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Via Online Submission

California Labor & Workforce Development Agency
800 Capitol Mall, Suite 5000 MIC-55
Sacramento, CA 95814

Re: Labor Code Sec. 2699 Notice

Fareed Roshandell v. Wyndham Vacation Ownership, Inc

Dear Sir or Madame:

Pursuant to Labor Code § 2699.3(a)(1), Fareed Roshandell (“Mr. Roshandell”) hereby gives written notice of his intent to file a claim under Labor Code § 2699 against Wyndham Vacation Ownership, Inc. (“the Company”). Mr. Roshandell intends to bring this claim as a representative action on behalf of himself and all similarly situated employees in the State of California. This notice is being provided to the California Labor & Workforce Development Agency via online submission and to the Company via certified mail.

Mr. Roshandell worked for the Company in marketing for approximately eight (8) years until his termination on or about December 13, 2024. During his employment, Mr. Roshandell regularly worked more than eight (8) hours per day and/or more than forty (40) hours per week without receiving overtime pay in violation of the California Labor Code. The Company also regularly failed to provide a second meal period as required on days that Mr. Roshandell worked over 10 hours in a day. The Company also would schedule Mr. Roshandell to work seven days consecutively (and sometimes more) in violation of the Labor Code, including failing to pay him overtime on the seventh day. The Company also failed to pay Mr. Roshandell wages for travel time.

As a result of the Company’s intentional and unlawful actions, the Company violated various Labor Code sections, including but not limited to §§ 201, 202, 203, 204, 210, 226, 510, 512, 551, 552, 1194, 1197, 2699 et seq., and other applicable California laws. Mr. Roshandell intends to

pursue all applicable remedies for these violations, including all premiums and penalties, punitive damages, interest, attorney's fees, and costs.

We look forward to receiving your response to this letter pursuant to Labor Code Sec. 2699.3(a)(2)(A). Thank you and please do not hesitate to call with any questions.

Very truly yours,

KESLUK, SILVERSTEIN JACOB & MORRISON P.C.

Catherine J. Roland

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cc. via certified mail
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