



MARQUEE LAW GROUP
A PROFESSIONAL CORPORATION

9100 Wilshire Boulevard
Suite 445 East Tower
Beverly Hills, CA 90212
T: (310) 275-1844
F: (310) 275-1801

December 22, 2025

Via Online Filing

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

Via U.S. Certified Mail

Global Logic, Inc.
2535 Augustine Drive, 5th Floor
Santa Clara, CA 95054

Via U.S. Certified Mail

Global Logic, Inc.
c/o CSC-Lawyers
2710 Gateway Oaks Drive
Sacramento, CA 95833

Re: *Victoria Boutros v. Global Logic, Inc., et al*

To Whom It May Concern:

Please be advised that this law firm represents Victoria Boutros (“Ms. Boutros” or “Plaintiff”) in claims arising from her employment with Global Logic, Inc. and Does 1 through 100 (collectively, “GLI” or “Defendants”). Ms. Boutros is an “aggrieved employee” as defined by Labor Code section 2698, *et seq.* due to Defendants’ violations of the Labor Code as set forth below. The purpose of this letter is to comply with Labor Code section 2699.3, which requires aggrieved employees to notify their employer and the Labor and Workforce Development Agency (“LWDA”) of the specific provisions of the Labor Code allegedly violated.

For purposes of this letter, “aggrieved employees” are all current and former employees of Defendants who have worked for Defendants in California at any time from one year immediately preceding the date of this letter through the date that judgment is entered in Ms. Boutros’s contemplated PAGA action or any alternative date agreed upon by the parties and/or approved by the court.

Defendants are a digital product engineering company. According to their website, Defendants implement over 2,100 product releases per year, have 59 product engineering centers, and employ 32,000 professionals in 25 countries. Plaintiff was employed by Defendants as a non-exempt employee from approximately January 2024 until on or about July 9, 2025.

During her employment with Defendants, Defendants required Plaintiff and other employees to incur business expenses without reimbursement. Specifically, Plaintiff and other employees who worked from home were required to use their own internet service to perform their work for Defendants, as well as provide their own computer mice and other

work-related items. On information and belief, many other aggrieved employees have also been required to provide their internet service, mice, and other work-related items without reimbursement.

As a result of Defendants' requirement to incur these work-related expenses that are required for Plaintiff and other aggrieved employees to perform their work for Defendants, Plaintiff and other aggrieved employees are entitled to reimbursement for those costs, plus interest on said amounts, pursuant to Labor Code § 2802.

Beginning in or about January 2025, Defendants also failed to maintain accurate records of the hours worked by Plaintiff and other aggrieved employees. Specifically, Plaintiff and other aggrieved employees regularly worked in excess of eight hours a day and/or 40 hours a week. However, beginning in or about January 2025, Defendants announced to their employees that it was Defendants' new policy that employees were not permitted to report any overtime hours worked. Plaintiff's and other aggrieved employees' workload did not change at all, so they continued working overtime hours. However, Plaintiff and other aggrieved employees were forced to begin working those hours unpaid and un-reported due to Defendants' aforementioned policy. This policy resulted in Defendants failing to maintain accurate records of Plaintiff's and other aggrieved employees' hours worked, in violation of Labor Code § 1174 and Section 7 of Wage Order 4.

As described above, Defendants committed, and continues to commit, the following violations of the California Labor Code and Industrial Welfare Commission Wage Order No. 4 ("Wage Order 4") against Plaintiff and other aggrieved employees:

Failure to Reimburse or Indemnify Employees for Business Expenses

As alleged herein, Defendants have failed to reimburse or indemnify Ms. Boutros and other aggrieved employees for expenses incurred in direct consequence of their job duties and/or as a result of directives from Defendants, including but not limited to their use of personal internet, personal computer mice and other work-related items, despite the fact that Defendants were aware (or reasonably should have been aware) of the fact that these expenses were incurred. Defendants' policy/practice of not providing reimbursement for necessary work expenditures violates Labor Code §§ 2802 and 2804. Ms. Boutros and other aggrieved employees are therefore entitled to reimbursement of such unpaid work expenses, with interest.

Recordkeeping Violations

As alleged above, Defendants have, as a matter of uniform policy and practice, failed to maintain accurate records of, *inter alia*, Plaintiff's and other aggrieved employees' hours worked, including overtime hours worked, in violation of Labor Code §§ 1174, 1198, 1199, and Wage Order 4, § 7.

///

Ms. Boutros is informed and believes, and based thereon alleges, that the violations alleged herein are continuing to the present and are ongoing. As an “aggrieved employee,” Ms. Boutros will initiate a civil action on behalf of herself, the State of California, and other aggrieved employees to recover civil penalties resulting from the wage and hour violations alleged herein, as well as appropriate injunctive relief. Based on Ms. Boutros’s investigation, and on information and belief, GLI has committed the following Labor Code violations:

- a. GLI has violated Labor Code §§ 2802 and 2804 by failing to reimburse Ms. Boutros and other aggrieved employees for the use of their personal internet, computer mice, and/or other personal devices for work purposes;
- b. GLI has violated Labor Code §§ 1174, 1198, and 1199 by failing to maintain accurate records of, *inter alia*, all hours (including overtime hours) worked by, and other records regarding Ms. Boutros and other aggrieved employees.

Pursuant to Labor Code section 2699.3, please notify our office and GLI if the LWDA intends to investigate these alleged violations of the Labor Code. Please contact me should you require additional information.

Very truly yours,
MARQUEE LAW GROUP, A.P.C.



Tuvia Korobkin