

Danny Yadidsion, Esq.
310-494-6082 | danny@laborlawpc.com

June 26, 2025

VIA CERTIFIED MAIL – RETURN RECEIPT REQUESTED

ONE TABLE RESTAURANT BRANDS LLC
1201 W Fifth Street Suite T-400
Los Angeles, CA 90017

RE: Bryan Garcia v. One Table Restaurant Brands LLC, et al.

To Whom It May Concern:

This office represents Bryan Garcia (“Claimant”) who was employed by One Table Restaurant Brands LLC, and related entities (“Respondents”). This letter is notice, and a request, pursuant to Labor Code § 2699.3, that your agency investigates the claims in this impending civil action. If the agency does not intend to investigate the alleged violations, we specifically request such notification to allow Claimant to file a civil action to pursue PAGA claims.

Overview of Claims and Aggrieved Employees

This action is brought on behalf of Claimant and similarly aggrieved non-exempt employees who were employed by Respondents at any of Respondents’ California locations at any point during the one-year period preceding this notice through the present. The claims involve widespread, systemic Labor Code violations including:

- Failure to pay all wages for hours worked, including off-the-clock time;
- Failure to pay overtime wages at the correct rate;
- Meal and rest break violations;
- Inaccurate wage statements;
- Waiting time penalties upon separation;
- Failure to reimburse for mandatory business use, such as personal cell phones;
- Other derivative and statutory Labor Code violations.

Claimant’s Background and Employment

Claimant worked for Respondents most recently beginning on October 22, 2024, as a Shift Leader. He regularly worked 36–40 hours/week, 6–7 days/week, and was expected to remain on duty or responsive during breaks. He frequently worked off-the-clock, including responding to work calls before clocking in and after clocking out.

Respondents failed to pay Claimant and similarly situated employees for all compensable time, including pre- and post-shift duties. Meal and rest breaks were regularly interrupted or not provided, and no premiums were paid in lieu thereof. Claimant and other technicians were required to use personal cell phones for work without reimbursement. His wage statements were inaccurate and failed to reflect off-the-clock hours or break premiums. Upon separation, he was not promptly paid all earned wages.

Detailed Labor Code Violations

1. Failure to Pay for All Hours Worked

Labor Code §§ 1194, 204, 226.2

- Claimant and similarly situated employees worked off the clock by, for example, handling calls and logistical issues before and after shifts.
- Time records did not capture all hours worked; compensation did not reflect the actual time worked.

2. Failure to Pay Overtime

Labor Code § 510

- Claimant and similarly situated employees worked over 8 hours per day and 40 hours per week.
- Overtime was not always paid or calculated using the correct regular rate.

3. Meal and Rest Break Violations

Labor Code §§ 226.7, 512

- Breaks were consistently interrupted. For example, employees were expected to carry radios and respond during breaks.
- Employees were not fully relieved of duty and were denied compliant meal and rest breaks.
- No premiums were paid in lieu of missed or interrupted breaks.

4. Inaccurate Wage Statements

Labor Code § 226(a)

- Wage statements failed to reflect all hours worked and break premiums.
- The deficiencies violate subsections (2), (5), and (9) of § 226(a).

5. Waiting Time Penalties

Labor Code §§ 201–203

- Employees did not receive all earned and unpaid wages timely.

6. Failure to Reimburse for Business Expenses

Labor Code § 2802

- Employees were required to use their personal cell phones for work communications without reimbursement.
- These business expenses were incurred for the benefit of Respondents but not compensated.

Conclusion and Request for Agency Action. The violations described herein occurred consistently at Respondents' facilities across California and affected a broad group of similarly situated employees. Claimant seeks recovery of all available PAGA civil penalties, as well as attorneys' fees and costs associated with enforcement.

Pursuant to Labor Code § 2699.3, we request that the LWDA notify us in writing if it elects not to investigate these violations so that Claimant may proceed with a representative PAGA action. If no notice is received within the statutory period, Claimant will file a civil complaint.

Very truly yours,



Danny Yadidsion