

**LAW OFFICES OF TODD M. FRIEDMAN, P.C.**

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WRITER LICENSED IN:

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February 12, 2026

**Via Online Submission**

California Labor & Workforce Development Agency

ATTN: PAGA Administrator

800 Capitol Mall

Sacramento, CA 95814

<https://dir.tfaforms.net/308>

**RE: Shehryar Iqbal v. Iqvia, Inc., et al.**

Dear PAGA Administrator:

This office represents Mr. Shehryar Iqbal in connection with his claims under the California labor code and sends this letter in compliance with the notice requirements of the Private Attorneys General Act of 2004 ("PAGA"). Lab. C. § 2699.3. Mr. Iqbal was an employee of Iqvia Inc., Iqvia RDS Inc., and Iqvia Holdings, Inc. where Mr. Iqbal worked as a clinical research associate ("CRA") throughout California, including San Diego.

The employer may be contacted directly at:

Iqvia Inc.

100 IMS Drive

Parsippany, NJ 07054

Iqvia RDS Inc.

2400 Ellis Road

Durham, NC 27703

Iqvia Holdings Inc.

2400 Ellis Road

Durham, NC 27703

Mr. Iqbal, on behalf of himself and other current and former laborers and workers who are similarly situated, alleges that Iqvia Inc., Iqvia RDS Inc., and Iqvia Holdings Inc. (collectively, "Defendants") have violated, and continue to violate, the provisions of the Labor Code and wage orders promulgated by the Industrial Welfare Commission. Those similarly situated workers include all current and former exempt CRAs, including but not limited to clinical research associate I, clinical research associate II, clinical research associate III, and senior clinical research associate, employed by Defendant, who were wrongfully misclassified as exempt employees, who were denied wages for hours worked during time of employment and upon termination, who were denied compliant meal and rest breaks under California

Law, who received improper wage statements, and worked for Defendant from November --, 2024 to the present date.

As described more thoroughly in the attached proposed Complaint, Mr. Iqbal was employed by Defendants as a clinical research associate. During the relevant time period, Defendants employed Iqbal as a CRA and treated him as exempt from overtime, did not properly calculate Plaintiff's and the other Class Members' hours, did not properly compensate Mr. Iqbal for the overtime hours he worked at the correct rates and did not provide other wage and hourly protections and benefits to which nonexempt employees are entitled under California law.

The complaint alleges that Defendants' actions are subject to civil penalties pursuant to the following provisions of the *Labor Code* and Industrial Welfare Commission Wage Order 4:

- a. Sections 510, 1182.12, 1194, 1194.2, 1194.3, 1197, 1197.1, 1199, and Wage Order 4-2001, for failing to pay for all wages earned;
- b. Sections 204, 1197, and 1199, for failing to pay all regular wages;
- c. Sections 226.7, 512, 558, and 1198, for failing to provide duty-free meal and rest periods;
- d. Section 558, for failing to properly compensate for all hours worked;
- e. Sections 201-204, for failing to timely pay all earned wages during employment and upon termination;
- f. Sections 226(a), 226.3, and Wage Order 4-2001, for failing to provide accurate, itemized wage statements;
- g. Sections 1174, 1174.5, and 1175, for failing to keep accurate records of hours worked; and
- h. Sections 216, 218, 218.5, 218.6, and 225.5, for willfully refusing to pay wages.

Accordingly, Mr. Iqbal requests that the Labor and Workforce Development Agency not investigate these violations and permit them to pursue a claim for such penalties under the Private Attorney General's Act (Labor Code section 2698 et seq. and Labor Code section 558). Upon receiving notice that this Agency does not intend to investigate the alleged violations, or, if no notice is provided, then within 60 calendar days of the postmark date of this letter, the named plaintiff will amend their lawsuit to include these claims.

Thank you for your time and consideration.

Best regards,

*Todd M. Friedman*

Todd M. Friedman  
Attorney at Law

Labor Workforce Development Agency  
Re: *Shehryar Iqbal v. Iqvia, Inc., et al.*  
February 12, 2026  
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Enclosure: Complaint  
cc: **By Certified Mail** (with enclosure)  
Iqvia Inc.  
100 IMS Drive  
Parsippany, NJ 07054

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2400 Ellis Road  
Durham, NC 27703

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