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February 24, 2025

Elizabeth Christopher
BIBIYAN LAW GROUP, P.C.
1460 Westwood Boulevard
Los Angeles, CA 90024
Via Certified Mail

CALIFORNIA LABOR & WORKFORCE
DEVELOPMENT AGENCY
Attn: PAGA Administrator
Via Online Submission

RE: *Jared Surs v. Joshua Tree PACC, LLC*
Case No.: *LWDA-CM-1069368-24*

To the LWDA and Counsel for Bibiyan Law Group, P.C.:

This office represents Joshua Tree PACC, LLC (“Joshua Tree”) with regard to the claims made by Claimant Jared Surs (“Claimant”). We received Claimant’s Labor Code § 2699.3 Notice (“PAGA Notice”) dated December 26, 2024. The template PAGA Notice recites an exhaustive list of Labor Code violations, including violations of sections 96, 98.6, 200, 201, 201.5, 201.7, 202, 203, 203.5, 204, 204(a), 205, 205.5, 210, 212, 221, 222, 223, 222.5, 226, 226.2, 226.3, 227.3, 232, 232.5, 245, 246, 432, 432.3, 432.5, 432.7, 432.8, 1102.5, 1197.5, 1198, 1198.5, 1527, 3366, 3457, and 8397.4.

Additionally, we are in receipt of the February 13, 2025 Notice Directing Submission of Amended PAGA Notices (“Enforcement Letter”) that Todd M. Ratshin, Deputy Secretary for Enforcement, LWDA issued to Bibiyan Law Group regarding the “numerous boilerplate PAGA notices containing seemingly frivolous allegations on behalf of aggrieved employees against employers throughout the state” that it has issued. We have attached a copy of the Enforcement Letter to this correspondence. In the Enforcement Letter, Mr. Ratshin, states:

Before an “aggrieved employee” may commence a civil action under PAGA, section 2699.3, subdivision (c)(1) requires the employee give written notice to LWDA and the employer “of the specific provisions of this code alleged to have been violated, including the facts and theories to support the alleged violation.” This prelitigation notice obligation has been described as an “administrative exhaustion” requirement (*Rojas-Cifuentes v. Superior Court* (2020) 58 Cal.App.5th 1051, 1056), and courts have affirmed that “[p]roper notice under section 2699.3 is a ‘condition’ of a PAGA lawsuit.” (*Uribe v. Crown Bldg. Maint. Co.* (2021) 70 Cal.App.5th 986, 1003.)

The Enforcement Letter further states:

[A] PAGA notice properly must inform both LWDA and the employer of the nature of the violations alleged with some level of detail in describing the “facts and theories” supporting them. The boilerplate PAGA notices you are filing (*at an extraordinary rate of more than two per business day*) generally fail to demonstrate any applicability or relevance to a particular claimant or their unique circumstances in terms of their employment with their current or former employer in any specific case. Given the exhaustive recitation of numerous alleged Labor Code violations in each matter it is impossible to discern what violation(s), if any, a claimant in any case actually personally suffered. (See § 2699, subd. (c)(1).) ***As you previously have been cautioned, such blanket notices are tantamount to no notice at all, either to LWDA for purposes of determining whether to investigate a particular matter or to an employer seeking to ascertain the nature of the claims at issue for purposes of attempting to cure or resolve them.***

Abusive, evasive, or other tactics designed to frustrate the role of LWDA during these procedures, or the ability of employers to identify the nature of the claims actually at issue, will not be tolerated. An attorney presenting a matter to LWDA in accordance with PAGA’s prelitigation administrative notice requirements is certifying the matter (1) is not being presented for an improper purpose, such as to harass a party; (2) the claims asserted are warranted and not frivolous; and (3) the allegations and other factual contentions are supported by evidence. (See Code Civ. Proc., § 128.7, subd. (b).)

(emphasis added). The LWDA’s Enforcement Letter also includes an Index Listing Cases, in which the LWDA directs Bibiyan Law Group to “file amended PAGA notices in each pending matter listed in the index.” ***Identified on the index at #113, is the pending action against our client, Jared Surs v. Joshua Tree PACC, LLC, LWDA-CM- 1069368-24.***

Let us be clear: Joshua Tree takes all reasonable steps to comply with the law. However, for the reasons listed above, the PAGA Notice filed against Joshua Tree is defective, and does “not satisfy even the minimal standard of ‘nonfrivolousness’ applicable to PAGA notices preceding the recent reforms.” As such, the PAGA Notice fails to meet the “administrative exhaustion” requirement of section 2699.3(c)(1). Because the defective notice is “tantamount to no notice at all,” Joshua Tree’s cure period to amend any alleged Labor Code violations has not begun to run. Despite being instructed to do so, it is our understanding that Joshua Tree has not received an amended PAGA Notice for this matter.

Should Bibiyan Law Group choose to file a complaint based on PAGA Notice “containing seemingly frivolous allegations,” Joshua Tree reserves the right to pursue all legal remedies, including a demurrer and/or motion seeking sanctions under Code of Civil Procedure section 128.7. As the LWDA noted in its Enforcement Letter, Section 128.7 subjects all legal filings to a certification requirement that the matter (1) is not being presented for an improper purpose, such as to harass a

February 24, 2025

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party; (2) the claims asserted are warranted and not frivolous; and (3) the allegations and other factual contentions are supported by evidence.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. Johnson', with a long horizontal line extending to the left.

Tim L. Johnson



STATE OF CALIFORNIA
Labor & Workforce Development Agency

GOVERNOR Gavin Newsom • SECRETARY Stewart Knox

Agricultural Labor Relations Board • California Unemployment Insurance Appeals Board
California Workforce Development Board • Department of Industrial Relations
Employment Development Department • Employment Training Panel • Public Employment Relations Board

February 13, 2025

Elizabeth Christopher
Bibiyan Law Group, P.C.
1460 Westwood Boulevard
Los Angeles, CA 90024

Certified Mail

USPS Tracking No. 9859 0710 5270 0078 3290 93

**Re: Notice Directing Submission of Amended PAGA Notices
See Index Listing Cases**

Ms. Christopher:

It has come to the attention of the Private Attorneys General Act (PAGA) Unit of the California Labor and Workforce Development Agency (LWDA) that you have filed numerous boilerplate PAGA notices containing seemingly frivolous allegations on behalf of allegedly aggrieved employees against employers throughout the state. These notices do not appear to satisfy PAGA's prelitigation administrative notice requirements under Labor Code section¹ 2699.3. Based on a demonstrated pattern of conduct evidencing abuse of the prelitigation administrative processes administered by LWDA, you hereby are directed to file amended PAGA notices in each pending matter listed in the index included with this letter consistent with the instructions provided. Failure to correct this behavior moving forward may result in referral to the State Bar.

Five letters already have been issued to you in specific cases requiring you file amended PAGA notices based on the conduct described above. (*Boyd v. Aminco International (USA), Inc.*, case no. LWDA-CM-1052275-24 [Nov. 8, 2024]; *Cortes v. Marin Baking LLC dba Bordenave's*, case no. LWDA-CM-1054962-24 [Nov. 25, 2024]; *Moreno v. Polaris Industries Inc., et al.*, case no. LWDA-CM-1057782-24 [Dec. 9, 2024]; *Gailani v. Wayfare, LP dba Wayfare Tavern*, case no. LWDA-CM-1066755-24 [Jan. 24, 2025]; *Vodden v. Ernest Pierson Co. dba Pierson*

¹ Subsequent statutory citations are to the Labor Code unless otherwise indicated.

Building Center, case no. LWDA-CM-1069115-24 [Feb. 5, 2025].)² The PAGA Case Search site, available at < <https://cadir.my.salesforce-sites.com/PagaSearch> >, shows you personally have filed 335 PAGA notices since July 1, 2024.³ A review of a sampling of these notices demonstrates the notice filed in each matter consists of a template form without regard to any individual claimant's particular experiences or employment with their respective employer in any given case. In every case you specifically state there are 75 impacted employees, without variance. Despite the letters sent to you in the specific cases listed above, your conduct has continued unabated without sign of any intention by you to correct your behavior.

Before an "aggrieved employee" may commence a civil action under PAGA, section 2699.3, subdivision (c)(1) requires the employee give written notice to LWDA and the employer "of the specific provisions of this code alleged to have been violated, including the facts and theories to support the alleged violation."⁴ This prelitigation notice obligation has been described as an "administrative exhaustion" requirement (*Rojas-Cifuentes v. Superior Court* (2020) 58 Cal.App.5th 1051, 1056), and courts have affirmed that "[p]roper notice under section 2699.3 is a 'condition' of a PAGA lawsuit." (*Uribe v. Crown Bldg. Maint. Co.* (2021) 70 Cal.App.5th 986, 1003.)

The PAGA reforms enacted last year (Stats. 2024, ch. 44 [Assem. Bill No. 2288 (2023-2024 Reg. Sess.)], ch. 45 [Sen. Bill No. 92 (2023-2024 Reg. Sess.)]), effective July 1, 2024, establish a legislative intent to increase LWDA oversight of PAGA, including for purposes of providing more robust early resolution avenues for employers and to achieve more timely remedies for employees without the type of protracted and costly litigation that has led to criticism of the Act. (Sen. Com. on Jud., analysis of Assem. Bill No. 2288 (2023-2024 Reg. Sess.) as amended June 21, 2024, p. 1; Assem. Com. on Jud., Analysis of Sen. Bill No. 92 (2023-2024 Reg. Sess.) as amended June 21, 2024, p. 12.) Two key components of the reforms are (1) the small employer prelitigation cure process administered by LWDA and (2) the early evaluation conference procedure available after a civil action has commenced, both of which are designed to facilitate more timely resolution of PAGA claims. (Assem. Com. on Jud., Analysis of Sen. Bill No. 92 (2023-2024 Reg. Sess.) as amended June 21, 2024, p. 13.)

² The PAGA notices filed in *Wayfare, LP*, *supra*, and *Ernest Pierson Co.*, *supra*, are not included in the index at the end of this letter, as you already have been directed to file amended notices in those cases.

³ See < <https://cadir.my.salesforce-sites.com/PagaSearch/PAGASearchResults?ed=2025-02-13&sd=2024-07-01&ss=Elizabeth+Christopher&st=PAGA+Notice> >, last visited Feb. 12, 2025.

⁴ Subdivisions (a)(1)(A) and (b)(1) include similar notice requirements for claims subject to those provisions.

These early resolution opportunities are complemented by amendments to section 2699.5 expanding the types of claims subject to cure and early resolution procedures, including the most common types of wage and hour violations alleged in PAGA notices. Another important aspect of the reforms relevant here is the limitation on employee standing; under section 2699, subdivision (c)(1) a claimant must have been employed by the employer “and personally suffered each of the violations alleged” within one year of the date the PAGA notice is filed. (Emphasis added.)

With these considerations in mind, a PAGA notice properly must inform both LWDA and the employer of the nature of the violations alleged with some level of detail in describing the “facts and theories” supporting them. The boilerplate PAGA notices you are filing (*at an extraordinary rate of more than two per business day*) generally fail to demonstrate any applicability or relevance to a particular claimant or their unique circumstances in terms of their employment with their current or former employer in any specific case. Given the exhaustive recitation of numerous alleged Labor Code violations in each matter it is impossible to discern what violation(s), if any, a claimant in any case actually personally suffered. (See § 2699, subd. (c)(1).) As you previously have been cautioned, such blanket notices are tantamount to no notice at all, either to LWDA for purposes of determining whether to investigate a particular matter or to an employer seeking to ascertain the nature of the claims at issue for purposes of attempting to cure or resolve them. While the pleading standard attendant to PAGA notices is not necessarily a “weighty” or burdensome one, the notices you are filing do not satisfy even the minimal standard of “nonfrivolousness” applicable to PAGA notices preceding the recent reforms. (*Williams v. Superior Court* (2017) 3 Cal.5th 531, 545, citing Code Civ. Proc., § 128.7.)

Courts previously have found a PAGA notice “must be specific enough such that the LWDA and the [employer] can glean the underlying factual basis for the alleged violations.” (*Ibarra v. Chuy & Sons Labor, Inc.* (2024) 102 Cal.App.5th 874, 882, quoting *Gunther v. Alaska Airlines, Inc.* (2021) 72 Cal.App.5th 334, 351.) Thus, “more than bare allegations” are required. (*Ibarra, supra*, 102 Cal.App.5th at p. 881.) The notice must contain sufficient information to allow LWDA “to intelligently assess the seriousness of the alleged violations” and to give the employer enough information to understand the nature of the violations so it may decide “whether to fold or fight.” (*Ibid.*, quoting *Brown v. Ralph’s Grocery Co.* (2018) 28 Cal.App.5th 824, 837.) Proper notice to the employer informing it of the violations alleged enables the employer to submit a response to LWDA, which, in turn, further promotes informed agency decisionmaking whether to allocate resources to an investigation. (*Ibarra, supra*, 102 Cal.App.5th at p. 881; *Uribe, supra*, 70 Cal.App.5th at pp. 1003-1004.)

These considerations underlying PAGA's prelitigation notice requirements take on even more importance after the reforms enacted last year. The effectiveness of the new administrative cure procedure set forth in section 2699.3, subdivision (c)(2) and judicial early evaluation procedure set forth in section 2699.3, subdivision (f) depend on proper notice of the violations alleged both so LWDA accurately can assess the nature of the claims at issue and an employer has a reasonable opportunity to identify, respond, and endeavor to correct them.⁵ New standing requirements under section 2699, subdivision (c)(1) further limit the scope of the violations a PAGA claimant may allege.

A claimant or claimant's representative must participate in PAGA's prelitigation administrative procedures in good faith. Abusive, evasive, or other tactics designed to frustrate the role of LWDA during these procedures, or the ability of employers to identify the nature of the claims actually at issue, will not be tolerated. An attorney presenting a matter to LWDA in accordance with PAGA's prelitigation administrative notice requirements is certifying the matter (1) is not being presented for an improper purpose, such as to harass a party; (2) the claims asserted are warranted and not frivolous; and (3) the allegations and other factual contentions are supported by evidence. (See Code Civ. Proc., § 128.7, subd. (b).)⁶

Accordingly, you hereby are directed to file amended PAGA notices in each matter listed in the index included with this letter.⁷ All amended notices shall set forth those specific violations personally suffered by each particular claimant and describe the particular facts and theories supporting the specific violations alleged in each case. All amended PAGA notices must be filed via the online PAGA filing portal with service to the employer or any identified employer representative by certified mail as required by section 2699.3, subdivision (c)(1). All amended notices shall be signed by an attorney of record pursuant to Code of Civil Procedure section 128.7.

Absent amendment, the notices in the matters listed in the index included with this letter appear insufficient to satisfy the administrative notice requirements of

⁵ As noted, you represent there are 75 impacted employees in every case you have filed. If true, every employer against whom you have filed a notice is eligible to participate in the cure procedures described in section 2699.3, subdivision (c)(2).

⁶ In many cases the PAGA notices you are filing are not signed by you and bear no indication you are the filing attorney, but rather conclude with the salutation: "Very truly yours, [¶] BIBIYAN LAW GROUP, P.C." (See, e.g., *Aminco International (USA), Inc.*, *supra*; *Marin Baking LLC*, *supra*; *Wayfare, LP*, *supra*; *Ernest Pierson Co.*, *supra*.) Notwithstanding this, the PAGA portal online submission form and case information page identify you as the filer.

⁷ The index is limited to matters pending before LWDA and within the applicable period for administrative investigation. (See § 2699.3, subd. (c)(1)(E).)

section 2699.3, subdivision (c).

Failure to comply prospectively with PAGA's prelitigation notice requirements may result in further action against you and/or your law firm, after due notice and an opportunity to be heard, including, but not limited to, pre-filing screening requirements. Failure to correct the behavior described in this letter, as well as in the previous letters sent to you, additionally may result in referral to the State Bar.

Sincerely,



Todd M. Ratshin
Deputy Secretary for Enforcement

cc: All Employers or Identified Employer Representatives in the Matters Listed in
the Following Index

Index of PAGA Notices Filed by Elizabeth Christopher
December 9, 2024 — February 12, 2025*
[Lab. Code, § 2699.3, subds. (a)(2)(B), (c)(1)(E)]

#	LWDA #	Date	Employer Name	#/Employees	Law Firm for PAGA Plaintiff	Plaintiff for PAGA Case	Filer/Attorney for PAGA Case
1	LWDA-CM-1079100-25	2/11/2025	HERITAGE TRANSPORTATION, INC.	75	Bibiyon Law Group P.C.	AVTAR SINGH SANGHU	Elizabeth Christopher
2	LWDA-CM-1079097-25	2/11/2025	GOLDEN STATE SUPPLY, LLC	75	Bibiyon Law Group P.C.	ANNA LISA RODRIGUEZ	Elizabeth Christopher
3	LWDA-CM-1078715-25	2/8/2025	TEXAS ROADHOUSE MANAGEMENT CORP.	75	Bibiyon Law Group P.C.	David Aguilar	Elizabeth Christopher
4	LWDA-CM-1078699-25	2/8/2025	PAUSE WELLNESS, PC	75	Bibiyon Law Group P.C.	Lauren Donatz	Elizabeth Christopher
5	LWDA-CM-1078651-25	2/7/2025	SLP Tacer Operating, LLC dba TOWN AND COUNTRY EVENT RENTALS	75	Bibiyon Law Group P.C.	Gabriela Natareno	Elizabeth Christopher
6	LWDA-CM-1078408-25	2/6/2025	PARTNERS PERSONNEL-MANAGEMENT SERVICES, LLC.	75	Bibiyon Law Group P.C.	MARK LICONA	Elizabeth Christopher
7	LWDA-CM-1078395-25	2/6/2025	SONOMA SPECIALTY HOSPITAL, LLC.	75	Bibiyon Law Group P.C.	SIMONNE ZEPHIR	Elizabeth Christopher
8	LWDA-CM-1078382-25	2/6/2025	DAY-LEE FOODS INC.	75	Bibiyon Law Group P.C.	Sonia Y De la Barra	Elizabeth Christopher
9	LWDA-CM-1078363-25	2/6/2025	YOUNG ADULT INSTITUTE, INC. dba YAI	75	Bibiyon Law Group P.C.	EMILY RAMIREZ LAGUNAS	Elizabeth Christopher
10	LWDA-CM-1078119-25	2/5/2025	YOUTH HOMES INCORPORATED	75	Bibiyon Law Group P.C.	Brianna Camara	Elizabeth Christopher
11	LWDA-CM-1078100-25	2/5/2025	L&M LOGISTICS GROUP, INC.	75	Bibiyon Law Group P.C.	Hector Pena	Elizabeth Christopher
12	LWDA-CM-1077886-25	2/4/2025	NOBEL BIOCARE USA, LLC.	75	Bibiyon Law Group P.C.	FAVIOLA FRANCO	Elizabeth Christopher
13	LWDA-CM-1077834-25	2/4/2025	SPIRE HOSPITALITY, LLC dba Marriott Burbank	75	Bibiyon Law Group P.C.	ANA ORELLANA	Elizabeth Christopher
14	LWDA-CM-1077803-25	2/4/2025	ANDERSEN COMMERCIAL PLUMBING LLC dba Andersen Commercial Plumbing	75	Bibiyon Law Group P.C.	MARK OZONOH	Elizabeth Christopher
15	LWDA-CM-1077782-25	2/4/2025	GATEWAY CONCRETE, LLC	75	Bibiyon Law Group P.C.	Ruben Maciel	Elizabeth Christopher

* The information set forth in this index is extracted from search results using the PAGA Case Search site, available at < <https://cadir.my.salesforce-sites.com/PagaSearch> >, for PAGA notices filed by Elizabeth Christopher from December 10, 2024, through February 12, 2025.

#	LWDA #	Date	Employer Name	#/Employees	Law Firm for PAGA Plaintiff	Plaintiff for PAGA Case	Filer/Attorney for PAGA Case
16	LWDA-CM-107764-25	2/4/2025	GENERAL DYNAMICS INFORMATION TECHNOLOGY, INC.	75	Bibiyon Law Group P.C.	CARLOS RODRIGUEZ	Elizabeth Christopher
17	LWDA-CM-1077638-25	2/4/2025	RYDETRANS dba A-Para Transit Corp	75	Bibiyon Law Group P.C.	CHARLIE JOHNSON	Elizabeth Christopher
18	LWDA-CM-1077622-25	2/3/2025	INSTITUTE FOR APPLIED BEHAVIOR ANALYSIS, A CALIFORNIA CORPORATION	75	Bibiyon Law Group P.C.	Karina Gaynutdinova	Elizabeth Christopher
19	LWDA-CM-1077609-25	2/3/2025	HEARINGLIFE HEARING AID CENTER LLC	75	Bibiyon Law Group P.C.	Kristy Hernandez	Elizabeth Christopher
20	LWDA-CM-1077568-25	2/3/2025	LOCK-N-STITCH, INC	75	Bibiyon Law Group P.C.	Miguel Gomez	Elizabeth Christopher
21	LWDA-CM-1077532-25	2/3/2025	MAXIMUS REAL ESTATE PARTNERS LTD	75	Bibiyon Law Group P.C.	Alvin Norman	Elizabeth Christopher
22	LWDA-CM-1076903-25	1/31/2025	BUILDERS FENCE COMPANY INC	75	Bibiyon Law Group P.C.	Eric Morris	Elizabeth Christopher
23	LWDA-CM-1076893-25	1/31/2025	PTGMB LLC	75	Bibiyon Law Group P.C.	BEVERLY HERNANDEZ	Elizabeth Christopher
24	LWDA-CM-1076849-25	1/30/2025	COASTLINE TRANSPORT INC.	75	Bibiyon Law Group P.C.	Doral Hammond	Elizabeth Christopher
25	LWDA-CM-1076841-25	1/30/2025	ALLI EAST GROUP ONE, INC.	75	Bibiyon Law Group P.C.	Alejandro Hernandez	Elizabeth Christopher
26	LWDA-CM-1076778-25	1/30/2025	TRU STAFFING GROUP, INC.	75	Bibiyon Law Group P.C.	Jeanneth Ruiz	Elizabeth Christopher
27	LWDA-CM-1076566-25	1/29/2025	PARASS FOODS, LLC dba Denny's	75	Bibiyon Law Group P.C.	Maria Moreno Medina	Elizabeth Christopher
28	LWDA-CM-1076544-25	1/29/2025	BAYEH PIZZA INC	75	Bibiyon Law Group P.C.	ADALBERTO CRUZ CRUZ	Elizabeth Christopher
29	LWDA-CM-1076516-25	1/29/2025	COAST KING PACKING, LLC	75	Bibiyon Law Group P.C.	Wenceslao Rodriguez Virgen	Elizabeth Christopher
30	LWDA-CM-1076328-25	1/29/2025	NATURIFE BERRY GROWERS, INC	75	Bibiyon Law Group P.C.	RAFAEL LARA ZAVALA	Elizabeth Christopher
31	LWDA-CM-1076243-25	1/28/2025	KAIS & SKAN INC. dba BARCHA RESTAURANT	75	Bibiyon Law Group P.C.	ASMA EL BOUJAMAAI	Elizabeth Christopher
32	LWDA-CM-1076241-25	1/28/2025	SATCO, INC.	75	Bibiyon Law Group P.C.	RAUL GOMEZ MULGADO	Elizabeth Christopher
33	LWDA-CM-1076190-25	1/28/2025	BAY VALLEY SECURITY, INC.	75	Bibiyon Law Group P.C.	Brian Hayes	Elizabeth Christopher
34	LWDA-CM-1076048-25	1/28/2025	SCHNEIDER NATIONAL CARRIERS, INC.	75	Bibiyon Law Group P.C.	JAMES FRISVOLD	Elizabeth Christopher
35	LWDA-CM-1075893-25	1/27/2025	THE SONOMA COUNTY AIRPORT EXPRESS, INC. dba Groome Transportation	75	Bibiyon Law Group P.C.	Michael Espinosa	Elizabeth Christopher
36	LWDA-CM-1075208-25	1/23/2025	WE CARE COMMUNITY SERVICE LLC	75	Bibiyon Law Group P.C.	VERCIA MCCOWAN	Elizabeth Christopher

#	LWDA #	Date	Employer Name	#/Employees	Law Firm for PAGA Plaintiff	Plaintiff for PAGA Case	Filer/Attorney for PAGA Case
37	LWDA-CM-1075188-25	1/23/2025	EMPOWER RF SYSTEMS, INC	75	Bibiyon Law Group P.C.	LEE IRVING	Elizabeth Christopher
38	LWDA-CM-1075174-25	1/23/2025	UNIVERSAL PACKAGING SYSTEMS INC dba Paklab	75	Bibiyon Law Group P.C.	JORGE PALACIOS	Elizabeth Christopher
39	LWDA-CM-1075173-25	1/23/2025	JEREMY PELLE dba PHOENIX PRIME SECURITY	75	Bibiyon Law Group P.C.	TABARÃ% BERNARD BEN DUTTO	Elizabeth Christopher
40	LWDA-CM-1074794-25	1/22/2025	QUAIL LODGE, INC.	75	Bibiyon Law Group P.C.	CARLOS MEJIA	Elizabeth Christopher
41	LWDA-CM-1074786-25	1/22/2025	SILLER HELICOPTERS, INC	75	Bibiyon Law Group P.C.	DERRICK BROWN	Elizabeth Christopher
42	LWDA-CM-1074706-25	1/22/2025	Benihana Downey Corp.	75	Bibiyon Law Group P.C.	RUDY VELASQUEZ	Elizabeth Christopher
43	LWDA-CM-1074705-25	1/22/2025	Benihana Downey Corp.	75	Bibiyon Law Group P.C.	MELISSA RIVAS	Elizabeth Christopher
44	LWDA-CM-1074696-25	1/22/2025	Benihana Downey Corp.	75	Bibiyon Law Group P.C.	Desmond Mitchell	Elizabeth Christopher
45	LWDA-CM-1074695-25	1/22/2025	Benihana Downey Corp.	75	Bibiyon Law Group P.C.	LANAYA HAWKINS	Elizabeth Christopher
46	LWDA-CM-1074681-25	1/22/2025	Benihana Downey Corp.	75	Bibiyon Law Group P.C.	STEPHANIE ANDRO	Elizabeth Christopher
47	LWDA-CM-1074678-25	1/22/2025	Benihana Downey Corp.	75	Bibiyon Law Group P.C.	BRYSSA VARGAS ALVARADO	Elizabeth Christopher
48	LWDA-CM-1074648-25	1/21/2025	Benihana Downey Corp.	75	Bibiyon Law Group P.C.	CHERISH ADAMS	Elizabeth Christopher
49	LWDA-CM-1074647-25	1/21/2025	Benihana Downey Corp.	75	Bibiyon Law Group P.C.	Landon Acevedo	Elizabeth Christopher
50	LWDA-CM-1074418-25	1/21/2025	CABE BROTHERS dba CABE TOYOTA	75	Bibiyon Law Group P.C.	William E. Vela	Elizabeth Christopher
51	LWDA-CM-1074406-25	1/20/2025	CRESCENT HOTELS & RESORTS LLC dba Sandbourne Santa Monica Hotel	75	Bibiyon Law Group P.C.	JAKE RITCHIE	Elizabeth Christopher
52	LWDA-CM-1073750-25	1/17/2025	WENDY'S OF FRESNO, INC.	75	Bibiyon Law Group P.C.	RENE CAMPOS	Elizabeth Christopher
53	LWDA-CM-1073701-25	1/16/2025	BEVERAGES & MORE, INC. dba BevMo	75	Bibiyon Law Group P.C.	GLORIA ESPINOZA	Elizabeth Christopher
54	LWDA-CM-1073385-25	1/15/2025	AMERICAN RELIANCE SECURITY INC	75	Bibiyon Law Group P.C.	MUKARRAM KHAN	Elizabeth Christopher
55	LWDA-CM-1073183-25	1/15/2025	Staffpay, LLC dba Emplicity	75	Bibiyon Law Group P.C.	ROSA E. CASTRO	Elizabeth Christopher
56	LWDA-CM-1072856-25	1/14/2025	EDCO DISPOSAL CORPORATION	75	Bibiyon Law Group P.C.	CESAR RAMIREZ	Elizabeth Christopher
57	LWDA-CM-1072728-25	1/13/2025	LOWE'S HOME CENTERS, LLC.	75	Bibiyon Law Group P.C.	LORENZO RAMIREZ	Elizabeth Christopher
58	LWDA-CM-1072245-25	1/11/2025	THE CHEESECAKE FACTORY BAKERY INCORPORATED	75	Bibiyon Law Group P.C.	CECILIO CHAVEZ	Elizabeth Christopher
59	LWDA-CM-1072152-25	1/10/2025	BHP HOLDING PARTNERS, LTD. dba Beverly Hills Porsche	75	Bibiyon Law Group P.C.	JERRY KERNS	Elizabeth Christopher

#	LWDA #	Date	Employer Name	#/Employees	Law Firm for PAGA Plaintiff	Plaintiff for PAGA Case	Filer/Attorney for PAGA Case
60	LWDA-CM-1072101-25	1/10/2025	ALTERNATIVE FAMILY SERVICES, INC.	75	Bibiyan Law Group P.C.	CYNTHIA MOSELEY	Elizabeth Christopher
61	LWDA-CM-1072087-25	1/10/2025	FLOYD'S 99 BARBERSHOPS, INC.	75	Bibiyan Law Group P.C.	JOHN MORRIS	Elizabeth Christopher
62	LWDA-CM-1071812-25	1/9/2025	PRIME NOW LLC	75	Bibiyan Law Group P.C.	KONSTANTIN RABINOVICH	Elizabeth Christopher
63	LWDA-CM-1071631-25	1/8/2025	ALPHA PHLEBOTOMY GROUP, INC.	75	Bibiyan Law Group P.C.	RANDALL BECK	Elizabeth Christopher
64	LWDA-CM-1071435-25	1/8/2025	THE ADT SECURITY CORPORATION	75	Bibiyan Law Group P.C.	SHARESE BATES	Elizabeth Christopher
65	LWDA-CM-1071403-25	1/7/2025	HOME EXPRESS DELIVERY SERVICE, LLC dba Temco Logistics	75	Bibiyan Law Group P.C.	Andrew William Robinson	Elizabeth Christopher
66	LWDA-CM-1071401-25	1/7/2025	HomeGoods LLC	75	Bibiyan Law Group P.C.	Briana Becerra	Elizabeth Christopher
67	LWDA-CM-1071357-25	1/7/2025	AIDS HEALTHCARE FOUNDATION	75	Bibiyan Law Group P.C.	DARREN EDWARDS	Elizabeth Christopher
68	LWDA-CM-1071276-25	1/7/2025	DENNY'S, INC.	75	Bibiyan Law Group P.C.	KAITLYNN ALLEN	Elizabeth Christopher
69	LWDA-CM-1071272-25	1/7/2025	KOTEITSP USA LLC.	75	Bibiyan Law Group P.C.	Jason Navarro	Elizabeth Christopher
70	LWDA-CM-1071261-25	1/7/2025	GOLDEN WEST SECURITY SERVICES, INC.	75	Bibiyan Law Group P.C.	MICHELLE CHAVEZ	Elizabeth Christopher
71	LWDA-CM-1071140-25	1/7/2025	OM HOTELS SANTA ANA LLC dba La Quinta Inn & Suites Orange County Airport	75	Bibiyan Law Group P.C.	Vanessa Rose Phillips	Elizabeth Christopher
72	LWDA-CM-1071138-25	1/7/2025	AGRICULTURE PACKING SERVICES INC.	75	Bibiyan Law Group P.C.	Jesus Castro	Elizabeth Christopher
73	LWDA-CM-1071088-25	1/6/2025	OC STAFFING AND HR SOLUTIONS LLC	75	Bibiyan Law Group P.C.	Epitacio Acosta Wenceslao	Elizabeth Christopher
74	LWDA-CM-1071045-25	1/6/2025	WORKFORCE PERSONNEL, INC.	75	Bibiyan Law Group P.C.	Wendy Palacios	Elizabeth Christopher
75	LWDA-CM-1071044-25	1/6/2025	THE VILLAGES GOLF AND COUNTRY CLUB †	75	Bibiyan Law Group P.C.	Maria Cristina Castro	Elizabeth Christopher
76	LWDA-CM-1071002-25	1/6/2025	UPWARD BOUND HOUSE	75	Bibiyan Law Group P.C.	Karen Carlos	Elizabeth Christopher
77	LWDA-CM-1070999-25	1/6/2025	STONELEDGE FURNITURE LLC dba Ashley Furniture	75	Bibiyan Law Group P.C.	BLAKE HUTTON	Elizabeth Christopher
78	LWDA-CM-1070977-25	1/6/2025	THE WARDEN'S OFFICE, INC.	75	Bibiyan Law Group P.C.	BENJAMIN HERRERA	Elizabeth Christopher
79	LWDA-CM-1070970-25	1/6/2025	NLC ENTERPRISES INC dba McDonalds	75	Bibiyan Law Group P.C.	MICHELLE SUTHERLAND	Elizabeth Christopher

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#	LWDA #	Date	Employer Name	#/Employees	Law Firm for PAGA Plaintiff	Plaintiff for PAGA Case	Filer/Attorney for PAGA Case
80	LWDA-CM-1070650-25	1/3/2025	BURGER LOUNGE III, LLC dba Burger Lounge	75	Bibiyan Law Group P.C.	Shaemarie Martinez	Elizabeth Christopher
81	LWDA-CM-1070649-25	1/3/2025	THE RIGHT HIRE, INC	75	Bibiyan Law Group P.C.	Stanley Huynh	Elizabeth Christopher
82	LWDA-CM-1070625-25	1/3/2025	INNOVATIVE CLEANING SERVICES, LLC.	75	Bibiyan Law Group P.C.	Eva Salcedo	Elizabeth Christopher
83	LWDA-CM-1070624-25	1/3/2025	DYNAMIC PRE-CAST CO., INC.	75	Bibiyan Law Group P.C.	Fernando Rodriguez Romero	Elizabeth Christopher
84	LWDA-CM-1070597-25	1/3/2025	EL CHE CORPORATION	75	Bibiyan Law Group P.C.	ROGEL DANIEL MERCADO GONZALEZ	Elizabeth Christopher
85	LWDA-CM-1070591-25	1/3/2025	PARTNERS PERSONNEL & MANAGEMENT SERVICES, LLC	75	Bibiyan Law Group P.C.	SUSANA DE LOS SANTOS	Elizabeth Christopher
86	LWDA-CM-1070566-25	1/3/2025	WASH MULTIFAMILY LAUNDRY SYSTEMS, LLC	75	Bibiyan Law Group P.C.	JAVON MIGUEL	Elizabeth Christopher
87	LWDA-CM-1070565-25	1/3/2025	BALL AUTOMOTIVE GROUP	75	Bibiyan Law Group P.C.	Alberto Loberia	Elizabeth Christopher
88	LWDA-CM-1070438-25	1/3/2025	Gem-Pack Berries, LLC.	75	Bibiyan Law Group P.C.	AZAM KHATIBI AMINI	Elizabeth Christopher
89	LWDA-CM-1070436-25	1/3/2025	MERCED TRUCK & TRAILER, INC	75	Bibiyan Law Group P.C.	TACI BASS	Elizabeth Christopher
90	LWDA-CM-1070435-25	1/3/2025	TARGET CORPORATION	75	Bibiyan Law Group P.C.	Cristopher Ruiz	Elizabeth Christopher
91	LWDA-CM-1070392-25	1/2/2025	HUMANO LLC	75	Bibiyan Law Group P.C.	MARCUS SMITH	Elizabeth Christopher
92	LWDA-CM-1070364-25	1/2/2025	HOME CARPET INVESTMENT, INC. dba AMERICAS FINEST CARPET COMPANY	75	Bibiyan Law Group P.C.	KARINA CANO	Elizabeth Christopher
93	LWDA-CM-1070363-25	1/2/2025	JETBLUE AIRWAYS CORPORATION	75	Bibiyan Law Group P.C.	Timothy Griffin	Elizabeth Christopher
94	LWDA-CM-1070340-25	1/2/2025	TARGET CORPORATION	75	Bibiyan Law Group P.C.	CHRISTOPHER HARO	Elizabeth Christopher
95	LWDA-CM-1070320-25	1/2/2025	FOOD EXPRESS INC.	75	Bibiyan Law Group P.C.	Kelvin Barnes	Elizabeth Christopher
96	LWDA-CM-1070306-25	1/2/2025	RALPHS GROCERY COMPANY	75	Bibiyan Law Group P.C.	WEUSI PETERSON	Elizabeth Christopher
97	LWDA-CM-1070304-25	1/2/2025	FIVE BELOW INC	75	Bibiyan Law Group P.C.	Blanca Brenes	Elizabeth Christopher
98	LWDA-CM-1070156-24	12/31/2024	SPARC GROUP LLC dba AEROPOSTALE	75	Bibiyan Law Group P.C.	Jennifer Peppars	Elizabeth Christopher
99	LWDA-CM-1070128-24	12/31/2024	ZURN ELKAY WATER SOLUTIONS dba ZURN WATER, LLC	75	Bibiyan Law Group P.C.	CHRISTOPHER BULL	Elizabeth Christopher
100	LWDA-CM-1070122-24	12/31/2024	FREMONT BANK	75	Bibiyan Law Group P.C.	Bijal Dholaria	Elizabeth Christopher
101	LWDA-CM-1070121-24	12/31/2024	KELLANOVA	75	Bibiyan Law Group P.C.	WAYNE RUSSELL	Elizabeth Christopher

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102	LWDA-CM-1069903-24	12/30/2024	XANTERRA PARKS & RESORTS INC dba Xanterra Travel Collection and dba The Oasis at	75	Bibiyan Law Group P.C.	April Shannon	Elizabeth Christopher
103	LWDA-CM-1069886-24	12/30/2024	SCAN HEALTH PLAN	75	Bibiyan Law Group P.C.	Cecelia Allen	Elizabeth Christopher
104	LWDA-CM-1069636-24	12/28/2024	COMMUNITY HOSPITAL OF THE MONTEREY PENINSULA	75	Bibiyan Law Group P.C.	ARDY HOWARD BASH	Elizabeth Christopher
105	LWDA-CM-1069627-24	12/28/2024	EGGLESTON YOUTH CENTERS, INC	75	Bibiyan Law Group P.C.	HECTOR RIVAS	Elizabeth Christopher
106	LWDA-CM-1069613-24	12/28/2024	HOME CARPET INVESTMENT, INC. dba AMERICAS FINEST CARPET COMPANY	75	Bibiyan Law Group P.C.	SANYAY SHARMA	Elizabeth Christopher
107	LWDA-CM-1069610-24	12/28/2024	DISCOVERY PRACTICE MANAGEMENT, INC dba Casa Palmera	75	Bibiyan Law Group P.C.	Kevin Greene	Elizabeth Christopher
108	LWDA-CM-1069536-24	12/27/2024	PRECISION HOSPITALITY & DEVELOPMENT, LLC dba DUNKIN DONUTS	75	Bibiyan Law Group P.C.	LAWRENCE PARKER	Elizabeth Christopher
109	LWDA-CM-1069512-24	12/27/2024	PLATT COLLEGE LOS ANGELES, LLC	75	Bibiyan Law Group P.C.	James Morales	Elizabeth Christopher
110	LWDA-CM-1069409-24	12/26/2024	MARSHALL MEDICAL CENTER ‡	75	Bibiyan Law Group P.C.	KALEY DUNBAR	Elizabeth Christopher
111	LWDA-CM-1069400-24	12/26/2024	LANZ CABINET SHOP, INC	75	Bibiyan Law Group P.C.	ADAN RENDON-RODRIGUEZ	Elizabeth Christopher
112	LWDA-CM-1069398-24	12/26/2024	LJ EATS, LLC dba Le Coq	75	Bibiyan Law Group P.C.	FATMEH MUHAREB	Elizabeth Christopher
113	LWDA-CM-1069368-24	12/26/2024	JOSHUA TREE PACC, LLC	75	Bibiyan Law Group. P.C	JARED SURS	Elizabeth Christopher
114	LWDA-CM-1069347-24	12/26/2024	WESTERN TRUCK PARTS & EQUIPMENT COMPANY LLC dba Western Truck Center	75	Bibiyan Law Group P.C.	Marco Perez	Elizabeth Christopher
115	LWDA-CM-1069339-24	12/26/2024	OIL CHANGER, INC	75	Bibiyan Law Group P.C.	SHAWNTANISH A SHARNAE OXLEY	Elizabeth Christopher
116	LWDA-CM-1069251-24	12/24/2024	GRUMA CORPORATION	75	Bibiyan Law Group P.C.	JORGE NAVA GOMEZ	Elizabeth Christopher
117	LWDA-CM-1069243-24	12/24/2024	COAST AGGREGATES	75	Bibiyan Law Group. P.C	MARK LEOUSAKOS	Elizabeth Christopher
118	LWDA-CM-1069209-24	12/24/2024	THE WATERFRONT SEAFOOD GRILL	75	Bibiyan Law Group P.C.	Eleazar Johnson	Elizabeth Christopher

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119	LWDA-CM-1069192-24	12/24/2024	WORLD MARKET, LL	75	Bibiyon Law Group P.C.	Norma Robles	Elizabeth Christopher
120	LWDA-CM-1069185-24	12/24/2024	L.A. Downtown Medical Center LLC	75	Bibiyon Law Group P.C.	Patricia Zepeda	Elizabeth Christopher
121	LWDA-CM-1069046-24	12/23/2024	MADAME TUSSAUDS HOLLYWOOD LLC	75	Bibiyon Law Group. P.C	DAVID PRINCE	Elizabeth Christopher
122	LWDA-CM-1068351-24	12/19/2024	LAMB FUELS, INC.	75	Bibiyon Law Group. P.C	JOHN WEAVER III (1st matter)	Elizabeth Christopher
123	LWDA-CM-1067813-24	12/17/2024	HUNT & SONS, INC	75	Bibiyon Law Group. P.C	Robert Ponce	Elizabeth Christopher
124	LWDA-CM-1067119-24	12/13/2024	NATIONAL BUSINESS INVESTIGATION, INC. dba MPS SECURITY	75	Bibiyon Law Group. P.C	DEONTA BLACK	Elizabeth Christopher
125	LWDA-CM-1067117-24	12/13/2024	MG ELECTRIC INC.	75	Bibiyon Law Group. P.C	ANGEL RANGEL, RANDY GAMEZ	Elizabeth Christopher
126	LWDA-CM-1067030-24	12/13/2024	ENVOY AIR INC.	75	Bibiyon Law Group. P.C	LORRAINE MELANIA MARQUEZ	Elizabeth Christopher
127	LWDA-CM-1066982-24	12/12/2024	KEY ESSENTIALS TO BEHAVIOR MANAGEMENT, CORP.	75	Bibiyon Law Group. P.C	LYDIA PLATA	Elizabeth Christopher
128	LWDA-CM-1066931-24	12/12/2024	CARDINAL LOGISTICS MANAGEMENT CORPORATIO	75	Bibiyon Law Group. P.C	CESAR HERRERA	Elizabeth Christopher
129	LWDA-CM-1066733-24	12/11/2024	DEMLER BROTHERS, LLC	75	Bibiyon Law Group. P.C	OLGA VASQUEZ	Elizabeth Christopher
130	LWDA-CM-1066732-24	12/11/2024	NORTH AMERICAN SECURITY AND INVESTIGATIONS, INC. dba NASI	75	Bibiyon Law Group. P.C	BRANDI AMUNIQUE DAVIS 2	Elizabeth Christopher
131	LWDA-CM-1066730-24	12/11/2024	NORTH AMERICAN SECURITY AND INVESTIGATIONS, INC. dba NASI	75	Bibiyon Law Group. P.C	BRANDI AMUNIQUE DAVIS	Elizabeth Christopher
132	LWDA-CM-1066672-24	12/11/2024	IN-ROADS CREATIVE PROGRAMS, INC	75	Bibiyon Law Group. P.C	ADELA SOSA (2nd matter)	Elizabeth Christopher
133	LWDA-CM-1066669-24	12/11/2024	IN-ROADS CREATIVE PROGRAMS, INC	75	Bibiyon Law Group. P.C	ADELA SOSA 2	Elizabeth Christopher
134	LWDA-CM-1066666-24	12/11/2024	LAMB FUELS, INC.	75	Bibiyon Law Group. P.C	JOHN WEAVER III 2	Elizabeth Christopher
135	LWDA-CM-1066647-24	12/11/2024	MED FOR AMERICA INC. dba Dreamfields	75	Bibiyon Law Group. P.C	CLARISSA AGUILAR	Elizabeth Christopher
136	LWDA-CM-1066630-24	12/11/2024	THE ASC CHARITABLE FOUNDATION dba ANNE SIPPI CLINICS	75	Bibiyon Law Group. P.C	FREDDY JOHNSON	Elizabeth Christopher

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137	LWDA-CM- 1066596-24	12/11/2024	QUALITY TRANSFORMER & ELECTRONICS	75	Bibiyan Law Group. P.C	ANTHONY VALLACQUA	Elizabeth Christopher