



Advocates for Workplace Fairness

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VIA ONLINE SUBMISSION

California Labor and Workforce Development Agency
Attn: PAGA Administrator

Re: PAGA Notice of California Labor Code Claims against Whova, Inc.

Dear PAGA Administrator:

Outten & Golden LLP represents Hayden Steger (“Plaintiff” or “Mr. Steger”), a former sales employee employed by Whova, Inc. (“Whova”). Mr. Steger was employed by Whova as an exempt classified Sales Development Representative (“SDR”) from approximately July 2024 to January 2025 and Account Executive (“AE”) from approximately January 2025 to September 2025. Mr. Steger worked from Whova’s offices in San Diego, California. As set forth below, Plaintiff alleges that Whova failed to pay him and other similarly situated employees as required by California law.

Plaintiff alleges that Whova misclassified Sales Employees¹ as exempt from overtime. Plaintiff’s and Sales Employees’ primary duties were and are non-exempt inside sales duties. However, throughout their employment, Whova denied them proper overtime compensation. On information and belief, Whova similarly denies all Sales Employees proper overtime compensation. Plaintiff further alleges that Sales Employees routinely worked during their meal and rest breaks, and that Whova failed to reimburse Sales Employees for business expenses.

Specifically, Plaintiff alleges that Defendant violated California law by (1) failing to pay Sales Employees proper overtime compensation for all hours worked over 40 in a workweek and/or over eight hours in a workday (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”)); (2) failing to timely pay wages during employment and upon separation (in violation of Cal. Labor Code §§ 201-204); (3) failing to provide timely, accurate, and itemized wage statements (in violation of Cal. Labor Code §§ 226 and 226.3); (4) failing to provide uninterrupted meal breaks (in violation of Cal. Labor Code § 512); and (5) failing to reimburse Sales Employees for business expenses (in violation of Cal. Labor Code § 2802).

¹ “Sales Employees” means individuals who worked as exempt-classified inside salespeople for Whova in California in the job titles of Sales Development Representative, Account Executive, and Account Manager.

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 Sales Employees who work and worked for Whova in the State of California. Plaintiff will seek all applicable civil penalties on behalf of himself and all similarly situated Sales Employees, including but not limited to penalties pursuant to California Labor Code §§ 210, 218.5, 226.3, 558, 2699, 2802, 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 him and other current or former Sales Employees or of additional claims against Defendant, he 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 jsagafi@outtengolden.com or (415) 638-8800.

Respectfully submitted,

By: /s/ Jahan C. Sagafi

Jahan C. Sagafi

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