

McDermott Will & Emery

Boston Brussels Chicago Dallas Düsseldorf Frankfurt Houston London Los Angeles Miami
Milan Munich New York Orange County Paris Rome Seoul Silicon Valley Washington, D.C.

Strategic alliance with MWE China Law Offices (Shanghai)

Marissa C. Krumm
mkrumm@mwe.com
+1 305 329 4456

March 23, 2015

VIA CM/ECF

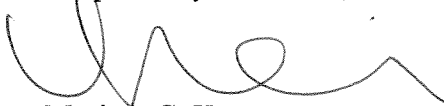
Honorable Susie Morgan
United States District Court
Eastern District of Louisiana
500 Poydras Street, Room C322
New Orleans, LA 70130

RE: *Krishnakutty, et al. v. Signal Int'l, LLC, et al.*, Civ. No. 13-6220

Dear Judge Morgan:

Pursuant to the Court's request during the March 2, 2015 conference that plaintiffs in each of the consolidated *Achari* cases provide the Court with a summary of their claims in chart format [D.E. 443], please find enclosed a chart summarizing the *Krishnakutty* plaintiffs' claims.

Respectfully submitted,



Marissa C. Krumm

Enclosure

Copies to all counsel of record via CM/ECF

Krishnakutty v. Signal, et al, Civ. No. 13-6220
Summary of Claims in First Amended Complaint

Claim Made ¹	Damages Sought ²	Claim Brought Against ³				
		Signal	Burnett	Dewan	Global Resources	Indo Ameri-soft
1. THE TRAFFICKING VICTIMS PROTECTION ACT OF 2003 18 U.S.C. § 1589 (forced labor) and 18 U.S.C. § 1590 (trafficking with respect to personage, slavery, involuntary servitude, or forced labor) Am. Compl. ¶¶ 214-230	• Compensatory Damages, including (without limitation*): - o Loss of wages - o Loss of opportunity - o Pain and suffering - o Mental and emotional distress - o Prejudgment interest - o Recruitment and visa fees paid to Defendants - o Expenses that Plaintiffs incurred to pay such fees, including but not limited to interest from loans - o Medical expenses - o Damages related to living and working conditions - o Mandatory housing and other fees paid to Signal • Punitive damages • Attorneys' fees	Yes	Yes	Yes	Yes	Yes
2. RACKETEER INFLUENCED AND	• Compensatory Damages, including (without limitation*):	Yes	Yes	Yes	Yes	Yes

¹ Plaintiffs Sabu Puthukkuttumel Veede Krishnakutty and Thampy Putham Prambil Edicula ("Plaintiffs") assert identical claims in this action.

² This chart summarizes the allegations in ¶¶ 214-372 of the First Amended Complaint, and is not intended to modify, replace or substitute for those allegations.

* Plaintiffs do not seek damages from any defendants relating to events that occurred after their employment with Signal ended.

³ For purposes of this Summary of Claims, "Signal" means Signal International LLC; "Burnett" means Malvern C. Burnett, and Gulf Coast Immigration Law Center, LLC; "Dewan" means Sachin Dewan and Dewan Consultants Pvt. Ltd.; and "Indo Amerisoft" means Indo AmeriSoft L.L.C. and Kurella Rao.

CORRUPT ORGANIZATIONS ACT 18 U.S.C. § 1962(c) and 18 U.S.C. § 1962(d) Am. Compl. ¶¶ 231-279	- o Loss of wages - o Loss of opportunity - o Pain and suffering - o Mental and emotional distress - o Prejudgment interest - o Recruitment and visa fees paid to Defendants - o Expenses that Plaintiffs incurred to pay such fees, including but not limited to interest from loans - o Medical expenses - o Damages related to living and working conditions - o Mandatory housing and other fees paid to Signal • Punitive damages • Attorneys' fees					
3. VIOLATIONS OF THE CIVIL RIGHTS ACT OF 1866 42 U.S.C. § 1981 (Discriminatory Treatment) Am. Compl. ¶¶ 280-293	• Compensatory Damages, including (without limitation*): - o Loss of wages - o Loss of opportunity - o Pain and suffering - o Mental and emotional distress - o Prejudgment interest - o Medical expenses - o Damages related to living and working conditions - o Mandatory housing and other fees paid to Signal • Punitive damages • Attorneys' fees	Yes	No	No	No	No
4. VIOLATIONS OF THE KU KLUX KLAN ACT OF 1871 42 U.S.C. § 1985 and the Thirteenth Amendment	• Compensatory Damages, including (without limitation*): - o Loss of wages - o Loss of opportunity - o Pain and suffering - o Mental and emotional distress - o Prejudgment interest	Yes	Yes	Yes	Yes	Yes

Am. Compl. ¶¶ 294-301	- o Medical expenses - o Damages related to living and working conditions - o Mandatory housing and other fees paid to Signal • Punitive damages • Attorneys' fees					
5. FRAUD (Mississippi Law) Am. Compl. ¶¶ 302-316	• Compensatory Damages, including (without limitation*): - o Loss of wages - o Loss of opportunity - o Pain and suffering - o Mental and emotional distress - o Prejudgment interest - o Recruitment and visa fees paid to Defendants - o Expenses that Plaintiffs incurred to pay such fees, including but not limited to interest from loans - o Medical expenses - o Damages related to living and working conditions - o Mandatory housing and other fees paid to Signal • Punitive damages • Attorneys' fees	Yes	Yes	Yes	Yes	Yes
6. NEGLIGENT MISREPRESENTATION (Mississippi Law) Am. Compl. ¶¶ 317-331	• Compensatory Damages, including (without limitation*): - o Loss of wages - o Loss of opportunity - o Pain and suffering - o Mental and emotional distress - o Prejudgment interest - o Recruitment and visa fees paid to Defendants - o Expenses that Plaintiffs incurred to pay such fees, including but not limited to interest from loans - o Medical expenses	Yes	Yes	Yes	Yes	Yes

	- o Damages related to living and working conditions - o Mandatory housing and other fees paid to Signal • Punitive damages • Attorneys' fees					
7. BREACH OF CONTRACT (Mississippi Law) Am. Compl. ¶¶ 332-342	• Compensatory Damages, including (without limitation*): - o Loss of wages - o Loss of opportunity - o Pain and suffering - o Mental and emotional distress, - o Prejudgment interest, - o Recruitment and visa fees paid to Defendants - o Expenses that Plaintiffs incurred to pay such fees, including but not limited to interest from loans - o Medical expenses - o Damages related to living and working conditions - o Mandatory housing and other fees paid to Signal • Punitive damages • Attorneys' fees	Yes	Yes	Yes	Yes	Yes
8. MONEY HAD AND RECEIVED (Mississippi Law) Am. Compl. ¶¶ 343-352	• Compensatory Damages, including (without limitation*): - o Recruitment and visa fees paid to Defendants - o Mandatory housing and other fees paid to Signal - o Prejudgment interest • Punitive damages • Attorneys' fees	Yes	Yes	Yes	Yes	Yes
9. BREACH OF FIDUCIARY DUTY (Mississippi Law) Am. Compl. ¶¶ 353-362	• Compensatory Damages, including (without limitation*): - o Loss of wages - o Loss of opportunity - o Pain and suffering	No	Yes	No	No	No

	- o Mental and emotional distress - o Prejudgment interest - o Recruitment and visa fees paid to Defendants - o Expenses that Plaintiffs incurred to pay such fees, including but not limited to interest from loans • Punitive damages • Attorneys' fees • Constructive Trust					
10. BREACH OF SPECIAL/CONFIDENTIAL RELATIONSHIP (Mississippi Law) Am. Compl. ¶¶ 363-372	• Compensatory Damages, including (without limitation*): - o Loss of wages - o Loss of opportunity - o Pain and suffering - o Mental and emotional distress, - o Prejudgment interest, - o Recruitment and visa fees paid to Defendants - o Expenses that Plaintiffs incurred to pay such fees, including but not limited to interest from loans - o Medical expenses - o Damages related to living and working conditions - o Mandatory housing and other fees paid to Signal • Punitive damages • Attorneys' fees • Constructive Trust	Yes	Yes	Yes	Yes	Yes