

October 9, 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 8451 Cucina Alba, LLC:  
Cobi Levy  
8451 Melrose Ave.  
West Hollywood, CA 90048

**Re: Alejandro Lopez v. 8451 Melrose Eatery, LLC dba Cucina Alba**

Dear Labor and Workforce Development Agency and 8451 Cucina Alba, LLC:

This letter shall serve as Alejandro Lopez's ("Mr. Lopez") written notice as required by California Labor Code 2699.3(a)(1) of the specific provisions of the Labor Code allegedly violated by 8451 Cucina Alba, LLC dba Cucina Alba ("Cucina Alba"), including the facts and theories to support the alleged violations. Mr. Lopez intends to seek civil penalties against Cucina Alba 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 Cucina Alba in California during the statutory period ("Aggrieved Employees"). Mr. Lopez 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. Lopez alleges Cucina Alba violated the following Labor Code provisions: Labor Code §§ 201, 202, 203, 204, 210, 226, 226.7, 512, 558, 1174, 1174.5, 2802.

**Facts and Theories Supporting Each Alleged Violation**

Mr. Lopez was employed by Cucina Alba in West Hollywood, California as an hourly-paid, non-exempt line cook from approximately March 2025 to approximately June 2025.

**Meal Periods**

Throughout the statutory period, Cucina Alba failed to provide Mr. Lopez and other Aggrieved Employees with 30-minute meal periods for every 5 hours worked as required by Labor Code § 512. Mr. Lopez 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. Lopez 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. Cucina Alba failed to pay Mr. Lopez 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, Cucina Alba 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, Cucina Alba failed to authorize and permit Mr. Lopez and other Aggrieved Employees to take 10-minute rest periods for every 4 hours worked or major fraction thereof. Mr. Lopez and other Aggrieved Employees were required and/or incentivized to work through their rest periods, discouraged from taking their rest periods, required to remain available during their rest periods, and/or were not relieved of all duties in order to take all rest periods. Cucina Alba failed to pay Mr. Lopez 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, Cucina Alba failed to permit rest periods and pay rest period premiums in violation of Labor Code § 226.7.

#### Wage Statements

Due to Cucina Alba's wage, meal period, rest period, and deduction violations as alleged above, Cucina Alba failed to provide Mr. Lopez 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 Cucina Alba's wage, meal period, rest period, and deduction violations as alleged above, Cucina Alba failed to pay all wages due during Mr. Lopez'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.

#### Reimbursement

Ms. Lopez also alleges that Cucina Alba failed to reimburse necessary business expenses in violation of Labor Code § 2802. Specifically, Cucina Alba required Mr. Lopez and other Aggrieved Employees to download an application on their personal devices in order to clock in and out. Cucina Alba failed to reimburse Mr. Lopez and other Aggrieved Employees for the expense of using their personal devices for work purposes.

#### Recordkeeping

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

Based on these violations, Mr. Lopez seeks civil penalties, injunctive relief, and attorneys' fees and costs under PAGA. Enclosed and incorporated herein is the class action complaint Mr. Lopez will be filing on behalf of himself and all other Aggrieved Employees against Cucina Alba. Mr. Lopez 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, appearing to read "Jacquelyn Silva", written in a cursive style.

Jacquelyn Silva

Enclosure: Class Action Complaint