

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

JONATHAN RANGEL, individually and on
behalf of all other similarly situated persons,

Plaintiffs,

vs.

DMV PROTECTION, LLC and JOVAN
VLADIC

Defendants.

Case No. 1:25-cv-01288

**DEFENDANTS' DMV PROTECTION, LLC AND JOVAN VLADIC MOTION TO
DECERTIFY FLSA COLLECTIVE ACTION AND DENY RULE 23 CLASS
CERTIFICATION**

Defendants DMV PROTECTION, LLC and JOVAN VLADIC (collectively "DMV") respectfully moves this Court to decertify the conditionally certified Fair Labor Standards Act ("FLSA") collective action and deny certification of the proposed Federal Rule of Civil Procedure 23 class. Discovery has now closed, and the record demonstrates that Plaintiffs are not similarly situated for purposes of the FLSA collective action and that the proposed Rule 23 class fails multiple requirements for certification.

WHEREFORE, Defendant respectfully requests that the Court:

1. Grant Defendant's Motion to Decertify the conditionally certified FLSA collective action;
2. Deny Plaintiffs' Motion for Rule 23 Class Certification [OR deny certification of the proposed Rule 23 class];

3. Order that the named Plaintiffs and any opt-in plaintiffs proceed on their individual claims; and

4. Grant such other and further relief as the Court deems just and proper.

A memorandum of support to accompany this Motion is filed concurrently herewith.

Date: August 7, 2026

Respectfully submitted,

DMV Protection, LLC and
Jovan Vladic, Individually

/s/ Milton C. Johns
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CERTIFICATE OF SERVICE

I hereby certify that on August 7, 2026, I filed the foregoing with the Court's ECF system which will send electronic notice of the same to all counsel of record.

/s/ Milton C. Johns
Milton C. Johns
Executive Law Partners, PLLC