



April 11, 2025

Via Certified Mail 9589 0710 5270 1861 4687 53

TRUIST BANK dba LIGHTSTREAM
CSC - Lawyers Incorporating Service - Koy Saechao
2710 Gateway Oaks Drive
Sacramento, CA 95833

In re Scott Heinrich, Dodge Robinson - Notice of PAGA Claim

To Whom it May Concern:

This office has been retained by Scott Heinrich and Dodge Robinson (hereinafter "Plaintiffs"), current employees of TRUIST BANK dba LIGHTSTREAM and TRUIST FINANCIAL CORPORATION dba LIGHTSTREAM (collectively "LIGHTSTREAM"). Pursuant to Labor Code § 2699.3(a), we are providing written notice that LIGHTSTREAM violated various provisions of the California Labor Code. Plaintiff intends on filing a complaint against LIGHTSTREAM in San Diego County Superior Court pursuant to Labor Code § 2699 et. seq. on behalf of themselves and all hourly employees for LIGHTSTREAM ("Aggrieved Employees").

During the entirety of their employment with LIGHTSTREAM, Defendants failed to compensate Plaintiffs and all hourly Aggrieved Employees for all overtime hours worked. In addition, Plaintiff Heinrich consistently raised concerns of violation of various banking, auditing and Labor Code rules and regulations. Plaintiff Heinrich is informed and believes that his complaints about LIGHTSTREAM'S unlawful and dangerous workplace actions and inactions were a contributory reason and a substantial factor in Defendants' decision to pass him over for promotion, in violation of Labor Code §§ 98.6 & 1102.5.

Accordingly, LIGHTSTREAM is in violation of the following provisions under Labor Code § 2699.5: Labor Code §§ 510, 1194 & 1198 (Unpaid Overtime), Labor Code §§ 200-204, et seq. (Waiting Time Penalties), and Labor Code § 226(A), et seq. (Inaccurate Wage Statements). Please be advised Plaintiff intends to enforce these claims against all owners, directors, officers, and managing agents of AKDY under section 558.1 of the Labor Code. Finally, pursuant to Labor Code § 2699.3(a)(1), Plaintiffs will serve the same written notice to LIGHTSTREAM by and through its respective agents of service of process by certified mail.

Very truly yours,

A handwritten signature in black ink, appearing to read "N. Yasman", is written over a horizontal line.

Nicholas A. Yasman, Esq.

CC: California Labor and Workforce Development Agency



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TRUIST FINANCIAL CORPORATION dba LIGHTSTREAM

Agent for Service of Process: Elaine Selan
416 W SAN YSIDRO BLVD L-1958
SAN YSIDRO, CA 92173

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A handwritten signature in black ink, appearing to read "Nicholas A. Yasman".

Nicholas A. Yasman, Esq.

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