



February 4, 2026

Via Online Filing at (dir.govfa.net/411)

Attention: PAGA Notice Filing
Labor & Workforce Development Agency
Department of Industrial Relations
455 Golden Gate Avenue, 10th Floor
San Francisco, California 94102

Re: Notice of Labor Code §2699 "PAGA Violations"
Claimant: Alyson Courtney Stockin
Respondent: Ehsan Ali, M.D., Inc. dba SEV Laser

Dear Labor & Workforce Development Agency:

Pursuant to Labor Code section 2699.3, this letter provides notice to the Labor & Workforce Development Agency ("LWDA"), the Employer, Ehsan Ali, M.D., Inc. dba SEV Laser, and all affiliated entities ("the Company") that Complainant Alyson Courtney Stockin ("Ms. Stockin") intends to file a civil lawsuit based on claims, *inter alia*, arising under the Private Attorney General Act, California Labor Code section §§ 2699, et seq., ("the PAGA"), if the LWDA declines to pursue the allegations set forth in this letter.

Ehsan Ali, M.D., Inc., doing business as Sev, employed Ms. Courtney Alyson Stockin since September 27, 2021. During her employment, Ms. Stockin worked as a registered nurse and was later promoted to Lead Nurse before being demoted to Floor Nurse. In this capacity, Ms. Stockin provided clinical services to patients at Sev's medical spa locations in Hermosa Beach. Ms. Stockin was paid on an hourly basis and earned approximately \$41.00 per hour as a Lead Nurse, which was later reduced to approximately \$40.00 per hour following her demotion.

Ms. Stockin worked part time to full time schedules consisting of approximately three twelve-hour shifts per week, generally working between thirty (30) and forty (40) hours per week. Her shifts typically ran from approximately 9:45 a.m. to 7:30 p.m., and on certain days ended earlier due to condensed scheduling. Despite the length of her shifts, Ms. Stockin was routinely required to work through meal and rest periods due to staffing levels, patient scheduling, and management directives.

As a result of the Company's scheduling practices and operational demands, Ms. Stockin was not provided with compliant unpaid meal periods during which she was relieved of all duty for a period of no less than thirty minutes. She was frequently required to perform work during meal periods, including cleaning duties such as vacuuming, mopping, and dusting, which often reduced her meal period to less than the required duration. Similarly, Ms. Stockin was not consistently provided with compliant ten-minute rest periods and was often required to perform charting, patient preparation, and other job duties during rest breaks.



Ms. Stockin was also required to perform work off the clock. This included coming in early and staying late without pay to complete charting, prepare rooms, and perform lead nurse duties. Additionally, Ms. Stockin was required to train other employees and was instructed to arrive up to an hour early on numerous training days to prepare workstations, equipment, paperwork, and treatment rooms before trainees arrived, without clocking in or receiving compensation for that time.

Furthermore, the Company failed to maintain accurate time records and failed to issue legally compliant wage statements. The wage statements provided to Ms. Stockin did not accurately reflect all hours worked, failed to account for off-the-clock work, and failed to include all wages earned. As a result, Ms. Stockin was not paid all wages due for all hours worked, including overtime and premium wages for missed meal and rest periods.

Mr. Stockin estimates the Company employs approximately fifty (200) employees in a similar capacity to her at any given time. She asserts that the Labor Code violations described herein were systemic and generally applicable to similarly situated employees during the year preceding this notice and beyond. Accordingly, Ms. Stockin is an aggrieved employee within the meaning of the Private Attorneys General Act, and all other impacted employees are likewise aggrieved under the same facts, policies, and legal theories. The unlawful policies and practices described above have been in effect from at least 2021 through the present.

Ms. Stockin asserts the above facts provide statutorily compliant notice of violation of the following Labor Code sections for purposes of PAGA notice:

- 1) Labor Code section 200 – definition of wages
- 2) Labor Code section 201 – failure to pay wages on involuntary discharge
- 3) Labor Code section 226 – wage statement
- 4) Labor Code section 246 – paid sick leave
- 5) Labor Code section 247.5 – maintenance of hours work and paid sick leave accrual
- 6) Labor Code section 226.7 – meal and rest periods
- 7) Labor Code section 510 – failure to pay overtime
- 8) Labor Code section 2802 – expense reimbursement.

If the LWDA provides notice that it does not intend to pursue these matters, or we do not receive notice within sixty (60) calendar days of the date of this letter, we intend to file a claim under the PAGA, in addition to other potential claims.



Should you have any questions or need further information, please contact our office on Ms. Stockin's behalf, please call me directly at (213) 286-4127 and/or at the physical or email address as set forth herein. Thank you for your attention to this matter.

Very truly yours,

WEST COAST TRIAL LAWYERS

A handwritten signature in black ink that reads "William D. Becker". The signature is written in a cursive, flowing style.

William D. Becker, Esq.

CC: By Certified Mail # 9589 0710 5270 3723 1815 96
Ehsan Ali, M.D., Inc. dba SEV Laser
c/o Angineh Petrosian, Agent for Service of Process
2921 West Burbank Boulevard,
Burbank, CA 91505