

Assigned for all purposes to: Stanley Mosk Courthouse, Judicial Officer: Gregory Keosian

Joseph Lavi, Esq. (SBN 209776)
Email: jlavi@lelawfirm.com
Vincent C. Granberry, Esq. (SBN 276483)
Email: vgranberry@lelawfirm.com
Courtney M. Miller, Esq. (SBN 327850)
Email: cmiller@lelawfirm.com
LAVI & EBRAHIMIAN, LLP
8889 W. Olympic Boulevard, Suite 200
Beverly Hills, California 90211
Telephone: (310) 432-0000
Facsimile: (310) 432-0001

Attorneys for Plaintiff CARLA AGUILAR on behalf
of herself and all other current and former aggrieved
California-based hourly non-exempt employees

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES – CENTRAL DISTRICT

CARLA AGUILAR on behalf of herself and all
other current and former aggrieved California-
based hourly non-exempt employees,

Plaintiff,

v.

B & V ENTERPRISES, INC. D/B/A SUPER
KING MARKETS; and DOES 1 to 100,
inclusive,

Defendants.

Case No.: **20STCV28012**

PAGA ACTION

**PLAINTIFF CARLA AGUILAR'S
COMPLAINT FOR DAMAGES AND
RESTITUTION FOR:**

- 1. CIVIL PENALTIES PURSUANT
TO THE PRIVATE ATTORNEYS
GENERAL ACT OF 2004
("PAGA"), LABOR CODE
SECTION 2698, et seq.**

DEMAND FOR JURY TRIAL

NOW COMES Plaintiff CARLA AGUILAR ("Plaintiff"), on behalf of herself and all other
current and former aggrieved California-based hourly non-exempt employees, who alleges and
complains against Defendants B & V ENTERPRISES, INC. D/B/A SUPER KING MARKETS; and
DOES 1 to 100, inclusive ("Defendants") as follows:

I. INTRODUCTION

1. This is a Private Attorneys General Act of 2004, Labor Code § 2698, et seq.,
("PAGA") representative action brought by Plaintiff on behalf of herself, all other current and former
aggrieved California-based hourly non-exempt employees, and the State of California seeking civil

1 penalties associated with Defendants' violations of the Labor Code based on: failure to provide
2 suitable seats. After filing the requisite notice with the Labor and Workforce Development Agency
3 ("LWDA"), Plaintiff now seeks the following on a representative basis: civil penalties, reasonable
4 attorneys' fees pursuant to Labor Code section 2699(g)(1) and costs brought on behalf of Plaintiff,
5 all other current and former aggrieved California-based hourly non-exempt employees of Defendants,
6 and the State of California.

7 **II. JURISDICTION AND VENUE**

8 2. This Court has jurisdiction over the claims of Plaintiff and all other current and former
9 aggrieved California-based hourly non-exempt employees because Plaintiff's lawsuit seeks civil
10 penalties on behalf of herself, all other current and former aggrieved California-based hourly non-
11 exempt employees, and the State of California in excess of twenty-five thousand dollars (\$25,000);
12 Defendants employed Plaintiff and all other current and former aggrieved California-based hourly
13 non-exempt employees; and the injuries to Plaintiff and all other current and former aggrieved
14 California-based hourly non-exempt employees occurred in locations throughout California,
15 including Los Angeles County at 7227 Van Nuys Boulevard, Van Nuys, California 91405.

16 **III. PARTIES**

17 3. Plaintiff brings this action on behalf of herself, other current and former aggrieved
18 California-based hourly non-exempt employees of Defendants, and the State of California pursuant
19 to PAGA. The named Plaintiff and other aggrieved employees are current, former, and/or future
20 employees of Defendants who worked, work, or will work for Defendants as hourly non-exempt
21 employees in California. At all times mentioned herein, the currently named Plaintiff is and was
22 domiciled in and a resident and citizen of California and was employed by Defendants as an hourly
23 non-exempt employee within the one (1) year prior to the filing of the complaint.

24 4. Plaintiff is informed and believes, and thereon alleges, that Defendant B & V
25 ENTERPRISES, INC. D/B/A SUPER KING MARKETS is authorized to do business within the State
26 of California and is doing business in the State of California and/or and Defendants DOES 1 - 33 are,
27 and at all times relevant hereto, were persons acting on behalf of Defendant B & V ENTERPRISES,
28 INC. D/B/A SUPER KING MARKETS in the establishment of, or ratification of, the aforementioned

1 illegal wage and hour practices or policies. Defendant B & V ENTERPRISES, INC. D/B/A SUPER
2 KING MARKETS operates throughout California including Los Angeles County and employed
3 current and former aggrieved California-based non-exempt employees throughout California
4 including Los Angeles County.

5 5. Plaintiff is informed and believes, and thereon alleges, that Defendants DOES 34 - 66
6 are corporations, or are other business entities or organizations of a nature unknown to Plaintiff that
7 employed Plaintiff and all other current and former aggrieved California-based hourly non-exempt
8 employees to work, and exercised control over the working conditions of employment of Plaintiff
9 and all other current and former aggrieved California-based hourly non-exempt employees.

10 6. Plaintiff is informed and believes, and thereon alleges, that Defendants DOES 67 - 100
11 are individuals unknown to Plaintiff. Each of the individual defendants is sued individually and in his
12 or her capacity as an agent, shareholder, owner, representative, manager, supervisor, independent
13 contractor and/or employee of each defendant who violated or caused to be violated the Labor Code
14 and/or any provision of the Industrial Welfare Commission's wage orders regulating working
15 conditions.

16 7. Plaintiff is unaware of the true names of Defendants DOES 1 - 100. Plaintiff sues said
17 defendants by said fictitious names and will amend this complaint when the true names and capacities
18 are ascertained or when such facts pertaining to liability are ascertained, or as permitted by law or by
19 the Court. Plaintiff is informed and believes that each of the fictitiously named defendants is in some
20 manner responsible for the events and allegations set forth in this complaint.

21 8. Plaintiff makes the allegations in this complaint without any admission that, as to any
22 particular allegation, Plaintiff bears the burden of pleading, proving, or persuading and Plaintiff
23 reserves all of Plaintiff's right to plead in the alternative.

24 ///

25 ///

26 ///

27 ///

28 ///

1 FIRST CAUSE OF ACTION

2 **CIVIL PENALTIES PURSUANT TO THE PRIVATE ATTORNEYS GENERAL ACT OF**
3 **2004, LABOR CODE SECTION 2698, *et seq.***

4 **(As Against all Defendants and DOE Defendants by Plaintiff)**

5 9. Plaintiff hereby incorporates by reference paragraphs 1-8 above, as if fully set forth
6 below.

7 10. During the one (1) year preceding the filing of notice with LWDA, Defendants
8 violated Labor Code section 1198. Specifically, Defendants have committed the following violations
9 of the California Labor Code:

10 11. **Failure to provide Plaintiff and all other current and former aggrieved**
11 **California-based hourly non-exempt employees with suitable seats:** Section 14(A) of Wage Order
12 7 provides that: "All working employees shall be provided with suitable seats when the nature of the
13 work reasonably permits the use of seats." Section 14(B) of Wage Order 7 continues, "When
14 employees are not engaged in the active duties of their employment and the nature of the work
15 requires standing, an adequate number of suitable seats shall be placed in reasonable proximity to the
16 work area and employees shall be permitted to use such seats when it does not interfere with the
17 performance of their duties."

18 12. During the one (1) year preceding the filing of notice with LWDA, Defendants did not
19 comply with the requirements of Section 14(A) of Wage Order 7. Plaintiff is informed and believes,
20 and thereon alleges, that when the nature of the work of her and all other current and former aggrieved
21 California-based hourly non-exempt employees reasonably permitted the use of seats, Defendants
22 failed to provide Plaintiff and all other current and former aggrieved California-based hourly non-
23 exempt employees with suitable seats for use during their employment.

24 13. Further, during the one (1) year preceding the filing of notice with LWDA, Defendants
25 did not comply with the requirements of Section 14(B) of Wage Order 7. Plaintiff is informed and
26 believes, and thereon alleges, that when she and all other current and former aggrieved California-
27 based hourly non-exempt employees were not engaged in the active duties of their employment and
28 the nature of the work required standing, Defendants failed to place an adequate number of suitable

1 seats in reasonable proximity to the work area and further failed to permit Plaintiff and all other
2 current and former aggrieved California-based hourly non-exempt employees to use such seats when
3 it did not interfere with the performance of their duties.

4 14. Defendants' violations of Wage Order 7 constituted a violations of Labor Code Section
5 1198, which prohibits employment under conditions of labor that violate the Industrial Welfare
6 Commission ("IWC") Wage Orders.

7 15. Labor Code sections 2699, subdivisions (a) and (g) authorize an aggrieved employee,
8 on behalf of oneself and all other current or former employees, to bring a civil action to recover civil
9 penalties against all Defendants pursuant to the procedures specified in Labor Code section 2699.3.

10 16. Plaintiff has complied with the procedures for bringing suit specified in Labor Code
11 section 2699.3. On May 19, 2020, Plaintiff filed notice with LWDA and provided notice to
12 Defendants by certified mail which provided notice of the specific provision of the Labor Code
13 alleged to have been violated, including the facts and theories to support the alleged violations. A true
14 and correct copy of Plaintiff's notice to LWDA and to Defendants is hereto attached as **Exhibit 1**.

15 17. Pursuant to Labor Code section 2699.3, LWDA must give written notice by certified
16 mail to the parties that it intends to investigate the alleged violations of the Labor Code within sixty-
17 five (65) days of the date of the aggrieved employee or representative's written notice and/or the
18 employer may attempt to cure for certain violations. The LWDA failed to provide the parties notice
19 within sixty-five (65) days of the date of Plaintiff's notice that it intended to investigate Plaintiff's
20 claims and/or Defendants failed to cure any of the alleged violations which could have been cured.

21 18. Pursuant to Labor Code sections 2699(a) and (f), Plaintiff seeks civil penalties for
22 Defendants' violations of Labor Code 1198, for the one (1) year prior to the mailing of the LWDA
23 notice, in the following amounts:

24 a. For violations of Labor Code section 1198; one hundred dollars (\$100) for each
25 employee per pay period for the initial violation and two hundred dollars (\$200) for each employee
26 per pay period for each subsequent violation. Said penalty amounts are established by Labor Code
27 section 2699(f)(2).

28 ///

19. Pursuant to Labor Code section 2699(g), Plaintiff is entitled to an award of reasonable attorneys' fees and costs in connection with her claims for civil penalties.

PRAYER FOR RELIEF

WHEREFORE, PLAINTIFF ON BEHALF OF HERSELF AND ALL OTHER
CURRENT AND FORMER AGGRIEVED CALIFORNIA-BASED HOURLY NON-EXEMPT
EMPLOYEES OF DEFENDANTS, PRAYS AS FOLLOWS:

ON THE FIRST CAUSE OF ACTION:

1. That the Defendants be found to have violated the provisions of the Labor Code and the IWC Wages Orders as to the Plaintiff and all other current and former aggrieved California-based hourly non-exempt employees;

2. For any and all legally applicable penalties during the relevant statute of limitations subject to any permissible tolling including, but not limited to, those recoverable under California Labor Code section 1198;

3. For attorneys' fees and costs of suit, including but not limited to those recoverable under California Labor Code section 2699(g); and,

4. For any other further relief, in law and/or equity, as the Court deems just or appropriate.

Dated: July 24, 2020

Respectfully submitted,

LAVI & EBRAHIMIAN, LLP

By: CONTINUOUS

Joseph Lavi, Esq.

Vincent C. Granberry, Esq.

Courtney M. Miller, Esq.

Attorneys for Plaintiff CARLA AGUILAR on
behalf of herself and all other current and
former aggrieved California-based hourly non-
exempt employees

DEMAND FOR JURY TRIAL

PLAINTIFF CARLA AGUILAR demands a trial by jury for herself and all other current and former aggrieved California-based hourly non-exempt employees of Defendants on all claims so triable.

Dated: July 24, 2020

Respectfully submitted,

LAVI & EBRAHIMIAN, LLP

By:



Joseph Lavi, Esq.

Vincent C. Granberry, Esq.

Courtney M. Miller, Esq.

Attorneys for Plaintiff CARLA AGUILAR on behalf of herself and all other current and former aggrieved California-based hourly non-exempt employees

EXHIBIT 1

LAW OFFICES OF
LAVI & EBRAHIMIAN, LLP
8889 W. OLYMPIC BLVD., SUITE 200
BEVERLY HILLS, CALIFORNIA 90211
TELEPHONE: (310) 432-0000
FACSIMILE: (310) 432-0001
WWW.LELAWFIRM.COM

May 19, 2020

**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

Department of Industrial Relations
Accounting Unit
455 Golden Gate Avenue, 10th Floor
San Francisco, California 94102
\$75 PAGA Payment sent via:

Certified Mail Number: 7019 0700 0002 2123 3447

B & V Enterprises, Inc. d/b/a Super King Markets
c/o Chris Safarian, Agent for Service of Process
791 S. Mission Road
Los Angeles, California 90023

Certified Mail Number: 7019 0700 0002 2123 3454

From: Carla Aguilar, on behalf of herself and other aggrieved California-based non-exempt employees of B & V Enterprises, Inc. d/b/a Super King Markets

c/o Joseph Lavi, Esq.

Vincent C. Granberry, Esq.

Anwar D. Burton, Esq.

LAVI & EBRAHIMIAN, LLP

8889 West Olympic Boulevard, Suite 200

Beverly Hills, California 90211

Dear Madam/Sir:

I am writing this letter to the Labor and Workforce Development Agency ("LWDA") pursuant to the provisions of the California Labor Code Sections 2699 and 2699.3 ("PAGA"). The purpose of this letter is to inquire whether the LWDA intends to investigate and seek civil penalties associated with my client's allegations of violations of the Labor Code by her former employer.

Specifically, my firm has been retained by aggrieved employee Ms. Carla Aguilar ("Employee") concerning a representative PAGA action against her employer, B & V Enterprises, Inc. d/b/a Super King Markets ("Employer"). Employee is currently employed by Employer as an hourly non-exempt employee. Employer is a grocery store who operates throughout the state of California. Employer's contact information may be found above. The following is the summary of Employee's allegations against Employer:

FACTUAL STATEMENT AND THEORIES OF LABOR CODE VIOLATIONS

1. Failure to Provide Suitable Seats

First, employee maintains, during the one-year period preceding this letter, that Employer failed to provide her and other aggrieved California-based non-exempt employees with suitable seats as required by Industrial Welfare Commission ("IWC") Wage Order No. 7, codified at California Code of Regulations title 8, sections 11070 and California Labor Code section 1198. Specifically, California Labor Code section 1198 provides that the standard conditions of labor fixed by the commission [IWC] shall be the standard conditions of labor for employees in the state of California. Pursuant to Wage Order No. 7, Employers are employers of Employee and other aggrieved California-based non-exempt employees who performed other duties that reasonably permitted the use of seats within the meaning of the applicable Wage Order No. 7 and applicable California Labor Code sections. Section 14(A) of Wage Orders 7 provides, "All working employees shall be provided with suitable seats when the nature of the work reasonably permits the use of seats." Section 14(b) of Wage Order 7 further provides, "[w]hen employees are not engaged in the active duties of their employment and the nature of the work requires standing, an adequate number of suitable seats shall be placed in reasonable proximity to the work area and employees shall be permitted to use such seats when it does not interfere with the performance of their duties."

In this case, Employee maintains that Employers failed to comply with the requirements of Section 14(A) of Wage Order 7 by failing to provide suitable seating to her and other California-based, hourly, non-exempt employees who performed duties that reasonably permitted the use of seats despite that the nature of their work reasonably permitted the use of seats. Employee further maintains that Employers failed to comply with the requirements of Section 14(B) of Wage Orders 7 by failing to provide suitable seating to her and other California-based, hourly, non-exempt employees when they were not engaged in the active duties of their employment and the nature of the work required standing, Employers failed to provide an adequate number of suitable seats placed in reasonable proximity to the work area and further failed to permit Employee and other California-based, hourly, non-exempt employees to use such seats when it did not interfere with the performance of their duties.

Based on these violations, Employee will seek civil penalties pursuant to Labor Code section 2699(a) for herself and other California-based, hourly, non-exempt employees who worked for Employers and who performed other duties that reasonably permitted the use of seats and/or who performed duties that required standing, but were not provided suitable seats within a reasonable proximity of their work areas for Employer's violation of Wage Order 7 and California

Labor Code section 1198, on behalf of the LWDA against Employer if authorized to file a representative action on behalf of the State of California.

2. Civil Penalties Associated with Employers' Other Potential Violations of the Labor Code

Pursuant to *Huff v. Securitas Security Services USA, Inc.* (2018) 25 Cal.App.5th 745 ("Huff"), as an aggrieved employee, Employee has standing to, and intends to, on behalf of the LWDA, pursue civil penalties against Employers for any and all other violations Labor Code violations committed by Employers. In *Huff*, the California Court of Appeals held that an employee alleging a single violation of the California Labor Code under the PAGA may also bring PAGA claims against the employer for all other alleged Labor Code violations, even those suffered by other employees of the same employer. According to the *Huff* decision, Employee, as an "aggrieved" employee affected by at least one Labor Code violation may, and hereby does, pursue penalties on behalf of the LWDA for unrelated Labor Code violations by Employers.

CONCLUSION

My client intends to file a representative action pursuant PAGA concerning her claims as warranted by Employer's violations of California Labor Code section 1198 and the IWC Wage Orders. This letter is being sent to you as an inquiry into whether the LWDA wishes to investigate my client's allegations for any civil penalties associated with the Employer's alleged violations of the Labor Code. Thank you for your assistance and cooperation in his matter. Please contact me at the above-listed information.

Very truly yours,
LAVI & EBRAHIMIAN, LLP


Vincent C. Granberry, Esq.

7019 0700 0002 2123 3447

U.S. Postal Service™ CERTIFIED MAIL® RECEIPT Domestic Mail Only	
For delivery information, visit our website at www.usps.com ®.	
OFFICIAL USE	
Certified Mail Fee	
\$	
Extra Services & Fees (check box, add fee as appropriate)	
☐ Return Receipt (hardcopy)	\$
☐ Return Receipt (electronic)	\$
☐ Certified Mail Restricted Delivery	\$
☐ Adult Signature Required	\$
☐ Adult Signature Restricted Delivery	\$
Postage	
\$	
Total	
\$	
Sent	
Street	
City	
PS Form	

Postmark Here

Department of Industrial Relations
Accounting Unit
455 Golden Gate Avenue, 10th Floor
San Francisco, California 94102

SEE REVERSE FOR INSTRUCTIONS

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY																
☒ Complete items 1, 2, and 3. ☒ Print your name and address on the reverse so that we can return the card to you. ☒ Attach this card to the back of the mailpiece, or on the front if space permits. 1. Article Addressed to: Department of Industrial Relations Accounting Unit 455 Golden Gate Avenue, 10th Floor San Francisco, California 94102  9590 9402 5541 9249 4035 09 2. Article Number (Transfer from service label) 7019 0700 0002 2123 3447	A. Signature X ☐ Agent ☐ Addressee B. Received by (Printed Name) C. Date of Delivery D. Is delivery address different from item 1? ☐ Yes If YES, enter delivery address below: ☐ No 3. Service Type <table border="0"> <tr> <td>☐ Adult Signature</td> <td>☐ Priority Mail Express®</td> </tr> <tr> <td>☐ Adult Signature Restricted Delivery</td> <td>☐ Registered Mail™</td> </tr> <tr> <td>☒ Certified Mail®</td> <td>☐ Registered Mail Restricted Delivery</td> </tr> <tr> <td>☐ Certified Mail Restricted Delivery</td> <td>☒ Return Receipt for Merchandise</td> </tr> <tr> <td>☐ Collect on Delivery</td> <td>☐ Signature Confirmation™</td> </tr> <tr> <td>☐ Collect on Delivery Restricted Delivery</td> <td>☐ Signature Confirmation Restricted Delivery</td> </tr> <tr> <td>☐ Insured Mail</td> <td></td> </tr> <tr> <td>☐ Mail Restricted Delivery (00)</td> <td></td> </tr> </table>	☐ Adult Signature	☐ Priority Mail Express®	☐ Adult Signature Restricted Delivery	☐ Registered Mail™	☒ Certified Mail®	☐ Registered Mail Restricted Delivery	☐ Certified Mail Restricted Delivery	☒ Return Receipt for Merchandise	☐ Collect on Delivery	☐ Signature Confirmation™	☐ Collect on Delivery Restricted Delivery	☐ Signature Confirmation Restricted Delivery	☐ Insured Mail		☐ Mail Restricted Delivery (00)	
☐ Adult Signature	☐ Priority Mail Express®																
☐ Adult Signature Restricted Delivery	☐ Registered Mail™																
☒ Certified Mail®	☐ Registered Mail Restricted Delivery																
☐ Certified Mail Restricted Delivery	☒ Return Receipt for Merchandise																
☐ Collect on Delivery	☐ Signature Confirmation™																
☐ Collect on Delivery Restricted Delivery	☐ Signature Confirmation Restricted Delivery																
☐ Insured Mail																	
☐ Mail Restricted Delivery (00)																	

PS Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return Receipt

USPS TRACKING #



9590 9402 5541 9249 4035 09

 First-Class Mail
 Postage & Fees Paid
 USPS
 Permit No. G-10

 United States
 Postal Service

• Sender: Please print your name, address, and ZIP+4® in this box®

 Lavi & Ebrahimian, LLP
 8889 W. Olympic Blvd, Suite 200
 Beverly Hills, CA 90211

VG/YP

Aguilar v. Super King / Paga Letter

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

 Department of Industrial Relations
 Accounting Unit
 455 Golden Gate Avenue, 10th Floor
 San Francisco, California 94102


9590 9402 5541 9249 4035 09

2. Article Number (Transfer from service label)

7019 0700 0002 2123 3447

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

 D. Is delivery address different from item 1? ☐ Yes
 If YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☒ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail

- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ☒ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

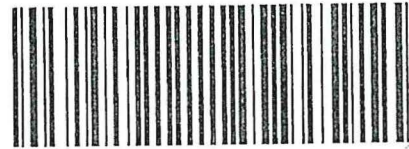
Mail Restricted Delivery
00)

PS Form 3811, July 2015 PSN 7530-02-000-9053

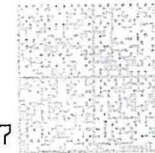
Domestic Return Receipt

LAW OFFICES OF
LAVI & EBRAHIMIAN, LLP
8889 W. OLYMPIC BLVD., SUITE 200
BEVERLY HILLS, CALIFORNIA 90211

CERTIFIED MAIL



7019 0700 0002 2123 3447



PRIMEY BOWES ***
US POSTAGE
02 1P \$ 007.05⁰
0001217907 MAY 19 2020
MAILED FROM ZIP CODE 90211

Department of Industrial Relations
Accounting Unit
455 Golden Gate Avenue, 10th Floor
San Francisco, California 94102

USPS TRACKING#



9590 9402 5541 9249 4035 16

 First-Class Mail
 Postage & Fees Paid
 USPS
 Permit No. G-10

 United States
 Postal Service

• Sender: Please print your name, address, and ZIP+4® in this box•

 Lavi & Ebrahimiyan, LLP
 8889 W. Olympic Blvd, Suite 200
 Beverly Hills, CA 90211

VG/YR

Aguilar v. Super King / Paga letter

SENDER COMPLETE THIS SECTION

- ☒ Complete items 1, 2, and 3.
- ☒ Print your name and address on the reverse so that we can return the card to you.
- ☒ Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

 B & V Enterprises, Inc. d/b/a Super King Markets
 c/o Chris Safarian, Agent for Service of Process
 791 S. Mission Road
 Los Angeles, California 90023


9590 9402 5541 9249 4035 16

2. Article Number (Transfer from service label)

7019 0700 0002 2123 3454

lected Delivery

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

- D. Is delivery address different from item 1? ☐ Yes
 If YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☒ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ☒ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return Receipt

LAW OFFICES OF
LAVI & EBRAHIMIAN, LLP
8889 W. OLYMPIC BLVD., SUITE 200
BEVERLY HILLS, CALIFORNIA 90211

CERTIFIED MAIL



7019 0700 0002 2123 3454



02 1P
0001217807 MAY 19 2020
MAILED FROM ZIP CODE 90211
US POSTAGE
\$ 007.05⁰

B & V Enterprises, Inc. d/b/a Super King Markets
c/o Chris Safarian, Agent for Service of Process
791 S. Mission Road
Los Angeles, California 90023

Courtney Miller

From: noreply@salesforce.com on behalf of LWDA DO NOT REPLY
<lwdadonotreply@dir.ca.gov>
Sent: Tuesday, May 19, 2020 5:24 PM
To: Vincent Granberry
Subject: Thank you for submission of your PAGA Case.

5/19/2020

LWDA Case No. LWDA-CM-787271-20
Law Firm : Lavi & Ebrahimian, LLP
Plaintiff Name : Carla Aguilar
Employer: B & V Enterprises, Inc. d/b/a Super King Markets

Item submitted: Initial PAGA Notice

Thank you for your submission to the Labor and Workforce Development Agency. Please make a note of the LWDA Case No. above as you may need this number for future reference when filing any subsequent documents for this Case.

If you have questions or concerns regarding this submission or your case, please send an email to pagainfo@dir.ca.gov.

DIR PAGA Unit on behalf of
Labor and Workforce Development Agency

Website: https://url.emailprotection.link/?bWbanY_9554At1NI-HmBW8Q9ebD4RoG2o-CxYjT2zYgMm52ybnhmR1PqXo25bOpfHcNC4pvgwRbLRfWi6K3gtDjkwztz0mZb7C7MB2OWVYg6bwQUd1eU4qsn-TJ0nIYxH