

February 4, 2025

Via E-mail & Online Submission to LWDA

Attn: PAGA Administrator
Labor Workforce Development Agency
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Re: **Amos v. UnitedHealth Group Incorporated, et al.**
Notice of Proposed Settlement

This notice pertains to the above-referenced PAGA matter. Pursuant to Labor Code 2699(l), Ms. Amos is providing notice that she is moving for approval of a proposed settlement as described herein.

Background:

On March 18, 2022, Jasmine Amos delivered a pre-filing PAGA notice to the Labor and Workforce Development Agency ("LWDA"), the State of California, and Ms. Amos' former employer. No response to the letter was received from the LWDA, the State of California, and/or Ms. Amos' former employer within the period required by the PAGA.

On May 24, 2022, Ms. Amos filed an action against her former employer(s) (“Defendants”) on behalf of herself, all aggrieved employees, and the State of California in the Superior Court of California, County of San Mateo, Case No. 22-CIV-02095 (“Action”).

On or about May 9, 2023, the court in the Action entered an order: a) compelling arbitration of Ms. Amos’ “individual” claims and b) staying the claims filed by Ms. Amos on behalf of the State of California and all aggrieved employees. On or about September 20, 2023, Ms. Amos filed a Demand for Arbitration (the “Arbitration”) with the American Arbitration Association (Case No. 01-23-004-1593). Subsequently, Ms. Amos filed an amended and Second Amended Demand for Arbitration. AAA arbitrator, Dwight Armstrong, was assigned to adjudicate the arbitration case.

Proposed Settlement of Individual Claim Only:

Subject to the approval required by the PAGA (Labor Code 2699(l)), Ms. Amos and Defendants/Respondents have agreed to resolve Ms. Amos’ individual PAGA claims which are pending in the Arbitration (see, attached *redacted* settlement agreement). The proposed settlement is not intended to resolve any PAGA claims alleged in the Action which Ms. Amos has brought in her representative capacity on behalf of the LWDA, the State of California, or other allegedly aggrieved employees. The proposed settlement is only intended to resolve Ms. Amos’ individual claims pending in the Arbitration.

Under the proposed settlement, a portion of the total settlement (\$1,000.00) is proposed for resolution of Ms. Amos’ alleged individual PAGA claims. Under the PAGA, 75% (\$750) is allocated as payable to the LWDA and 25% (\$250) is allocated as payable to Ms. Amos. Upon approval of the proposed settlement, Ms. Amos will continue prosecuting the claims alleged in the Action on behalf of the LWDA, State of California, and all aggrieved employees.

Under the terms of the PAGA, at this time Ms. Amos’ proposed individual settlement is being submitted to the arbitrator for approval. See, attached Proof of Service.

Very truly yours,

RIGHETTI GLUGOSKI, P.C.

s/ Matthew Righetti

Matthew Righetti

Counsel for Jasmine Amos