



PARDELL, KRUYK
&
GIRIBALDO PLLC

Logan A. Pardell, Esq.
Email: lpardell@pkglegal.com

March 31, 2026

VIA ONLINE SUBMISSION

California Labor and Workforce Development Agency
800 Capitol Mall, MIC-55
Sacramento, CA 95814

VIA CERTIFIED U.S. MAIL

Datavant LLC
Ciox Health LLC d/b/a Datavant Group
2222 W. Dunlap Ave, Suite 250
Phoenix, AZ 85120

Re: PAGA Notice of California Labor Code Claims against Datavant LLC and Ciox Health LLC d/b/a Datavant Group

Dear PAGA Administrator:

Pardell, Kruzyk & Giribaldo, PLLC, represents Danielle Combs, a former employee of Datavant LLC and Ciox Health LLC d/b/a Datavant Group (collectively, "Datavant"). Ms. Combs was employed by Datavant as a Health Information Specialist from approximately June 2024 through April 2025.

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 Ms. Combs and similarly situated non-exempt employees who worked for Datavant in the State of California and suffered the same harms that Ms. Combs personally experienced at any time within one year prior to the date of this Notice and continuing through the present, including: (i) not being paid for all hours worked; (ii) not being paid for overtime for hours worked over 8 in a day or over 40 in a week; (iii) not being provided meal or rest breaks, or paid the required meal and rest break premiums when they were not provided; (iv) not being reimbursed for all reasonably necessary business expenses; (v) not being timely paid all wages owed during their employment or following their termination; and (vi) not receiving paystubs that accurately reflect all hours worked, (collectively, "Aggrieved Employees"). As set forth in this Notice, Ms. Combs alleges that Datavant violated numerous provisions of the California Labor Code, including, but not limited to: §§ 201-204, 210, 218.5, 226, 246, 510, 512, 558, 1174, 1194, 1194.2, 1197, 1197.1, 1198, and 2802, as well as provisions of the applicable Wage Orders. Ms. Combs will seek all applicable civil penalties on behalf of herself and all Aggrieved Employees, including but not limited to, penalties pursuant to the aforementioned statutes and California Labor Code §§ 226.3, 558.1,

1174.5, 2698 *et seq.*, and the applicable Wage Order.

Datavant typically schedules its non-exempt employees for shifts of eight hours or more. However, Datavant does not pay them for all hours that they work. Specifically, Aggrieved Employees only get paid once they boot up their computers, log into their necessary programs, review emails, and otherwise become call-ready at the start of their shift. The time that Aggrieved Employees spend to become call-ready, which takes approximately 10 to 15 minutes, is performed off the clock without compensation. In addition, in an effort to meet their metrics that are a condition of continued employment, Aggrieved Employees are pressured to work off the clock after the end of their scheduled shifts to complete their assigned tasks. All of this time constitutes “hours worked” under the employer’s control and, as a result, Datavant fails to pay minimum and overtime wages in violation of Labor Code §§ 510, 1194, and 1197, and fails to maintain accurate records in violation of § 1174.

Further, Aggrieved Employees are not afforded meal and rest breaks. Datavant had policies and practices that discouraged, impeded, or failed to authorize and permit compliant ten-minute rest periods for every four hours worked (or major fraction thereof) or meal breaks of at least 30 minutes for work periods of five hours or more. Datavant fails to pay meal and rest break premiums for these missed meal breaks.

Datavant also fails to reimburse its Aggrieved Employees for all reasonable and necessary business expenses. For example, Datavant requires or knowingly permits remote work that necessitates the use of personal internet service. However, for remote Aggrieved Employees, Datavant fails to reimburse them for the business-use of their home Wi-Fi, which they know or should know that Aggrieved Employees must use to complete their job functions.

Datavant also fails to timely pay all wages owed to Aggrieved Employees. Datavant fails to pay Aggrieved Employees all wages owed (including overtime and break premiums) immediately upon discharge or within 72 hours of quitting.

Because Datavant fails to pay all straight time pay, overtime pay, meal break premiums, and rest break premiums owed to Ms. Combs and Aggrieved Employees, Datavant also provides them with inaccurate wage statements in violation of California law.

The facts and claims contained herein are based on the information available at the time of this writing. Therefore, if, through further review or informal or formal discovery, Ms. Combs becomes aware of additional compensation or penalties owed to her and other current or former Aggrieved Employees or of additional claims against Datavant, she reserves the right to revise these facts and/or add any new claims by amending this letter.

Based on the foregoing, Ms. Combs intends to file a civil action to pursue claims against Datavant and to seek PAGA remedies for these violations. Ms. Combs respectfully requests that the Labor & Workforce Development Agency notify her if it intends to investigate the above allegations pursuant to PAGA.

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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 561-726-8344.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Logan A. Pardell', with a long horizontal flourish extending to the right.

Logan A. Pardell