

August 11, 2025

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

California Labor and Workforce Development Agency
Attn: PAGA Administrator
455 Golden Gate Avenue, 9th Floor
San Francisco, CA 94102

Re: **Brooks, Sarah Ann v. The Johns Hopkins University**
PAGA Notice Pursuant to California Labor Code section 2699.3, et seq.

Dear Sir/Madam:

This firm represents Sarah Ann Brooks (hereinafter “Plaintiff”) and all other aggrieved employees who intend to file a claim against The Johns Hopkins University (hereinafter “Respondent”) with the Los Angeles County Superior Court regarding violations of the California Labor Code committed by Respondent. This letter shall serve as notice, and a request, pursuant to California Labor Code section 2699.3, et seq. (Private Attorneys General Act of 2004 (hereinafter “PAGA”), that your agency investigate the alleged violations by Respondent described herein against Complainant and other current and/or former employees. If the agency does not intend to investigate the alleged violations described herein, we respectfully request that the agency specifically notify our office of the same at your earliest possible opportunity.

Statement of Specific Provisions of the Labor Code Alleged to Have Been Violated

The above-mentioned civil action will be brought by Complainant against Respondent for violations of California Labor Code sections: 204 (untimely payment of wages); 510 (overtime); 1194(a) 1197, and 1197.1 (minimum wage); 226 (wage statement); 1174(d) and 1198.5 (recordkeeping); and 201-203 (payment of final wages); 512 (unpaid meal period premiums); Labor Code 226.7 (unpaid rest period premiums).

Facts and Theories in Support of Alleged Violations

Complainant is informed and believes, and based thereon alleges, that at all times relevant herein, Respondent The Johns Hopkins University (“Respondent” or “TJHU”) is a nonprofit institution of higher education that offers educational programs spanning primary, secondary, and postsecondary levels. TJHU’s “Center for Talented Youth” operates a series of a summer school programs.

Complainant worked for Respondent from in or around June 2025 through in or around August 2025 as a “Center for Talented Youth Program Assistant.”

Throughout the relevant time period, Respondent maintained uniform policies and practices that resulted in violations of Complainant and all other aggrieved employees rights under the Labor Code. These policies, practices, and violations fall into the following general categories:

Misclassification as Salaried, Exempt Employees: Complainant and the other Class Members were not paid for the actual hours worked. Instead, Respondent maintained a policy and practice of classifying Complainant and all others similarly-situated as exempt, salaried employees. Complainant and members of the Class did not make at least twice the minimum wage, and were not subject to any exemption to the California Labor Code or Wage Orders pertaining to the payment of overtime wages. Complainant and all others similarly-situated routinely worked hours in excess of eight in a day and/or forty in a week. As a result of this practice, Respondent committed violations of Labor Code sections 510 (overtime); 1194(a) 1197, and 1197.1 (minimum wage); 226 (wage statement); 1174(d) and 1198. (recordkeeping); and 201-203 (payment of final wages).

Failure to Provide Meal Periods: Complainant and the other aggrieved employees were not timely provided all uninterrupted meal periods to which they were entitled. Complainant and aggrieved employees were not authorized or permitted to take meal periods unless released by their supervisor. Often this was not done until after the fifth hour of work. On other occasions, aggrieved employees were interrupted during their meal periods, or not released to a meal period at all. On these occasions Respondent did not pay meal period premiums. As a result of these practices, Respondent committed violations of Labor Code sections 512.

Failure to Provide Rest Periods: Complainant and the other aggrieved employees were not timely provided all uninterrupted rest periods to which they were entitled. Complainant and aggrieved employees were not authorized or permitted to take rest periods unless released by their supervisor. Often this was not done until after their fourth hour of work, or not at all, or were not provided a second rest period during shifts greater than 6 hours. On these occasions Respondent did not pay rest period premiums. As a result of these practices, Respondent committed violations of Labor Code sections 226.7.

CONCLUSION

We provide notice pursuant to California Labor Code section 2699.3 of the Private Attorneys General Act of 2004, and specifically ask that your agency conduct an investigation as to the alleged violations described herein; or, in the alternative, if the agency does not intend to investigate the alleged violations, we ask that you issue an immediate notification letter to our office confirming the same so that we may proceed with our civil action with regard to the PAGA claims described herein against Respondent.

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If you require anything further and/or have any questions, please do not hesitate to contact me. Nothing in this letter is intended to be, nor should be construed as, an admission against the interests of Plaintiff, and/or other current and/or former employees and shall not be construed as a waiver of their rights, remedies, claims, or defenses, all of which are expressly reserved.

Respectfully submitted
LYFE LAW, LLP

/s/ John F. Litwin

By:

John F. Litwin, Esq.

cc: THE JOHNS HOPKINS UNIVERSITY
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Glendale, CA 91203
VIA CERTIFIED MAIL