



865 Howe Avenue, Sacramento, CA 95825
P: 916-777-7777 | F: 916-924-1829 | justice4you.com

CLAYEO C. ARNOLD
ANTHONY M.
ONTIVEROS
JOHN T. STRALEN**
*Of Counsel
**Board-Certified Civil
Trial Advocate by
National Board of Trial
Advocacy

JOSHUA H. WATSON
GINA M. BOWDEN
LESLIE GUILLON
ANDREW MINNEY
ANTHONY J.
POIDMORE*
M. ANDERSON BERRY

PERSONAL INJURY
WRONGFUL DEATH
EMPLOYMENT LAW
PRODUCT LIABILITY
CLASS ACTION
QUI TAM

Via Certified Mail, Return Receipt Requested

US FOODS, INC.
9399 WEST HIGGINS ROAD SUITE 100
ROSEMONT, IL 60018

US FOODS, INC.
AGENT FOR SERVICE: **CSC - LAWYERS INCORPORATING SERVICE**
2710 GATEWAY OAKS DRIVE
SACRAMENTO, CA 95833

Via Electornic Submission

Labor Workforce & Development Agency
<https://www.dir.ca.gov/Private-Attorneys-General-Act/Private-Attorneys-General-Act.html>

**RE: NOTICE OF COMPLAINT FILED WITH LWDA,
DEMAND FOR EMPLOYEE RECORDS, & PRESERVATION DEMAND**

Employee: Kasey Camp

Dates of Employment: June 2023 to Present

Employer(s): U.S. Foodservice, Inc.; U.S. Foods, Inc.

Dear EMPLOYER and LWDA:

this letter serves as a complaint and notice of complaint to the California Labor Workforce & Development Agency on behalf of Kasey Camp and all similarly situated employees at the Sacramento facility for violations of the California Labor Code enforceable by the Private Attorney General's Act, Labor Code § 2699 et seq. Arnold Law Firm represents Ms. Camp, and a designation of counsel form is attached.

This letter is also a demand for production of the following three categories of employee records, which the above employer(s) must produce within 21 days of receipt of this letter or be subject to suit:

1. **Wage and Hours Documentation:** All documents reflecting wages paid to the employee and the specific hours worked.
(See Cal. Labor Code § 226(c).)
2. **Signed Documents:** All documents that were signed by the employee.
(See Cal. Labor Code § 432.)
3. **Personnel File:** The employee's complete personnel file in its entirety.
(See Cal. Labor Code § 1198.5.)

This letter further demands that the employer(s) preserve all potential evidence related to the issues raised herein. The duty to preserve extends to all business records, computer files, electronic communications, cell phone data (including messages and bills), and any other form of information—whether stored electronically or on paper—that relates to Ms. Camp’s employment or any related communications. No alterations or changes in document retention policies are permitted that might result in the destruction of such relevant information.

In general terms, our client alleges the following:

Labor Code Violation

Description of Violation

LC 226.7, 512

The employer(s) failed to provide an unpaid, uninterrupted 30-minute meal period each workday, in violation of the applicable IWC Wage Order. As a result, Ms. Camp—and all similarly situated employees at the Sacramento facility—were deprived of their legally mandated meal breaks, entitling them to one additional hour of wages at their regular rate for each workday the meal period was not provided.

LC 226 [pay check stub does not include correct:

☐ gross wages, ☐ total hours worked or number of pieces, ☐ all deductions,
☐ net wages, inclusive dates of pay period, ☐ employee name, ☐ SSN or ☐ employee ID number, ☐ name, ☐ hourly rate(s) in effect for pay, period with hours worked for each.]

The employer(s) issued wage statements that did not list the amount of wages due because the omitted meal premiums.

To the extent that any violations of the California Labor Code are curable prior to suit, the employer(s) must remedy such violations within the statutory period and furnish satisfactory proof of any cure.

Unless otherwise instructed by LWDA, we will file suit or amend any already-filed civil suit to include these PAGA allegations at the conclusion of the mandatory statutory waiting period.

Very truly yours,

/s/ Joshua H. Watson

Joshua H. Watson
Attorney at Law

AUTHORIZATION FOR LEGAL REPRESENTATION AND RELEASE OF INFORMATION

TO : USFoods and any other related persons and/or entities

RE : Client's Name : Kasey Camp
Date of Birth :
Matter :

I, the undersigned, hereby appoint Clayeo C. Arnold, A Professional Law Corporation dba Arnold Law Firm, their attorneys, employees, agents and representatives, as my legal representative for investigating certain matters.

I authorize the party, agency or entity to whom this authorization is directed to furnish to my attorney, his agents, designees or representatives, the following: any and all records in your possession pertaining me, the undersigned. These records include but are not limited to, police reports, investigative reports, and related information; personnel, employment, payroll records and related information; insurance, policy information, payments, listing of providers, and related information; academic or school records, attendance records, grades, reports and related information; including but not limited to those listed above and further specified below:

I hereby waive any privilege which would prevent you from disclosing the above-described information to my attorney, but the waiver of any privilege is hereby expressly limited to allowing you to disclose the information to my attorney only, and all other privileges are hereby expressly retained and not waived.

A copy of this authorization shall be deemed as valid as the original. This authorization shall become effective immediately and remain in effect until revoked by me in writing or for one year from date of signature.

DATED: 12 / 20 / 2024 Signed: K Camp