



April 3, 2025

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

California Labor and Workforce Development Agency  
Attn: PAGA Administrator  
455 Golden Gate Avenue, 9<sup>th</sup> 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 is scheduled to be heard on April 18, 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 9<sup>th</sup> Street, Sacramento, CA 95814.

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

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



RE: O'Braza, et al. v. Dignity Health

April 3, 2025

Page 2 of 2

cc: Counsel for Dignity Health:

**Sheppard, Mullin, Richter & Hampton LLP**

Richard J. Simmons ([rsimmons@sheppardmullin.com](mailto:rsimmons@sheppardmullin.com))

Jason W. Kearnaghan ([jkearnaghan@sheppardmullin.com](mailto:jkearnaghan@sheppardmullin.com))

Hilary A. Habib ([hhabib@sheppardmullin.com](mailto:hhabib@sheppardmullin.com))

Richard B. Azada ([razada@sheppardmullin.com](mailto:razada@sheppardmullin.com))

350 S. Grand Avenue, 40<sup>th</sup> Floor

Los Angeles, California 90071

**VIA EMAIL**