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Attorneys for Plaintiff

Per local Rule, This case is assigned to
Judge Reyes, Benjamin T, II, for all purposes.

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF CONTRA COSTA

DANIEL HWANG, as a private attorney general,

Plaintiff,

vs.

PYRAMID CONSULTING, INC., a Georgia
corporation; and DOES 1 through 50, inclusive,

Defendants.

Case No. C25-03575

**REPRESENTATIVE ACTION COMPLAINT
FOR VIOLATION OF LABOR CODE § 2698,
ET SEQ., THE PRIVATE ATTORNEYS
GENERAL ACT**

DEMAND OVER \$35,000.00

SUMMONS ISSUED

1 Plaintiff Daniel Hwang (“Plaintiff”) hereby submits this Representative Action Complaint
2 (“Complaint”) against Defendant Pyramid Consulting, Inc. (“Defendant”) and Does 1-50 (hereinafter
3 collectively referred to as “Defendants”), on behalf of himself and all other aggrieved employees of
4 Defendants for penalties pursuant to the Private Attorneys General Act, Labor Code section 2698, *et seq.*
5 (“PAGA”), for Defendants’ violations of the California Labor Code, as follows:

6 **INTRODUCTION**

7 1. This representative action is within the Court’s jurisdiction under California Labor Code
8 sections 204 and 2698, *et seq.*, and the California Industrial Welfare Commission’s (“IWC”) Wage
9 Orders.

10 2. This Complaint challenges systemic illegal employment practices resulting in violations
11 of the California Labor Code against employees of Defendants.

12 3. Plaintiff is informed and believes and based thereon alleges that Defendants jointly and
13 severally have acted intentionally and with deliberate indifference and conscious disregard to the rights
14 of all employees by failing to timely pay employees.

15 4. Plaintiff is informed and believes and based thereon alleges that Defendants have
16 engaged in, among other things, a system of willful violations of the California Labor Code, and
17 applicable IWC Wage Orders by creating and maintaining policies, practices, and customs that
18 knowingly deny employees the above stated rights and benefits.

19 5. The policies, practices, and customs of Defendants described above and below have
20 resulted in unjust enrichment of Defendants and an unfair business advantage over businesses that
21 routinely adhere to the strictures of the California Labor Code.

22 **JURISDICTION AND VENUE**

23 6. The Court has jurisdiction over the violations of the California Labor Code sections 204
24 and 2698, *et seq.*

25 7. Venue is proper in Contra Costa County because Plaintiff worked for Defendants in
26 Contra Costa County.

27 **PARTIES**

28 8. Plaintiff was employed by Defendant as a Financial Analyst during the approximate
period of March 15, 2025 to September 12, 2025.

1 9. Plaintiff is informed and believes and based thereon alleges that Defendant Pyramid
2 Consulting, Inc. was and is a Georgia corporation doing business in the State of California.

3 10. Plaintiff is informed and believes and based thereon alleges that at all times herein
4 mentioned Defendant and Does 1 through 50 are and were business entities, individuals, and
5 partnerships, licensed to do business and actually doing business in the State of California. As such, and
6 based upon all the facts and circumstances incident to Defendants' business in California, Defendants
7 are subject to California Labor Code sections 204 and 2698, *et seq.*, and IWC Wage Orders.

8 11. Plaintiff does not know the true names or capacities, whether individual, partner, or
9 corporate, of the Defendants sued herein as Does 1 through 50, inclusive, and for that reason, said
10 Defendants are sued under such fictitious names, and Plaintiff prays for leave to amend this complaint
11 when the true names and capacities are known. Plaintiff is informed and believes and based thereon
12 alleges that each of said fictitious Defendants was responsible in some way for the matters alleged
13 herein and proximately caused Plaintiff and aggrieved employees to be subject to the illegal employment
14 practices, wrongs, and injuries complained of herein.

15 12. At all times herein mentioned, each of said Defendants participated in the doing of the
16 acts hereinafter alleged to have been done by the named Defendants; and furthermore, the Defendants,
17 and each of them, were the agents, servants, and employees of each of the other Defendants, as well as
18 the agents of all Defendants, and at all times herein mentioned, were acting within the course and scope
19 of said agency and employment.

20 13. Plaintiff is informed and believes and based thereon alleges that at all times material
21 hereto, each of the Defendants named herein was the agent, employee, alter ego, and/or joint venturer of,
22 or working in concert with each of the other co-Defendants and was acting within the course and scope
23 of such agency, employment, joint venture, or concerted activity. To the extent said acts, conduct, and
24 omissions were perpetrated by certain Defendants, each of the remaining Defendants confirmed and
25 ratified said acts, conduct, and omissions of the acting Defendants.

26 14. At all times herein mentioned, Defendants, and each of them, were members of, and
27 engaged in, a joint venture, partnership, and common enterprise, and acting within the course and scope
28 of, and in pursuance of, said joint venture, partnership, and common enterprise.

1 15. At all times herein mentioned, the acts and omissions of various Defendants, and each of
2 them, concurred and contributed to the various acts and omissions of each and all of the other
3 Defendants in proximately causing the injuries and damages as herein alleged. At all times herein
4 mentioned, Defendants, and each of them, ratified each and every act or omission complained of herein.
5 At all times herein mentioned, the Defendants, and each of them, aided and abetted the acts and
6 omissions of each and all of the other Defendants in proximately causing the damages as herein alleged.

7 **FIRST CAUSE OF ACTION**

8 **VIOLATION OF LABOR CODE § 2698, ET SEQ.**

9 **(BY PLAINTIFF AND AGGRIEVED EMPLOYEES AGAINST ALL DEFENDANTS)**

10 16. Plaintiff re-alleges and incorporates by reference the preceding paragraphs as though
11 fully set forth herein.

12 17. Plaintiff brings this cause of action as a proxy for the State of California and in this
13 capacity, seeks penalties on behalf of all Aggrieved Employees in the State of California from October
14 14, 2024, through the present, for Defendant's violations of Labor Code section 204 arising from
15 Defendant's policy and practice of failing to timely pay employees within seven days of the close of the
16 applicable pay period.

17 18. As a matter of corporate policy and practice, Defendant paid Plaintiff and other aggrieved
18 employees more than seven days after the end of the pay period. By way of example, for the pay period
19 of July 21, 2025 through August 3, 2025, the wages earned during such pay period were not paid until
20 August 13, 2025.

21 19. On or about October 14, 2025, Plaintiff sent a written notice to the Labor & Workforce
22 Development Agency ("LWDA") of specific facts and theories for Defendant's violations Labor Code
23 section 204. Plaintiff simultaneously sent written notices to Defendant via certified mail.

24 20. As of the date of the filing of this Complaint, the LWDA has not responded to Plaintiff's
25 written notices nor indicated that it intends to investigate the Labor Code violations provided for in the
26 written notices.

27 21. As such, pursuant to Labor Code section 2699(a), Plaintiff seeks recovery of any and all
28 applicable civil penalties for Defendants' violations of Labor Code sections 204 and 2698 *et seq.*, for the
time period described above, on behalf of himself and other Aggrieved Employees.

1 **PRAYER FOR RELIEF**

2 WHEREFORE, Plaintiff prays for judgment for himself and all similarly situated employees
3 against Defendants, jointly and severally, as follows:

4 1. Upon the First Cause of Action, for the full amount of civil penalties available under the
5 PAGA, and for costs and attorneys' fees;

6 2. On all causes of action, for attorneys' fees and costs as provided by California Labor
7 Code sections 204 and 2698, *et seq.*, and Code of Civil Procedure § 1021.5; and

8 3. For such other and further relief as the Court may deem just and proper.

9
10 DATED: December 4, 2025

DIVERSITY LAW GROUP, P.C.

11 By:  _____

Larry W. Lee

Kristen M. Agnew

12 Attorneys for Plaintiff
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