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STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE

Assigned for All Purposes

Judge Glenn Salter

MAYLO BARNUEVO, NELSON BASILIO,)
ERIC ADRIAN ESTRELLA, ERIC BRIAN)
ESTRELLA, ALI KHATATBA, PATRICK)
SANTIAGO LIM, KAREN SAMPSON)

Plaintiffs,

vs.

PRIME HEALTHCARE LA PALMA, LLC;
DOES 1-100

Defendants

CASE NO. 30-2021-01223132-CU-OE-NJC

COMPLAINT FOR DAMAGES, DEMAND
FOR JURY TRIAL ON ALL CAUSES OF
ACTION OTHER THAN 10TH FOR WHICH
THE RELIEF IS EQUITABLE

1. CALIFORNIA MINIMUM WAGE
VIOLATIONS

2. CALIFORNIA OVERTIME/DOUBLE TIME
VIOLATIONS

3. DAMAGES & RELIEF UNDER
CALIFORNIA CONTROLLED
STANDBY LAW AND/OR REPORTING
TIME LAW

4. COMMON COUNTS FOR REASONABLE
VALUE OF SERVICES

5. CALIFORNIA LABOR CODE SECTION 226

6. LABOR CODE SECTION 2802

7. CALIFORNIA LABOR CODE SECTION
558 PENALTIES

8. MEAL BREAK VIOLATIONS

9. REST BREAK VIOLATIONS

10. B&P 17200 VIOLATIONS

1 PLAINTIFFS complain and allege as follows:
2

3 GENERAL ALLEGATIONS

4 (Against All Named Defendants)
5

6 1. Plaintiff, MAYLO BARNUEVO, is a resident of the State of California at all times
7 herein mentioned.

8 1.1. Plaintiff, NELSON BASILIO is a resident of the State of California at all times herein
9 mentioned.

10 2. Plaintiff, ERIC ADRIAN ESTRELLA, is a resident of the State of California at all times
11 herein mentioned.

12 3. Plaintiff, ERIC BRIAN ESTRELLA, is a resident of the State of California at all times
13 herein mentioned.

14 4. Plaintiff, ALI KHATATBA, is a resident of the State of California at all times herein
15 mentioned.

16 5. Plaintiff, PATRICK SANTIAGO LIM, is a resident of the State of California at all times
17 herein mentioned.

18 6. Plaintiff, KAREN SAMPSON , is a resident of the State of California at all times herein
19 mentioned.

20 7. At all times herein mentioned, Defendant, PRIME HEALTHCARE LA PALMA, LLC
21 has been a corporation only doing business in California and employing people in California. In
22 doing so they sent Plaintiffs to hospitals in Orange County, California located at 7901 Walker Street
23 in La Palma, California 90623, 3033 West Orange Avenue in Anaheim, California 92804, 12601
24 Garden Grove Boulevard in Garden Grove, California, and 17772 Beach Boulevard in Huntington
25 Beach, California.

26 8. Plaintiffs are ignorant of the true names and capacities, whether individual, corporate,
27 or associate, of those defendants fictitiously sued as DOES 1 through 100 inclusive and so the
28 Plaintiffs sue them by these fictitious names. Upon discovering the true names and capacities of

1 these fictitiously named Defendants, the Plaintiffs will amend this complaint to show the true names
2 and capacities of these fictitiously named defendants.

3 9. Plaintiffs are nonexempt nurses who have worked for Defendant since 2017 or 2018.

4 10. Plaintiffs were required to be on call from 7 PM to 7 AM on a rotating basis. They were
5 paid a sub-minimum wage for this period when they were not at the hospital. They were required
6 to answer their phones immediately when called into work, and then report in immediately. Their
7 services were needed to begin dialysis on hospital patients within 2 hours of the call for them to
8 come into work. Given how long it would take to contact doctors concerning the orders, and prepare
9 the dialysis machines rushing out of their homes upon getting the calls was required in order to
10 make it into the hospitals Defendant sent Plaintiffs to within 2 hours.

11 11. Plaintiffs were dispatched to several hospitals per shift, per day, and not paid mileage
12 for that. Sometimes when at the hospital they had to carry a phone and be the nurse in charge for
13 the day meaning they were not completely relieved in order to take meal or rest breaks.

14
15 FIRST CAUSE OF ACTION

16 FOR MINIMUM WAGE VIOLATIONS

17 (AGAINST ALL NAMED DEFENDANTS AND ALL DOE DEFENDANTS)
18

19 12. Plaintiffs reallege the information set forth in Paragraphs 1-11 and incorporates those
20 paragraphs as though fully stated in this cause of action.

21 13. Plaintiffs were paid a sub-minimum wage such as \$6.00 per hour for being on restricted
22 on-call/standby. They were required to answer their phones immediately when called and report into
23 work immediately so that dialysis could begin within a two hour period of time when it took a long
24 time to set up the dialysis machines, speak to doctors concerning the orders, and prepare the
25 patients. In addition, they made calls and answered their phones when on-call and were not paid
26 anything for that, including, but not limited to, half their normal hours for a shift, 4 hours, or 6
27 hours. They were only paid for the time they were actually in the hospital. Due to the restricted
28 nature of Plaintiffs' lives and their time on call primarily benefitting Defendant when not being

1 paid, California Labor Code Section 1194 was violated by not paying Plaintiffs minimum wage to
2 wait and be available for the calls, or engage in workplace/patient conversations while not on the
3 clock.

4 14. The Plaintiffs also pray for minimum wage to the extent they were clocked out and
5 worked through meal breaks and then were not paid anything for that time.

6 15. Plaintiffs pray for relief under California Labor Code Sections 1194 and 1194.2
7 including liquidated damages to pay Plaintiffs minimum wage for all hours on call and worked,
8 attorney fees, and costs. Plaintiffs also pray for California Labor Code Section 1197.1 civil penalties
9 of \$250.00 per pay period when not paid minimum wage for each hour worked. Plaintiffs also pray
10 for injunctive relief that \$6.00 per hour is not a legal minimum wage, it does not create a valid
11 contract to work for that wage, and they are not in fact compensated when they are paid that wage.
12

13 SECOND CAUSE OF ACTION

14 FOR OVERTIME & DOUBLE TIME VIOLATIONS

15 (AGAINST ALL NAMED DEFENDANTS AND ALL DOE DEFENDANTS)
16

17 16. Plaintiffs reallege the information set forth in Paragraphs 1-11, Paragraphs 12-15 of the
18 First Cause of Action, and incorporate those paragraphs as though fully stated in this cause of
19 action.

20 17. Based upon the number of hours Plaintiffs worked in a day and/or were waiting to be
21 called to work which primarily benefitted Defendant, Plaintiffs are entitled to overtime and double
22 time for many of the hours Plaintiffs were on restricted on-call waiting to be called for work.
23 Moreover, being on call caused the hours Plaintiffs were paid for as part of a regular, non-overtime
24 shift, to be overtime and double time hours. Plaintiffs also should be paid overtime and/or double
25 time because they worked through meal breaks they were clocked out for and that time would create
26 overtime and double time. Overtime and double time violations also occurred due to improper
27 payment of overtime and double time under an alternative work week that violates Wage Order 5.
28 Accordingly California Labor Code Sections 1194 requires the Plaintiff to receive overtime and

1 double time, and so does California Labor Code Section 510.

2 18. Plaintiffs pray for relief under California Labor Code Section 1194 including unpaid
3 overtime, double time, attorney fees, and costs.

4
5 THIRD CAUSE OF ACTION
6 VIOLATION OF CALIFORNIA CONTROLLED STANDBY/AND OR REPORTING TIME
7 LAW
8 (AGAINST ALL NAMED DEFENDANTS AND ALL DOE DEFENDANTS)
9

10 19. Plaintiffs reallege the information set forth in Paragraphs 1-11, Paragraphs 12-15 of the
11 First Cause of Action, Paragraphs 16-18 of the Second Cause of Action, and incorporate those
12 paragraphs as though fully stated in this cause of action.

13 20. California law recognizes the concept of controlled standby being compensable pay. The
14 2002 Division of Labor Standards Enforcement Policies and Interpretations Manual Section 46.6.3
15 and Wage Order 5 defines¹ time spent as hours in which employees must merely wait for something
16 to happen, and specifies these hours constitute hours worked. Section 47.5.1. of the manual
17 indicates on-call time must be paid at least at minimum wage unless there is an agreement to pay
18 another rate which does not fall below minimum wage. A number of California cases including
19 Seymore v. Melton, 194 Cal.App.4th 361 (2011), Mendiola v. CPS Security, 60 Cal.4th 833 (2015),
20 and Ward v. Tilly's, 31 Cal.App.5th 1167, 1182 (2019) essentially adopt these positions in the
21 Enforcement Manual and the authorities cited above in this paragraph. Other California bases of
22 authority for on call time being compensable include Title VIII of the California Code of
23 Regulations Section 11150(2)(K), and California law recognizes the concept of controlled standby
24 being compensable pay.

25
26 _____
27 ¹ (2)(K) of Wage order 5 states, "Hours worked" means the time during which an employee
28 is subject to the control of an employer, and includes all the time the employee is suffered or
permitted to work, whether or not required to do so

21. In the alternative, or in addition, if allowed, Plaintiffs contends they are entitled to Reporting Time Pay which means the employee reports to work and is not put to work. California Code of Regulations Title VIII Section 11150(5) requires reporting time pay to be paid of at least 4 hours per work day or half their regularly scheduled hours for reporting in when on-call which includes time spent answering the phone, communicating with Defendant and doctors. Plaintiffs were not paid a valid, legal minimum wage when they were on-call. Plaintiffs contend 4 hours of pay is not the measure because their work days were not merely eight hours a day but twelve or more. Plaintiffs pray for relief under these reporting time pay theories including penalties under Section 20 of 11150 which are \$50 for the first violation and \$100 for each subsequent violation.

22. Under this Cause of Action Plaintiffs pray for all relief available under the authorities pled in this Cause of Action in order to compensate Plaintiffs for what California recognizes as controlled standby and/or reporting time pay at their regular hourly rates and/or at least minimum wage and relevant overtime, double time..This includes, but is not limited to, attorney fees and costs under California Labor Code Section 218.5, interest under 218.6, and attorney fees and costs under California Labor Code Section 1194.

FOURTH CAUSE OF ACTION

COMMON COUNT FOR WORK AND LABOR PERFORMED (QUANTUM MERUIT)
(AGAINST ALL NAMED DEFENDANTS AND DOE DEFENDANTS)

23. Plaintiffs reallege the information set forth in Paragraphs 1-11, Paragraphs 12-15 of the First Cause of Action, Paragraphs 16-18 of the Second Cause of Action, Paragraphs 19-22 of the Third Cause of Action, and incorporate those paragraphs as though fully stated in this cause of action.

24. Plaintiffs were not fully paid for all of their efforts at Defendant. These efforts include having to make themselves available for work, and a cell phone call to work on a moments notice, when on-call. The manner in which Plaintiffs had to be available when on-call constitutes compensable time under the theory of controlled standby/on call. Although the Plaintiffs' lives were

severely restricted as pled earlier in this complaint, Plaintiffs were not paid any compensation for having to be available for work during their on-call rotations. This arrangement allowed Defendant to avoid paying considerable wages it would cost to have Plaintiffs waiting at the hospital ready to work for additional shifts. Defendant tied up Plaintiffs' lives not allowing them to work elsewhere, travel outside of their geography, further his education, engage in chosen activities, take a pain reliever or do something that would prevent them from driving or working, or do anything that required commitment and focus while they were just waiting for an on-call work assignment. Plaintiffs also performed hours of work on the phone they were never paid for.

25. Plaintiffs were not paid any wages at all for periods of time they were clocked out for meal breaks they did not receive, or did not get. As a result Plaintiffs were not compensated at overtime and double time rates they should have been. Nor were double time rates paid.

26. Plaintiffs pray to be compensated for the reasonable value of their services and for the work and labor Plaintiffs performed at the actual rate per hour they agreed to work and the accompanying overtime and double time rates if they applied, but Plaintiffs were not paid for every hour worked and not paid including time spent waiting to be called into work while on-call.

FIFTH CAUSE OF ACTION

FOR CALIFORNIA LABOR CODE SECTION 226 PENALTIES

(AGAINST ALL NAMED DEFENDANTS AND ALL DOE DEFENDANTS)

27. Plaintiffs reallege the information set forth in Paragraphs 1-11, Paragraphs 12-15 of the First Cause of Action, Paragraphs 16-18 of the Second Cause of Action, Paragraphs 19-22 of the Third Cause of Action, Paragraphs 23-26 of the Fourth Cause of Action, and incorporate those paragraphs as though fully stated in this cause of action.

28. Defendant violated California Labor Code Section 226 by failing to indicate the correct number of hours Plaintiffs worked on each paystub because restricted on-call and standby pay was not enumerated in terms of hours worked or hourly rate, nor were times not paid when Plaintiffs picked up a call when at home. The hours worked were wrong due to off-the-clock work. The rates

1 of pay were all wrong. The number of hours reported were wrong for straight time, overtime, and
2 double time. None of the computations included time spent waiting to be called into work or time
3 spent on the phone before coming into the hospital. The paystubs also falsely claimed fewer hours
4 worked than Plaintiffs did do to being clocked out for meal breaks while Plaintiffs worked.

5 29. Plaintiffs pray for statutory California Labor Code Section 226(e) damages of \$50.00
6 for the first violation and \$100.00 for each subsequent violation.

7 30. Plaintiffs pray for injunctive relief under California Labor Code Section 226(h) as well
8 as attorney fees and costs in doing so.

9 31. Plaintiffs pray for attorney fees and costs under California Labor Code Section 218.5
10 and interest under 218.6.

11
12 SIXTH CAUSE OF ACTION
13 FOR CALIFORNIA LABOR CODE SECTION 2802 VIOLATIONS
14 (AGAINST ALL NAMED DEFENDANTS AND ALL DOE DEFENDANTS)
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16 32. Plaintiffs reallege the information set forth in Paragraphs 1-11, Paragraphs 12-15 of the
17 First Cause of Action, Paragraphs 16-18 of the Second Cause of Action, Paragraphs 19-22 of the
18 Third Cause of Action, Paragraphs 23-26 of the Fourth Cause of Action, Paragraphs 27-31 of the
19 Fifth Cause of Action, and incorporate those paragraphs as though fully stated in this cause of
20 action.

21 33. Plaintiffs used their own cellular phone for work and were not compensated for the use
22 of their phones.

23 34. Plaintiffs were not reimbursed for mileage after their first commutes in for the day.
24 Often, in a work day they would start at one hospital and be dispatched to a second one of the
25 hospitals enumerated in Paragraph 9. They were not reimbursed for driving between the various
26 hospitals or when called back to work when on-call after they had already reported into work one,
27 two, or even three times for the day.

28 35. Plaintiffs pray for reimbursement for cellular phone bills, cell phones, and miles driven

1 as specified in Paragraph 34, during the period of time they were employed by Defendant within
2 the statutory period of this California Labor Code Section 2802 cause of action which they contend
3 is three years from the date this lawsuit was filed.

4 36. Plaintiffs pray for attorney fees and costs under California Labor Code Section 2802c
5 for the purpose of enforcing their rights in this Cause of Action under California Labor Code
6 Section 2802.

7
8 SEVENTH CAUSE OF ACTION

9 CALIFORNIA LABOR CODE SECTION 558 PENALTIES

10 (AGAINST ALL NAMED DEFENDANTS AND ALL DOE DEFENDANTS)
11

12 37. Plaintiffs reallege the information set forth in Paragraphs 1-11, Paragraphs 12-15 of the
13 First Cause of Action, Paragraphs 16-18 of the Second Cause of Action, Paragraphs 19-22 of the
14 Third Cause of Action, Paragraphs 23-26 of the Fourth Cause of Action, Paragraphs 27-31 of the
15 Fifth Cause of Action, Paragraphs 32-36 of the Sixth Cause of Action, and incorporates those
16 paragraphs as though fully stated in this cause of action.

17 38. Plaintiffs were not paid all wages due. The under payments existed because Plaintiffs
18 were not paid for all time worked at least minimum wage, were not paid all overtime, double time,
19 and sums pled in the first three Causes of Action. Plaintiffs pray to recover all underpaid wages
20 under California Labor Code Section 558(a)(3), and all statutory penalties.

21
22 EIGHTH CAUSE OF ACTION

23 FOR MEAL BREAK VIOLATIONS

24 (AGAINST DEFENDANT AND ALL DOE DEFENDANTS)
25

26 39. Plaintiffs, reallege the information set forth in Paragraphs 1-11, Paragraphs 12-15 of the
27 First Cause of Action, Paragraphs 16-18 of the Second Cause of Action, Paragraphs 19-22 of the
28 Third Cause of Action, Paragraphs 23-26 of the Fourth Cause of Action, Paragraphs 27-31 of the

1 Fifth Cause of Action, Paragraphs 32-36 of the Sixth Cause of Action, Paragraphs 37-38 of the
2 Seventh Cause of Action, and incorporates those paragraphs as though fully stated in this cause of
3 action.

4 40. California Labor Code Section 512 specifies when employees are to get meal breaks.
5 California Labor Code Section 226.7 sets forth the penalty scheme which the Murphy Court has
6 interpreted to be a wage. California Labor Code Section 516 further allows the Industrial Welfare
7 Commission to make orders about breaks and meal periods.

8 41. Under California Labor Code Section 226.7, Plaintiffs pray for one hour of pay for each
9 uninterrupted 30 minute meal break they were prevented from taking because they were prevented
10 from taking a 30 minute uninterrupted meal breaks before their fifth hour or work, and their second
11 through fourth if they worked more than ten hour shifts, up to 24 hour shifts, Plaintiffs worked. The
12 reasons for the prevented meal breaks include, but are not limited to, Plaintiffs being assigned as
13 the charge nurse and having to carry and answer a telephone at all times they were on shift.

14
15 NINTH CAUSE OF ACTION
16 FOR REST BREAK VIOLATIONS
17 (AGAINST DEFENDANT AND ALL DOE DEFENDANTS)
18

19 42. Plaintiffs, reallege the information set forth in Paragraphs 1-11, Paragraphs 12-15 of the
20 First Cause of Action, Paragraphs 16-18 of the Second Cause of Action, Paragraphs 19-22 of the
21 Third Cause of Action, Paragraphs 23-26 of the Fourth Cause of Action, Paragraphs 27-31 of the
22 Fifth Cause of Action, Paragraphs 32-36 of the Sixth Cause of Action, Paragraphs 37-38 of the
23 Seventh Cause of Action, Paragraphs 39-41 of the Eighth Cause of Action, and incorporate those
24 paragraphs as though fully stated in this cause of action.

25 43. California Labor Code Section 516 allows the Industrial Welfare Commission to make
26 orders about rest breaks and meal periods. Title 8 of the California Code of Regulations Section
27 11050(12) requires rest breaks be given every 4 hours, for 10 minutes. Plaintiffs were prevented
28 from taking a 10 minute uninterrupted rest breaks every 4 hours. Plaintiffs allege they were

1 prevented from taking numerous rest breaks for reasons that included, but are not limited to, having
2 to answer their phones at all times when they were charge nurses.

3 44. Under California Labor Code Section 226.7, Plaintiffs pray for one hour of pay for each
4 uninterrupted 10 minute rest break they were prevented from taking.

5
6 TENTH CAUSE OF ACTION
7 FOR BUSINESS & PROFESSIONS CODE VIOLATIONS
8 (AGAINST ALL NAMED DEFENDANTS AND ALL DOE DEFENDANTS)
9

10 45. Plaintiffs, reallege the information set forth in Paragraphs 1-11, Paragraphs 12-15 of the
11 First Cause of Action, Paragraphs 16-18 of the Second Cause of Action, Paragraphs 19-22 of the
12 Third Cause of Action, Paragraphs 23-26 of the Fourth Cause of Action, Paragraphs 27-31 of the
13 Fifth Cause of Action, Paragraphs 32-36 of the Sixth Cause of Action, Paragraphs 37-38 of the
14 Seventh Cause of Action, Paragraphs 39-41 of the Eighth Cause of Action, Paragraphs 42-44 of the
15 Tenth Cause of Action, and incorporate those paragraphs as though fully stated in this cause of
16 action.

17 46. Defendant violated California Business and Professions Code Section 17200 by
18 violating the laws and statutes alleged in all causes of action other than common counts. These
19 statutes are required of California employers. By violating these statutes Defendant saved millions
20 of dollars a year in labor costs while violating the California Labor laws pled in this lawsuit. These
21 practices allowed Defendant to underbid and undercut. They were able to promise services they
22 could not render, without these labor law violations, compared to their competitors who complied
23 with California Labor laws by providing 24 hour a day coverage with multiple people opposed to
24 Defendant making their employees sit at home waiting to be called into work when not
25 compensating for that, violating reporting time pay law, and not paying for time spent conducting
26 work while not in the hospital. Defendant also failed to pay the Plaintiffs for their cell phone when
27 case law has required the reimbursement for cell phones and necessary business expenses including
28 mileage reimbursements which Defendant did not pay Plaintiffs for driving between Defendant

1 hospitals during the day or reporting into work after their first report. It was also unfair, deceptive,
2 and fraudulent not to pay Plaintiffs for all hours worked, and to fail to pay Plaintiffs overtime and
3 double time rates due under California law, minimum wage, and to require Plaintiffs to miss meal
4 and rest breaks while deducting sums from their paychecks for meal breaks not taken nor allowed.
5 Defendant paid Plaintiffs as single employees when they were getting the work of multiple
6 employees because they were on call, they did not get meal and rest breaks, worked exceptionally
7 long shifts, and did not get wages that reflected the time spent waiting to be called into work as
8 overtime, double time, regular rate wages, or minimum wage.

9 47. Plaintiffs pray that California Business and Professions Code Section 17202 be utilized
10 to enforce the labor laws specified in all causes of action and require Defendant to pay Plaintiffs
11 for all unpaid wages due.

12 48. Plaintiffs further pray that California Business and Professions Code Section 17203 be
13 utilized to enjoin Defendant from further engaging in the unlawful and unfair business practices
14 specified in this Cause of Action.

15 49. Under this Cause of Action, Plaintiffs also pray that equitable relief be given including
16 disgorgement of Defendant's profits, the payment to Plaintiffs of all money earned by Defendant
17 while violating the California Labor Code Sections specified in this lawsuit, restitutionary relief
18 and all remedies under this Claim going back four years from the filing of this lawsuit. Plaintiffs
19 further prays for equitable relief in Defendant being responsible for a judgment that pays Plaintiffs
20 for unpaid wages based upon Plaintiff's actual agreed hourly wages opposed to minimum wage and
21 then overtime and double time based upon minimum wage as well as hours of pay for each missed
22 meal break.

23 WHEREFORE, the Plaintiffs prays for a jury trial on all claims other than Ten for which
24 the court shall provide all equitable relief available including disgorgement, restitution, and
25 injunctive relief.

26 For all claims Plaintiffs pray for:

27
28 1. For all costs and disbursements incurred in this suit;

1 2. For such other and further relief as the Court deems just and proper;

2 3. For interest, including prejudgment interest, on all causes of action other than the
3 Tenth, and statutory interest where allowed based upon the Causes of Action pled;

4
5 For the First Cause of Action:

6
7 4. For all unpaid minimum wages due as well as liquidated damages under California Labor
8 Code Section 1194.2 and 1197.1 and injunctive relief;

9 5. Attorney fees and costs under California Labor Code Section 1194;

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11 For the Second Cause of Action:

12
13 6. All overtime and double time compensation due under California Labor Code Section
14 1194 as well as all overtime and double time compensation provided by California Labor Code
15 Section 510;

16 7. Attorney fees and costs under California Labor Code Section 1194;

17
18 For the Third Cause of Action:

19
20 8. For all available damages and penalties allowed for California controlled standby and/or
21 reporting time including statutory damages under the Wage Order and all statutes enumerated in
22 that cause of action;

23 9. Attorney fees and costs under California Labor Code Sections 218.5 and interest under
24 Section 218.6, and 1194;

25
26 For the Fourth Cause of Action Plaintiff prays for:

27
28 10. The reasonable value of the Plaintiff's services not compensated for;

1
2 For the Fifth Cause of Action:

3
4 11. For California Labor Code Section 226 penalties up to \$4,000;

5 12. For injunctive Relief;

6 13. For attorney fees and costs under California Labor Code Sections 226 and 218.5 as
7 well as interest under California Labor Code Section 218.6;

8
9 For the Sixth Cause of Action:

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11 14. Reimbursement for cellular phone costs and mileage reimbursement issues alleged;

12 15. Attorney fees and costs under California Labor Code Section 2802c;

13
14 For the Seventh Cause of Action:

15
16 16. Plaintiffs pray for the California Labor Code Section 558(a) penalty of \$100 for each
17 violation after the initial \$50 penalty for the initial underpayment violation.

18
19 For the Eighth and Ninth Causes of Action:

20
21 17. For one hour of pay for all missed meal and rest breaks under California Labor Code
22 Section 226.7.

23
24 For the Tenth Cause of Action:

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26 18. For all equitable relief available including injunctive relief.

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DATED: September 25, 2021

EMPLOYMENT LAWYERS GROUP

BY: 
KARL GERBER,
ATTORNEY FOR PLAINTIFFS