



January 20, 2026

Via Online Filing

Labor and Workforce Development Agency
Attn: PAGA Unit
1515 Clay Street, Suite 801
Oakland, CA 94612

Via Certified Mail

Sony Pictures Studios, Inc.
10202 W. Washington Boulevard
Culver City, C 90232

Re: Notice of Labor Code Violations Pursuant to Labor Code § 2699.
Aggrieved Employee: Laurie Delgado

Dear Labor and Workforce Development Agency:

This letter serves as written notice under the Private Attorneys General Act of 2004, California Labor Code sections 2698 et seq., on behalf of aggrieved employee Laurie Delgado against Sony Pictures Studios, Inc., including its divisions, operations, agents, and representatives operating the Sony Pictures Athletic Club. Ms. Delgado submits this notice on behalf of herself and all other current and former similarly situated workers and aggrieved employees.

Ms. Delgado worked as a massage therapist at the Sony Pictures Athletic Club in Culver City, California from approximately August 2022 through July 2025. During that period, Sony Pictures Studios, Inc. classified Ms. Delgado and other massage therapists as independent contractors. That classification was improper under California law. Based on the actual nature of the working relationship, Ms. Delgado was an employee, and Sony Pictures Studios, Inc.'s misclassification resulted in widespread violations of the California Labor Code.

Despite the independent contractor label, Sony Pictures Studios, Inc. exercised significant control over Ms. Delgado's work. The company dictated her schedule, assigned her clients, controlled the duration and structure of services, required compliance with workplace policies and procedures, and imposed restrictions requiring her to remain on site during unpaid gaps between appointments. Ms. Delgado performed work that was central to Sony Pictures Studios, Inc.'s regular business operations of the Sony Pictures Athletic Club and did so at a company-controlled facility, using company-provided equipment, branding, and client systems. Sony Pictures Studios, Inc. retained the unilateral authority to modify schedules, reduce hours, dock pay, discipline, and ultimately terminate Ms. Delgado's services. Ms. Delgado did not operate an independent business with respect to her work at the Athletic Club. Under the ABC test and



applicable common law standards, Ms. Delgado and similarly situated workers were employees, not independent contractors.

As a direct and proximate result of this willful misclassification, Sony Pictures Studios, Inc. failed to pay all wages required by law, including overtime wages, and failed to provide legally compliant meal periods and rest breaks. The company failed to timely pay all wages owed during employment and upon separation and failed to provide accurate, itemized wage statements reflecting all hours worked and wages earned. Sony Pictures Studios, Inc. unlawfully withheld and deducted earned wages and failed to reimburse employees for necessary business expenses incurred in the course of their work. The company also failed to maintain accurate payroll and employment records as required by law. These violations were ongoing, systemic, and affected Ms. Delgado and other aggrieved employees throughout the relevant period.

Ms. Delgado further experienced unilateral reductions in hours and pay, material schedule changes, docking of earned wages, and termination under circumstances that further demonstrate Sony Pictures Studios, Inc.'s control over the workforce and reinforce the improper classification scheme. These actions deprived Ms. Delgado and similarly situated workers of the statutory protections afforded to employees under the Labor Code and shifted the costs and risks of employment onto workers in violation of California public policy.

This notice is intended to satisfy the requirements of Labor Code section 2699.3(a) and to provide the Labor and Workforce Development Agency with an opportunity to investigate the violations described herein. Ms. Delgado seeks to recover civil penalties on behalf of the State of California, herself, and other aggrieved employees for violations of, including but not limited to, Labor Code sections 201 through 203, 204, 221, 226, 226.7, 510, 512, 558, 1174, 1174.5, 1194, 1198, 2750.3, and 2802, as well as all applicable wage order provisions, to the extent they apply. To the extent any alleged violations are subject to cure, Sony Pictures Studios, Inc. has not cured and continues to fail to cure those violations.

Ms. Delgado respectfully submits this notice in good faith based on the facts known to her and reserves the right to pursue all remedies available under PAGA and applicable law if the Agency declines to investigate or Sony Pictures Studios, Inc. fails to resolve the violations within the statutory period.

Please direct any correspondence regarding this matter to undersigned counsel.

Very Truly Yours,

/s/ Barbara E. Cowan
Barbara E. Cowan, Esq.
Attorney for Laurie Delgado