

# Law Offices of Todd M. Friedman, P.C.

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Writer licensed in:  
California  
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June 25, 2026

## **Via Online Submission**

California Labor & Workforce Development Agency  
ATTN: PAGA Administrator  
800 Capitol Mall  
Sacramento, CA 95814  
<https://dir.tfaforms.net/308>

**RE: Noelle Steinberg v. Kadiant LLC**

Dear PAGA Administrator:

This office represents Ms. Noelle Steinberg in connection with his claims under the California labor code and sends this letter in compliance with the notice requirements of the Private Attorneys General Act of 2004 (“PAGA”). Lab. C. § 2699.3. Ms. Steinberg was an employee of Kadiant LLC in California.

The employers may be contacted directly at:

Kadiant LLC  
850 Towbin Ave.  
Lakewood, NJ 08701

Ms. Steinberg, on behalf of herself and other current and former laborers and workers who are similarly situated, alleges that Kadiant LLC (“Kadiant” or “Defendant”) has violated, and continues to violate, the provisions of the Labor Code and wage orders promulgated by the Industrial Welfare Commission. Those similarly situated workers include all current and former hourly-paid employees, employed by Defendant, who were denied wages for hours worked, not compensated, and who were denied compliant rest breaks under California Law, and provided services to Defendants, at any of its locations and/or job sites in the state of California, from June 25, 2025 to the present date.

As described more thoroughly in the attached proposed Complaint, Ms. Steinberg was employed by Defendant as an hourly-paid employee. During the relevant time period, Defendant did not pay Ms. Steinberg minimum wage and did provide Ms. Steinberg meal and rest breaks, as required by California law.

The complaint alleges that Defendant’s actions are subject to civil penalties pursuant to the following provisions of the *Labor Code* and Industrial Welfare Commission Wage Order 4:

- a. Sections 1194 and 1197, for failing to pay minimum wage;

- b. Section 204, 1197, and 1199, for failing to pay all regular wages;
- c. Sections 226.7 and 512, for failing to provide duty-free meal and rest periods;
- d. Section 558, for failing to properly compensate for all hours worked;
- e. Sections 201-203, for failing to pay all wages due and owing when employees terminated;
- f. Section 226, for failing to provide accurate, itemized wage statements; and,
- g. Section 1199, and Wage Orders No. 4 § 20, for failing to pay proper wages and/or provide required working conditions and/or for violating the applicable Wage Order/regulations.

Accordingly, Ms. Steinberg requests that the Labor and Workforce Development Agency not investigate these violations and permit him to pursue a claim for such penalties under the Private Attorney General's Act (Labor Code section 2698 et seq. and Labor Code section 558). Upon receiving notice that this Agency does not intend to investigate the alleged violations, or, if no notice is provided, then within 60 calendar days of the postmark date of this letter, the named plaintiff will amend his lawsuit to include these claims.

Thank you for your time and consideration.

Yours Truly,

A handwritten signature in black ink, appearing to read 'Todd M. Friedman', is written over a horizontal line.

**Todd M. Friedman, Esq.**

Enclosure: Complaint

cc:

**By Email** (with enclosure)  
Kadiant LLC  
c/o Nancy Lubrano  
CDF Labor Law LLP  
nlubrano@cdflaborlaw.com