

LAVI & EBRAHIMIAN, LLP

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June 29, 2026

**NOTICE OF LABOR CODE VIOLATIONS PURSUANT TO
LABOR CODE SECTION 2699.3**

To: California Labor and Workforce Development Agency
Attn. PAGA Administrator
1515 Clay Street, Suite 801
Oakland, California 94612
Via Online Submission Only

<u>STARBUCKS CORPORATION</u> Registered Agent for Process of Service c/o Corporation Service Company which will do business in California as CSC-Lawyers Incorporating Service 2710 Gateway Oaks Drive, Suite 150N Sacramento, California 95833 <u>Certified No.: 9589 0710 5270 4047 1963 72</u>	<u>STARBUCKS CORPORATION</u> Attention: Legal Department 2401 Utah Avenue South, Suite 800 Seattle, Washington 98134 <u>Certified No.: 9589 0710 5270 4047 1963 89</u>
<u>STARBUCKS CORPORATION</u> Attention: Legal Department 5010 North West Lane Stockton, California 95210 <u>Certified No.: 9589 0710 5270 4047 1963 96</u>	

From: JESSICA HEWITT, on behalf of herself and all other current and former aggrieved
California-based hourly non-exempt employees of STARBUCKS CORPORATION.

c/o Joseph Lavi, Esq.
Vincent C. Granberry, Esq.
Jeffrey D. Klein, Esq.
Michael L. Huggins, Esq.
LAVI & EBRAHIMIAN, LLP
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Our firm has been retained by aggrieved employee JESSICA HEWITT concerning a representative action pursuant to the Private Attorneys General Act of 2004, Labor Code sections 2698, *et seq.* ("PAGA") against her employers, STARBUCKS CORPORATION.

We are filing this written notice with the Labor and Workforce Development Agency ("LWDA") pursuant to the provisions of the California Labor Code Sections 2699, 2699.3, and 2698, *et seq.* The purpose of this letter is to inquire whether LWDA intends to investigate and seek civil penalties associated with my client's allegations of violations of the Labor Code by her Employer. In addition to submitting this letter and the \$75.00 filing fee via the online PAGA filing system, I am causing a copy of this letter to be mailed to the Department of Industrial Relations – Accounting Unit.

FACTUAL STATEMENT AND THEORIES OF LABOR CODE VIOLATIONS

Aggrieved employee JESSICA HEWITT ("Plaintiff" or "Employee") was employed by STARBUCKS CORPORATION ("Defendants" or "Employers") as an hourly non-exempt employee from in or around April 7, 2023, until on or around June 12, 2026. Plaintiff believes Defendant(s) employed more than one hundred (100) employees in total during the period covered by this notice, and Labor Code section 2999.3(c)(2) does not apply.

1. Failure to Authorize and Permit All Legally Required and Legally Compliant Lactation Accommodation Breaks and/or Failure to Pay Lactation Accommodation Premiums

Employers often employed non-exempt employees, including the named Employee and other current and former aggrieved California-based hourly non-exempt employees, who desired to express breast milk for the employees' infant children.

California law requires every employer to provide a reasonable amount of break time to accommodate an employee's desire to express breast milk for the employee's infant child each time the employee needs to express milk. California law also requires that an employer provide an employee with a room or location for the employee to express milk in private which shall:

- (a) not be a bathroom, shall be in close proximity to the employee's work area, shielded from view and free from intrusion while the employee is expressing milk;
- (b) shall be safe, clean, and free of hazardous materials as defined in Labor Code section 6382;
- (c) shall contain a surface to place a breast pump and personal items;
- (d) shall contain a place to sit; and
- (e) shall have access to electricity or alternative devices, including, but not limited to, extension cords or charging stations, needed to operate an electric or battery-powered breast pump.

California law also requires the employer provide access to a sink with running water and a refrigerator suitable for storing milk in close proximity to the employee's workspace or other suitable cooling device if a refrigerator cannot be provided. If an employer fails to provide reasonable break time or adequate space to express milk, the employer must pay the employee an additional hour of pay at the employee's regular rate for each workday the adequate space or reasonable time is not provided. (Lab. Code §§1033, subd. (a), 226.7, subd. (c).)

In this case, Employee and other current and former aggrieved California-based hourly non-exempt employees of Employer sought to express breast milk for the employees' infant children; however, Employer employed policies, practices, and/or procedures or lack of such policies, practices, and/or procedures which resulted in its failure to provide Plaintiff and similarly situated employees with reasonable break time for lactation or a room which complied with the requirements of California law, including but not limited to, the room not being private and shielded from view or free from intrusion while the employee is expressing milk. In most instances, Employer failed to provide Employee and other current and former aggrieved California-based hourly non-exempt employees with any lactation room whatsoever; instead forcing them to express breast milk in the bathroom or their personal vehicles. For example, because Employer failed to provide a suitable lactation room, Employee frequently found herself expressing breast milk in her car and had to go so far as to get her car windows tinted for additional privacy while expressing breast milk. In addition, Employee is informed, believes, and thereon alleges that in the instances where Defendant did provide employees a lactation room other than a bathroom, the room where Employee and other current and former aggrieved California-based hourly non-exempt employees were permitted to express milk (a) was not safe, clean, and free of hazardous materials; (b) did not contain a surface to place a breast pump and personal items; (c) did not have a place to sit; (d) did not have access to electricity or alternative devices; (ae) had no blinds or other forms of shielding view of the inside of the room; (bf) had no locking mechanism on the door(s); and/or (cg) which other employees were able or permitted to enter the room while Employee and other current and former aggrieved California-based hourly non-exempt employees were expressing milk.

Additionally, Employers failed to pay Employee and other current and former aggrieved California-based hourly non-exempt employees an additional hour of pay at their regular rate of compensation for each workday the employees did not receive all legally required and compliant lactation periods, i.e., legally compliant time or space. Employers employed policies and procedures which ensured that employees did not receive any lactation period premium wages to compensate them for workdays in which they did not receive all legally required and compliant lactation periods.

The aforementioned policies, practices, and/or procedures of Employers resulted in Employee and other current and former aggrieved California-based hourly non-exempt employees not being provided with all legally required and compliant lactation periods and/or not receiving premium wages to compensate them for such instances, all in violation of California law.

Labor & Workforce Development Agency
Re: *Hewitt v. Starbucks Corporation*
June 29, 2026
Page 4 of 4

CONCLUSION

Our client intends to file a representative action pursuant to PAGA concerning her wage claims as warranted by Employer's violations of Labor Code sections 1030, 1031, and 1033 and sections 3, 4, 11 and 12 of the applicable IWC Wage Orders. This letter is being sent to you as an inquiry into whether LWDA wishes to investigate my client's claims for civil penalties associated with Employer's violations of the Labor Code, as alleged herein. Thank you for your assistance and cooperation in this matter. If you have any questions or concerns, please contact me at the above-listed information.

Very truly yours,
LAVI & EBRAHIMIAN, LLP



Vincent C. Granberry, Esq.

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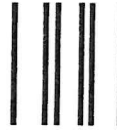
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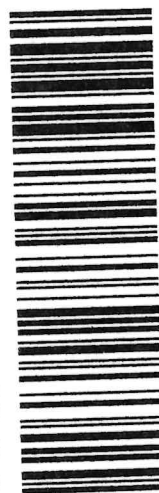
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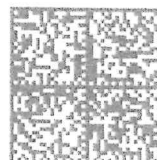
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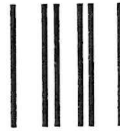
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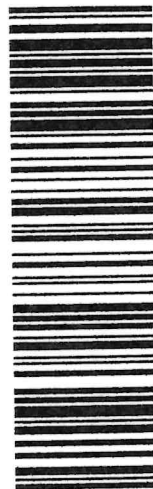
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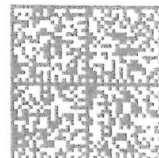
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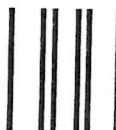
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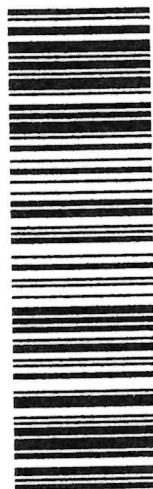
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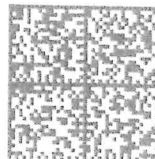
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