

DIVERSITY LAW GROUP

A PROFESSIONAL CORPORATION

515 S. FIGUEROA STREET, SUITE 1250

LOS ANGELES, CALIFORNIA 90071

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October 15, 2024

VIA ON-LINE FILING WITH LWDA AND CERTIFIED MAIL TO EMPLOYER

California Labor & Workforce Development Agency

Attn. PAGA Administrator

1515 Clay Street, Ste. 801

Oakland, CA 94612

PAGA@dir.ca.gov

Re: *Sarah Roberts-Cooper v. Rise Luxury Rehab, LLC*
LWDA Case No. LWDA-CM-1053040-24

To Whom It May Concern:

My office represents Sarah Roberts-Cooper ("Plaintiff") in her lawsuit against her former employer, Rise Luxury Rehab, LLC ("Defendant" or the "Company"). We are submitting this correspondence as an amendment to Plaintiff's September 26, 2024 written notice under Labor Code § 2699.3 of the claims asserted on behalf of Plaintiff and other aggrieved employees against Defendant. Specifically, Plaintiff amends the Company's address to:

Rise Luxury Rehab, LLC
2139 Pontius Ave
Los Angeles, CA 90025

Plaintiff's September 26, 2024 initial PAGA notice is attached herewith as Exhibit A. Please contact me at the above/phone number should you have any questions regarding this matter.

Sincerely,



Mai Tulyathan

cc: Rise Luxury Rehab, LLC (by certified mail)

EXHIBIT A

SARAH ROBERTS-COOPER

C/O DIVERSITY LAW GROUP, P.C.

515 S. FIGUEROA STREET, SUITE 1250

LOS ANGELES, CALIFORNIA 90071

TELEPHONE (213) 488-6555

FACSIMILE (213) 488-6554

September 23, 2024

VIA ON-LINE FILING AND CERTIFIED MAIL TO EMPLOYER

California Labor & Workforce Development Agency

Attn. PAGA Administrator

1515 Clay Street, Suite 801

Oakland, CA 94612

Re: *Sarah Roberts-Cooper v. Rise Luxury Rehab, LLC*

To Whom It May Concern:

This correspondence shall constitute written notice under Labor Code section 2699.3 of my claims against my former employer, Rise Luxury Rehab, LLC (the "Company"). Specifically, I allege that the Company:

1. Violated Labor Code §§ 201-203 and 226.7 by not authorizing and permitting a duty-free 10-minute rest period for every 4 hours worked, or major fraction thereof, to me and other non-exempt employees, nor paying the requisite rest period premium pay of an additional hour of wages. The Company violated these provisions by failing to provide me and other similarly situated aggrieved employees proper rest breaks as such breaks were either not provided or were interrupted. Furthermore, the Company required me and other similarly situated aggrieved employees to remain on work premises during our rest breaks.

2. Violated Labor Code §§ 201-203, 226.7, and 512 by not providing a duty-free 30-minute meal period within the first 5 hours of work for shifts in excess of 5 hours to me and other aggrieved employees. The Company violated these provisions by failing to provide me and other similarly situated aggrieved employees proper meal breaks as such breaks were either not provided or were interrupted. While our meal breaks were not provided, the Company would falsify our meal break times to show that meal breaks were taken. Furthermore, like our rest breaks, the Company required me and other similarly situated aggrieved employees to remain on work premises during our meal breaks.

3. Violated Labor Code §§ 201-204, 510, 558, 1194, 1197, 1197.1 by not paying wages, including minimum, regular, and overtime wages, to me and other similarly situated aggrieved employees for all hours worked. The Company violated these provisions by requiring me and other non-exempt employees to perform work off-the-clock after the end of our shifts without payment of any wages.

4. Violated Labor Code § 226(a) by not providing accurate, itemized wage statements to me and other non-exempt employees. The Company violated this by not listing the hourly rates for hours worked, and by not accurately reflecting the gross/net wages earned, total hours worked, as well as for premium pay for missed meal and rest breaks on the paystubs of me and other non-exempt employees due to the violations stated above.

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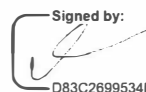
September 23, 2024
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The address for the Company is:

Rise Luxury Rehab, LLC
2319 Pontius Ave.
Los Angeles, CA 90025

Please contact my attorneys at the address/telephone number listed above if you have any questions regarding this matter.

Sincerely,

Signed by:


D83C2699534D47A
Sarah Roberts-Cooper

cc: Rise Luxury Rehab, LLC