

MARTIN MORENO

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August 3, 2020

VIA ONLINE FILING

California Labor & Workforce Development Agency
Attn: PAGA Administrator
1515 Clay Street, Suite 801
Oakland, CA 94612

Re: Moreno v. Medline Industries, Inc.

To Whom It May Concern:

This correspondence shall constitute as my written notice under Labor Code § 2699.3 of claims against my former employer, Medline Industries, Inc. ("Defendant" or "the Company"). Specifically, I allege as follows:

1. The Company violated Labor Code § 226 by failing to provide accurate and complete wage statements to myself and other similarly situated aggrieved employees. Specifically, the Company failed to list the accurate total hours worked for wage statements furnished to me and/or other similarly aggrieved non-exempt employees whenever shift differential wages were paid. In particular, whenever shift differential wages were paid, the wage statements issued by the Company did not identify the accurate total hours worked. Similarly, when the hours shown on the wage statements are added up, they do not appear to add up to the actual total hours worked. Therefore, the Company violated Labor Code § 226 as to me and all other similarly aggrieved employees as it failed to identify the correct total hours worked.

The address for Defendant is as follows:

Medline Industries, Inc.
Three Lakes Drive
Northfield, IL 60093

Please contact my attorney Larry W. Lee at the above address/phone number if you have any questions regarding this matter.

Sincerely,

DocuSigned by:

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Martin Moreno

Cc: Medline Industries, Inc. (via certified mail)