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September 24, 2025

VIA CERTIFIED MAIL – RETURN RECEIPT REQUESTED

EAZE, INC.

2467 Sheridan Blvd., Unit A
Edgewater, CO 80214

EAZE CALIFORNIA, LLC

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Edgewater, CO 80214

EAZE, INC.

c/o Cory John Azzalino
2800 3rd St., Suite 202
San Francisco, CA 94107

EAZE CALIFORNIA, LLC

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2800 3rd St., Suite 202
San Francisco, CA 94107

RE: Sue Prom v. Eaze, Inc. and Eaze California, LLC.

To Whom It May Concern:

This office represents Sue Prom (“Claimant”) who was employed by Eaze, Inc., Eaze California, 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 their 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.
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Claimant's Background and Employment

Claimant began working for Respondents in April 2023, as a Delivery Driver Specialist. Claimant was expected to remain on duty or responsive during breaks. She frequently worked off-the-clock, including performing close-out tasks like counting the money and returning the terminal and purse.

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 similarly situated employees were instructed to return to the depot to take their meal breaks, limiting their ability to use break time freely. Claimant and similarly situated employees were required to use their personal vehicles for work and were only paid mileage reimbursements at \$ 0.40 to \$ 0.44 per mile, which is well below the IRS standard rate. Her wage statements were inaccurate and failed to, for example, reflect off-the-clock hours or break premiums.

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 communication devices 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**

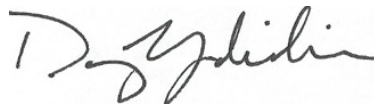
Labor Code § 2802

- Employees were required to incur business expenses such as use of their personal vehicles, but were not fully reimbursed.
- 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