

July 8, 2020

Attn: PAGA Administrator
1515 Clay Street, Suite 801
Oakland, California 94612

Re: Andrea Dunn v. Walmart

Dear Sir/Madam:

This letter shall serve as notice to your agency of Labor Code violations which is a prerequisite to commencing a private civil action.

Andrea started working for Walmart in 2001 as a cashier. She: (1) was qualified for the position; (2) always had overall satisfactory job performance and attendance; (3) was not disciplined for any misconduct or poor work performance; (4) could perform the essential function of the job with or without reasonable accommodation; and (5) remained ready, willing, and able to work in an environment free of discrimination and retaliation.

Within the last six months, Ms. Dunn engaged in protected activity by: complaining about a promised wage increase that she did not receive.

Walmart subjected Ms. Dunn to adverse action and treatment, including termination in March 2020. The protected activity was a substantial motivating factor for the treatment.

PAGA Administrator

July 8, 2020

Page 2

This conduct by Walmart violated the Labor Code. Ms. Dunn will file a civil action for damages, attorneys' fees and costs pursuant to the PAGA.

Sincerely,

BRYANT WHITTEN, LLP

A handwritten signature in blue ink, appearing to read "A. Whitten", with a long horizontal flourish extending to the right.

AMANDA B. WHITTEN

ABW/cjc

cc: Agent for Service of Process for Walmart