



August 13, 2021

Via Certified Mail

DMS FACILITY SERVICES, LLC
c/o Richard E. Dotts
Agent of Service of Process
1040 Arroyo Drive
South Pasadena, CA 91030

DMS FACILITY SERVICES, INC.
c/o Richard E. Dotts
Agent of Service of Process
1040 Arroyo Drive
South Pasadena, CA 91030

In re Vidal Soriano- Notice of PAGA Claim

To whom it may concern:

This office has been retained by, Vidal Soriano (hereinafter "Plaintiff"), a former employee of DMS Facility Services LLC and DMS Facility Services Inc., (collectively "DMS"). Pursuant to Labor Code § 2699.3(a), we are providing written notice that DMS Facility Services LLC and DMS Facility Services Inc., violated various provisions of the California Labor Code. Plaintiff intends on filing a complaint against DMS Facility Services LLC and DMS Facility Services Inc., in Los Angeles County Superior Court pursuant to Labor Code § 2699 et. seq. on behalf of himself and all hourly employees for DMS Facility Services LLC and DMS Facility Services Inc., ("Aggrieved Employees").

During the entirety of their employment with DMS Facility Services LLC and DMS Facility Services Inc, Plaintiff and Aggrieved Employees were denied the ability to take meal and rest breaks. Additionally, Plaintiff and Aggrieved Employees were denied overtime pay at an overtime rate for their overtime hours worked. Furthermore, DMS Facility Services LLC and DMS Facility Services Inc failed to maintain accurate time records for Plaintiff and Aggrieved Employees. As a result, Plaintiff and Aggrieved Employees were provided with inaccurate wage statements.

Accordingly, DMS Facility Services LLC and DMS Facility Services Inc are in violation of the following provisions under California Labor Code § 2699.5: § 226.7 and 512 (Meal and Rest Periods), Labor Code § 510-515 (Unpaid Overtime), - Labor Code § 201-204 (Waiting Time Penalties), and Labor Code § 226 § 226.3 (Inaccurate Wage Statements). Please be advised Plaintiff intends to enforce these claims against all owners, directors, officers, and managing agents of DMS Facility Services LLC and DMS Facility Services Inc under section 558.1 of the Labor Code. Finally, pursuant to Labor Code § 2699.3(a)(1), Plaintiff will serve the same written

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notice to that DMS Facility Services LLC and DMS Facility Services Inc by and through its respective agents of service of process by certified mail.

Very truly yours,

A handwritten signature in black ink, appearing to read 'nj', is positioned above the name Nick Yasman.

Nick Yasman, Esq.

CC: California Labor and Workforce
Development Agency