CALIFORNIA EMPLOYMENT LAWYERS ASSOCIATION

BULLETIN

Published monthly by the CALIFORNIA EMPLOYMENT LAWYERS ASSOCIATION | EDITORS: CRAIG T. BYRNES, ESQ. and TRACY FEHR, ESQ. | JANUARY 2021 | VOL. 35 NO. 1

RECENT EMPLOYMENT LAW DECISIONS

DECEMBER 2020 RULINGS

NINTH CIRCUIT

CHRISTIAN v. UMPQUA BANK

Employers can be liable for sexual harassment by third parties if they ratify it, or if they know about it and fail to take immediate and appropriate corrective action

PLAINTIFF CHRISTIAN ALLEGED THAT SHE WAS STALKED

The facts of the case were largely undisputed. A bank customer allegedly stalked Plaintiff Jennifer Christian, leaving her unwanted notes, entering the bank without a business purpose and staying to stare at her, making unwanted inquiries of her co-workers about her, and appearing at a charity event where Christian volunteered.

Plaintiff Christian brought the matter to her supervisors, asking them to close the customer's account and prohibit him from

(Cont'd on Page 2, **DECISIONS**)

IN THIS ISSUE

CALIFORNIA COURTS OF APPEAL

Calleros v. Rural Metro Of San Diego, Inc. 3
Domestic Linen Supply Co., Inc. v. L J T Flowers, Inc. 3
Gulf Offshore Logistics, LLC v. Superior Court Of Ventura County (Claude Norris) 3
Kao v. Joy Holiday 4
Kwan Software Engineering, Inc. v. Hennings 4
Rojas-Cifuentes v. Superior Court (American Modular Systems, Inc.) 5

NINTH CIRCUIT

Christian v. Umpqua Bank 1

CELA Call for Articles 6
CELA Coming Events 8
CELA Contact Information 2
CELA Marketplace 5
CELA Member Victories 7
CELA Mentors Needed! 6

2020 Employment Law Year-In-Review 1
You're Invited to CELA's 2021 Committee Conclave 7

2020 EMPLOYMENT LAW YEAR-IN-REVIEW

By Hon. Michael D. Marcus (Ret.)
ADR Services, Inc.

The following is a summary of many significant employment law decisions from 2020:

ADMINISTRATIVE REMEDIES

The employee, and not his attorney, must file the DFEH complaint. *Ruberson v. Gerdau Reinforcing Steel* (C.D. Cal. 2020) 2020 U.S. Dist. 122888; 2020 WL 3891679. Plaintiff's counsel, and not the plaintiff, filed the DFEH complaint and the right-to-sue letter was in the attorney's name. Four months after filing the initial complaint in this action, Plaintiff filed an amended charge with the DFEH to substitute in Plaintiff's name for the Complainant. In dismissing the complaint, the court held that the original charge did not constitute exhaustion of remedies by Plaintiff and that the later amendment to substitute his name as the complainant did not relate back to the earlier charge filed in the attorney's (At *6.)

The employee waited too long to amend his complaint; MSJ affirmed. *Foroudi v. The Aerospace Corporation* (2020) no. B291302; 2020 Cal. App. Lexis 1127; 2020 DJDAR 12689. Plaintiff filed a DFEH complaint in January 2013 alleging, without any supporting facts, discrimination, harassment and retaliation because of his age, associational disability, medical leave, national origin and religion. He was given a right-to-sue letter the next day. More than a year later, he filed an amended DFEH complaint alleging that he had been laid off because he is Muslim, over 60 and Persian and that younger, non-Muslims and non-Persians had not been terminated. He filed his complaint in superior court in August 2014. After the case had been moved to the federal court, that court found that plaintiff had not exhausted his administrative remedies. The matter was remanded to the superior court after plaintiff dismissed with prejudice his federal ADEA claim. In June 2015, plaintiff received a new right-to-sue letter from the EEOC. He filed an amended DFEH complaint in April 2016 with a new allegation that the lay-off had a disparate impact. The DFEH did not issue a new right-to-sue notice. The trial court denied the plaintiff's motion to amend his complaint to add class and disparate impact claims. The appellate court affirmed that order, noting that...

TO READ FULL SUMMARY OF EMPLOYMENT LAW YEAR IN REVIEW:

READ MORE

DECISIONS (From Page 1)

entering the premises. Although it closed (and subsequently re-opened) the customer's account, and finally barred him from the bank, its actions prior to that were arguably suspect. For example, according to the complaint, at least two supervisors told Christian that she should "hide in the break room" when the customer entered.

PLAINTIFF CHRISTIAN REQUESTED A TRANSFER AND ULTIMATELY QUIT

Believing that Defendant Umpqua Bank was not doing enough to protect her safety, Plaintiff Christian requested a transfer to another branch. She accepted shorter hours, despite the financial hardship that this imposed. She ultimately quit because her doctor advised her to.

THE CONTINUING ALLEGED HARASSMENT VIOLATED TITLE VII

The Ninth Circuit reversed the summary judgment granted by the district court. It found that the trial judge erred by disregarding those incidents which Plaintiff Christian did not herself witness, but about which she was nonetheless informed. For example, the customer left notes for Plaintiff Christian which were ultimately given to her, and her co-workers told her when the customer asked about her.

The district court erred further by disregarding the incidents between the first and last acts of harassment because they were seven months apart. The appellate court instructed that the continuing pattern of harassment was not to be disregarded just because it happened over a long period of time.

THE ALLEGATIONS WERE SUFFICIENT TO HOLD DEFENDANT UMPQUA BANK LIABLE

Moreover, the allegations of Defendant Umpqua Bank's actions – and frequent inactions – were sufficient that a reasonable jury could find that it either ratified the conduct, failed to take reasonable steps to stop it, or both.

CONCLUSION

Title VII allows for an employer's liability for the actions of third parties if the employer either ratifies the actions, or fails to take immediate and appropriate corrective action.

Ninth Circuit, Filed 12/31/20. Opinion by Justice Paez.
http://sos.metnews.com/sos.cgi?0121//18-35522

(Cont'd on Page 3, **DECISIONS**)

CALIFORNIA EMPLOYMENT LAWYERS ASSOCIATION

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CALIFORNIA COURTS OF APPEAL

CALLEROS v. RURAL METRO OF SAN DIEGO, INC.

Ambulance Workers Must Be On Call During Rest Breaks Pursuant to Proposition 11

AMBULANCE WORKERS ALLEGED THEY WERE UNLAWFULLY FORCED TO REMAIN ON CALL DURING REST BREAKS

Plaintiffs Reuben Calleros and Ralph Rubio filed a class action against Defendant Rural Metro of San Diego and other ambulance entities for wage and hour violations. The plaintiffs alleged that Defendants unlawfully required employees to remain on call during rest breaks. The court denied the plaintiff's motion for class certification. During the pendency of the case, voters passed Proposition 11, enacting provisions requiring ambulance employees to remain reachable by a communication device during shifts, including rest breaks. The plaintiffs appealed the denial of class certification. The Defendants opposed on the merits and also moved to dismiss the appeal, arguing that the plaintiffs' claims are now moot due to Proposition 11. The Court of Appeal agreed that the appeal was moot and dismissed it.

PROPOSITION 11 WAS RETROACTIVE AND RENDERED THE CASE MOOT

Proposition 11 is codified as Labor Code sections 880-890. Labor Code 887 requires emergency ambulance employees to remain reachable by portable communication device throughout each shift, including on rest breaks. This provision was expressly retroactive and applied to all actions pending on or commencing after October 25, 2017. Therefore, on-call rest periods are now required for ambulance employees. Because the plaintiffs' claims were based only on remaining on-call during rest periods, their appeal is now moot.

COA 4th Dist., Div. 1. Filed 11/23/20, publication ordered 12/15/20. 58 Cal.App.5th 660. Opinion by Justice Haller.
https://law.justia.com/cases/california/court-of-appeal/2020/d075400.html

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DOMESTIC LINEN SUPPLY CO., INC. v. L J T FLOWERS, INC.

A Party Cannot Enforce An Arbitration Provision that is Inconspicuous and Hidden in a Larger Contract

THE ARBITRATION PROVISION WAS IN SMALL PRINT AND INCONSPICUOUS

The parties entered into a business contract under which Plaintiff Domestic Linen rented uniforms to Defendant L J T Flowers. The contract was printed on both sides of one page, but the signature line for both parties was on the front. The back side of the page contained paragraphs 5 through 21 of the contract. Paragraph 15 contained an arbitration provision. All of the paragraphs on the back of the page were in small 8-point type, and paragraph 15 contained no heading, boldface, or italics. There was no signature or initial line on the back. After three years, a dispute arose, and Domestic filed a petition to compel arbitration. The court denied the petition, finding a lack of procedural due process because the arbitration agreement was "inconspicuous." Domestic appealed, and the Court of Appeal affirmed.

AN INCONSPICUOUS ARBITRATION AGREEMENT IS NOT ENFORCEABLE

Arbitration agreements are enforceable except upon such grounds that exist in law or equity for voiding a contract. The Constitutional right to trial by jury is basic "and should be zealously guarded by the courts." When in doubt, the issue should be resolved in favor of the right to trial by jury. The contract was deceptive, with the arbitration provision located after the signature line and on the back of the agreement. The arbitration provision was effectively hidden in fine print. "An arbitration clause in a contract is invalid because the clause is as inconspicuous as a frog in a thicket of water lilies." Therefore, there was no agreement to arbitrate.

COA 2nd Dist., Div. 6. Filed 12/4/20. 58 Cal.App.5th 180. Opinion by Presiding Justice Gilbert.
https://law.justia.com/cases/california/court-of-appeal/2020/b292863.html

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GULF OFFSHORE LOGISTICS, LLC v. SUPERIOR COURT OF VENTURA COUNTY (CLAUDE NORRIS)

California Law Applies to Employees When Their Principal Place of Work is in California

PLAINTIFFS WORKED OFFSHORE IN CALIFORNIA WATERS

Defendant Gulf Offshore Logistics employed Plaintiff Norris and others to work as crew members on a vessel that provided maintenance to offshore oil platforms. The vessel docked at a California port and traveled through California waters to the platforms, which were located outside of California's boundaries. Plaintiffs alleged that Gulf violated numerous California wage and hour laws, and they filed a class action. Gulf moved for summary judgment, arguing that Louisiana law applied and the FLSA preempted California law. The court denied the motion, and Gulf filed a petition for writ of mandate.

(Cont'd on Page 4, **DECISIONS**)

The Court of Appeal concluded that Louisiana law applied. The California Supreme Court granted review and subsequently transferred the case back to the Court of Appeal. In light of the Supreme Court's opinion, the Court of Appeal vacated its prior opinion and concluded that California law applied, affirming denial of the motion for summary judgment.

CALIFORNIA LAW APPLIES IN CALIFORNIA'S BOUNDARIES, INCLUDING ITS WATERS

Whether employees are entitled to California-compliant wage statements depends on whether their principal place of work is in California. The relevant geographic location is where the work occurs. California's power to protect employees is not limited if the worker or employer is a nonresident. Since the plaintiffs performed most of their work within the boundaries of California, California law applies.

CELA Involvement: Congratulations to CELA member Kristi Rothschild of Rothschild & Alwill, APC!

COA 2nd Dist., Div. 6. Filed 12/7/20. 58 Cal.App.5th 264. Opinion by Acting Presiding Justice Yegan.
https://law.justia.com/cases/california/court-of-appeal/2020/b298318a.html

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KAO v. JOY HOLIDAY

A Useful Case For Holding Individual Owners Liable as Alter Egos Where They Commingle Corporate Assets

OWNERS OF A CORPORATION PAID PLAINTIFF KAO FOR HIS WORK FROM PERSONAL ACCOUNTS

Defendant Joy Holiday was a bus tour company owned by Jessy Lin and Harry Chen as a closely-held corporation. Plaintiff Ming-Hsiang Kao moved to the United States upon receiving an offer to work for Defendants as a computer systems administrator. Kao lived with Lin and Chen. Lin and Chen paid Kao a "stipend" for his work and did not add Kao to Joy Holiday's payroll. Kao sued for various wage and hour violations. Following a bench trial, the court rejected all of Kao's statutory claims but found Defendants owed him unpaid wages under quantum meruit. On a previous appeal, the Court of Appeal found that Kao was a non-exempt employee and was entitled to recover unpaid wages under his statutory claims and remanded the matter. The trial court held further proceedings and awarded Kao over $480,000, payable by Joy Holiday, Lin, and Chen jointly and severally. The court found that Kao was employed by Joy Holiday and invoked the alter ego doctrine to hold Lin and Chen personally liable for wages owed. Lin and Chen appealed the alter ego finding, and the Court of Appeal affirmed.

THE ALTER EGO DOCTRINE APPLIED DUE TO A LACK OF SEPARATION BETWEEN JOY HOLIDAY AND ITS OWNERS AND THE RESULTING INJUSTICE TO KAO

The alter ego doctrine applies where an opposing party uses a corporate form unjustly and in derogation of the plaintiff's interests. When the doctrine applies, the court will hold individual shareholders liable for the actions of the corporation. Alter ego liability depends on: (1) unity of interest and ownership such that the separate personalities of the corporation and individual no longer exist, and (2) whether adherence to the fiction of separateness would promote fraud or injustice. Factors a court may consider include: commingling of funds and other assets, an individual treating the corporate assets as his own, failure to maintain adequate corporate records, sole ownership of all of the stock in a corporation by the members of a family, use of the corporation as a mere shell or conduit for the business of an individual, the concealment of personal business activities, the use of the corporate entity to procure services or merchandise for another person or entity, and the use of the corporation as a subterfuge for illegal transactions. Alter ego liability is not a question of law. Lin and Chen commingled assets with Joy Holiday, made unauthorized use of corporate assets, used personal funds to pay Kao, and owned all of Joy Holiday's stock and made all of the management decisions. These facts were sufficient to meet prong one of the alter ego analysis. Regarding prong two, the court could reasonably infer from Lin and Chen's commingling of assets that failure to impose alter ego liability would lead to an inequitable result.

COA 1st Dist., Div. 3. Filed 11/12/20, publication ordered 12/7/20. 58 Cal.App.5th 199. Opinion by Justice Petrou.
https://law.justia.com/cases/california/court-of-appeal/2020/a157886.html

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KWAN SOFTWARE ENGINEERING, INC. v. HENNINGS

A Court Has No Discretion to Decline to Award Monetary Sanctions Where a Party Engaged In Discovery Abuse Without Substantial Justification

KWAN SOFTWARE ENGAGED IN EGREGIOUS DISCOVERY MISCONDUCT

Plaintiffs Kwan Software and others sued business competitor Foray Technologies and its president Thomas Hennings. The parties litigated extensively, resulting in 175 hearings

(Cont'd on Page 5, **DECISIONS**)

over five years. Documents revealed that Kwan lied during his deposition and engaged in spoliation of evidence. Defendants moved for sanctions against Plaintiffs and their former counsel for misuse of the discovery process, including extensive litigation misconduct, destroying and hiding evidence, filing false declarations, and pursuing meritless claims. The court issued an OSC re sanctions. The court ultimately found that Kwan filed false declarations, committed fraud on the court, spoliated and suppressed evidence, and engaged in bad faith misconduct. The court ordered various sanctions including dismissal of claims with prejudice but denied Defendants' motion for monetary sanctions to recover millions in litigation costs. Defendants appealed the denial of monetary sanctions, and the Court of Appeal reversed.

THE COURT MUST ORDER MONETARY SANCTIONS FOR DISCOVERY ABUSE WHERE THE REQUIREMENTS OF THE CODE ARE MET

CCP section 2023.030 describes the trial court's authority to issue monetary sanctions for discovery abuse. It states that the court "shall" impose a sanction unless the subject "acted with substantial justification" or sanctions would otherwise be unjust. "Substantial justification" requires a justification that is clearly reasonable because it is well-grounded in both law and fact. There was no indication in the record that Kwan's conduct was substantially justified, and Kwan did not argue it was. Nor would imposition of monetary sanctions have been unjust. Sanctions have a remedial purpose and are not designed to punish and should therefore not be a windfall. Nothing in the record indicated that monetary sanctions would constitute punishment of Kwan. Therefore, under CCP 2023.030, monetary sanctions were required, and the court abused its discretion in failing to award them. Consideration of punishment influences the amount of the award, not entitlement to the award. On remand, the trial court must determine the amount of monetary sanctions.

COA 6th Dist. Filed 12/2/20. 58 Cal.App.5th 57. Opinion by Justice Danner.
https://law.justia.com/cases/california/court-of-appeal/2020/h042715.html

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ROJAS-CIFUENTES v. SUPERIOR COURT (AMERICAN MODULAR SYSTEMS, INC.)

Notices under the Labor Code Private Attorneys General Act to the L&WDA need not meet some heightened standard of "weightiness" to exhaust administrative remedies

PLAINTIFF ROJAS-CIFUENTES SUED UNDER PAGA

Plaintiff Rojas-Cifuentes sued Defendant American Modular Systems, Inc., for a number of statutory violations. As relevant here, it sued for violations of the Labor Code under California's Private Attorneys General Act ("PAGA").

THE TRIAL COURT GRANTED SUMMARY JUDGMENT

PAGA requires that, before a representative claim can be made under that statute, the Plaintiff must file a notice with the Labor & Workforce Development Agency ("L&WDA") and serve the defendant. That notice must put the L&WDA and the defendant on notice of sufficient "facts and theories" to allow the L&WDA to determine if it wants to file suit on behalf of the aggrieved employees. If they L&WDA either affirmatively does not do so, or sufficient time elapses without the L&WDA doing so, the plaintiff may file his or her own claim.

Agreeing with the Defendant, the trial court granted summary judgment as to Plaintiff's PAGA claim. It did so on the single ground that Plaintiff had failed to exhaust his administrative remedies by providing an insufficient PAGA notice.

FAILURE TO EXHAUST CANNOT BE REMEDIED BY AMENDING THE COMPLAINT

The appellate court first rejected Defendant's argument that Plaintiff had an adequate remedy before the trial court, and did not need writ relief. Defendant argued that Plaintiff had filed an amended complaint, and Defendant's demurrer was pending. If the demurrer were overruled, Defendant argued, then Plaintiff's case could continue.

The appellate court pointed out, however, that the trial court had granted summary judgment on the ground of failure to exhaust administrative remedies. No amendment could remedy that failure, and thus Plaintiff had no adequate remedy against the trial court's ruling in that regard.

THE NOTICE ALLEGATIONS WERE SUFFICIENT

The appellate court then rejected Defendant's argument that there must be modicum of evidentiary basis behind a PAGA notice. The court pointed out that PAGA notices precede discovery, and should not be held to a standard higher than that applied to complaints. So long as sufficient "facts and theories" were alleged – even if imperfect, and even if the dates of violations were not given – the notice will do enough to exhaust.

(Cont'd on Page 6, **DECISIONS**)

DECISIONS (From Page 5)

CONCLUSION

There is no heightened standard for PAGA notices. They are intended to give the L&WDA enough information to decide if it wants to pursue a claim on its own, and to give the Defendant a chance to remedy its defects. Otherwise, the courts will read such notices with liberality to determine if they allege sufficient "facts and theories."

CELA INVOLVEMENT

Congratulations to CELA Members Marco Palau and Hilary Hammell on this excellent result for California workers.

COA, 3rd Dist., filed 12/21/20. Opinion by Acting Presiding Justice Blease.
http://sos.metnews.com/sos.cgi?1220//C085463

WE NEED PRACTICE ARTICLES

The CELA Bulletin is distributed to judges and attorneys statewide.
We are looking for scholarly articles on practice matters important to the plaintiff's bar.
It is a great way to get your name out there!
Your article should keep its audience in mind, and promote CELA's mission of advancing the rights of workers.

If you have something you'd like to submit to the Bulletin, please get it to me at cbyrnes_esq@yahoo.com or to Tracy at tfehr@amfllp.com (or both is good, too). We will give preference to articles that haven't been published elsewhere.

SPECIAL REQUEST FOR MENTOR COMMITTEE MEMBERS

HELP US CARRY ON ONE OF CELA'S GREAT TRADITIONS: MENTORSHIP. THE CELA MENTOR COMMITTEE IS RECRUITING NEW COMMITTEE MEMBERS.

Our committee work has grown significantly over the years. Our mentorship matching has generated hundreds of great connections between CELA stalwarts and newcomers as well as law students. The organization is very proud of this tradition and grateful for all the time and effort our Mentor volunteers have given to help continue CELA's central mission of raising the confidence and competence of practitioners who dedicate their lives to vindicating civil rights in the workplace.

We are particularly looking for new committee members in Northern California (although we welcome more Southern California members to join as well) who can help match mentees and mentors, recruit mentors and develop opportunities for mentors and mentees to commiserate. The committee meets the first Thursday of every month at 10:00am. We are looking for members of all experience levels to join the committee.

This is a great opportunity for those of you who want to be more involved in CELA and help new members connect with our more experienced members.

For more information....

If you have any questions, feel free to reach out to us. If you are interested in joining the committee, please contact Alexandra Menna at alexandra@cela.org

Alireza Alivandivafa, Co-Chair (aalivandi@gmail.com)
Mythily Sivarajah, Co-Chair (mythily@wmlayers.com)

If you are interested in volunteering to be a mentor or in being matched with a more experienced CELA member mentor, contact us at info@cela.org.

The CELA Board Invites You to Attend its 2021 Virtual Committee Conclave

by Christina Krasomil, CELA's Administrative Director

Are you interested in hearing about what great work all the CELA Committees have been up to the last year? Have you considered getting more involved by joining one or more of CELA's Committees?

If you answered YES to either question, you are invited to attend our Virtual Committee Conclave on **Wednesday, March 24 and Friday, March 26 from 1:00pm-3:00pm**.

The annual Committee Conclave is a chance for leaders of CELA's important committees to cross-pollinate and share information about how our committees are working to accomplish CELA's mission. CELA Committee leaders (or delegates) will report on committee activities, future plans and goals, and more.

If you are interested in attending all (or a portion) of the Conclave, please RSVP here or https://cela.org/?pg=events&evAction=showDetail&eid=91003

We will keep in touch with further information and Zoom login instructions as we get closer to the Conclave. If you would like further information about any CELA Committee, please send an email to info@cela.org.

Thanks!

CELA MEMBER CASE VICTORIES

If you would like to include a recent victory in our listserv news and in the annual "CELA Victories!" presentations at the CELA Conference, please submit it here:

https://forms.gle/pUnBKfV3eHDPTx96A

COMING EVENTS

2021 CELA COMMITTEE CONCLAVE
Open to All CELA Members
Register:
www.cela.org

THE UNPACKING AND IMPACT OF PROPOSITION 22
CELA Webinar
Register:
www.cela.org

2020 ANNUAL CELA *VIRTUAL* CONFERENCE
Recordings now available on the CELA website
Register for access to the recordings, materials, and CLE
www.cela.org

SAVE THE DATES

October 15, 2021 - October 16, 2021
CELA 34th ANNUAL EMPLOYMENT LAW CONFERENCE
Hilton San Francisco, San Francisco, CA
(skills seminar on Thursday, October 14)

September 29, 2023 - September 30, 2023
CELA 36th ANNUAL EMPLOYMENT LAW CONFERENCE
Hilton San Francisco, San Francisco, CA
(skills seminar on Thursday, September 28)

CALIFORNIA EMPLOYMENT LAWYERS ASSOCIATION
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"Fighting for Employee Rights"