allowing careless and negligent employees to substitute the **"Pork"** pepperoni for the **"Halal"** pepperoni, and/or allowing for the **"Pork"** pepperoni or other **"Pork"** ingredients to contaminate the **"Halal"** pepperoni, making the entire pizza "non-Halal".

61. Plaintiffs and other Class members were damaged as a result of Defendants **LITTLE CAESAR PIZZA, and LITTLE CAESAR ENTERPRISE, INC.** negligent misrepresentations.

62. At the time, Defendants **LITTLE CAESAR PIZZA, and LITTLE CAESAR ENTERPRISE, INC.** knew or should have known that they misrepresented to Plaintiffs and other Class members that they were sold **"Pork"** pepperoni and not **"Halal"** pepperoni, as they were promised, (while others were sold "non-Halal" pizza that was contaminated by **"Pork"** ingredients).

63. The negligent misrepresentations, upon which Plaintiffs and the

Class reasonably and justifiably relied, were intended to induce them and actually did induce them to purchase a **“Halal”** pepperoni pizza.

64. Plaintiffs and the Class would not have purchased the **“Halal”** pepperoni pizza, if the true facts had been known.

65. Defendants negligent misrepresentation caused damage to Plaintiffs and the Class, who are entitled to damages and other legal and equitable relief.

WHEREFORE, Plaintiffs requests that the Court enter judgment in their favor and in favor of the class members and against Defendants as follows:

- a. For compensatory damages.
- b. For an injunction halting the practices complained of.
- c. For attorney’s fees, litigation expenses and costs.
- d. For such other or further relief as the Court deems appropriate.

COUNT III
UNJUST ENRICHMENT

66. Plaintiffs incorporate by reference paragraphs 1-65.

67. Plaintiffs bring this claim individually and on behalf of the proposed Class against Defendants.

68. Defendants **LITTLE CAESAR PIZZA, and LITTLE CAESAR ENTERPRISE, INC.** representation that they were selling “Halal” pepperoni to Plaintiff and other Class member was false.

69. Accordingly, Defendants **LITTLE CAESAR PIZZA, and LITTLE CAESAR ENTERPRISE, INC.** have been unjustly enriched in retaining revenues derived from Plaintiff and the Class who purchased “Halal” pepperoni under these circumstances.

WHEREFORE, Plaintiffs requests that the Court enter judgment in his favor and in favor of the class members and against Defendants as follows:

- a. For compensatory damages.
- b. For an injunction halting the practices complained of.
- c. For attorney’s fees, litigation expenses and costs.
- d. For such other or further relief as the Court deems appropriate.

COUNT IV
FRAUD

70. Plaintiffs incorporate by reference paragraphs 1-69.

71. Plaintiffs bring this claim individually and on behalf of the proposed Class against Defendant.

72. As detailed throughout Plaintiffs Complaint, Defendants **LITTLE CAESAR PIZZA, and LITTLE CAESAR ENTERPRISE, INC.** represented to Plaintiffs and Class members that they were purchasing “Halal” pepperoni pizza.

73. Defendants **LITTLE CAESAR PIZZA, and LITTLE CAESAR ENTERPRISE, INC.** knew or should have known that what they were selling was in fact “Pork” pepperoni or “Non-Halal” pizza, contaminated by

“Pork” ingredients on the production line (by workers touching “Pork” and “Halal” products, by negligently having “Pork” products fall into the “Halal” pepperoni, other vegetables, or cheese; by using the same pizza pans for “Halal” and “Pork” pizzas, and by using the same pizza cutter for “Halal” and “Pork” pizzas.

74. Defendants **LITTLE CAESAR PIZZA, and LITTLE CAESAR ENTERPRISE, INC.** misrepresentations were intended to induce and actually induced Plaintiffs and the Class to purchase “Halal” pepperoni pizza, and Plaintiffs and the Class reasonably and justifiably relied on Defendant’s fraudulent representations.

75. Plaintiffs and the Class were damaged through their purchase of “Non-Halal” pizza, which was advertised as “Halal”. Plaintiffs and the Class would not have purchased Defendants **LITTLE CAESAR PIZZA, and LITTLE CAESAR ENTERPRISE, INC.** had the true facts been known.

WHEREFORE, Plaintiffs requests that the Court enter judgment in their favor and in favor of the class members and against Defendants as follows:

- a. For compensatory damages.
- b. For an injunction halting the practices complained of.
- c. For attorney’s fees, litigation expenses and costs.
- d. For such other or further relief as the Court deems appropriate.

COUNT V
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

76. Plaintiffs incorporate paragraph 1-75.

77. Plaintiffs bring this claim individually and on behalf of the proposed Class against Defendant.

78. As detailed throughout Plaintiffs Complaint, Defendants **LITTLE CAESAR PIZZA, and LITTLE CAESAR ENTERPRISE, INC.** represented to Plaintiffs and Class members that they were purchasing "Halal" pepperoni pizza.

79. Defendants **LITTLE CAESAR PIZZA, and LITTLE CAESAR ENTERPRISE, INC.** knew or should have known that what they were selling was in fact "Pork" pepperoni or "Non-Halal" pizza, contaminated by "Pork" ingredients on the production line (by workers touching "Pork" and "Halal" products, by negligently having "Pork" products fall into the "Halal" pepperoni, other vegetables, or cheese; by using the same pizza pans for "Halal" and "Pork" pizzas, and by using the same pizza cutter for "Halal" and "Pork" pizzas.

80. Defendants intentionally and/or Negligently engaged in conduct which was extreme, outrageous and beyond the bounds of decency in a civilized society by selling "Pork" products to customers who practices Islam, in a community that has 99% Muslims, by disregarding the emotional distress it would cause Plaintiffs and the Class.

81. Through the conduct described above, Defendants intentionally

inflicted emotional distress upon Plaintiffs and the Class.

82. As a direct and proximate result of Defendant's gross negligence, intentional and/or reckless conduct, Plaintiff and the Class suffered severe emotional distress and all those damages described herein.

WHEREFORE, Plaintiffs requests that the Court enter judgment in his favor and in favor of the class members and against Defendants as follows:

- a. For compensatory damages.
- b. For an injunction halting the practices complained of.
- c. For attorney's fees, litigation expenses and costs.
- d. For such other or further relief as the Court deems appropriate.

COUNT VI

Assault and Battery

83. Plaintiffs incorporate paragraph 1-82.

84. Plaintiffs bring this claim individually and on behalf of the proposed Class against Defendant.

85. As detailed throughout Plaintiff's Complaint, Defendants **LITTLE CAESAR PIZZA, and LITTLE CAESAR ENTERPRISE, INC.** represented to Plaintiffs and Class members that they were purchasing "Halal" pepperoni pizza.

86. Defendants **LITTLE CAESAR PIZZA, and LITTLE CAESAR ENTERPRISE, INC.** knew or should have known that what they were selling was in fact "Pork" pepperoni or "Non-Halal" pizza, contaminated by

“Pork” ingredients on the production line (by workers touching “Pork” and “Halal” products, by negligently having “Pork” products fall into the “Halal” pepperoni, other vegetables, or cheese; by using the same pizza pans for “Halal” and “Pork” pizzas, and by using the same pizza cutter for “Halal” and “Pork” pizzas.

87. Defendants **LITTLE CAESAR PIZZA, and LITTLE CAESAR ENTERPRISE, INC.** knew or should have known that Plaintiff and Class members were going to ingest the “Pork” pepperoni or “Non-Halal” pizza.

88. Defendants **LITTLE CAESAR PIZZA, and LITTLE CAESAR ENTERPRISE, INC.** willfully and intentional served “Pork” pepperoni or “Non-Halal” pizza to Plaintiff and Class members, knowing that ingesting “Pork” or “Non-Halal” pizza was in violation of Plaintiffs and Class members religious beliefs, and Defendants know that this conduct would be harmful and offensive if it was known to Plaintiffs and Class members.

89. That as a direct and proximate result of Defendants assault and battery, Plaintiffs, and Class members have suffered injury and irreparable damage, past, present, and future, including the following:

- a. pain, suffering, and emotional distress
- b. humiliation, mortification, and embarrassment
- c. living with the emotional trauma that plaintiffs and Class members were unknowingly fed “Pork” or “non-Halal” pizza, in violation of their religious beliefs.

d. other injuries and damages and consequences that are found to be related to the assault and battery that develop or manifest themselves during the course of discover and trial.

WHEREFORE, Plaintiffd requests that the Court enter judgment in their favor and in favor of the class members and against Defendants as follows:

- a. For compensatory damages.
- b. For an injunction halting the practices complained of.
- c. For attorney’s fees, litigation expenses and costs.
- d. For such other or further relief as the Court deems appropriate.

COUNT VII
NEGLIGENCE

90. Plaintiffs incorporate paragraph 1-89.

91. Plaintiffs bring this claim individually and on behalf of the proposed Class against Defendant.

92. As detailed throughout Plaintiffs Complaint, Defendants **LITTLE CAESAR PIZZA, and LITTLE CAESAR ENTERPRISE, INC.** represented to Plaintiffs and Class members that they were purchasing “Halal” pepperoni pizza.

93. Defendants **LITTLE CAESAR PIZZA, and LITTLE CAESAR ENTERPRISE, INC.** knew or should have known that what they were selling was in fact “Pork” pepperoni or “Non-Halal” pizza, contaminated by

"Pork" ingredients on the production line (by workers touching "Pork" and "Halal" products, by negligently have "Pork" products fall into the "Halal" pepperoni, other vegetables, or cheese; by using the same pizza pans for "Halal" and "Pork" pizzas, and by using the same pizza cutter for "Halal" and "Pork" pizzas.

94. Defendants and/or its agent/s owed a duty to Plaintiffs and Class members to provide be served "Halal" pepperoni, not "Pork" pepperoni or a pizza contaminated with "Pork" ingredients.

95. Defendants and/or its agent/s breached that duty they served Plaintiff and Class members "Pork" pepperoni or "Non-Halal" pizzas, that were contaminated with "Pork" products, in violation of Plaintiffs and Class members religious beliefs.

96. The creation of a defective product line or the lack of training employees on how to properly prepare "Halal" pizza was the proximate cause of Plaintiffs and Class members injuries.

97. As a direct and proximate result of Defendant and/or its agent/s, negligence, Plaintiffs and Class members suffered substantial damages and injuries, past, present and future, including the following:

- a. pain, suffering, emotional distress;
- b. other injuries, damages and consequences that are found to be related to the incident that develop or manifest themselves during the course of discovery and trial.

COUNT VIII
RESPONDEAT SUPERIOR

98. Plaintiffs incorporate paragraph 1-97.

99. Plaintiffs brings this claim individually and on behalf of the proposed Class against Defendant.

100. That Defendants **LITTLE CAESAR PIZZA, and LITTLE CAESAR ENTERPRISE, INC.** are vicariously liable for all acts and omissions of named and unnamed defendants herein by virtue of the theory of Respondeat superior.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs individually and on behalf of all others similarly situated, seeks judgment against Defendants **LITTLE CAESAR PIZZA, LITTLE CAESAR ENTERPRISE, INC. and other JOHN DOE and JANE DOE, employees,** as follows:

a. For an Order certifying the Class and naming Plaintiffs **Michelle Meade and Ali Bazzi** as the representative of the Class and Plaintiffs attorney as Class Counsel to represent members of the Class;

b. For an Order declaring that Defendant's conduct violates the common law provisions referenced herein and other applicable statutes;

c. For an Order finding in favor of Plaintiffs, and the Class on all counts alleged herein;

d. For compensatory and punitive damages in amounts to be determined by the Court and/or jury.

e. For pre-judgment interest on all amounts awarded to the full extent allowed by law;

f. For injunctive relief as pleaded or as the Court may deem proper, and

h. For an Order awarding Plaintiffs, and the Class reasonable attorney fees and expenses to the full extent allowed by law.

Respectfully submitted by:

LAW OFFICES OF MAJED A. MOUGHNI, P.L.L.C.

Dated: June 3, 2017

BY: /s/ Majed A. Moughni

MAJED A. MOUGHNI (P 61087)
Attorney for Plaintiffs