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September 10, 2025

Via Online Filing

California Labor & Workforce Development Agency
New PAGA Claim Notice
<https://dir.govfa.net/411>

Re: Labor Code Sec. 2699 Notice

Dear Sir or Madam:

Pursuant to Labor Code Sec. 2699.3(a)(1), Plaintiff Anait Khanlaryan (“Khanlaryan” or “Plaintiff”), hereby gives written notice of her intent to file a Labor Code Sec. 2699 claim against Defendant Humangood Affordable Housing, Inc. (“Humangood”) and some related companies. This notice is being provided to Defendant, via certified mail, and the California Labor & Workforce Development Agency, via online filing.

The specific provisions of the Labor Code that Defendants have violated include, but are not limited to, Secs. 203, 216, 225, 226.6, 226, 226.7, 510, 512, 558, 1173, 1174, 1174.5, 1175, 1194.5, 1194, 1198, 1199.

The facts and theories supporting these violations are as follows: Plaintiff was misclassified as an exempt employee during her employment which ended in 2022, when she was titled as a Housing Administrator (“HA”) during the last four years of her employment. Further, Humangood titles other of its employees at other properties as HAs, and misclassifies each of them as exempt, and they are also covered by the lawsuit we intend to amend to include Ms. Khanlaryan, LASC Case No. 25STCV00778.

During her employment, Khanlaryan and other HA persons regularly required to work in excess of eight hours in a workday and/or 40 hours in a workweek without compensation at the rate of time and one-half for their regular hourly rate they should have been paid. Plaintiff was regularly required to work off the clock. Plaintiff was frequently not provided meal and rest periods in accordance with California law, nor did she receive paychecks properly detailing all deductions

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for all wages paid or payable, as required by law. As a result, Defendant Humangood and its related companies have violated the above-referenced Labor Code provisions, as well as other California laws, and is liable for all applicable premiums and penalties, punitive damages, interest, attorneys' 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,

LA SuperLawyers Inc.

A handwritten signature in blue ink, appearing to read 'William W. Bloch', is written over the typed name.

William W. Bloch

WWB/mc

cc: Via Online Filing
Martin R. Berman, Esq.
Client