

October 8, 2020

Via Certified Mail

The Gathering Inn
c/o Keith E Diederich
Agent for Service of Process
201 Berkeley Avenue
Roseville, California 95678

In re Kym Lawrence, et al. - Notice of PAGA Claim

Dear Mr. Diederich:

This office has been retained by Kym Lawrence, AJ Rodriguez, and Feso Malufau, (hereinafter “Plaintiffs”), former employees of The Gathering Inn. Pursuant to Labor Code § 2699.3(a), we are providing written notice that The Gathering Inn violated various provisions of the California Labor Code. Plaintiffs intend on filing a complaint against The Gathering Inn in Placer County Superior Court pursuant to Labor Code § 2699 et. seq. on behalf of themselves and all hourly employees for The Gathering Inn (“Aggrieved Employees”).

During the entirety of their employment with The Gathering Inn, Plaintiffs and Aggrieved Employees were denied overtime pay at an overtime rate for their overtime hours worked. In addition, Plaintiffs and Aggrieved Employees were denied the ability to take their meal breaks and rest breaks on a regular basis. Plaintiffs and Aggrieved Employees are entitled to reimbursements for employment related expenses. As a result, Plaintiff and Aggrieved Employees were not provided with accurate wage statements.

Accordingly, The Gathering Inn is in violation of the following provisions under California Labor Code § 2699.5: Labor Code § 2802 (Reimbursements), Labor Code §§ 226.7 and 512 (Meal and Rest Periods), Labor Code §§ 510-515 (Unpaid Overtime), Labor Code § 226 (Wage Statement Accuracy), and Labor Code §§ 201-204 (Waiting Time Penalties). Please be advised Plaintiff intends to enforce these claims against all owners, directors, officers, and managing agents of The Gathering Inn under section 558.1 of the Labor Code. Finally, pursuant to Labor Code § 2699.3(a)(1), Plaintiff will serve the same written notice to The Gathering Inn by and through its respective agents of service of process by certified mail.

Very truly yours,



Ronald L. Zambrano, Esq.

CC: California Labor and Workforce
Development Agency