

NARENDER GUPTA

c/o DIVERSITY LAW GROUP, P.C.
515 S. FIGUEROA STREET, SUITE 1250
LOS ANGELES, CALIFORNIA 90071
TELEPHONE (213) 488-6555
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February 22, 2022

VIA ONLINE FILING

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

Re: *Gupta v. Wal-Mart Associates, Inc.*

To Whom It May Concern:

This correspondence shall constitute written notice under Labor Code section 2699.3 of my claims against my former employer, Wal-Mart Associates, Inc. (the "Company"). Specifically, I allege that the Company:

1. Violated Labor Code §§ 201-204, 510, 558, 1194, 1197, 1197.1 by not paying wages, including minimum, regular, and overtime wages, to me and other similarly situated aggrieved employees for all time spent undergoing COVID screenings without the payment of wages. The Company violated these provisions by requiring me and other non-exempt employees to undergo daily temperature checks and answer COVID questionnaires before being allowed to clock in, without the payment of any wages for such time. Further as a result of such violations, the Company violated Labor Code §§ 201-203 by not paying employees all of their wages upon separation of employment due to the underpaid wages and Labor Code § 226(a) as the net/gross wages earned, applicable rates of pay and hours worked shown on the wage statements were inaccurate due to the wage violations set forth above.

2. Violated Labor Code § 2802 as it failed to reimburse for the costs I and other aggrieved employees incurred for work related expenses as we were required to use our personal cell phones for work related purposes. Specifically, we are required to use our personal cell phones and download a Walmart app which we were required to use in order to assist customers. However, we were not reimbursed for any such costs related to the usage of our personal cell phones for work related purposes.

The address for the Company is:

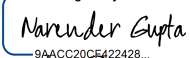
Wal-Mart Associates, Inc.
702 S.W. 8th St.
Bentonville, Arkansas 72716

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

Sincerely,

DocuSigned by:

9AACC20CE422428
Narender Gupta

cc: Wal-Mart Associates, Inc. (by certified mail)