

CONNECTICUT APPELLATE COURT

Woodford v. HRG Management, LLC

Woodford · No. AC 47708 · Decided March 31, 2026

SUMMARY

The Connecticut Appellate Court affirmed the trial court’s judgment granting the defendants’ motion to strike Michelle Woodford’s putative class action claims concerning tip credits, wage-recordkeeping requirements, and nonservice work. The court adopted the reasoning of its companion decision, *Farias v. Rodriguez*, concluding that the cited regulation did not create a private cause of action for recordkeeping violations, that Public Act 22-134 governed the claims, and that its application did not violate due process.

CASE DETAILS

COURT	Connecticut Appellate Court
WRITING FOR THE COURT	Suarez, J.; Seeley, J.; Wilson, J.
JURISDICTION	Connecticut Appellate Court
DECIDED	March 31, 2026
DOCKET	AC 47708
DISPOSITION	affirmed
PROCEDURAL POSTURE	Appeal from the trial court's judgment granting the defendants' motion to strike a putative class action complaint alleging violations of Connecticut minimum-wage laws and regulations.
STANDARD OF REVIEW	The court reviewed the granting of a motion to strike for legal sufficiency, taking the facts alleged in the complaint as true.
PRECEDENTIAL VALUE	Published Connecticut Appellate Court opinion
PARTIES	Michelle Woodford v. HRG Management, LLC, Michael Hamlin, Phillip Barnett, WNT, LLC, WNT IV, LLC, WNT V, LLC, WNT VI, LLC, WNT VII, LLC, WNT Hamden, LLC, WNT Farmington, LLC, WNT Newington, LLC, 410 Queen Street, Southington Partners, LLC

TOPICS

- wage and hour
- employment law
- class actions
- statutory interpretation

PRACTICE AREAS

employment law

wage and hour

class actions

civil procedure

QUESTIONS PRESENTED

1. Whether General Statutes § 31-68 provides a private cause of action for violations of the recordkeeping requirements in § 31-62-E3 of the 2015 Connecticut wage regulations.
2. Whether Public Act 22-134 retroactively deprived Woodford of a substantive cause of action under the Connecticut Minimum Wage Act.
3. Whether applying Public Act 22-134 to Woodford's claims violated due process.
4. Whether the trial court properly granted the defendants' motion to strike the claims alleging violations of the former wage regulations.

HOLDINGS

1. General Statutes § 31-68 does not provide a private cause of action for a recordkeeping violation under § 31-62-E3 of the 2015 wage regulations.
2. Public Act 22-134 did not impermissibly retroactively take away Woodford's cause of action, and claims filed after September 24, 2022, were required to be adjudicated solely under the version of § 31-60-2 effective September 24, 2020, and amendments thereto.
3. Applying P.A. 22-134 to Woodford's claims did not violate due process.

KEY QUOTATIONS

“Our conclusions with respect to the issues presented in Farias thoroughly resolve the claims in the present appeal, and there is nothing in this case that would mandate a result different from that which we reached in Farias.”

“Accordingly, we conclude that the trial court properly granted the defendants’ motion to strike.”

FACTUAL BACKGROUND

Woodford worked as a server and hostess at Wood-n-Tap restaurants from approximately September 2018 through May 2022. She alleged that the defendants treated the restaurants as a single enterprise, paid tipped employees less than the full minimum wage by taking a tip credit, and required servers to perform general cleaning, stocking, and other nonservice duties. Her putative class claims concerned alleged violations of the 2015 Connecticut wage regulations, including recordkeeping and segregation requirements, for a claim period from April 2, 2018, through September 23, 2020.

PROCEDURAL HISTORY

Woodford filed a putative class action in the Superior Court alleging that the defendants improperly claimed tip credits, failed to comply with wage-recordkeeping requirements, and failed to segregate service and nonservice work. The case was transferred to the Complex Litigation Docket, where the trial court granted the defendants' motion to strike, denied Woodford's motion to reargue, and later granted her motion for judgment. Woodford

filed an amended appeal after the court dismissed her original appeal for lack of a final judgment. The Connecticut Appellate Court affirmed.

DISPOSITION

affirmed

CASES CITED

- *Farias v. Rodriguez*, 238 Conn. App. 287, A.3d (2026)
- *Nettleton v. C & L Diners, LLC*, 219 Conn. App. 648, 296 A.3d 173 (2023)
- *State v. Drakes*, 321 Conn. 857, 864, 146 A.3d 21 (2016), cert. denied, 580 U.S. 927, 137 S. Ct. 321, 196 L. Ed. 2d 234 (2016)
- *Minnesota Methane, LLC v. Dept. of Public Utility Control*, 283 Conn. 700, 712, 931 A.2d 177 (2007)
- *Rodriguez v. Kaiaffa, LLC*, 337 Conn. 248, 259 n.11, 253 A.3d 13 (2020)
- *American Pipe & Construction Co. v. Utah*, 414 U.S. 538, 94 S. Ct. 756, 38 L. Ed. 2d 713 (1974)
- *Grimes v. Housing Authority*, 242 Conn. 236, 244, 698 A.2d 302 (1997)
- *Del Rio v. Amazon.com Services, Inc.*, 354 Conn. 151, 152, 349 A.3d 570 (2026)
- *Ferrua v. Napoli Foods, Inc.*, 237 Conn. App. 23, 25 n.5, 349 A.3d 620 (2025)