

October 15, 2025

VIA ONLINE SUBMISSION

California Labor and Workforce Development Agency
Attn: PAGA Administrator

VIA CERTIFIED MAIL (RETURN RECEIPT REQUESTED)

Agent for Service of Process for Lathrop Logistics LLC:
CT Corporation System
330 N. Brand Blvd., Suite 700
Glendale, CA 91203

Re: Irene Sanchez v. Lathrop Logistics LLC

Dear Labor and Workforce Development Agency and Lathrop Logistics LLC:

This letter shall serve as Irene Sanchez's ("Ms. Sanchez") written notice as required by California Labor Code 2699.3(a)(1) of the specific provisions of the Labor Code allegedly violated by Lathrop Logistics LLC ("Lathrop"), including the facts and theories to support the alleged violations. Ms. Sanchez intends to seek civil penalties against Lathrop under the Private Attorneys General Act of 2004 ("PAGA") on her own behalf and on behalf of all other non-exempt employees currently or formerly employed by Lathrop in California during the statutory period ("Aggrieved Employees"). Ms. Sanchez is informed and believes and based thereon alleges that there are at least 200 Aggrieved Employees in the statutory period.

Labor Code Provisions Alleged to Have Been Violated

Ms. Sanchez alleges Lathrop violated the following Labor Code provisions: Labor Code §§ 201, 202, 203, 204, 210, 226, 226.7, 510, 512, 558, 1174, 1174.5, 1182.12, 1194, 1194.2, 1197, 1197.1, 1198.

Facts and Theories Supporting Each Alleged Violation

Ms. Sanchez was employed by Lathrop in Lathrop, California as a non-exempt transportation coordinator from approximately March 2021 to approximately February 2025.

Minimum and Overtime Wages

Throughout the statutory period, Lathrop failed to pay Ms. Sanchez and other Aggrieved Employees at least the legal minimum wage and overtime wage for all hours worked due to Lathrop's policy and practice of paying overtime according to the number of hours worked in a shift rather than in a workday. As a result, Lathrop failed to pay Ms. Sanchez and other Aggrieved Employees for all minimum, straight time, and overtime wages due in violation of Labor Code §§ 510, 558, 1182.12, 1194, 1194.2, 1197, 1197.1, and 1198.

Meal Periods

Throughout the statutory period, Lathrop failed to provide Ms. Sanchez and other Aggrieved Employees with 30-minute meal periods for every 5 hours worked as required by Labor Code § 512. Ms. Sanchez and other Aggrieved Employees frequently worked shifts over five hours

and did not receive lawful meal periods because they were discouraged from taking meal periods, were interrupted during their meal periods, were required to remain on call during meal periods, and/or were not scheduled to be relieved at the appropriate intervals to receive all lawful meal periods, among other reasons. Further, when Ms. Sanchez and other Aggrieved Employees worked shifts over ten hours, they did not receive a second meal period. As a result, their meal periods were missed, late, short, and/or interrupted. Lathrop failed to pay Ms. Sanchez and other Aggrieved Employees an additional hour of pay at their regular rate of pay when they suffered a meal period violation. In fact, when Lathrop did pay meal period premiums, it failed to do so at Ms. Sanchez's and other Aggrieved Employees' regular rate of pay. As a result, Lathrop failed to provide meal periods and pay meal period premiums in violation of Labor Code §§ 226.7 and 512.

Rest Periods

Throughout the statutory period, Lathrop failed to authorize and permit Ms. Sanchez and other Aggrieved Employees to take 10-minute rest periods for every 4 hours worked or major fraction thereof. Ms. Sanchez and other Aggrieved Employees were required and/or incentivized to work through their rest periods, discouraged from taking their rest periods, required to remain on call during their rest periods, and/or were not relieved of all duties in order to take all rest periods. Lathrop failed to pay Ms. Sanchez and other Aggrieved Employees an additional hour of pay at their regular rate of pay when they suffered a rest period violation. As a result, Lathrop failed to permit rest periods and pay rest period premiums in violation of Labor Code § 226.7.

Wage Statements

Due to Lathrop's wage, meal period, rest period, and deduction violations as alleged above, Lathrop failed to provide Ms. Sanchez and other Aggrieved Employees with accurate, itemized wage statements that accurately reported gross wages earned, total hours worked, net wages earned, and all applicable hourly rates in effect during the pay period and the corresponding number of hours worked at each hourly rate in violation of Labor Code § 226. This failure was knowing and intentional.

Timing of Wage Payments

Due to Lathrop's wage, meal period, rest period, and deduction violations as alleged above, Lathrop failed to pay all wages due during Ms. Sanchez's and other Aggrieved Employees' employment and at the end of their employment in violation of Labor Code §§ 201, 202, 203, 204, and 210. This failure was willful and intentional.

Recordkeeping

Due to Lathrop's wage, meal period, rest period, and deduction violations as alleged above, Lathrop failed to maintain accurate and complete records showing the hours worked each day by Ms. Sanchez and other Aggrieved Employees in violation of Labor Code §§ 1174 and 1174.5.

Based on these violations, Ms. Sanchez seeks civil penalties, injunctive relief, and attorneys' fees and costs under PAGA. Enclosed and incorporated herein is the class action complaint Ms. Sanchez will be filing on behalf of herself and all other Aggrieved Employees against Lathrop. Ms. Sanchez intends to amend the complaint to add a cause of action under PAGA 65 days after the date of this notice pursuant to Labor Code § 2699.3(a)(2)(A).

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Thank you for your assistance on this matter. Should you have any questions or comments, please do not hesitate to contact the undersigned.

Sincerely,
ABRAMSON LABOR GROUP

A handwritten signature in black ink that reads "Desiree Ruiz Alfaro". The signature is written in a cursive, flowing style.

Desiree Ruiz Alfaro

Enclosure: Class Action Complaint