



February 10, 2025

VIA LWDA ONLINE PORTAL

<https://dir.govfa.net/310>

Labor and Workforce Dev. Agency
Attn: PAGA Administrator
1515 Clay Street, Ste. 801
Oakland, CA 94612

Allen Ito v. Living Spaces Furniture, LLC
LWDA-CM-1030423-24
Our Client: Allen Ito
Our File No.: 4-155
Subject: Amended PAGA Notice

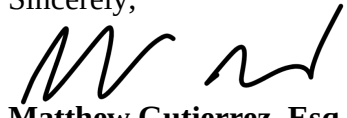
To Whom It May Concern:

Defendant Living Spaces Furniture, LLC, employed Plaintiff Allen Ito, from around August 8, 2011, to on or about February 29, 2024.

In the months leading up to February 23, 2024, Plaintiff text messaged a co-worker about working conditions. Shortly after February 23, 2024, one of Defendant's Vice Presidents, Luke Parker, discovered the content of Plaintiff's text message and terminated Plaintiff's employment in retaliation and discrimination on or about February 29, 2024. The discharge was in violation of Labor Code section 232.5(c). The discharge was also because of the exercise by Plaintiff on behalf of himself, or others, of rights afforded him, in violation of Labor Code section 98.6(a). Defendant has a pattern and practice of interpreting and applying its policies such that other aggrieved employees who discuss working conditions are disciplined, discriminated against, or discharged.

Plaintiff demands that Defendant take immediate measures to redress the above-referenced violations. Plaintiff intends to amend his pending civil action, to seek civil penalties in a cause of action under the PAGA for every violation that affected Plaintiff and other aggrieved employees.

Sincerely,

A handwritten signature in black ink, appearing to read 'Matthew Gutierrez', with a stylized, cursive script.

Matthew Gutierrez, Esq.

MG:ep

cc:

Marrian Chang, Senior Counsel
Living Spaces Furniture, LLC
14501 Artesia Blvd.
La Mirada, CA 90638
[Via Certified Mail]