



california courts of appeal pave the way for more paga claims

MSK Client Alert

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The California Court of Appeal recently issued two employee-friendly rulings regarding the California Private Attorneys General Act (PAGA), which further expand PAGA's reach. PAGA is part of the California Labor Code and authorizes individuals to bring representative actions against employers to recover civil penalties for violations of the California Labor Code.

In the first, *Huff v. Securitas Security Services USA, Inc.*, a California Court of Appeal addressed the issue of whether a plaintiff who brings a PAGA representative action may seek penalties not only for the Labor Code violation that affected him or her, but also for different Labor Code violations that affected other employees. The Court held that PAGA allows a plaintiff to pursue penalties for **all** the Labor Code violations committed by that employer that affected **any** employee, provided that the plaintiff must have been affected by at least one Labor Code violation. In other words, a plaintiff who brings a representative action under PAGA may seek penalties for violations that he or she did not even suffer.

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