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Attorney for Plaintiff
Josue Borja

SUPERIOR COURT OF CALIFORNIA
COUNTY OF RIVERSIDE

JOSUE BORJA, on behalf of himself and all aggrieved employees,	)	NO. CVRI 2405079
	)	
Plaintiff,	)	COMPLAINT FOR PAGA PENALTIES
	)	
v.	)	
	)	
PACIFIC HYDROTECH CORPORATION,	)	
and DOES 1 to 100,	)	
	)	
Defendants.	)	

PRELIMINARY ALLEGATIONS

1. Plaintiff Karen Flores is a resident of Riverside County.
2. Defendant Pacific Hydrotech Corporation is a California corporation with its principal place of business in Riverside County.
3. 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.
4. The named and Doe defendants are referred to as "Defendants" and are the alter ego of each other and are collectively liable for the acts below.
5. Defendants provide water and wastewater services.

1 6. Plaintiff has worked for Defendants in a nonexempt capacity; Wage Order 16 applies.

2 7. On May 13, 2024 Plaintiff sent a PAGA letter to Defendant and uploaded the letter to the
3 LWDA website. Since it has been more than 65 days since the letter was sent, Plaintiff may now
4 request PAGA penalties on behalf of herself and all aggrieved employees. (See Lab. Code, §
5 2699(a).)

7 FIRST CAUSE OF ACTION

8 PAGA Penalties

9 Against All Defendants

10 8. Plaintiff incorporates by reference paragraphs 1 to 7 of the complaint.

11 9. The PAGA penalties for the off the clock violations are in Labor Code 1197.1.

12 10. The PAGA penalties for the rounding violations are in Labor Code 2699.

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

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

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

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

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

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

19
20 PRAYER

21 First Cause of Action

22 1. All applicable penalties

23 2. Attorney fees and costs

24 3. Other relief the court deems proper

25 Date: September 9, 2024

FRONTIER LAW CENTER

26 /s/ Adam Rose

27 Attorney for Plaintiff

28 Josue Borja