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California Labor & Workforce Development Agency
801 K. Street, Suite 2101
Sacramento, CA 95814

Re: Labor Code Sec. 2699 Notice
Karen Reinhard v. Ross Dress for Less, Inc.

Pursuant to Labor Code Sec. 2699.3(a)(1), Karen Reinhard ("Claimant") hereby gives written notice of Claimant's intent to file a Labor Code Sec. 2699 ("PAGA") representative action on behalf of Claimant and other current and former employees to recover civil penalties for violations of the California Labor Code against Claimant's former employer Ross Dress for Less, Inc. ("Respondent").

Claimant worked for Respondent as a Cashier from in or about 2017 to on or about November 1, 2018.

Claimant is [REDACTED]

On or about November 1, 2018, Claimant was [REDACTED]

[REDACTED]

Further, due to the anxiety and panic attacks that Claimant suffered later that night from the incident, Claimant felt forced to immediately resign. Moreover, since that time, Claimant has been unable to work and has been seeing a psychologist and has been taking an anti-depressant and insomnia medications to cope with the stress.

Last, although Claimant could have performed her job functions seated, she was never provided any suitable seating.

For said conduct, Claimant seeks damages for the following violations, including but not limited to:

1. Failure to Provide Suitable Seating
2. Hostile Work Environment
3. Racial Harassment and Discrimination
4. Failure to Take Reasonable Steps to Prevent Harassment, Discrimination and Retaliation
5. Wrongful Constructive Termination
6. Unfair Business Practices

The specific provisions of the Labor Code that Respondent has violated, include, but are not limited to, Labor Code §§ 98.6, 200, 201-203, 204, 206, 210, 226, 226.3, 226.7, 232.5, 510, 512, 558, 1102.5, and 1194, and 3700.5(a). Respondent has violated the foregoing Labor Code provisions, as well as other California laws, although Claimant reserves the right to limit the above violations alleged upon further investigation. Respondent is also liable for all applicable premiums and penalties, interest, attorneys' fees and costs. We look forward to receiving your response to this letter pursuant to Labor Code Sec. 2699.3(a)(2)(A). Thank you and please do not hesitate to call with any questions.

Sincerely,

LAW OFFICE OF EDWARD ANTONINO



Edward Antonino, Esq.

cc: **Certified Mail**
Ross Dress for Less, Inc.
5130 Hacienda Dr.
Dublin, CA 94568