

October 10, 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 Libra Restaurant Inc.
Weizhou Lin
9059 Central Ave.
Montclair, CA 91763

Agent for Service of Process for Thousand Food Inc.
Tak Wai Cheng
9635 Chapman Ave.
Garden Grove, CA 92841

Agent for Service of Process for Greenbell Buffet Inc.
Mei Qin Zheng
875 N. Wilcox Ave.
Montebello, CA 90640

**Re: Luis Santiago Mendez v. Libra Restaurant Inc., Thousand Food Inc., and
Greenbell Buffet Inc.**

Dear Labor and Workforce Development Agency, Libra Restaurant, Thousand Food Inc., and
Greenbell Buffet Inc.:

This letter shall serve as Luis Santiago Mendez's ("Mr. Mendez") written notice as required by California Labor Code 2699.3(a)(1) of the specific provisions of the Labor Code allegedly violated by Libra Restaurant Inc., Thousand Food Inc., and Greenbell Buffet Inc. ("Libra"), including the facts and theories to support the alleged violations. Mr. Mendez intends to seek civil penalties against Libra under the Private Attorneys General Act of 2004 ("PAGA") on his own behalf and on behalf of all other non-exempt employees currently or formerly employed by Libra in California during the statutory period ("Aggrieved Employees"). Mr. Mendez is informed and believes and based thereon alleges that there are at least 50 Aggrieved Employees in the statutory period.

Labor Code Provisions Alleged to Have Been Violated

Mr. Mendez alleges Libra violated the following Labor Code provisions: Labor Code §§ 201, 202, 203, 204, 210, 221, 226, 226.7, 512, 558, 1174, 1174.5.

Facts and Theories Supporting Each Alleged Violation

Mr. Mendez was employed by Libra in Montclair, California as a non-exempt kitchen prep from approximately October 2023 to approximately March 2025.

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Meal Periods

Throughout the statutory period, Libra failed to provide Mr. Mendez and other Aggrieved Employees with 30-minute meal periods for every 5 hours worked as required by Labor Code § 512. Mr. Mendez 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 Mr. Mendez 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. Libra failed to pay Mr. Mendez and other Aggrieved Employees an additional hour of pay at their regular rate of pay when they suffered a meal period violation. As a result, Libra 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, Libra failed to authorize and permit Mr. Mendez and other Aggrieved Employees to take 10-minute rest periods for every 4 hours worked or major fraction thereof. Mr. Mendez 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. Libra failed to pay Mr. Mendez 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, Libra failed to permit rest periods and pay rest period premiums in violation of Labor Code § 226.7.

Unlawful Deductions

Throughout the statutory period, Libra made unlawful deductions to Mr. Mendez's and other Aggrieved Employees' wages. Specifically, Libra unlawfully deducted wages from Mr. Mendez's and other Aggrieved Employees paychecks for the cost of meals. Libra failed to obtain a written agreement from Mr. Mendez and other Aggrieved Employees authorizing these deductions. As a result, Libra made unlawful deductions from wages in violation of Labor Code § 221.

Wage Statements

Due to Libra's meal period, rest period, and deduction violations as alleged above, Libra failed to provide Mr. Mendez 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 Libra's meal period, rest period, and deduction violations as alleged above, Libra failed to pay all wages due during Mr. Mendez'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.

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Recordkeeping

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

Based on these violations, Mr. Mendez seeks civil penalties, injunctive relief, and attorneys' fees and costs under PAGA. Enclosed and incorporated herein is the class action complaint Mr. Mendez will be filing on behalf of himself and all other Aggrieved Employees against Libra. Mr. Mendez 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).

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