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July 29, 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. AstraZeneca LP, 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 a misclassified employee of AstraZeneca LP and AstraZeneca Pharmaceuticals LP where Mr. Iqbal worked as a clinical research associate ("CRA") in California.

The employer may be contacted directly at:

AstraZeneca LP

1209 Orange Street

Wilmington, DE 19801

AstraZeneca Pharmaceuticals LP

1800 Concord Pike

Wilmington, DE 19850

Mr. Iqbal, on behalf of himself and other current and former laborers and workers who are similarly situated, alleges that AstraZeneca LP and AstraZeneca Pharmaceuticals LP (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 or jointly employed by Defendants, 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 Defendants from approximately April, 2025 until April 9, 2026.

As described more thoroughly in the attached proposed Complaint, Mr. Iqbal was jointly employed by Defendants and other employers named IQVIA, INC., IQVIA RDS, INC., and/or IQVIA HOLDINGS, INC. ("IQVIA") 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 after 65 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
Attorney at Law

Enclosure: Complaint

Labor Workforce Development Agency
Re: *Shehryar Iqbal v. AstraZeneca LP., et al.*
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cc: **By E-Mail**

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