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Superior Court of California,
County of Los Angeles
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David W. Slayton,
Executive Officer/Clerk of Court,
By A. Munoz, Deputy Clerk

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SUPERIOR COURT OF CALIFORNIA

COUNTY OF LOS ANGELES

ERIC DEMETREOUS HILL, on behalf of
himself and all aggrieved employees,

Plaintiff,

v.

KLW CP, LLC,
RISERFIT CA, LLC,
and DOES 1 to 100,

Defendants.

) NO. **24STCV09523**

) COMPLAINT FOR PAGA PENALTIES

PRELIMINARY ALLEGATIONS

1. Plaintiff Eric Demetreous Hill is a resident of Orange County.
2. Defendant KLW CP, LLC is a limited liability company which is also called KLW Fitness;
it is based in Los Angeles County.
3. Defendant RiserFit CA, LLC is a Delaware limited liability company that is based 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 Club Pilates studios in the following cities: Tarzana, Sherman Oaks,
4 Granada Hills, North Hollywood, Brentwood, Burbank, Pacific Palisades, West Hollywood, West
5 Los Angeles, Miracle Mile, Glendale, Culver City, Echo Park, La Canada, Little Tokyo, Westlake
6 Village, South Pasadena, Thousand Oaks, Manhattan Beach, Pasadena, Redondo Beach, Torrance,
7 Monrovia, Palos Verdes, Camarillo, Lakewood, Cerritos, Long Beach, West Covina, Cypress, La
8 Habra, Seal Beach, San Dimas, Fullerton, Diamond Bar, Garden Grove, Brea, Huntington Beach,
9 Ventura, Yorba Linda, Chino Hills, Huntington Beach, Orange, Anaheim, Costa Mesa, Upland,
10 Tustin, Irvine, Newport Beach, Rancho Cucamonga, Norco, Fontana, Foothill Ranch, Mission
11 Viejo, Corona, Laguna Niguel, Rancho Santa Margarita, Dana Point, Riverside, San Clemente,
12 Santa Barbara, Redlands, Goleta, Wildomar, Bakersfield, Murrieta, Temecula, Oceanside,
13 Carlsbad, San Marcos, Encinitas, Solana Beach, Escondido, San Diego, Palm Springs, La Jolla,
14 Poway, Rancho Mirage, Santee, La Mesa, El Cajon, La Quinta, Chula Vista, Arroyo Grande, San
15 Luis Obispo, Paso Robles, Clovis, Fresno, Pacific Grove, Morgan Hill, Santa Cruz, San Jose,
16 Campbell, Saratoga, Cupertino, Sunnyvale, Mountain View, Fremont, Palo Alto, Pleasanton,
17 Redwood City, San Carlos, Danville, Brentwood (Contra Costa), Alameda, Walnut Creek,
18 Lafayette, Pleasant Hill, Daly City, Oakland, San Francisco, El Cerrito, Elk Grove, Benicia, El
19 Dorado Hills, Folsom, Sacramento, Greenbrae, Sacramento, Fair Oaks, Vacaville, Novato,
20 Roseville, Rocklin, Davis, Napa, Lincoln, Woodland, Petaluma, and more locations to come.

21 7. Plaintiff has worked for Defendants in a nonexempt capacity as a prep cook; therefore
22 Wage Order 10 applies.

23 8. On February 6, 2024 Plaintiff sent a PAGA letter to Defendants and uploaded the letter to
24 the LWDA website. Since it has been more than 65 days since the letter was sent, Plaintiff may
25 now request PAGA penalties on behalf of herself and all aggrieved employees. (See Lab. Code, §
26 2699(a).)

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1 FIRST CAUSE OF ACTION

2 PAGA Penalties

3 Against All Defendants

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

5 10. The underlying violations for PAGA penalties relate to the following: 1) minimum wage
6 violations, 2) overtime violations, 3) meal break violations, 4) rest break violations, 5) wage
7 statement violations, 6) waiting time penalty violations, and 7) sick pay violations.

8 11. The PAGA penalties for the minimum wage violations are in Labor Code 1197.1.

9 12. The PAGA penalties for the overtime violations are in Labor Code 558.

10 13. The PAGA penalties for the meal break violations are in Labor Code 558.

11 14. The PAGA penalties for the rest break violations are in Labor Code 2699.

12 15. The PAGA penalties for the wage statement violations are in Labor Code 226.3.

13 16. The PAGA penalties for the waiting time penalty violations are in Labor Code 2699.

14 17. The PAGA penalties for the sick pay violations are in Labor Code 2699.

15 18. Further, Plaintiff is entitled to attorney fees and costs pursuant to Labor Code 2699.

16
17 PRAYER

18 First Cause of Action

19 1. All applicable penalties

20 2. Attorney fees and costs

21 3. Other relief the court deems proper

22
23 Date: April 16, 2024

FRONTIER LAW CENTER

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25 *Adam Rose*

26 _____
Adam Rose
27 Attorney for Plaintiff
Eric Demetreous Hill