

California Appeals Court Requires Reimbursement for Employee Personal Cell Phones Used for Work-Related Calls

SEPTEMBER 3, 2014

In *Cochran v. Schwan's Home Service, Inc.*, a California Court of Appeal held that California Labor Code section 2802 requires that employers reimburse employees who use their *personal* cell phones for *work-related* calls. The court found that “[w]hether the employees have cell phone plans with unlimited minutes or limited minutes, the reimbursement owed is a reasonable percentage of their cell phone bills.” California employers should review their cell phone policies in light of *Cochran*.

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