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Attorneys for Plaintiff and the Proposed Class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF KERN**

DANIEL STEPHENSON, an individual, on
behalf of himself and others similarly situated

PLAINTIFF,

v.

BAKERSFIELD DODGE, INC.; and DOES 1
thru 50, inclusive,

DEFENDANTS.

CASE NO. BCV-20-102693

**FIRST AMENDED CLASS AND
REPRESENTATIVE ACTION
COMPLAINT**

1. Violation of Labor Code § 226(a)
2. Penalties Pursuant to Labor Code § 2699,
et seq.

1 Plaintiff DANIEL STEPHENSON, an individual, on behalf of himself, all others similarly
2 situated, and on behalf of the people of the State of California and as an “aggrieved employee”
3 under the Labor Code Private Attorneys General Act of 2004, §2699, et seq. (hereafter “PAGA”),
4 complains of Defendant BAKERSFIELD DODGE, INC. (“Defendant”) and each of them, as
5 follows:

6 **I.**

7 **INTRODUCTION**

8 1. This is a Class Action, pursuant to Code of Civil Procedure § 382, on behalf of
9 Plaintiff and a Proposed Class defined as:

10 All persons who are employed or have been employed as an hourly
11 employee by BAKERSFIELD DODGE, INC., in the State of
12 California since one (1) year prior to the filing of this action to the
present. (“Proposed Class”)

13 2. For at least one (1) year prior to the filing of this action and continuing to the
14 present, Defendant has failed to comply with Industrial Welfare Commission (“IWC”) Wage Order
15 7-2001 and Labor Code § 226(a) by failing to provide accurate itemized wage statements that show
16 total hours worked by the employee and all applicable hourly rates in effect during the pay period
17 and the corresponding number of hours worked at each hourly rate by the employee.

18 3. Plaintiff, on behalf of himself and all Proposed Class members bring this action
19 pursuant to Labor Code §226(a); Wage Order 7-2001; and California Code of Regulations, Title
20 8, Section 11070, seeking penalties and reasonable attorneys’ fees and costs.

21 4. For at least one (1) year prior to the date of the letter sent to the Labor and
22 Workforce Development Agency (“LWDA”) and Defendant giving notice of the claims pursuant
23 to PAGA and continuing to the present, Defendant has violated Labor Code 226(a) giving rise to a
24 claim pursuant to PAGA.

25 5. Plaintiff, on behalf of himself and all aggrieved employees presently or formerly
26 employed by Defendant during the liability period as defined in his PAGA notice letter (see Exhibit
27 “A”), bring this representative action pursuant to Labor Code §2699, et seq. seeking penalties for
28 Defendant’s failure to provide accurate itemized wage statements.

1 **II.**

2 **JURISDICTION AND VENUE**

3 6. This Court has subject matter jurisdiction over all causes of action asserted herein
4 pursuant to Article VI, § 10 of the California Constitution and California Code of Civil Procedure
5 § 410.10 by virtue of the fact that this is a civil action in which the matter in controversy, exclusive
6 of interest, exceeds \$25,000, and because each cause of action asserted arises under the laws of the
7 State of California or is subject to adjudication in the courts of the State of California.

8 7. This Court has personal jurisdiction over Defendant because Defendant has caused
9 injuries in the County of and the State of California through their acts, and by their violation of
10 the California Labor Code, California state common law, and California Business & Professions
11 Code § 17200, *et seq.*

12 8. Venue as to each Defendant is proper in this judicial district, pursuant to Code of
13 Civil Procedure § 395. Defendant operates within California and does business within Kern
14 County. The unlawful acts alleged herein have a direct effect on Plaintiff and all Proposed Class
15 members within the State of California and the county of Kern.

16 9. This case should be classified as complex according to Rule 3.400 of the California
17 Rules of Court, and assigned to a complex litigation judge and department, as it will involve
18 substantial documentary evidence, a large number of witnesses, and is likely to involve extensive
19 motion practice raising difficult or novel issues that will be time-consuming to resolve and would
20 require substantial post judgment judicial supervision.

21 **III.**

22 **PARTIES**

23 **A. PLAINTIFF**

24 10. Plaintiff DANIEL STEPHENSON is a resident of California.

25 11. Plaintiff and all Proposed Class members, were regularly required to:

26 a. Work without being provided accurate itemized wage statements that show
27 total hours worked by the employee and all applicable hourly rates in effect during the pay period
28 and the corresponding number of hours worked at each hourly rate by the employee.

1 12. Plaintiff and all current and former employees are aggrieved employees within the
2 meaning of Labor Code §2699, *et seq.* (see Labor Code §2699(c).)

3 **B. DEFENDANTS**

4 13. Defendant BAKERSFIELD DODGE, INC. is believed to be a California
5 corporation operating within the State of California. Defendant's corporate address is believed to
6 be 3000 Harris Rd, Bakersfield, CA 93313. Upon information and belief, Defendant employed
7 Plaintiff and similarly situated persons as hourly employees within California. Defendant has done
8 and does business throughout the State of California.

9 14. The true names and capacities, whether individual, corporate, associate, or
10 otherwise, of Defendants sued herein as DOES 1 to 50, inclusive, are currently unknown to
11 Plaintiff, who therefore sues Defendants by such fictitious names under Code of Civil Procedure
12 § 474. Plaintiff is informed and believes, and based thereon alleges, that each of the Defendants
13 designated herein as a DOE is legally responsible in some manner for the unlawful acts referred
14 to herein. Plaintiff will seek leave of court to amend this Complaint to reflect the true names and
15 capacities of the Defendants designated hereinafter as DOES when such identities become known.

16 15. Plaintiff is informed and believes, and based thereon alleges, that each Defendant
17 acted in all respects pertinent to this action as the agent of the other Defendants, carried out a joint
18 scheme, business plan or policy in all respects pertinent hereto, and the acts of each Defendant are
19 legally attributable to the other Defendants. Furthermore, Defendants in all respects acted as the
20 employer and/or joint employer of Plaintiff and the Proposed Class members.

21 16. Furthermore, Defendants acted in all respects as the employers or joint employers
22 of the Proposed Class. Defendants, and each of them, exercised control over the wages, hours or
23 working conditions of the Proposed Class, or suffered or permitted the Proposed Class to work, or
24 engaged, thereby creating a common law employment relationship, with the Proposed Class.
25 Therefore, Defendants, and each of them, employed or jointly employed the Proposed Class.

26 17. As a result of the acts alleged herein, Defendant violated Labor Code §2699, *et seq.*

27 ///

1 **IV.**

2 **FACTUAL BACKGROUND**

3 18. Plaintiff and the Proposed Class are, and at all times pertinent hereto, have been
4 classified as non-exempt employees by Defendant. Defendant hires employees who work as
5 hourly employees who are paid on an hourly basis.

6 19. Upon information and belief, Plaintiff and the Proposed Class are covered by
7 California Industrial Welfare Commission Occupational Wage Order No. 7-2001 (Title 8 Cal.
8 Code of Regs. § 11070).

9 20. Defendant has failed to comply with Industrial Welfare Commission (“IWC”)
10 Wage Order 7-2001(7) and Labor Code § 226(a) by failing to provide accurate itemized wage
11 statements that show total hours worked by the employee and all applicable hourly rates in effect
12 during the pay period and the corresponding number of hours worked at each hourly rate by the
13 employee.

14 **V.**

15 **CLASS ACTION ALLEGATIONS**

16 21. Plaintiff brings this action on behalf of himself and all others similarly situated as
17 a Class Action pursuant to § 382 of the Code of Civil Procedure. Plaintiff seeks to represent a
18 proposed class composed of and defined as follows:

19 All persons who are employed or have been employed as an hourly
20 employee by BAKERSFIELD DODGE, INC., in the State of
21 California since one (1) year prior to the filing of this action to the
22 present. (“Proposed Class”)

23 22. Plaintiff reserves the right under Rule 3.765(b) of the California Rules of Court to
24 amend or modify the class description with greater specificity, by division into subclasses, or by
25 limitation to particular issues.

26 23. This action has been brought and may properly be maintained as a class action
27 under the provisions of § 382 of the Code of Civil Procedure because there is a well-defined
28 community of interest in the litigation and the Proposed Class is easily ascertainable.

///

1 **A. NUMEROSITY**

2 24. The potential members of the Proposed Class as defined are so numerous that
3 joinder of all the members of the Proposed Class is impracticable. While the precise number of
4 Proposed Class members has not been determined at this time, Plaintiff is informed and believes
5 that Defendant currently employ, and during the relevant time periods employed over 50 members
6 of the Proposed Class.

7 25. Plaintiff alleges that Defendant's employment records would provide information
8 as to the number and location of all Proposed Class members. Joinder of all members of the
9 Proposed Class is not practicable.

10 **B. COMMONALITY**

11 26. There are questions of law and fact common to the Proposed Class that predominate
12 over any questions affecting only individual Proposed Class members. These common questions
13 of law and fact include, without limitation:

14 a. ;

15 b. Whether Defendants violated Labor Code § 226(a) and Wage Order 7-2001
16 or other applicable IWC Wage Orders, and Cal. Code Regs., Title 8, Section 11070 by failing to
17 provide accurate itemized wage statements that show total hours worked by the employee and all
18 applicable hourly rates in effect during the pay period and the corresponding number of hours
19 worked at each hourly rate by the employee;

20 c. Whether Defendant violated § 2699, *et seq.* by engaging in the acts
21 previously alleged; and

22 **C. TYPICALITY**

23 27. The claims of Plaintiff are typical of the claims of the Proposed Class. Plaintiff and
24 all members of the Proposed Class sustained injuries and damages arising out of and caused by
25 Defendant's common course of conduct in violation of laws, regulations that have the force and
26 effect of law, and statutes as alleged herein.

27 28. Whether Defendant violated Labor Code §2699, *et seq.* by engaging in the acts
28 alleged herein.

1 **D. ADEQUACY OF REPRESENTATION**

2 29. Plaintiff will fairly and adequately represent and protect the interests of the
3 members of the Proposed Class.

4 30. Counsel who represent Plaintiff and the Proposed Class are competent and
5 experienced in litigating large employment class actions.

6 **E. SUPERIORITY OF CLASS ACTION**

7 31. A class action is superior to other available means for the fair and efficient
8 adjudication of this controversy. Individual joinder of all Proposed Class members is not
9 practicable, and questions of law and fact common to the Proposed Class predominate over any
10 questions affecting only individual members of the Proposed Class. Each member of the Proposed
11 Class has been damaged and is entitled to recovery by reason of Defendant's illegal policy and/or
12 practice of failing to provide accurate itemized wage statements.

13 32. Class action treatment will allow those similarly situated persons to litigate their
14 claims in the manner that is most efficient and economical for the parties and the judicial system.
15 Plaintiff is unaware of any difficulties that are likely to be encountered in the management of this
16 action that would preclude its maintenance as a class action.

17 **VI.**

18 **FIRST CAUSE OF ACTION**

19 **PLAINTIFF ON BEHALF OF HIMSELF AND THE PROPOSED CLASS**

20 **VIOLATION OF LABOR CODE § 226(A)**

21 33. Plaintiff, on behalf of himself and the Proposed Class, realleges and incorporates
22 by reference all previous paragraphs.

23 34. California Labor Code § 226(a) requires employers to issue employees an accurate
24 itemized wage statement in writing showing total hours worked by the employee, and all applicable
25 hourly rates in effect during the pay period and the corresponding number of hours worked at each
26 hourly rate by the employee. (Labor Code §§ 226(a)(2) and (9) respectively.)

27 35. Defendant has failed to provide Plaintiff and Proposed Class Members accurate
28 itemized wage statements in writing that show total hours worked by the employee, and all

1 applicable hourly rates in effect during the pay period and the corresponding number of hours
2 worked at each hourly rate by the employee.

3 36. IWC Wage Orders 7-2001(7), 7-2000(7), 7-1998(7) require defendants to
4 accurately report total hours worked by Plaintiff and the members of the Proposed Class.

5 37. Defendant failed to provide accurate itemized wage statements in writing that show
6 total hours worked by the employee.

7 38. Defendant failed to provide accurate itemized wage statements in writing that show
8 all applicable hourly rates in effect during the pay period and the corresponding number of hours
9 worked at each hourly rate by the employee.

10 39. Defendant's failure to provide accurate itemized wages statements according to
11 Labor Code § 226(a) was all done on a regular and consistent basis.

12 40. An employee suffering injury as a result of a knowing and intentional failure by an
13 employer to comply with Labor Code § 226(a) is entitled to recover the greater of all actual
14 damages or fifty dollars (\$50) for the initial pay period in which a violation occurs and one hundred
15 dollars (\$100) per employee for each violation in a subsequent pay period, not exceeding an
16 aggregate penalty of four thousand dollars (\$4,000), and is entitled to an award of costs and
17 reasonable attorneys' fees.

18 **VII.**

19 **SECOND CAUSE OF ACTION**

20 **PENALTIES PURSUANT TO LABOR CODE §2699, ET SEQ.**

21 41. Plaintiff, on behalf of himself and the aggrieved employees, reallege and
22 incorporate by reference all previous paragraphs.

23 42. As a result of the acts alleged above and specifically incorporated herein, Plaintiff
24 seeks penalties under Labor Code § 2699, *et seq.* because of Defendant's violation of Labor Code
25 §226(a) which calls for civil penalties.

26 43. For each such penalty, Plaintiff and aggrieved employees are entitled to penalties
27 in an amount to be shown at trial, subject to the following formula:

28 a. \$100 for the initial violation per employee per pay period.

b. \$200 for each subsequent violation per employee per pay period.

44. These penalties shall be allocated seventy-five percent (75%) to the LWDA and twenty-five percent (25%) to the affected employees.

45. Pursuant to Labor Code § 2699.3(a)(1), Plaintiff uploaded a notice letter to the LWDA¹ and mailed a letter by certified mail to Defendant Bakersfield Dodge, Inc.'s entity address, which is 3000 Harris Rd Bakersfield, CA 93313, as proscribed by the Code on November 18, 2020, describing Defendant's conduct in violation of Labor Code §226(a). (See Exhibit "A".)

46. Plaintiff also obtained an e-filing confirmation from the LWDA confirming receipt of the notice (see Exhibit "B") and a signed certified green return receipt from Defendant on November 25, 2020 establishing that it also received Plaintiff's notice. (see Exhibit "C".)

47. As no letter evidencing the LWDA's intention to investigate was received by Plaintiff's Counsel within sixty-five (65) calendar days, Plaintiff is entitled to commence a civil action as though the LWDA had not chosen to investigate pursuant to Labor Code §2699.3(a)(2)(A). Plaintiff will also provide the LWDA with a filed-stamped copy of the First Amended Class and Representative Action Complaint immediately.

RELIEF REQUESTED

WHEREFORE, Plaintiff prays for the following relief:

1. For penalties pursuant to Labor Code § 226(e) for violation of Labor Code § 226(a) in the amount of fifty dollars (\$50) for the initial pay period in which a violation occurs and one hundred dollars (\$100) per employee for each violation in a subsequent pay period, not exceeding an aggregate penalty of four thousand dollars (\$4,000);

2. For penalties under Labor Code §2699, *et seq.* for Defendant's violation of Labor Code §§ 201, 202, 203, 226(a), 510, 1194, 1199, and IWC 7-2001.

3. An award providing for payment of costs of suit;

4. An award of attorneys' fees; and

5. Such other and further relief as this Court may deem proper and just.

¹ Plaintiff electronically filed a PAGA Claim Notice to the LWDA, via the State of California Labor and Workforce Development Agency / Department of Industrial Relations website (<https://dir.tfaforms.net/295>).

DEMAND FOR JURY TRIAL

Plaintiff hereby demands a trial of his claims by jury to the extent authorized by law.

DATED: February 18, 2021

KINGSLEY & KINGSLEY, APC

By: 

Kelsey M. Szamet

Attorneys for Plaintiff Daniel Stephenson and the
Proposed Class

EXHIBIT "A"



November 18, 2020

LABOR & WORKFORCE DEVELOPMENT AGENCY
Attn. PAGA Administrator
1515 Clay Street, Ste. 801
Oakland, CA 94612

BAKERSFIELD DODGE, INC.
3000 Harris Rd
Bakersfield, CA 93313

Re: DANIEL STEPHENSON v. BAKERSFIELD DODGE, INC.
California Labor Code § 2699 Penalties

Gentlepersons:

This office represents DANIEL STEPHENSON (“Plaintiff”) and a proposed group of current and former employees working for BAKERSFIELD DODGE, INC. (“Defendant”) in the State of California. The purpose of this letter is to comply with the Private Attorneys General Act of 2004, pursuant to California Labor Code § 2698, *et. seq.* We herein set forth the facts and theories of California Labor Code violations which we allege Defendant engaged in with respect to Plaintiff and all of Defendant’s aggrieved employees.

Plaintiff wishes to bring a representative action on behalf of himself and the State of California as well as on behalf of a group of aggrieved employees defined as: All persons who are employed or have been employed as an hourly employee by BAKERSFIELD DODGE, INC., in the State of California who worked one or more pay periods since one (1) year prior to the date of this letter and continuing to the present. (“aggrieved employees”).

Defendant has violated Labor Code §§ 510, 1194, and 1199. These statutes require an employer to compensate its employees at the minimum wage rate for all hours worked and at a rate of no less than one and one-half times the regular rate of pay for any work in excess of eight (8) hours in one workday and any work in excess of forty (40) hours in any one workweek.

Defendant has had a consistent policy of failing to pay wages and overtime to Plaintiff and all aggrieved employees at the appropriate rate of pay for all hours worked. Plaintiff and other aggrieved employees were not properly compensated for all hours at the appropriate regular rate of pay or at the appropriate overtime rate for all hours worked over eight (8) hours in one day or forty (40) hours in one week.

Labor Code §226(a)(2) requires that every employer shall semimonthly or at the time of each payment of wages, furnish each of his or her employees, an accurate itemized statement in writing that show total hours worked by the employee. Labor Code §226(a)(9) requires that every employer shall semimonthly or at the time of each payment of wages, furnish each of his or her

LABOR & WORKFORCE DEVELOPMENT AGENCY

California Labor Code §2699 Penalties

November 18, 2020

Page 2 of 2

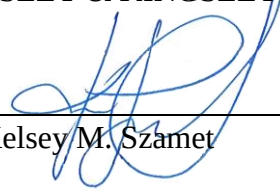
employees, an accurate itemized statement in writing that show all applicable hourly rates in effect during the pay period and the corresponding number of hours worked at each hourly rate by the employee. Plaintiff and the aggrieved employees are issued wage statements that do not accurately show total hours worked by the employee or all applicable hourly rates in effect during the pay period and the corresponding number of hours worked at each hourly rate by the employee. As such, Plaintiff is an aggrieved employee within the meaning PAGA, and Defendant has violated Labor Code §226(a) with respect to Plaintiff and all aggrieved employees.

Labor Code § 203 provides that if “an employer willfully fails to pay...any wages of an employee who is discharged or who quits, the wages of the employee shall continue as a penalty from the due date thereof at the same rate until paid or until an action therefor is commenced; but the wages shall not continue for more than 30 days.” Here, Plaintiff and all aggrieved employees were not paid all wages due upon their separation from Defendant’s employ. As such, Plaintiff is an aggrieved employee and Defendant failed to pay Plaintiff and all aggrieved employees all wages due at the time of termination or within seventy-two (72) hours of their resignation, and have failed to pay those sums for thirty (30) days thereafter in violation of Labor Code §203.

We are constrained to move forward with the filing of this complaint alleging causes of action pursuant to Labor Code §§ 201, 202, 203, 226(a), 510, 1194, and 1199. Thus, any action by the LWDA would not resolve the entirety of the case, and the interest of judicial economy will be served by allowing the case to proceed as a cohesive whole.

Very truly yours,

KINGSLEY & KINGSLEY, APC

By: 

Kelsey M. Szamet

KMS/jl

- Cc:
1. LWDA Letter filed via Electronic Submission: <https://dir.tfaforms.net/295>
 2. BAKERSFIELD DODGE, INC. via USPS Certified Mail #7018 1130 0001 5815 0782

EXHIBIT "B"



State of California

Labor and Workforce Development Agency /
Department of Industrial Relations

Private Attorneys General Act (PAGA) – Filing

New PAGA Claim Notice

Your Information (Person Who is Filing)

Your First Name *

Kelsey

Your Last Name *

Szamet



Firm Name (if any) *

Kingsley & Kingsley

(Enter "in pro per" if you are representing yourself)

Your Email Address *

service@kingsleykingsley.

Your Street Name, Number and Suite/Apt *

16133 Ventura Blvd., Suite

Your Mobile Phone Number

8189908300

Your City *

Encino

Your Work Phone Number

Your State *

California



Your Zip/Postal Code *

91436

Plaintiff Information

Plaintiff/Aggrieved Employee Name *

Daniel Stephenson

Plaintiff/Aggrieved Employee Occupation *

Hourly Employee

[Add Additional Plaintiffs](#)

Employer Information

Employer Entity Type

Corporation



Employer Name *

BAKERSFIELD DODGE, INC.

Maximum 80 Character Limit

Employer Street Name, Number and Suite/Apt

Employer City

Employer State



Employer Zip/Postal Code

Employer Industry *

**Add additional defendants**

- ☐ Add any entity other than an individual
- ☐ Add an individual/sole proprietor employer

Notice General Information

Estimated Number of Employees Impacted by Violations *

Notice Violations – Check All that Apply *

- ☐ Child Labor
- ☐ Misclassification Employee Classified as Contractor
- ☐ Misclassification NonExempt Classified as Exempt
- ☐ Minimum Wage
- ☒ Overtime
- ☒ Not paid for all hours worked
- ☒ Not paid wages due on termination
- ☐ Other Unpaid Wages
- ☐ Tips or Gratuities
- ☐ Payment or Reimbursement of Employee Expenses
- ☐ Improper Form of Payment Including NSF Checks
- ☐ Kickbacks
- ☐ Meal and Rest Breaks
- ☐ Sick Leave
- ☐ Lactation Accommodation (Labor Code 1030–1033)
- ☐ Not providing required time off, other
- ☐ Pay Discrimination on basis of sex, (Labor Code 1197.5)
- ☐ No Wage Statements
- ☒ Improper or Incomplete Wage Statements
- ☐ Other Notice or Posting or Recordkeeping
- ☐ Public Works (Labor Code 1720 – 1815)
- ☐ Apprenticeship (Labor Code 3070 – 3098)
- ☐ Occupational Safety and Health (Labor Code 6300 et seq)
- ☐ No Workers' Compensation
- ☐ Licensing, Registration, or Permit
- ☐ Unfair Immigration Activities
- ☐ Agricultural Labor Relations
- ☐ Industrial Homework
- ☐ Retaliation for Protected Status or Activity (Specify)
- ☐ Other

Child Labor – Specify Ages

PAGA Claim Type – Check All that Apply *

- ☒ Notice asserts one or more Labor Code violations listed in Labor Code 2699.5– not curable subject to 2699.3(a)
- ☐ Notice asserts one or more OSHA violations subject to requirements of 2699.3(b)
- ☐ Includes one or more violations not listed in Labor Code 2699.5 – curable subject to 2699.3(c)

Filing Fee

A filing fee of \$75 is required to file a new PAGA claim notice.

IFP

☐ I wish to claim In Forma Pauperis and am attaching a Confidential Request to Waive Court Fees (Judicial Council Court Form FW-001) or similar form to this submission.

Billing information

Billing First Name *

Eric

Billing Last Name *

Kingsley

Billing Email *

service@kingsleykingsley.

Billing Phone

8189908300

Billing Street Name, Number and Suite/Apt *

16133 Ventura Blvd., Suite 1200

Billing City *

Encino

Billing State *

California

Billing Zip/Postal Code *

91436

Credit Card Type *

[REDACTED]

Credit Card Number *

[REDACTED]

CVV Number *

[REDACTED]

Credit Card Expiration Month *

[REDACTED]
mm

Credit Card Expiration Year *

[REDACTED]
yyyy

Notice and Other Attachments

PAGA Claim Notice (must be a .pdf) *

Choose File

PAGA Letter- ...DGE, INC..pdf

Other Attachment - (if any) (must be a .pdf)

Choose File

No file chosen

[Add Another Attachment](#)

Should you have questions regarding this online form, please contact PAGAInfo@dir.ca.gov

IMPORTANT NOTICE OF REDACTION RESPONSIBILITY: All filers must redact: Social Security or taxpayer identification numbers; dates of birth; names of minor children; & financial account numbers. This requirement applies to all documents, including attachments.

☒ I understand that, if I file, I must comply with the redaction rules consistent with this notice.

Submit

Thank you!

From: noreply@salesforce.com on behalf of [LWDA DO NOT REPLY](#)
To: [Service Email](#)
Subject: Thank you for submission of your PAGA Case.
Date: Wednesday, November 18, 2020 12:55:44 PM

11/18/2020

LWDA Case No. LWDA-CM-812951-20
Law Firm : Kingsley & Kingsley
Plaintiff Name : Daniel Stephenson
Employer: BAKERSFIELD DODGE, INC.
Filing Fee : \$75.00
IFP Claimed : No

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: http://labor.ca.gov/Private_Attorneys_General_Act.htm

EXHIBIT "C"

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:

BAKERSFIELD DODGE, INC.
3000 Harris Rd
Bakersfield, CA 93313



9590 9402 6094 0125 0614 73

2. Article Number (Transfer from service label)

7016 1130 0001 5815 0782

COMPLETE THIS SECTION ON DELIVERY

A. Signature

x RE RT1305 ☒ Agent ☐ Address

B. Received by (Printed Name)

M. Wilson

C. Date of Delivery

4/1/25

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
- ☐ Insured Mail Restricted Delivery (over \$500)

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

USPS TRACKING#



SANTA CLARITA CA 913

25 NOV 2020PM 6 L

9590 9402 6094 0125 0614 73

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•

KINGSLEY & KINGSLEY

A PROFESSIONAL CORPORATION

CITY NATIONAL BANK BUILDING

6133 VENTURA BOULEVARD, SUITE 1200

ENCINO, CALIFORNIA 91436

3A LETTER
KERSFIELD DODGE, INC.

