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OUR FILE NUMBER:

5277-0002



CONFIDENTIAL COMMUNICATION
This correspondence and the information set forth herein
constitutes confidential communications

November 25, 2025

VIA LWDA PORTAL SUBMISSION

Labor Workforce Development Agency

Re: PAGA Notice, LWDA Case Number: LWDA-CM-1133732-25
Employer Name: Advanced Medical Research, Inc. and
LGA Management, Inc.
Guerrero Alexis Morales Medina v. Advanced Medical Research,
Inc. and LGA Management, Inc.

Dear Sir/Madam:

This law firm represents Advanced Medical Research, Inc. and LGA Management, Inc. regarding the PAGA notice dated October 23, 2025, by Guerrero Alexis Morales Medina ("Medina") and the Abramson Law Group and received by Advanced Medical Research, Inc. ("AMR") on or about that same day. This is a confidential statement as Advanced Medical has less than 100 employees.

We have carefully reviewed the notice and the only factual allegation is with respect to Medina's allegation that AMR failed to pay at least the legal minimum wage and overtime wage for all hours worked due to AMR's alleged policy and practice of failing to include bonuses in the regular rate of pay. The bonuses AMR pays to its employees are *discretionary* and, therefore, the bonus payments are correctly not included in the employees' regular rate of pay. AMR is more than happy to review the bonus policy with you to demonstrate they are discretionary.

With respect to the remaining allegations, AMR believes they are deficient under California Labor Code § 2699.3. The notice fails to include sufficient facts and legal theories to allow for a comprehensive investigation by either AMR or the Labor and Workforce Development Agency.

AMR reserves all rights and defenses under the law, including but not limited to the right to assert that the claims contained in the notice lack merit, are untimely, or are subject to correction. The filing of this response should not be construed as an admission of liability or as a waiver of any defenses, whether expressly stated or not.

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We look forward to addressing this matter further as appropriate.

Best regards,

CALLAHAN & BLAINE

A handwritten signature in blue ink, appearing to read "Scott Nelson", written in a cursive style.

Scott D. Nelson

SDN/er