

**Superior Court of California for the County of Los Angeles**

*Ricardo P. Flores v. Parkwood Landscape Maintenance, Inc., et al.*, Case Number 20STCV12795  
*Ricardo P. Flores v. Parkwood Landscape Maintenance, Inc., et al.*, Case Number 20STCV21284

**NOTICE TO CURRENT AND FORMER HOURLY NON-EXEMPT CALIFORNIA EMPLOYEES OF PARKWOOD LANDSCAPE MAINTENANCE, INC.**

**THIS NOTICE RELATES TO YOUR PRIVACY RIGHTS IN CONNECTION WITH A PROPOSED CLASS ACTION LAWSUIT AND A REPRESENTATIVE ACTION UNDER THE PRIVATE ATTORNEYS GENERAL ACT. PLEASE BE AWARE THAT IF YOU TAKE NO ACTION, YOUR NAME, ADDRESS, AND TELEPHONE NUMBER WILL BE DISCLOSED AND YOU MAY BE CONTACTED CONNECTION WITH THESE LAWSUITS.**

**I. WHAT ARE THE LAWSUITS ABOUT?**

This letter is a notice, mailed by a neutral third party, **ILYM Group, Inc.**, to current and former hourly non-exempt employees who have worked for defendant Parkwood Landscape Maintenance, Inc. (“Parkwood”) in California from April 1, 2016 through the present.

Plaintiff Ricardo P. Flores (“Flores”), a former employee of Parkwood, filed a class action lawsuit against Parkwood, entitled *Ricardo P. Flores v. Parkwood Landscape Maintenance, Inc.*, Los Angeles Superior Court Case No. 20STCV12795 (the “Class Action”) and a representative action under the Private Attorneys General Act (“PAGA”) against Parkwood, entitled *Ricardo P. Flores v. Parkwood Landscape Maintenance, Inc.*, Los Angeles Superior Court Case No. 20STCV21284 (the “PAGA Action”, and collectively with the Class Action (the “Lawsuits.”) Flores seeks to represent current and former hourly non-exempt employees of Parkwood who work or worked for Parkwood in California between April 1, 2016 through the present.

In the Lawsuits, Flores alleges, on behalf of himself and other current and former hourly non-exempt California employees of Parkwood, that Parkwood failed to pay employees due overtime wages; failed to pay employees due minimum wages; failed to provide meal periods or compensation in lieu thereof; failed to provide rest periods or compensation in lieu thereof; failed to timely pay wages during employment and upon termination or resignation; and failed to provide accurate itemized wage statements, among other things.

Parkwood denies all claims asserted by Flores in the Lawsuits, denies that the cases should proceed as a class action or as a representative action, and denies that Flores or others are entitled to the relief requested. Parkwood contends that it complies with all applicable California laws.

**The Court has not made any decision on the merits of the lawsuits or as to whether it should proceed as a class action.**

**II. WHY AM I BEING SENT THIS NOTICE?**

The Court needs to determine whether Flores’ Class Action lawsuit should proceed as a class action, as well as hold a trial for the PAGA Action. As part of this process, Flores’ attorneys have requested that Parkwood provide your name, home address, telephone number, and dates of employment so that they may communicate with you directly in order to investigate the facts relating to Flores’ allegations in the lawsuit and your experiences as a Parkwood employee. Parkwood declined to provide this information on grounds of employee privacy and confidentiality.

The purpose of this letter is to give you the opportunity to decide whether you want your name, contact information and dates of employment disclosed to Flores’ attorneys. You are under no obligation to release your name and contact information to or to discuss this matter with Flores or Flores’ lawyers or with Parkwood or Parkwood’s lawyers.

**III. WHAT ARE MY OPTIONS?**

If you want your name, home address, telephone number, and dates of employment that are on file with Parkwood to be provided to Flores’ attorneys, then you do not need to take any action. By doing nothing, your name and contact information will be released to Flores’ attorneys. No personal information other than that specifically stated will be disclosed. Flores’ attorneys have agreed that your contact information will be kept confidential and only be used in connection with the Lawsuits.

If you do not want your name, home address, telephone number, and dates of employment to be provided to Flores' attorneys, you must enter your unique identifier – <<ILYM ID>> – on the following website: [parkwoodclassactionlawsuit.com](http://parkwoodclassactionlawsuit.com) no later than **May 22, 2022**. If you do not enter the above unique identifier into the listed website by that date, your contact information will be released to Flores' attorneys.

Please be assured that Parkwood will not retaliate against you based on any decision by you to provide or refuse to provide your name and contact information to Flores' attorneys. In addition, your decision to withhold your name and contact information at this time will have no impact on any right you may have to participate in the Lawsuits.

#### IV. QUESTIONS?

If you have any questions, please direct them to:

**Flores v. Parkwood Landscape Maintenance, Inc., et al.**  
c/o ILYM Group, Inc.  
P.O. Box 2031  
Tustin, CA 92781

Additionally, you may contact the attorneys for either Flores or Parkwood using the contact information below.

<p><b>Attorneys for Plaintiff Ricardo P. Flores</b></p> <p>Jeffrey D. Klein Deigo Aviles (se habla Espanol) BIBIYAN LAW GROUP, P.C. 8484 Wilshire Boulevard, Suite 500 Beverly Hills, California 90211 Tel: (310) 438-5555 Fax: (310) 300-1705 Email: <a href="mailto:jeff@tomorrowlaw.com">jeff@tomorrowlaw.com</a> <a href="mailto:diego@tomorrowlaw.com">diego@tomorrowlaw.com</a> (se habla Espanol)</p>	<p><b>Attorneys for Defendant Parkwood Landscape Maintenance, Inc.</b></p> <p>Howard M. Knee Caitlin I. Sanders BLANK ROME LLP 2029 Century Park East   6th Floor Los Angeles, CA 90067 Tel: (424) 239-3400   Fax: (424) 239-3434 Email: <a href="mailto:howard.knee@blankrome.com">howard.knee@blankrome.com</a> <a href="mailto:caitlin.sanders@blankrome.com">caitlin.sanders@blankrome.com</a></p> <p>Martin Simone SIMONE &amp; ROOS, LLP 5627 Sepulveda Blvd, Suite 206 Sherman Oaks, California 91411 Tel: (818) 788-1914   Fax: (818) 787-1960 Email: <a href="mailto:martin@frankandsimonelaw.com">martin@frankandsimonelaw.com</a></p>
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**THIS NOTICE IS NOT A COMMUNICATION FROM THE COURT AND IS NOT AN EXPRESSION OF ANY OPINION BY THE COURT AS TO THE MERITS OF THE CLAIMS OR DEFENSE BY EITHER SIDE IN THIS LITIGATION.**

**PLEASE DO NOT CONTACT THE COURT.**