



June 13, 2025

**VIA ELECTRONIC SUBMISSION
VIA ELECTRONIC MAIL TO OPPOSING PARTY**

California Labor and Workforce Development Agency
Attn: PAGA Administrator
455 Golden Gate Avenue, 9th Floor
San Francisco, CA 94102

Re: **Stacy O’Braza, Rachel Elias-Berg, Heather Fichtner, et al. adv. Dignity Health**
LWDA Case No. LWDA-CM-1083030-25
Notice of Proposed PAGA Settlement

Dear Sir/Madam:

On behalf of Stacy O’Braza, Rachel Elias-Berg, and Heather Fichtner (hereinafter “Plaintiffs”), Lyfe Law, LLP and the Lazarski Law Practice hereby provide pursuant to Labor Code section 2699(s)(2) of the proposed settlement of all claims for PAGA penalties alleged on behalf of all current and former non-exempt employees who worked for Dignity Health during the period from September 10, 2014 through the date of Preliminary Approval in the pending civil action, *O’Braza, et al. v. Dignity Health* (Sacramento County Superior Court Case No. 34-2018-00240446) (the “Civil Action”).

Concurrent with the submission of this Notice of Proposed PAGA Settlement, Plaintiffs have submitted a motion seeking approval of a proposed PAGA Penalty Payment of \$100,000.00. This motion has been tentatively approved subject to submission of this notice and is scheduled to be heard at a Compliance Hearing on June 20, 2025 at 9:00 a.m. before the Hon. Lauri A. Damrell in Department 22 of the Sacramento County Superior Court, Gordon D. Schaber Courthouse located at 720 9th Street, Sacramento, CA 95814.

Respectfully submitted
LAZARSKI LAW PRACTICE, P.C.
LYFE LAW, LLP

By: /s/ Gregory P. Wong
Gregory P. Wong, Esq.



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cc: Counsel for Dignity Health:

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VIA EMAIL