



June 20, 2025

BY ONLINE SUBMISSION

California Labor & Workforce Development Agency
PAGAfilings@dir.ca.gov

Re: KECK MEDICINE OF USC SURGERY CENTERS, LLC; KECK MEDICINE OF USC SURGERY CENTER - PASADENA, LLC; KECK MEDICINE OF USC IMAGING CENTERS, LLC; KECK MEDICINE OF USC; KECK MEDICAL CENTER OF USC; KECK HOSPITAL OF USC; USC HEALTH VENTURES, LLC

Dear Representative:

We have been retained to represent Tanya Marshall against Keck Medicine of USC Surgery Centers, LLC, Keck Medicine of USC Surgery Center – Pasadena, LLC, Keck Medicine of USC Imaging Centers, LLC, Keck Medicine of USC, Keck Medical Center of USC, Keck Hospital of USC, and USC Health Ventures, LLC (including any and all affiliates, subsidiaries, parents, directors, officers, agents, and executive employees) (collectively referred to as “Keck/USC”) for violations of California wage-and-hour laws. Ms. Marshall seeks penalties for violations of the California Labor Code, which are recoverable under California Labor Code section 2698, et seq., the Labor Code Private Attorneys General Act of 2004 (“PAGA”) and all other remedies available under PAGA.

Ms. Marshall seeks these remedies on behalf of the State of California and “aggrieved employees,” as defined herein. This letter is sent in compliance with the reporting requirements of California Labor Code section 2699.3.

Keck/USC employed Ms. Marshall as an hourly-paid, non-exempt employee in approximately August 2024, in the State of California.

The “aggrieved employees” that Ms. Marshall may seek penalties on behalf of are all current and former hourly-paid or non-exempt employees who worked for any of the above-referenced entities within the State of California.

Based on the following facts and theories, Keck/USC has violated and/or continues to violate, among other provisions of the California Labor Code and applicable wage law, California Labor Code sections 201, 202, 203, 204, 226(a), 226.7, 510, 512(a), 551, 552, 558, 1174(d), 1194, 1197, 1197.1, 1198, 2800 and 2802, and IWC Wage Orders including *inter alia*, Wage Orders 4-2001 and 5-2001.

Keck/USC required Ms. Marshall and other aggrieved employees to perform work before their scheduled shifts, after their scheduled shifts, during off-the-clock meal breaks, and/or during rest breaks and failed to compensate Ms. Marshall and other aggrieved employees for this time. Such work included, but was not limited to, assisting patients, donning and doffing, waiting to clock in, traveling between work sites, and completing other regular tasks/duties. Keck/USC rounded the work time recorded by Ms. Marshall and other aggrieved employees in a manner that was not fair and neutral on its face and/or that favored Keck/USC over time, resulting in aggrieved employees being underpaid for their time worked.

California Labor Code sections 510 and 1198 require employers to pay time-and-a-half or double time overtime wages, and make it unlawful to work employees for hours longer than eight hours in one day and/or over forty hours in one week without paying the premium overtime rates at one-and-one-half times or double the regular rate of pay, including additional remuneration. During the relevant time period, Ms. Marshall and other aggrieved employees worked in excess of 8 hours in a day and 40 hours in a week. Therefore, Ms. Marshall and other aggrieved employees were entitled to receive certain wages for overtime compensation, but they were not paid for all overtime hours worked.

California Labor Code sections 226.7 and 512 require employers to pay an employee one additional hour of pay at the employee's regular rate for each meal or rest period that is not provided. During the relevant time period, Keck/USC required Ms. Marshall and other aggrieved employees to work during meal and rest periods and failed to compensate them properly for non-compliant meal and rest periods including, *inter alia*, short, late, interrupted, and missed meal and rest periods. Keck/USC also required Ms. Marshall and other aggrieved employees to stay on work premises during rest periods.

California Labor Code sections 201 and 202 provide that if an employer discharges an employee, the wages earned and unpaid at the time of discharge are due and payable immediately, and if an employee quits his or her employment, his or her wages shall become due and payable not later than seventy-two (72) hours thereafter, unless the employee has given seventy-two (72) hours' notice of his or her intention to quit, in which case the employee is entitled to his or her wages at the time of quitting. During the relevant time period, Keck/USC failed to pay Ms. Marshall and other aggrieved employees all wages due to them within any time period specified by California Labor Code sections 201 and 202, including earned and unpaid minimum, overtime, and premium wages as discussed above.

California Labor Code section 204 requires that all wages earned by any person in any employment between the 1st and the 15th days, inclusive, of any calendar month, other than those wages due upon termination of an employee, are due and payable between the 16th and the 26th day of the month during which the labor was performed, and that all wages earned by any person in any employment between the 16th and the last day, inclusive, of any calendar month, other than those wages due upon termination of an employee, are due and payable between the 1st and the 10th day of the following month. California Labor Code section 204 also requires that all wages earned for labor in excess of the normal work period shall be paid no later than the payday for the next regular payroll period. During the relevant time period, Keck/USC failed to pay Ms. Marshall and other aggrieved employees all wages due to them within any time period specified by California Labor

Code section 204, including earned and unpaid minimum, overtime, and premium wages as discussed above.

California Labor Code section 226 requires employers to make, keep and provide complete and accurate itemized wage statements to their employees. During the relevant time period, Keck/USC did not provide Ms. Marshall and other aggrieved employees with complete and accurate itemized wage statements. The wage statements they received from Keck/USC were in violation of California Labor Code section 226(a). The violations include, but are not limited to, the failure to include the total hours worked by Ms. Marshall and other aggrieved employees, including time spent working off-the-clock and during meal and rest periods as discussed above, and the failure to accurately list the employer.

California Labor Code sections 551 and 552 require that every person employed in any occupation of labor is entitled to one day's rest in a seven-day workweek, that no employer of labor shall cause his employees to work more than six days in a workweek, and that an employer shall pay a civil penalty in the amounts of fifty dollars (\$50) for each aggrieved employee per pay period for the initial violation and one hundred dollars (\$100) for each aggrieved employee per pay period for each subsequent violation. During the relevant time period, Ms. Marshall and the aggrieved employees were required to regularly and/or consistently work in excess of six (6) days in a workweek. During the relevant time period, Ms. Marshall and the aggrieved employees were required to work in excess of thirty (30) hours in a week and/or six (6) hours in any one (1) day thereof, during workweeks in which they were required to work in excess of six (6) days. During the relevant time period, Ms. Marshall and the aggrieved employees were required to work in excess of six (6) days in a workweek without accumulating or being provided the opportunity to take at least one (1) day of rest, and when Ms. Marshall and the aggrieved employees accumulated days of rest, they were not actually provided the opportunity to take the equivalent of one (1) day's rest in seven (7) during each calendar month.

California Labor Code sections 1174(d) requires an employer to keep, at a central location in the state or at the plants or establishments at which employees are employed, payroll records showing the hours worked daily by and the wages paid to, and the number of piece-rate units earned by and any applicable piece rate paid to, employees employed at the respective plants or establishments. These records shall be kept with rules established for this purpose by the commission, but in any case shall be kept on file for not less than two years. During the relevant time period, Keck/USC failed to keep accurate and complete payroll records showing the actual hours worked daily and the wages earned by Ms. Marshall and other aggrieved employees, including earned and unpaid minimum, overtime, and premium wages as discussed above.

California Labor Code sections 1194, 1197, and 1197.1 provide the minimum wage to be paid to employees, and the payment of a lesser wage than the minimum so fixed is unlawful. During the relevant time period, Keck/USC did not provide Ms. Marshall and other aggrieved employees with the minimum wages to which they were entitled for work performed "off-the-clock."

California Labor Code section 1198 provides that "The employment of any employee ... under conditions of labor prohibited by the [Industrial Wage Orders] is unlawful." The applicable Industrial Wage Orders, including *inter alia*, Wage Orders 4-2001 and 5-2001, require that for each workday an employee is required to report for work and does report, but is not put to work

or is furnished less than half said employee's usual or scheduled day's work, the employee shall be paid for half the usual or scheduled day's work, but in no event for less than two (2) hours nor more than four (4) hours, at the employee's regular rate of pay. Further, if an employee is required to report for work a second time in any one workday and is furnished less than two (2) hours of work on the second reporting, said employee shall be paid for two (2) hours at the employee's regular rate of pay. During the relevant time period, Keck/USC failed to pay Ms. Marshall and other aggrieved employees half the usual or scheduled day's work in an amount no less than two (2) hours nor more than four (4) hours at the employee's regular rate of pay for workdays in which Ms. Marshall and the other aggrieved employees reported to work and were furnished less than half the usual or scheduled day's work. During the relevant time period, Keck/USC failed to pay Ms. Marshall and other aggrieved employees for two (2) hours at the employee's regular rate of pay on days in which Ms. Marshall and the other aggrieved employees were required to report for work a second time in one workday and were furnished less than two (2) hours of work upon the second reporting.

California Labor Code sections 2800 and 2802 require an employer to reimburse its employee for all necessary expenditures incurred by the employee in direct consequence of the discharge of his or her job duties or in direct consequence of his or her obedience to the directions of the employer. During the relevant time period, Ms. Marshall and other aggrieved employees incurred necessary business-related expenses and costs that were not fully reimbursed by Keck/USC. These costs include, but are not limited to, the purchasing and maintenance of clothing in compliance with company policy, and the purchasing and maintenance of specialty footwear in compliance with company policy.

Therefore, on behalf of all aggrieved employees, Ms. Marshall seeks all applicable penalties arising out of the above-referenced wage, hour, and payroll practices, or which could be assessed and collected by the Labor and Workforce Development Agency, for violation of the California Labor Code pursuant to PAGA, including civil penalties pursuant to Labor Code section 558.

///

///

///

///

///

///

///

///

///

///

If you have any questions or require additional information, please do not hesitate to contact us.
Thank you for your attention to this matter and the noble cause you advance each and every day.

With kind regards,



Arman Marukyan, Esq.

Cc: (By U.S. Certified Mail / Return Receipt Requested)

Keck Medicine of USC Surgery Centers, LLC,
Keck Medicine of USC Surgery Center – Pasadena, LLC
Keck Medicine of USC Imaging Centers, LLC
USC Health Ventures, LLC
c/o Jeannine Taylor
Agent for Service of Process
1510 San Pablo St., Suite 600
Los Angeles, CA 90033

USC Health Ventures, LLC
c/o Jeannine Taylor
Agent for Service of Process
3551 Trousdale Parkway ADM 352
Los Angeles, CA 90089

Keck Medicine of USC
Keck Hospital of USC
1500 San Pablo St.
Los Angeles, CA 90033

Keck Medical Center of USC
c/o Christopher Campbell
Agent for Service of Process
1510 San Pablo Street, Suite 600
Los Angeles, CA 90033

LAWYERS FOR JUSTICE
450 N. BRAND BLVD., SUITE 900 / GLENDALE, CA 91203

CERTIFIED MAIL



9589 0710 5270 0409 9589 85
9589 0710 5270 0409 9589 85

PITNEY BOWES
\$9.92 0
US POSTAGETM
FIRST-CLASS
028W00002311246
2000152203
Zip 91203
JUN 20 2025

U.S. Po
CERT
Domestic

PAGA Notice #1
Tanya Marshall v. Keck Medicine of USC Surgery C

For delivery information, visit our website at www.usps.com

OFFICIAL US

Certified Mail Fee	
\$	
Extra Services & Fees (check box, add fee as appropriate)	
☐ Return Receipt (hardcopy)	\$
☐ Return Receipt (electronic)	\$
☐ Certified Mail Restricted Delivery	\$
☐ Adult Signature Required	\$
☐ Adult Signature Restricted Delivery	\$

Postage

Keck Medicine of USC Surgery Centers, LLC
Keck Medicine of USC Surgery Center – Pasadena, LLC
Keck Medicine of USC Imaging Centers, LLC
USC Health Ventures, LLC
c/o Jeannine Taylor
Agent for Service of Process
1510 San Pablo St., Suite 600
Los Angeles, CA 90033

PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Keck Medicine of USC Surgery Centers, LLC
Keck Medicine of USC Surgery Center - Pasadena, LLC
Keck Medicine of USC Imaging Centers, LLC
USC Health Ventures, LLC
c/o Jeannine Taylor
Agent for Service of Process
1510 San Pablo St., Suite 600
Los Angeles, CA 90033



9590 9402 8701 3310 7906 50

2. Article Number (Transfer from service label)

9589 0710 5270 0409 9589 85

PS Form 3811, July 2020 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature		☐ Agent
X		☐ Addressee
B. Received by (Printed Name)	C. Date of Delivery	
D. Is delivery address different from item 1? If YES, enter delivery address below:		☐ Yes ☐ No

3. Service Type	☐ Priority Mail Express®
☐ Adult Signature	☐ Registered Mail™
☐ Adult Signature Restricted Delivery	☐ Registered Mail Restricted Delivery
☐ Certified Mail®	☐ Signature Confirmation™
☐ Certified Mail Restricted Delivery	☐ Signature Confirmation Restricted Delivery
☐ Collect on Delivery	☐ Signature Confirmation Restricted Delivery
☐ Collect on Delivery Restricted Delivery	☐ Signature Confirmation Restricted Delivery

Domestic Return Receipt

LAWYERS FOR JUSTICE[®]
450 N. BRAND BLVD., SUITE 900 / GLENDALE, CA 91203

CERTIFIED MAIL



9589 0710 5270 0409 9589 92
9589 0710 5270 0409 9589 92

PITNEY BOWES
\$9.92
US POSTAGE[®]
FIRST-CLASS[®]
028W0002312053
2000152203
ZIP 91203
JUN 20 2025

U.S. POST SERVICE
CERTIFIED MAIL
Domestic

PAGA Notice #2
Tanya Marshall v. Keck Medicine of USC Surgery C

For delivery information, visit our website at www.usps.com

OFFICIAL USE

Certified Mail Fee	
\$	
Extra Services & Fees (check box, add fee as appropriate)	
☐ Return Receipt (hardcopy)	\$
☐ Return Receipt (electronic)	\$
☐ Certified Mail Restricted Delivery	\$
☐ Adult Signature Required	\$
☐ Adult Signature Restricted Delivery	\$

Postage

USC Health Ventures, LLC
c/o Jeannine Taylor
Agent for Service of Process
3551 Trousdale Parkway ADM 352
Los Angeles, CA 90089

PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article

USC Health Ventures, LLC
c/o Jeannine Taylor
Agent for Service of Process
3551 Trousdale Parkway ADM 352
Los Angeles, CA 90089



9590 9402 8701 3310 7906 43

2. Article Number (Transfer from service label)

9589 0710 5270 0409 9589 92

PS Form 3811, July 2020 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X

☐ Agent
☐ Addressee

B. Received by (Printed Name) C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
- ☐ Adult Signature
 - ☐ Adult Signature Restricted Delivery
 - ☐ Certified Mail®
 - ☐ Certified Mail Restricted Delivery
 - ☐ Collect on Delivery
 - ☐ Collect on Delivery Restricted Delivery
 - ☐ Priority Mail Express®
 - ☐ Registered Mail™
 - ☐ Registered Mail Restricted Delivery
 - ☐ Signature Confirmation™
 - ☐ Signature Confirmation Restricted Delivery

Domestic Return Receipt

LAWYERS FOR JUSTICE
450 N. BRAND BLVD., SUITE 900 / GLENDALE, CA 91203

CERTIFIED MAIL



9589 0710 5270 0409 9591 80
9589 0710 5270 0409 9591 80

PITNEY BOWES
\$9.92 0
US POSTAGETM
FIRST-CLASS
028W0002311246
2000152203
ZIP 91203
JUN 20 2025



U.S.
CERTIFIED MAIL[®]
Domestic

PAGA Notice #3
Tanya Marshall v. Keck Medicine of USC Surgery

For delivery information, visit our website at www.usps.com

OFFICIAL

Certified Mail Fee

\$

Extra Services & Fees (check box, add fee as appropriate)

- | | |
|--|----|
| ☐ Return Receipt (hardcopy) | \$ |
| ☐ Return Receipt (electronic) | \$ |
| ☐ Certified Mail Restricted Delivery | \$ |
| ☐ Adult Signature Required | \$ |
| ☐ Adult Signature Restricted Delivery | \$ |

Postage

Keck Medicine of USC
Keck Hospital of USC
1500 San Pablo St.
Los Angeles, CA 90033

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

Keck Medicine of USC
Keck Hospital of USC
1500 San Pablo St.
Los Angeles, CA 90033



9590 9402 8701 3310 7906 36

2 Article Number (Transfer from service label)

9589 0710 5270 0409 9591 80

PS Form 3811, July 2020 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature		☐ Agent
X		☐ Addressee
B. Received by (Printed Name)	C. Date of Delivery	
D. Is delivery address different from item 1? ☐ Yes if YES, enter delivery address below: ☐ No		

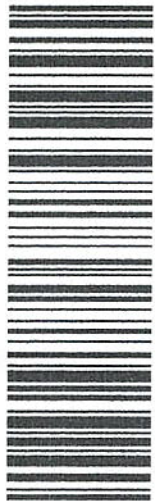
3. Service Type

☐ Adult Signature	☐ Priority Mail Express®
☐ Adult Signature Restricted Delivery	☐ Registered Mail™
☐ Certified Mail®	☐ Registered Mail Restricted Delivery
☐ Certified Mail Restricted Delivery	☐ Signature Confirmation™
☐ Collect on Delivery	☐ Signature Confirmation Restricted Delivery
☐ Collect on Delivery Restricted Delivery	

Domestic Return Receipt

LAWYERS FOR JUSTICE
450 N. BRAND BLVD., SUITE 900 / GLENDALE, CA 91203

CERTIFIED MAIL



9589 0710 5270 0409 9579 95
9589 0710 5270 0409 9579 95

PITNEY BOWES
\$9.92 0
US POSTAGE[®]
FIRST-CLASS
028W0002310186
2000152203
ZIP 91203
JUN 20 2025

U.S. P
CERT
Domest

PAGA Notice #4
Tanya Marshall v. Keck Medicine of USC Surgery Center

For delivery information, visit our website at www.usps.com

OFFICIAL U.S. MAIL

Certified Mail Fee	
\$	
Extra Services & Fees (check box, add fee as appropriate)	
☐ Return Receipt (hardcopy)	\$
☐ Return Receipt (electronic)	\$
☐ Certified Mail Restricted Delivery	\$
☐ Adult Signature Required	\$
☐ Adult Signature Restricted Delivery	\$

Keck Medical Center of USC
c/o Christopher Campbell
Agent for Service of Process
1510 San Pablo Street, Suite 600
Los Angeles, CA 90033

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1
 Keck Medical Center of USC
 c/o Christopher Campbell
 Agent for Service of Process
 1510 San Pablo Street, Suite 600
 Los Angeles, CA 90033



9590 9402 8701 3310 7906 29

2. Article Number (Transfer from service label)

9589 0710 5270 0409 9579 95

PS Form 3811, July 2020 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature		☐ Agent
X		☐ Addressee
B. Received by (Printed Name)	C. Date of Delivery	
D. Is delivery address different from item 1? ☐ Yes ☐ No If YES, enter delivery address below:		

3. Service Type

☐ Adult Signature	☐ Priority Mail Express®
☐ Adult Signature Restricted Delivery	☐ Registered Mail™
☐ Certified Mail®	☐ Registered Mail Restricted Delivery
☐ Certified Mail Restricted Delivery	☐ Signature Confirmation™
☐ Collect on Delivery	☐ Signature Confirmation Restricted Delivery
☐ Collect on Delivery Restricted Delivery	☐ Restricted Delivery

all Restricted Delivery

Domestic Return Receipt