

NORTHERN CALIFORNIA
118 WEST OAK STREET
LODI, CALIFORNIA 95240
[BY APPT. ONLY – NO SERVICE ACCEPTED]
SOUTHERN CALIFORNIA
360 EAST 2ND STREET, SUITE 800
LOS ANGELES, CALIFORNIA 90012
[BY APPT. ONLY – NO SERVICE ACCEPTED]



112 SOUTH CHURCH STREET
LODI, CALIFORNIA 95240

TELEPHONE: (209) 477-3833
WWW.MAYALLAW.COM

VLADIMIR F. KOZINA
MARK E. BERRY
WILLIAM J. GORHAM, III
NICHOLAS F. SCARDIGLI
ROBERT J. WASSERMANN
JENNY D. BAYSINGER
JOHN P. BRISCOE
VLADIMIR J. KOZINA

December 10, 2025

SENT VIA ONLINE FILING (<https://dir.tfaforms.net/308>)

Labor and Workforce Development Agency
Attn: PAGA Administrator
1515 Clay Street, Suite 801
Oakland, California 94612

SENT VIA CERTIFIED MAIL

Antonini Bros. Inc.
207 N Cardinal Ave.
Stockton, CA 95215

Re: Altair De Padua (Employee No. 384574)

To Whom It May Concern:

This firm represents Mr. De Padua in relation to his employment with Antonini Bros. Inc. (“Employer”). In accordance with California Labor Code section 2699.3, this letter shall serve as Mr. De Padua’s written notice to the Labor and Workforce Development Agency (“LWDA”) and Employer regarding the following Labor Code violations, and the facts and theories supporting the same.

Employer operates a trucking company that transports freight throughout California’s Central Valley. Mr. De Padua was employed by Employer as a driver from June 2025 until October 2025. During the last year Employers have:

1. Failure to Pay for All Hours Worked – Because of Employer’s unlawful compensation system, and in violation of Labor Code sections 226.2, 1182.12 et. seq., and 1194, Employer’s drivers were routinely not paid at least minimum wage for every hour they worked. Specifically, Employer would (a) refuse to pay drivers for all non-productive/non-driving time; (b) refuse to pay drivers for all waiting time, (c) require drivers to work off-the-clock, and/or (c) manipulate drivers’ time to their detriment.
2. Failure to Furnish Accurate Itemized Wage Statements – Because of the violations set forth above, the wage statements furnished by Employer to its employees violated Labor Code section 226(a) and 226.2 insofar as they failed to:

- a. Accurately show the gross wages earned in violation of section 226(a)(1);
- b. Accurately show the total number of hours worked by the employee in violation of section 226(a)(2);
- c. Accurately show the number of piece-rate units earned and any applicable piece rate if the employee is paid on a piece-rate basis in violation of section 226(a)(3);
- d. Accurately show the net wages earned in violation of section 226(a)(5);
- e. Accurately show all applicable hourly rates in effect during the pay period and the corresponding number of hours worked at each hourly rate in violation of section 226(a)(9); and
- f. Accurately show the total hours of compensable rest and recovery periods, the rate of compensation, and the gross wages paid for those periods during the pay period in violation of section 226(a)(2)(a).

3. Failure to Timely Pay Wages – Because Mr. De Padua Employer's other drivers are not properly compensated for all of their hours worked, they are not timely compensated for the same during each pay period and at the end of their employment in violation of Labor Code Sections 201-204 and 210.

Accordingly, and as set forth above, Mr. De Padua contends Employers have violated Labor Code sections 201-204, 210, 226, 226.2, 1182.12 et seq., 1194, and 1197, as well as the applicable IWC Wage Orders.

If the LWDA believes that it needs additional information to determine whether to investigate these claims, please contact me immediately to request the additional information, which I will provide to the extent it is available to me or my client.

If the LWDA does not intend to investigate these violations, Mr. De Padua intends to file a civil complaint, or amend a pre-existing civil complaint, against Employer pursuant to the Labor Code Private Attorneys General Act of 2004 (Labor Code §§ 2698 – 2699.5), on his behalf and, as a proxy for the LWDA, on behalf of all aggrieved current and former drivers. Thank you for your attention in this matter.

Regards,

MAYALL HURLEY P.C.



By _____
Robert Wassermann