

PARK APC

April 15, 2026

California Labor & Workforce Development Agency
Attn. PAGA Administrator
1515 Clay Street, Suite 801
Oakland, CA 94612

Sent Via Online

Re: Concentra Health Services, Inc.

Dear PAGA Administrator:

We represent Jose Rodriguez (“Plaintiff”). Pursuant to Labor Code § 2699.3(a), we are providing written notice that Plaintiff’s employer, Concentra Health Services, Inc. (“Defendants” or “Concentra”), is in violation of various provisions of the California Labor Code. Plaintiff intends on filing a complaint against Defendants in a California Superior Court pursuant to Labor Code § 2699 on behalf of himself and all Center Operations Director employees who worked for Defendants in California within four years prior to filing of the complaint (“Aggrieved Employees”).

Defendants employed Plaintiff as a Center Operations Director from May 2023 to May 2, 2025 at their El Segundo, California clinic.

Defendants’ clinic operated from 8 am to 5 pm, Monday to Friday, and serviced anywhere from 80 to 100 patients a day. But Defendants grossly understaffed their clinic and required Plaintiff to do the job of a medical assistant during the clinic’s operating hours.

So Plaintiff, as required by Defendants, worked as a medical assistant from 8 am to 5 pm, Monday to Friday. For example, Plaintiff signed patients in at the front desk, placed them in examining rooms, took their physicals, including vitals, height and weight, and drew their blood.

Defendants also required Plaintiff to do the job of a Center Operations Director—i.e., before and after the clinic’s operating hours, Defendants required Plaintiff to, among others, complete necessary paperwork, review patient complaints, check medical charts, administer the required paperwork for insurance, check emails, complete payroll, and set employee schedules.

Plaintiff’s workday would begin as early as 7 am and end as late as 10 pm.

Defendants failed to compensate Plaintiff and Aggrieved Employees for all overtime hours worked in excess of eight hours per day and/or 40 hours per week as required by Labor Code §§ 510 and 1194, and applicable Industrial Welfare Commission’s (“IWC”) Wage Orders.

Plaintiff and Aggrieved Employees were not authorized or permitted lawful meal periods and were not provided with one hour's wages in lieu thereof in violation of, among others, Labor Code §§ 226.7, 512, and applicable IWC Wage Orders. Further Defendants failed to provide Plaintiff and Aggrieved Employees their second meal periods for shifts longer than ten hours.

Plaintiff and Aggrieved Employees were not authorized or permitted lawful rest breaks and were not provided with one hour's wages in lieu thereof in violation of, among others, Labor Code § 226.7 and applicable IWC Wage Orders.

Defendants also failed to correctly record Plaintiff and Aggrieved Employees' meal periods as required by Labor Code § 1198 and applicable IWC Wage Orders.

Defendants failed to timely pay Plaintiff and Aggrieved Employees for all wages owed to them upon termination. Plaintiff and Aggrieved Employees did not receive their final paychecks timely, and the final paychecks did not include all wages owed to them.

Further Defendants have intentionally and willfully failed to provide Plaintiff and Aggrieved Employees with complete and accurate wage statements. The deficiencies include, among other things, the failure to correctly identify total hours worked and the gross wages earned by Plaintiff and Aggrieved Employees; the overtime hours worked by Plaintiff and Aggrieved Employees; and the meal period and rest break premiums owing to Plaintiff and Aggrieved Employees.

Defendants are in violation of the following Labor Code provisions under Labor Code § 2699.5:

1. California Labor Code §§ 510, 1194 and 1198 (Unpaid Overtime)
2. California Labor Code §§ 226.7 and 512(a) (Unpaid Meal Period Premiums)
3. California Labor Code § 226.7 (Unpaid Rest Period Premiums)
4. California Labor Code § 226(a) (Non-compliant Wage Statements)
5. California Labor Code §§ 1194, 1197 and 1197.1 (Unpaid Minimum Wages)
6. California Labor Code §§ 1198 (Standard Conditions of Labor)
7. California Labor Code §§ 1174 (Failure to Maintain Records)
8. California Labor Code §§ 201, 202 and 203 (Non-Payment of Wages, and Wages Not Timely Paid Upon Termination)
9. California Labor Code § 1198 and IWC Wage Order (Failure to Record Meal Periods)

Pursuant to Labor Code § 2699.3(a)(1), Plaintiff will serve the same written notice to Defendants.

Very truly yours,

PARK APC

James Park

Sang (James) Park

CC: Via Certified US Mail
Concentra Health Services, Inc.
5080 Spectrum Drive
Suite 1200 West Tower
Addison, Texas 75001