

Assigned for all purposes to: Stanley Mosk Courthouse, Judicial Officer: Barbara Meiers

Larry W. Lee (State Bar No. 228175)
Kristen M. Agnew (State Bar No. 247656)
Nicholas Rosenthal (State Bar No. 268297)
DIVERSITY LAW GROUP, P.C.
515 S. Figueroa Street, Suite 1250
Los Angeles, CA 90071
(213) 488-6555
(213) 488-6554 facsimile

Attorneys for Plaintiff and Aggrieved Employees

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

JAMEEL GEORGE, as an individual and
on behalf of all others similarly situated,

Plaintiff,

vs.

TELEDYNE DEFENSE
ELECTRONICS, LLC; a Limited
Liability Company and DOES 1 through
50, inclusive,

Defendants.

Case No.: **20STCV26198**

**REPRESENTATIVE ACTION COMPLAINT
FOR:**

**(1) VIOLATION OF CAL. LABOR CODE §
2698, *ET SEQ.*;**

DEMAND OVER \$25,000.00

1 Plaintiff Jameel George (“Plaintiff”) hereby submits this Representative Action
2 Complaint (“Complaint”) against Defendant Teledyne Defense Electronics, LLC (“Defendant”)
3 and Does 1 through 50 (hereinafter collectively referred to as “Defendants”) on behalf of himself
4 and the aggrieved current and former employees of Defendants for penalties under the Private
5 Attorneys General Act of 2004 (the “PAGA”), codified at California Labor Code section 2698, *et*
6 *seq.* for violations of Labor Code section 226(a), as follows:

7 **INTRODUCTION**

8 1. This representative action is within the Court’s jurisdiction under California
9 Labor Code sections 226 and 2698 *et seq.*

10 2. This Complaint challenges systemic illegal employment practices resulting in
11 violations of the California Labor Code against individuals who worked for Defendants.

12 3. Plaintiff is informed and believes, and based thereon alleges, that Defendants,
13 jointly and severally, have acted intentionally and with deliberate indifference and conscious
14 disregard to the rights of all employees in Defendants; failure to provide accurate itemized wage
15 statements.

16 4. Plaintiff is informed and believes, and based thereon alleges, that Defendants
17 have engaged in, among other things a system of willful violations of the California Labor Code,
18 by creating and maintaining policies, practices and customs that knowingly deny employees the
19 above stated rights and benefits.

20 **JURISDICTION AND VENUE**

21 5. The Court has jurisdiction over the violations of California Labor Code sections
22 226 and 2698 *et seq.*

23 6. Venue is proper in Los Angeles County because Defendant maintains operations
24 in Los Angeles County, and Plaintiff was employed by Defendant in Los Angeles County.

25 **PARTIES**

26 7. Plaintiff worked for Defendant from in or around June 2017 to on or about April
27 11, 2020. Throughout his employment, Plaintiff was an hourly non-exempt employee.

28 8. Plaintiff is informed and believes, and based thereon alleges, that at all times

1 herein mentioned Teledyne Defense Electronics, LLC was licensed to do business and actually
2 doing business in the State of California. As such, and based upon all the facts and circumstances
3 incident to Defendant's business, Defendant is subject to California Labor Code sections 226 and
4 2698 *et seq.*

5 9. Plaintiff does not know the true names or capacities, whether individual, partner
6 or corporate, of the defendants sued herein as Does 1 through 50, inclusive, and for that reason,
7 said defendants are sued under such fictitious names, and Plaintiff prays for leave to amend this
8 complaint when the true names and capacities are known. Plaintiff is informed and believes and
9 based thereon alleges that each of said fictitious defendants was responsible in some way for the
10 matters alleged herein and proximately caused Plaintiff and members of the general public and
11 class to be subject to the illegal employment practices, wrongs and injuries complained of herein.

12 10. At all times herein mentioned, each of said defendants participated in the doing of
13 the acts hereinafter alleged to have been done by the named Defendant; and furthermore, the
14 Defendants, and each of them, were the agents, servants and employees of each of the other
15 Defendants, as well as the agents of all Defendants, and at all times herein mentioned, were
16 acting within the course and scope of said agency and employment.

17 11. Plaintiff is informed and believes, and based thereon alleges, that at all times
18 material hereto, each of the Defendants named herein was the agent, employee, alter ego and/or
19 joint venturer of, or working in concert with each of the other co-Defendants and was acting
20 within the course and scope of such agency, employment, joint venture, or concerted activity. To
21 the extent said acts, conduct, and omissions were perpetrated by certain Defendants, each of the
22 remaining Defendants confirmed and ratified said acts, conduct, and omissions of the acting
23 Defendants.

24 12. At all times herein mentioned, Defendants, and each of them, were members of,
25 and engaged in, a joint venture, partnership and common enterprise, and acting within the course
26 and scope of, and in pursuance of, said joint venture, partnership and common enterprise.

27 13. At all times herein mentioned, the acts and omissions of various Defendants, and
28 each of them, concurred and contributed to the various acts and omissions of each and all of the

1 other Defendants in proximately causing the injuries and damages as herein alleged. At all times
2 herein mentioned, Defendants, and each of them, ratified each and every act or omission
3 complained of herein. At all times herein mentioned, Defendants, and each of them, aided and
4 abetted the acts and omissions of each and all of the other Defendants in proximately causing the
5 damages as herein alleged.

6 **FIRST CAUSE OF ACTION**

7 **VIOLATION OF LABOR CODE § 2698, *ET SEQ.***

8 **(BY PLAINTIFF, ON BEHALF OF THE STATE AND THE AGGRIEVED**
9 **EMPLOYEES, AGAINST ALL DEFENDANTS)**

10 14. Plaintiff re-alleges and incorporates by reference paragraphs 1 through 13 as
11 though fully set forth herein.

12 15. Plaintiff brings this cause of action as a proxy for the State of California and in
13 this capacity, seeks penalties on behalf of all Aggrieved Employees from May 8, 2019, through
14 the present, for Defendant's violations of Labor Code section and 226(a).

15 16. The final wage statements issued by Defendant to Plaintiff and other former
16 employees do not identify all applicable hourly rates, in violation of Labor Code section
17 226(a)(9). Whenever overtime wages were paid in the final pay period, the corresponding wage
18 statements omit the applicable hourly rate used to calculate the overtime wages. Additionally, the
19 final wage statements issued by Defendant to Plaintiff and other former employees also fail to
20 identify the correct inclusive dates of the pay period, in violation of Labor Code section
21 226(a)(6).

22 17. On or about May 8, 2020, Plaintiff sent written notice to the California Labor &
23 Workforce Development Agency ("LWDA") of Defendant's violations of Labor Code section
24 226(a), pursuant to the PAGA. To date, the LWDA has not responded to Plaintiff's written
25 notice.

26 18. As such, pursuant to Labor Code section 2699(a), Plaintiff seeks recovery of any
27 and all applicable civil penalties for Defendant's violation of Labor Code section 226(a), for the
28 time period described above, on behalf of himself and other Aggrieved Employees.

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1. Upon the First Cause of Action, for civil penalties according to proof pursuant to Labor Code section 2698, *et seq.*, and for costs and attorneys' fees; and
2. For such other and further relief the Court may deem just and proper.

DIVERSITY LAW GROUP, P.C.

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