

DIVERSITY LAW GROUP

A PROFESSIONAL CORPORATION

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May 17, 2023

VIA ONLINE FILING

California Labor & Workforce Development Agency
Attn.: PAGA Administrator
1515 Clay Street, Ste. 801
Oakland, CA 94612

Re: *Wooten v. PRIDE Industries*
LWDA Case No.: LWDA-CM-954035-23

To Whom It May Concern:

This correspondence shall constitute supplemental written notice under Labor Code section 2699.3 of Curtis Wooten's ("Claimant") claims against his former employer, PRIDE Industries (the "Company"). Specifically, in addition to the claims as set forth in Claimant's May 10, 2023 notice, Claimant further alleges:

1. The Company violated Labor Code § 227.3 by failing to pay vested but unused vacation wages at the final rate of pay in violation of Labor Code § 227.3. Like other employees, Claimant received non-discretionary remuneration, including, but not limited to, shift differential wages, which the Company did not factor into the final rate of pay when paying employees vested but unused vacation wages. As a result, the Company violated Labor Code §227.3 in addition to Labor Code §§ 201, 202, and 203.

2. On information and belief, the Company also failed to pay sick pay wages at the regular rate of pay, pursuant to Labor Code § 246, when employees earned wages and other non-discretionary remuneration. Thus, when employees separated from employment, they were not paid all wages owed in violation of Labor Code §§ 201, 202, 203.

The address for the Company is:

PRIDE Industries
10030 Foothills Blvd
Roseville, CA 95747

Please contact the undersigned if you have any questions regarding this matter.

Sincerely,



Max W. Gavron

May 17, 2023

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cc: PRIDE Industries (by certified mail)