

November 24, 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 Americold Logistics, LLC:
CSC - Lawyers Incorporating Service
2710 Gateway Oaks Drive, Suite 150N
Sacramento, CA 95833

Re: Vincent Muñoz v. Americold Logistics, LLC

Dear Labor and Workforce Development Agency and Americold Logistics, LLC:

This letter shall serve as Vincent Muñoz's ("Mr. Muñoz") written notice as required by California Labor Code 2699.3(a)(1) of the specific provisions of the Labor Code allegedly violated by Americold Logistics, LLC ("Americold"), including the facts and theories to support the alleged violations. Mr. Muñoz intends to seek civil penalties against Americold 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 Americold in California during the statutory period ("Aggrieved Employees"). Mr. Muñoz is informed and believes and based thereon alleges that there are at least 500 Aggrieved Employees in the statutory period.

Labor Code Provisions Alleged to Have Been Violated

Mr. Muñoz alleges Americold violated the following Labor Code provisions: Labor Code §§ 2101, 2102, and 2103.

Facts and Theories Supporting Each Alleged Violation

Mr. Muñoz was employed by Americold in Victorville, California as a non-exempt fork lift operator from approximately August 2022 to approximately May 2025.

Warehouse Quota Violations

Throughout the statutory period, Americold was required to provide Mr. Muñoz and other Aggrieved Employees with a written description of each quota to which Mr. Muñoz and other Aggrieved Employees were subject, including the quantified number of tasks to be performed or materials to be produced or handled within the time period, and any potential adverse employment action that could result from failure to meet the quota. Further, Americold was prohibited from taking adverse employment action against Mr. Muñoz and other Aggrieved Employees for failing to meet a quota that did not allow Mr. Muñoz and other Aggrieved Employees to comply with meal and rest period or occupational health and safety laws, or for failure to meet a quota that had not been disclosed in writing to Mr. Muñoz and other Aggrieved Employees. However, Americold established quotas that did not allow compliance with meal and rest periods or occupational health and safety laws, failed to provide written notice of those quotas, and took adverse employment actions for failing to meet the quotas in violation of Labor Code §§ 2101 and 2102. Americold's established quotas



also failed to consider actions taken by Mr. Muñoz and other Aggrieved Employees to comply with the Labor Code as time on task and productive time for purposes of Americold's quota system in violation of Labor Code § 2103.

Based on these violations, Mr. Muñoz seeks civil penalties, injunctive relief, and attorneys' fees and costs under PAGA. Mr. Muñoz intends to file a complaint asserting a cause of action under PAGA on behalf of himself and all other Aggrieved Employees 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 blue ink, appearing to read "Fawn F. Bekam", is written over a light blue circular stamp.

Fawn F. Bekam

Enclosure: Class Action Complaint