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March 22, 2023

VIA ONLINE FILING TO LABOR &
WORKFORCE DEVELOPMENT AGENCY
AND THE DEPARTMENT OF INDUSTRIAL
RELATIONS
<https://dir.tfaforms.net/309>

VIA CERTIFIED MAIL TO COUNSEL FOR
ELIZABETH MORA
Harout Messrelian, Esq.
Messrelian Law
500 N Central Avenue, Suite 840
Glendale, California 91203

RE: *Elizabeth Mora v. IHG Management, LLC – PAGA Cure*

PLEASE TAKE NOTICE:

IHG Management (Maryland) LLC (“IHG”) understands Messrelian Law submitted a notice to the Labor and Workforce Development Agency (“LWDA”) on behalf of Elizabeth Mora (“Plaintiff”). The LWDA notice states Plaintiff intends to pursue a representative action under California’s Labor Code Private Attorneys General Act (“PAGA”). Among other things, the LWDA notice alleges IHG violated California Labor Code Section 226(a) by failing to include certain information on the wage statements including, the correct and complete name and address of the legal employer.

IHG denies that it violated Section 226(a). However, in investigating the matter, IHG did notice a typographical error on checks that were hand-issued outside of ordinary payroll which listed its legal name as “IHG Managment Maryland LLC” instead of “IHG Management (Maryland) LLC.” As such, IHG availed itself of the right to cure the allegedly defective wage statements by sending fully compliant, itemized statements to each allegedly aggrieved employee that received such a check for the three-year period prior to the date of the LWDA Notice.

IHG provided the corrected wage statements to the aggrieved employees on **March 22, 2023**. Attached hereto is an exemplar of a corrected wage statement (with identifying information redacted

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for privacy reasons). The corrected wage statements contain all relevant information required under Section 226(a) including the corrected spelling of IHG's name.

IHG sent this notice of cure by online filing to the LWDA and certified mail to Plaintiff's representative identified in the LWDA Notice.

Please do not hesitate to contact me if you have any questions.

Sincerely



Spencer C. Skeen
Marlene M. Moffitt

Enclosure

Earnings Statement



IHG MANAGEMENT (MARYLAND) LLC
3 RAVINIA DRIVE, ATTN: PAYROLL
SUITE 100
ATLANTA, GA 30346

Pay Date: 07/07/2022

Filing Status:
Exemptions/Allowances:
Federal:

Earnings	rate	hours	this period	year to date
Regular	24.3000	70 51	1,713 39	4,941 65
Overtime	36.4500	02	0 73	0 73
Adj Rr Hr Wrk			3 25	3 25
Pto			1 86	1 86
Gross Pay			\$1,719.23	4,947 49

Other Benefits and Information	this period	total to date
Totl Hrs Worked	70 53	
Employee Id		
Personal Bal Hr		0 00
Pto Bal Hr		1 86

Deductions	Statutory		
Federal Income Tax			390 69
Social Security Tax			306 74
Medicare Tax			71 74
CA State Income Tax			137 17
CA SDI Tax			54 42
Net Pay		\$1,381.06	
Net Check		\$1,381.06	

Important Notes
EMPLOYER CONTACT PHONE NUMBER 770-689-4318

IF NO CA Sppl Used IS LISTED YOU HAVE USED ZERO HRS

Additional Tax Withholding Information

Taxable Marital Status:

CA:

Exemptions/Allowances:

CA:

Period Beginning: 06/17/2022

Period Ending: 06/30/2022

Your federal taxable wages this period are
\$1,719.23

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IHG MANAGEMENT (MARYLAND) LLC
3 RAVINIA DRIVE, ATTN: PAYROLL
SUITE 100
ATLANTA, GA 30346

WZA

90-477/1222

Payroll check number:

Pay date: 07/07/2022

Pay to the
order of:

This amount:

ONE THOUSAND THREE HUNDRED EIGHTY ONE AND 06/100 DOLLARS

\$1381.06

ASSISTANCE WITH VERIFICATION AVAILABLE AT 1-877-433-7343
VOID NON NEGOTIABLE VOID NON NEGOTIABLE

VOID AFTER 180 DAYS

Wells Fargo Bank, N.A.
5401 California Ave
Bakersfield, CA 93309



WCS
ADP AUTHORIZED SIGNATURE

NON-NEGOTIABLE - VOID - NON-NEGOTIABLE - VOID