

<<FIRST NAME>> <<LAST NAME>>
<<ADDRESS>>

Re: Payment From *Ruvalcaba v. Rod Fraser Enterprises, Inc., et al.*

Dear <<FIRST NAME>> <<LAST NAME>>:

Enclosed you will find a check made payable to you. This is your payment from the settlement of the lawsuit filed in the Orange County Superior Court, entitled *Asuncion Gonzalez Ruvalcaba v. Rod Fraser Enterprises, Inc., et al.*, Case No. 30-2023-01320538-CU-OE-CXC (the “Action”).

The Action was filed against Rod Fraser Enterprises, Inc. (“RFE”) and Roderick A. Fraser II (together, “Defendants”) pursuant to the California Private Attorneys General Act of 2004, California Labor Code section 2698 *et seq.* (“PAGA”). The claims were brought by a former employee of RFE on behalf of the State of California and all non-exempt employees who worked for RFE in California at any time from February 8, 2022 up to February 20, 2024. You have been identified as one of the individuals on whose behalf the case was brought.

The plaintiff in the Action claimed that Defendants owed penalties under PAGA for alleged violations of the California Labor Code related to overtime compensation, minimum wage compensation, meal periods, rest periods, wage statements, wage payment during employment and on separation, reimbursement of business-related expenses, paid sick leave, and alleged unsafe working conditions, as applied to RFE’s non-exempt employees in California between February 8, 2022 and February 20, 2024. Defendants deny the allegations and maintain that their policies and practices were lawful and that all employees were provided all wages and compensation to which they were entitled under the law, and denies that they owe any unpaid wages or penalties.

The Court has not ruled on the merits of the lawsuit, but it has approved the \$612,500.00 gross settlement amount the parties agreed to. A portion of the settlement amount goes to the State of California’s Labor and Workforce Development Agency. Another portion of the settlement amount goes to the individuals who were allegedly affected by the wage and hour practices at issue in the case. In agreeing to this settlement, Defendants do not admit that they are liable in any way to RFE’s employees for underpaid wages.

Pursuant to the settlement, enclosed is a check for your share of a portion of the civil penalties. You are not a party to this lawsuit, but you and the government will be bound by the judgment in this matter as to PAGA civil penalties.

Sincerely,

ILYM Group Inc.