

1 Adam Rose (210880)
2 adam@frontierlawcenter.com
3 FRONTIER LAW CENTER
4 23901 Calabasas Road, #1084
5 Calabasas, CA 91302
6 Telephone: (818) 914-3433
7 Facsimile: (818) 914-3433

8 Attorney for Plaintiff
9 Karen Flores

Electronically FILED by
Superior Court of California,
County of Los Angeles
4/16/2024 11:43 AM
David W. Slayton,
Executive Officer/Clerk of Court,
By Y. Ayala, Deputy Clerk

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SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

KAREN FLORES, on behalf of herself and all
aggrieved employees,

Plaintiff,

v.

PLANTA BRENTWOOD, LLC,
PLANTA MARINA, LLC,
and DOES 1 to 100,

Defendants.

) NO. 24STCV09516

) COMPLAINT FOR PAGA PENALTIES

PRELIMINARY ALLEGATIONS

1. Plaintiff Karen Flores is a resident of Los Angeles County.

2. Defendant Planta Brentwood, LLC is a Delaware limited liability company with its
principal place of business in Los Angeles County.

3. Defendant Planta Marina, LLC is a Delaware limited liability company with its principal
place of business in Los Angeles County.

4. Plaintiff does not know the names and capacities of Does 1 to 100 and therefore use
fictitious names. Plaintiff will amend pursuant to Code of Civil Procedure section 474 when the
names and capacities are known.

1 5. The named and Doe defendants are referred to as “Defendants” and are the alter ego of each
2 other and are collectively liable for the acts below.

3 6. Defendants operate Planta restaurants in Brentwood and Marina del Rey.

4 7. Plaintiff has worked for Defendants in a nonexempt capacity as a prep cook; therefore
5 Wage Order 5 applies.

6 8. On February 6, 2024 Plaintiff sent a PAGA letter to Defendants and uploaded the letter to
7 the LWDA website. Since it has been more than 65 days since the letter was sent, Plaintiff may
8 now request PAGA penalties on behalf of herself and all aggrieved employees. (See Lab. Code, §
9 2699(a).)

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11 FIRST CAUSE OF ACTION

12 PAGA Penalties

13 Against All Defendants

14 9. Plaintiff incorporates by reference paragraphs 1 to 8 of the complaint.

15 10. The PAGA penalties for the minimum wage violations are in Labor Code 1197.1.

16 11. The PAGA penalties for the overtime violations are in Labor Code 558.

17 12. The PAGA penalties for the meal break violations are in Labor Code 558.

18 13. The PAGA penalties for the rest break violations are in Labor Code 2699.

19 14. The PAGA penalties for the wage statement violations are in Labor Code 226.3.

20 15. The PAGA penalties for the waiting time penalty violations are in Labor Code 2699.

21 16. Further, Plaintiff is entitled to attorney fees and costs pursuant to Labor Code 2699.

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23 PRAYER

24 First Cause of Action

25 1. All applicable penalties

26 2. Attorney fees and costs

27 3. Other relief the court deems proper

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Date:

FRONTIER LAW CENTER

Adam Rose

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Attorney for Plaintiff
Karen Flores