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January 23, 2024

E-MAIL ONLY TO NICK@FERRAROVEGA.COM AND ELECTRONIC FILING ONLY TO LWDA

Nicholas J. Ferraro
3160 Camino del Rio South, Suite 308
San Diego, California 92108

California Labor and Workforce Development Agency
Department of Industrial Relations
800 Capitol Mall, Suite 5000 (MIC-55)
Sacramento, CA 95814

Re: Maria Sanchez v. Harris Ranch Beef Company et al., LWDA-CM-1004706-24

Dear Mr. Ferraro and LWDA Officer:

This letter serves as Harris Farms, Inc.'s response to the Notice of Labor Code Violations filed in the above-referenced matter. This office of Littler Mendelson represents Harris Farms, Inc. Accordingly, please direct any future correspondence to my attention and also copy my legal assistant Venus Bernardo at vbernardo@littler.com.

With respect to the substance of Ms. Sanchez's allegations, please note that Harris Farms, Inc. has never employed Ms. Sanchez either directly or indirectly. Although it appears from her PAGA notice that Ms. Sanchez might be seeking to include Harris Farms, Inc. as a "joint employer" or "alter ego" of the other companies listed in her complaint, Harris Farms, Inc. has no relationship with those other entities. Rather, any potentially relevant overlapping ownership interests between those entities ceased almost five years ago when Harris Ranch Beef Holding Company (including its subsidiary Harris Ranch Beef Company) was sold to Central Valley Meat Co., Inc. According to Ms. Sanchez's own PAGA letter, Ms. Sanchez allegedly began employment after the sale.

Harris Farms, Inc. hereby demands that Ms. Sanchez immediately withdraw her complaint against Harris Farms, Inc. Should she fail to do so, Harris Farms, Inc. will have no choice but to take all appropriate steps necessary to protect its legal interests. Furthermore, given that Ms. Sanchez

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and the LWDA are now both on notice that Harris Farms, Inc. is an improper party, any subsequent action against Harris Farms would therefore be "frivolous, unreasonable or without foundation", and the LWDA in particular is now on notice that its failure to intervene to halt any subsequent civil action by Ms. Sanchez as a "private attorney general" could result in significant attorneys' fees and costs for the reasons addressed in *Rose v. Hobby Lobby Stores*, Alameda Superior Court Case No. RG17-862127.

Sincerely,



Jason H. Borchers
Special Counsel

JHB