

CONFIDENTIAL ATTORNEY-CLIENT PRIVILEGED

CLIENT FILE: DAVID KIM

Client ID:	LAW-002
Full Name:	David Kim
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Email:	david.kim.dev@email.com
Address:	1456 Oak Avenue, San Jose, CA 95128
Employer/Defendant:	Digital Marketing Partners LLC
Case Type:	Wage and Hour Violation
Case Status:	Active - Settlement Negotiations
Settlement Demand:	\$85,000

CASE DETAILS AND ANALYSIS

Software developer classified as exempt but performed non-exempt duties. Required to work 60-70 hours per week without overtime pay. No meal or rest breaks provided during crunch periods. Employer failed to provide accurate wage statements showing overtime calculations. **LEGAL ISSUES:** Misclassification of exempt employee, unpaid overtime violations (Labor Code 510), meal and rest break violations (Labor Code 226.7), inaccurate wage statements (Labor Code 226). **DAMAGES:** 18 months unpaid overtime estimated at \$45,000, meal/rest break premiums \$8,400, waiting time penalties, attorney's fees. PAGA penalties potentially available.

CASE TIMELINE

- Initial incident/violation occurred
- Client consultation scheduled
- Retainer agreement signed
- Demand letter sent to opposing party
- Complaint filed (if applicable)
- Discovery phase initiated
- Mediation/settlement discussions

LEGAL STRATEGY

LEGAL STRATEGY: Pursue all available remedies under applicable state and federal law. Document all damages and maintain detailed records. Consider alternative dispute resolution to minimize costs and time. Evaluate strength of case based on evidence and witness testimony. **NEXT STEPS:** Complete discovery, conduct depositions, prepare expert witness reports, evaluate settlement opportunities, prepare for trial if necessary. **ESTIMATED CASE VALUE:** \$85,000 based on current damages assessment.