



11/27/25

To PAGA
Department of Industrial Relations
Division of Labor Standards Enforcement.
Subject: Employer Response to PAGA notice Case No: LWDA-CM-1132894-25

Dear Concerned Officers,

In response to the PAGA notice we submit to your authority our position that the plaintiff Ms. Reina Jimenez is filing the two baseless claims against our company.

1. Employers willfully failed to pay for wages due for "hours worked. Cal. code of Regs., tit. 8, § 13520. Labor code section 203.
2. Employers failed to provide meals and rest periods under Labor Code §§ 226.7 (c), 512 (a) and Cal. Code Regs Tit. 2, § 599.780; Cal. Code Reg, tit. 8, § 11070(4)(B) for themselves and other similarly situated employees.

Claim no 1: Zee Foods has been in business since 2003 and has always paid the employees more than the minimum wage as per city of Fremont and in a timely manner, including all the overtime worked. We have payroll records for all the employees including Ms. Jimenez.

Claim No 2: We have an employee manual in English and Spanish which clearly outlines meals and breaks under section 6.1. We have provided the employees with a dedicated area for taking meals and breaks.

Accordingly, the four-employee team, which included a supervisor and three employees including Ms. Jimenez, were given two 15-minute paid breaks plus a 30-minute unpaid lunch in each 8-hour shift in a timely manner. In addition, the employees have been taking restroom or phone breaks anytime they needed.

Attachment: Payroll summary of Ms. Reina Jimenez.

Should you have any questions, please feel free to contact me.

Regards,

Akram Khan
Zee Foods LLC
Cell: (510) 453-1757