

SUPPORTING DOCUMENTATION AND PROCEDURAL HISTORY

In Support of PAGA Notice - Jezreel Gil v. Tata Consultancy Services Limited

Submitted as "Other Attachment" to Formal PAGA Claim Notice Claimant: Jezreel Gil Employer: Tata Consultancy Services Limited (TCS) Employment Period: October 29, 2021 - March 29, 2023

I. PURPOSE OF THIS DOCUMENT

This attachment provides the Labor and Workforce Development Agency ("LWDA") with a chronological record of the procedural history underlying my PAGA claim. It demonstrates that my assertion of PAGA rights against TCS has been continuously maintained since May 4, 2023, predating both the Joshua Hall PAGA notice (filed June 13, 2022, Case No. LWDA-CM-297659-17) as to my personal claims, and the Ross v. TCS settlement (Los Angeles Superior Court Case No. 24STCV0607, approved February 27, 2026).

This document does not replace or modify my Formal PAGA Claim Notice. It is offered solely as procedural and evidentiary support.

II. CHRONOLOGICAL PROCEDURAL HISTORY

1. May 4, 2023 - DLSE Wage Claim Filed

I filed a wage claim with the California Division of Labor Standards Enforcement (DLSE), Case No. WC-CM-952803. My claim documented unpaid overtime, unauthorized wage deductions, a 41-day delay in initial payment (October 29, 2021 - December 9, 2021), and waiting-time penalties following my March 29, 2023 termination. Throughout this proceeding, I asserted that TCS's conduct violated multiple Labor Code provisions affecting other similarly situated employees, consistent with PAGA's representative purpose.

2. August 12, 2024 - DLSE Pre-Hearing Conference

The DLSE held its first pre-conference hearing approximately 16 months after my initial wage claim filing, following intervention requests to a U.S. Congressional office and a California State Assembly office to compel scheduling.

3. July 17, 2025 - Evidence Compilation Submitted to DLSE

I submitted a comprehensive evidence compilation in advance of the August 4, 2025 DLSE hearing, including a chronological timeline of paystubs, timecards, and correspondence documenting wage violations. This submission included a good-faith placeholder estimate of PAGA-related liability. I have since clarified, in my formal PAGA notice, that this figure was a non-binding prayer for relief, not a calculated damages figure, and that actual PAGA penalties remain subject to proof upon receipt of subpoenaed payroll and timekeeping records.

4. August 22, 2025 - DLSE Dismissal Without Prejudice

The Labor Commissioner's Office dismissed my wage claim without prejudice, reassigning it to me for civil action. The dismissal letter, signed by Senior Deputy Labor Commissioner [REDACTED], expressly stated that the matter involved complexity, voluminous documentation, and evidentiary issues "beyond what is typically addressed in the limited scope of our wage adjudication hearings," and that the appropriate forum was the civil courts. This dismissal was procedural, not a determination on the merits, and preserved my right to pursue all claims, including PAGA, in a court of competent jurisdiction.

5. October 21, 2025 - Superior Court Complaint Filed

Following the DLSE's dismissal and reassignment, I filed a civil complaint in San Bernardino Superior Court, Case No. CIVRS2508792, asserting five causes of action: (1) Labor Code violations (wage-and-hour, waiting-time, wage statement), (2) Tortious Interference with Prospective Economic Advantage, (3) Whistleblower Retaliation (Labor Code Section 1102.5), (4) Civil Rights Violations, and (5) PAGA Representative Action. This filing formally preserved my PAGA claims in a state court of competent jurisdiction.

6. December 2025 - Removal to Federal Court

TCS, through counsel (Littler Mendelson, P.C.), removed CIVRS2508792 to the United States District Court for the Central District of California, Case No. 5:25-cv-03372-FMO-AS. My PAGA claims remain pending and unresolved in that removed action. I have challenged the propriety of this removal on the ground that PAGA representative claims brought on behalf of the State of California are not properly removable under controlling Ninth Circuit precedent (*Gaus v. Miles, Inc.*, 980 F.2d 564 (9th Cir. 1992)), and have moved for remand and for sanctions under Federal Rule of Civil Procedure 11.

7. February 27, 2026 - Ross v. TCS PAGA Settlement Approved (Non-Party to This Action)

The Los Angeles County Superior Court approved a PAGA settlement in *Moises Ross v. Tata Consultancy Services Limited, et al.*, Case No. 24STCV0607. I was not a party to that action and had no opportunity to object prior to approval, as my own independently filed PAGA representative action (CIVRS2508792) was already pending in San Bernardino Superior Court at that time.

8. July 9, 2026 - Individual PAGA Member Payment Received

I received a Court Approved Notice of PAGA Settlement and an Individual PAGA Member Payment check in the amount of \$37.18, issued by Phoenix Settlement Administrators on behalf of the Ross settlement. The notice defines the released "PAGA Period" as January 2, 2023 through January 3, 2026, and states that TCS's own records show I worked only 7.00 pay periods during that period, consistent with my termination on March 29, 2023. The substantial majority of the violations documented in my Formal PAGA Claim Notice occurred before January 2, 2023, and are therefore outside the scope of the Ross release by the express terms of the settlement notice itself.

9. July 31, 2026 - PAGA Notice Inquiry Submitted to LWDA

I contacted the LWDA PAGA Unit directly by email to inquire whether an existing PAGA notice was on file under my name and to formally assert my PAGA rights in writing. The LWDA PAGA Unit responded that no PAGA notice existed in its electronic database associated with my name and employer, and correctly advised that an emailed notice does not satisfy the formal filing requirement. I am submitting this Formal PAGA Claim Notice through the official online portal in direct response to that guidance.

III. DISCLOSURE OF PRIOR RELATED PAGA MATTERS

A. Hall v. Tata Consultancy Services Limited (LWDA Case No. LWDA-CM-297659-17)

A PAGA notice against TCS was filed by Joshua Hall through the law firm Blumenthal, Nordrehaug & Bhowmik on June 13, 2022. Based on publicly available records, this matter appears to have concluded with dismissal of the plaintiff's individual claims and the putative class claims. I have not been able to independently confirm through court records whether this matter was ever adjudicated as a PAGA representative action on behalf of the State of California, or whether any PAGA penalties were assessed, paid, or allocated to aggrieved employees as a result. This notice predates the specific violations I allege, which arose during my employment (October 29, 2021 - March 29, 2023) and continued through my termination. I am not aware of any settlement, judgment, or release in the Hall matter that would bar or extinguish my independent PAGA claims, and I expressly reserve all rights to pursue them.

B. Ross v. Tata Consultancy Services Limited (Los Angeles Superior Court Case No. 24STCV0607)

I received a Court Approved Notice of PAGA Settlement dated July 9, 2026, reflecting an Individual PAGA Member Payment of \$37.18, issued pursuant to a settlement approved by the Court on February 27, 2026. By the express terms of that settlement notice, the released claims are limited to PAGA penalty claims that accrued during the defined "PAGA Period" of January 2, 2023 through January 3, 2026, and TCS's own records reflect that I worked only 7.00 pay periods during that window.

The substantial majority of the violations I allege in my Formal PAGA Claim Notice occurred before January 2, 2023, including the 41-day delay in initial payment (October 29, 2021 - December 9, 2021), the denial of overtime for mandatory training (January 7, 2022), and the unauthorized \$836.64 payroll deduction (August 5, 2022). These pre-January 2, 2023 violations fall outside the released PAGA Period and are not released, waived, or extinguished by the Ross settlement under its own express terms.

To the extent any portion of my claims arose between January 2, 2023 and my termination on March 29, 2023, I had an active, independently filed PAGA representative action pending in San Bernardino Superior Court Case No. CIVRS2508792 prior to the Ross settlement's approval. I received no meaningful notice of, and no meaningful opportunity to object to, that settlement prior to its approval, and I do not concede that it adequately investigated, litigated, or compensated the specific violations I have documented for that limited overlapping window. I expressly reserve all rights to challenge the adequacy of that settlement as applied to any overlapping portion of my claims.

IV. TOLLING OF PAGA CLAIMS

My PAGA claims have been continuously and affirmatively asserted since May 4, 2023 through four sequential proceedings: the DLSE wage claim (WC-CM-952803, dismissed without prejudice on August 22, 2025), the Superior Court PAGA representative action (CIVRS2508792, filed October 21, 2025), and the removed federal action (5:25-cv-03372-FMO-AS). The DLSE's own dismissal letter confirms that my claims were reassigned to me for civil action, not rejected on the merits, and that pursuit through the courts was contemplated and expected. TCS's subsequent removal of my state court action to federal court in December 2025 further interrupted my ability to prosecute my PAGA claims in California state court and constitutes additional grounds for equitable tolling during the pendency of that removal and this notice process.

V. RELATIONSHIP OF THIS ATTACHMENT TO THE FORMAL PAGA NOTICE

The violations described in my Formal PAGA Claim Notice are supported by documentary evidence in my possession, including:

- Email from PMO supervisor [REDACTED] dated January 7, 2022, denying overtime approval for mandatory training and directing that I not report to my work assignment until training modules were completed (supports Labor Code Sections 510, 1194);
- Payroll records reflecting an unauthorized \$836.64 deduction on August 5, 2022, and related "Overtime Retro" and "Holiday Retro" deductions without written consent (supports Labor Code Section 221);
- IPMS timecard records showing PMO supervisor overrides of recorded overtime hours (e.g., December 23 and December 27, 2021) replaced with uniform eight-hour entries (supports Labor Code Section 226);
- Bank statement records confirming a 41-day delay between my October 29, 2021 start date and my first paycheck on December 9, 2021 (supports Labor Code Section 204);
- Termination records dated March 29, 2023, and related waiting-time claim documentation reflecting a 30-day delay before wages were paid (supports Labor Code Section 203);
- ADP screenshots showing post-employment record modifications approximately 18 months after separation (relevant to spoliation and retaliation claims);
- Termination communications from HR representative [REDACTED] citing "how" rather than "what" I said at a February 2023 company meeting, shortly after my request to speak was granted by management (supports Labor Code Section 1102.5);
- The Ross v. TCS Court Approved Notice of PAGA Settlement dated July 9, 2026, establishing the precise released PAGA Period (January 2, 2023 - January 3, 2026) and confirming that the overwhelming majority of my claims predate and fall outside that release.

This evidence remains available upon request and will be further developed through discovery, including outstanding subpoenas issued to TCS and ADP for complete clock-in/clock-out records, including break and

lunch period data.

Respectfully submitted,

Jezreel Gil Pro Se Claimant

[REDACTED]

[REDACTED]