



AMANDA B. WHITTEN
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June 9, 2025

Attn: PAGA Administrator
1515 Clay Street, Suite 801
Oakland, California 94612

Re: Christe Hara

Dear Sir/Madam:

This letter shall serve as notice to your agency of Labor Code violations, which is a prerequisite to commencing a private civil action.

From in or about 2015, until in or about 2022, Christe Hara was employed by Sutter Health (doing business as Memorial Hospital Los Banos), herein referred to as ("Employer") in Merced County. Her last position was Respiratory Therapist.

In or about December of 2020, Plaintiff complained to her employer about sexual harassment, sexual battery, and/or sexual assault committed on her and/or a female patient, because she reasonably believed that it created a safety concern for herself and/or other workers or patients. Plaintiff also reasonably believed it violated civil and criminal statutes regarding these subjects and other similar regulations.

Employer retaliated against Ms. Hara for her complaints by subjecting her to unwarranted and unjust criticism, and subsequently refusing to re-hire her for a position at a different hospital. Ms. Hara's complaints about safety and/or Employer's noncompliance with state and federal rules and regulations were a substantial motivating reason for the

termination. This conduct violated Labor Code sections 1102.5 and 1102.6.

Ms. Hara will file a civil action for damages, attorneys' fees, and costs pursuant to the PAGA.

Sincerely,

BRYANT WHITTEN, LLP

A handwritten signature in blue ink, appearing to read 'A. Whitten', with a horizontal line extending to the right.

AMANDA B. WHITTEN

ABW/cjc

Enclosure

cc: Christe Hara
Agent for Service of Process for Sutter Health