

EISNER & ASSOCIATES, P.C.

ATTORNEYS AT LAW
113 UNIVERSITY PLACE, EIGHTH FLOOR
NEW YORK, NEW YORK 10003-4527

TELEPHONE: (212) 473-8700
FACSIMILE: (212) 473-8705

E-MAIL: gene@eisnerassociates.com
INTERNET: www.eisnerassociates.com

EUGENE G. EISNER
BENJAMIN N. DICTOR
MARIA L. CHICKEDANTZ

OF COUNSEL
NATHANIEL K. CHARNY*
ROGER J. BERNSTEIN

* NY AND NJ BAR

January 14, 2015

**Via Hand Delivery and
First Class Mail**

CGM 54 Irving LLC,
d/b/a Pure Food and Wine
54 Irving Place,
New York, New York
Attn: Ms. Sarma Melngailis

Re: Notice of Legal Claims

Dear Ms. Melngailis:

I am writing to you on behalf of Daniel Schubmehl and Alessandra Coltelli, who were employed by you at Pure Food and Wine (the Company), a restaurant located at 54 Irving Place in Manhattan.

We have been advised that you have failed to pay the overwhelming majority of your employees wages that have been due and owing since December 26, 2014. You have also unlawfully withheld gratuities from your wait staff, which constitutes a separate violation of law with respect to those individuals. Throughout the period that you have unlawfully withheld their wages and tips, you have nevertheless required your employees to continue to work for you. As you are already aware, your failure to pay your employees any wages for the better part of a month has resulted in their constructive termination.

Failure to pay wages is a violation of both New York State and federal wage and hour law for which you may be held personally liable. Additionally, New York Limited Liability Company Law provides that the ten members with largest interest in the Company may be personally liable for all unpaid wages of the Company's employees.

Furthermore, if your employees commence litigation to recover the wages owing to them, both New York State and federal law provide for the recovery of damages in an amount equal to the wages withheld – effectively doubling what is owed to them at this time.

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My clients believe it is in the best interest of all parties to pursue an amicable resolution of this matter. However, if all wages owed are not paid in full by the close of business on Friday, January 16, 2015, we will immediately commence a lawsuit in the United States District Court as a collective action, which will seek to include all employees from whom you have withheld wages. Please be further advised that New York State and federal law protect your employees in making this demand. Any retaliation will be met with swift legal action.

Very truly yours,

A handwritten signature in black ink, appearing to read "Benjamin N. Dictor". The signature is fluid and cursive, with a large, stylized initial "B" and "D".

Benjamin N. Dictor

BND:ec

cc: Mr. Jeffrey Chodorow