



LAW OFFICE OF PEGGY A. FARRELL^{APC}
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February 22, 2026

VIA ONLINE SUBMISSION

<https://www.dir.ca.gov/Private-Attorneys-General-Act/Private-Attorneys-General-Act.html>

LWDA- Dept. of Industrial Relations

Re: Notice of AMENDED PAGA Claim, Matter No. LWDA-CM-1149801-26

Dear LWDA:

Claimant, Michael Beckman (“Mr. Beckman” or “Complainant”) hereby amends his July 13, 2025 “Notice of PAGA Claim,” against his former joint employers, Warner Bros. Discovery, Inc. (“WBD”), Home Box Office, Inc. (“HBO”) (collectively, “HBO/WBD”), and Random Productions, LLC (Matter No. LWDA-CM-1149801-26). Mr. Beckman alleges the following additional facts and legal theories in support of his PAGA action against HBO/WBD¹ below:

I. SPECIFIC FACTS IN SUPPORT OF COMPLAINANT’S AMENDED PAGA CLAIM FOR ADDITIONAL PREDICATE VIOLATIONS OF CAL. LABOR CODE AGAINST HBO/WBD.

On January 7, 2026, Complainant sent a letter to Respondents Warner Bros. Discovery, Inc. and Home Box Office, Inc. via FedEx, which contained a written demand for Complainant’s payroll and personnel records as follows:

Please also provide [] Mr. Beckman’s payroll and personnel records pursuant to Cal. Labor Code §§ 226(c) and 1198.5(a). Payroll records must be provided within 21 days of the request and personnel records must be provided within 30 days of the request. *Id.* The foregoing constitutes a written request from [] Mr. Beckman’s authorized representative under Labor Code §§ 1198.5(2)(i)(ii) and 226(c) respectively, such that failure to timely provide this information will result in further violations of law and waiting time penalties.

Respondents HBO/WBD did not respond nor provide Complainant’s personnel or payroll

¹ Respondent Random Productions, LLC has not yet been served with a written demand for records pursuant to Cal. Labor Code §§ 226(c) and 1198.5(a), such that this amendment applies only to Respondents’ HBO and WBD.

files within 21 or 30 days respectively from the date of the written request nor did they seek an extension to respond. Accordingly, Respondents violated Labor Code §§ 226 and 1198.5(a), respectively, entitling him to penalties on behalf of himself and all other employees similarly aggrieved by these violations.

Mr. Beckman is therefore entitled to penalties under the PAGA on behalf of himself and all other employees similarly aggrieved by Respondents' violations of Labor Code §§ 225(c) and 1198.5(a) applying the default penalty formula.

Respondents' additional violations of Labor Code §§ 226(c) and 1198.5(a) with respect to Mr. Beckman and other employees similarly aggrieved trigger the protection of the PAGA. Mr. Beckman therefore seeks the LWDA's approval to go forward with this cause of action that includes these additional claims, while reserving the right to amend these allegations should evidence of additional violations be discovered. Please respond to this letter within the required time period.

LAW OFFICE OF PEGGY A. FARRELL, ^{APC}



Peggy A. Farrell
Attorneys for Complainant, MICHAEL BECKMAN

PROOF OF SERVICE

Beckman v. HBO/WBD, et al. (Matter No. LWDA-CM-1149801-26)

I, the undersigned, am over the age of eighteen years and am resident of Los Angeles County, California; I am not a party to the above-entitled action; my business mailing address is 2658 Griffith Park Blvd., #114, Los Angeles, CA 90039.

On February 22, 2026, I served the following document(s):

COMPLAINANT MICHAEL BECKMAN'S AMENDED NOTICE OF PAGA CLAIM AGAINST RESPONDENTS WARNER BROS. DISCOVERY, INC. & HOME BOX OFFICE, INC.

X BY CERTIFIED MAIL: Pursuant to Cal. Labor Code § 2699.3(a)(1)(A), I served the above-captioned document via certified mail to:

Mr. David Zaslav, CEO
Warner Bros. Discovery, Inc.
230 Park Ave. South
New York, NY 10003

Mr. Todd F. Davis, CEO
Home Box Office, Inc.
30 Hudson Yards
New York, NY 10001

California Corporate Registered Agent *for*
Warner Bros. Discovery, Inc.
Home Box Office, Inc.
Random Productions, LLC
CT CORPORATION SYSTEM
Registered Corp. 1505 Agent
Attn: Ms. Amanda Garcia
330 N. Brand Blvd.
Glendale, CA 91203

Executed on February 22, 2026, from Los Angeles, California.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.



Peggy A. Farrell

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