

Danny Yadidsion, Esq.
310-494-6082 | danny@laborlawpc.com

January 19, 2026

VIA CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Skipolini's Inc.
3070 Main Street
Oakley, CA 94561

RE: Watkins, Delaney v. Skipolini's, Inc.

To Whom It May Concern:

This office represents Delaney Watkins ("Claimant") who was employed by Skipolini's, Inc. and related entities ("Respondents"). This letter is notice, and a request, pursuant to Labor Code § 2699.3 that your agency investigates the claims in this impending civil action. If the agency does not intend to investigate the alleged violations, we specifically request such notification to allow Claimant to file a civil action to pursue PAGA claims.

Overview of Claims and Aggrieved Employees

This action is brought on behalf of Claimant and similarly aggrieved non-exempt employees who were employed by Respondents at any of their California locations at any point during the one-year period preceding this notice through the present. The claims involve widespread, systemic Labor Code violations including:

- Failure to pay all wages for hours worked, including off-the-clock time;
- Failure to pay overtime wages at the correct rate;
- Meal and rest break violations;
- Inaccurate wage statements;
- Waiting time penalties upon separation;
- Failure to reimburse for mandatory business use of personal cell phones;
- Retaliation and constructive discharge related to protected activity;
- Other derivative and statutory Labor Code violations.

Claimant's Background and Employment

Claimant worked for Respondents in or about May 2025, as a Server/Host/Bar Attendant, working on-site at Respondents' Antioch, California location. Claimant worked set shifts that were monitored by Respondents' timekeeping system, generally 3-4 days per week. Throughout her employment, Respondents did not provide Claimant with meal periods. Rest breaks were likewise not authorized or permitted in practice. As a result, Claimant did not receive legally required meal or rest period premium pay.

Detailed Labor Code Violations

1. Failure to Pay for All Hours Worked

Labor Code §§ 1194, 204, 226.2

- o Respondents regularly failed to pay Claimant and similarly situated employees for all compensable hours worked. Although Respondents utilized a clock-in/clock-out timekeeping system, their payroll practices did not ensure that all recorded time was fully and accurately compensated.
- o Specifically, Respondents employed rounding and payroll practices that resulted in employees being underpaid for time worked. Respondents' timekeeping and payroll records failed to accurately capture and compensate all hours worked, including time that should have been paid under California law.
- o In addition, Respondents' time records did not capture all hours worked. As such, Claimant and similarly situated employees were not compensated for all hours worked.

2. Failure to Pay Overtime

Labor Code § 510

- o Claimant and similarly situated employees regularly worked over 8 hours per day and 40 hours per week. Respondents did not compensate them for all hours worked.

3. Meal and Rest Break Violations

Labor Code §§ 226.7, 512

- o Claimant was routinely denied compliant meal periods. Respondents did not provide Claimant with a duty-free meal break, and Respondents did not provide meal period premium pay in lieu of compliant breaks.
- o Similarly, Respondents failed to authorize and permit legally compliant rest breaks. Claimant was expected to remain available to perform work during shifts without being relieved of all duty for rest periods.
- o These practices were common and affected similarly situated employees working similar roles and schedules.

4. Inaccurate Wage Statements

Labor Code § 226(a)

- o Wage statements failed to reflect all hours worked and break premiums.
- o The deficiencies violate subsections (2), (5), and (9) of § 226(a).

5. Waiting Time Penalties

Labor Code §§ 201–203

- o Employees did not receive all earned and unpaid wages timely.

6. Failure to Reimburse for Business Expenses

Labor Code § 2802

- o Employees were required to use their personal cell phones for work communications without reimbursement.
- o These business expenses were incurred for the benefit of Respondents but not compensated.

Conclusion and Request for Agency Action

The violations described herein occurred consistently at Respondents' facilities across California and affected a broad group of similarly situated employees. Claimant seeks recovery of all available PAGA civil penalties, as well as attorneys' fees and costs associated with enforcement. Pursuant to Labor Code § 2699.3, we request that the LWDA notify us in writing if it elects not to investigate these violations so that Claimant may proceed with a representative PAGA action. If no notice is received within the statutory period, Claimant will file a civil complaint.

Very truly yours,



Danny Yadidsion