



Advocates for Workplace Fairness

June 5, 2024

VIA ONLINE SUBMISSION

California Labor and Workforce Development Agency
Attn: PAGA Administrator

VIA CERTIFIED MAIL

Scott P. Jang
Michael D. Thomas
Jackson Lewis P.C.
50 California Street, 9th Floor
San Francisco, CA 94111

Re: PAGA Notice of California Labor Code Claims against Intel Corporation

Dear PAGA Administrator:

Outten & Golden LLP and the Shavitz Law Group, P.A. represent Stephanie Hanson ("Plaintiff"), who worked as a non-exempt hourly employee of Intel Corporation ("Intel"). Ms. Hanson worked as an Executive Assistant for Intel in California.

As set forth below, on behalf of all non-exempt Intel employees, Plaintiff alleges that Intel failed to pay her proper compensation as required by California law. On information and belief, Intel similarly denies all non-exempt hourly employees proper compensation. Specifically, Plaintiff alleges that Intel granted restricted stock units ("RSUs") to non-exempt employees but failed to include the value of such RSUs in their regular rates of pay when calculating and determining amounts owed to non-exempt employees for regular pay, premiums, and overtime compensation. As a result thereof, Plaintiff alleges that Intel violated California law by failing to pay legally required overtime wages and all earned wages upon discharge. In addition, Intel failed to provide Plaintiffs with accurate wage statements. On information and belief, Intel similarly denies all non-exempt employees who are granted RSUs, regardless of job title, proper compensation and fails to provide them with accurate wage statements.

Accordingly, as a result of Intel's failure to include RSUs in non-exempt employees' regular rates of pay, Plaintiff alleges that Intel violated and is violating California law by (1) failing to pay non-exempt hourly employees proper overtime compensation (in violation of Cal. Labor Code §§ 510, 1194, 1198 and Cal. Industrial Welfare Commission Wage Order Nos. 4-2001 and 7-2001 ("the Wage Orders") and other compensation derived from the regular rate of pay (in violation of Cal. Labor Code §§ 226.7, 512, 516, and 246)); (2) failing to timely pay wages during employment and upon separation (in violation of Cal. Labor Code §§ 201-204);

and (3) failing to provide legally sufficient wage statements or keep proper payroll records (in violation of Cal. Labor Code §§ 226 and 1174 and Cal. Industrial Welfare Commission Wage Order Nos. 4-2001 and 7-2001 (“the Wage Orders”)).

This letter serves as notice of our intent to seek civil penalties pursuant to the Private Attorneys General Act (“PAGA”), Cal. Lab. Code §§ 2698, *et seq.*, on behalf of Plaintiff and similarly-situated non-exempt hourly employees who worked for Intel in the State of California to the fullest time period allowed under the law. Plaintiff will seek all applicable civil penalties on behalf of themselves and all similarly-situated non-exempt employees who were granted RSUs, including but not limited to penalties pursuant to the aforementioned statutes and California Labor Code §§ 210, 218.5, 226.3, 226.6, 256, 558, 1174.5, and 2699, and the Wage Orders.

The facts and claims contained herein are based on the limited information available at the time of this writing. Therefore, if through further review or informal or formal discovery, Plaintiff becomes aware of additional compensation or penalties owed to her and other current or former non-exempt hourly employees or of additional claims against Intel, she reserves the right to revise these facts and/or add any new claims by amending this letter.

* * *

Thank you for your attention to this matter. Please direct all communications and correspondence to our office going forward. If you have any questions, please do not hesitate to contact us at 212-245-1000.

Sincerely,

A handwritten signature in black ink, appearing to read "Jahan Sagafi", written in a cursive style.

Jahan Sagafi

cc: Scott P. Jang, Scott.Jang@jacksonlewis.com
Michael D. Thomas, Michael.Thomas@jacksonlewis.com