



July 17, 2024

Via Certified Mail 9589 0710 5270 1317 9642 59

Lundquist Institute for Biomedical Innovation at Harbor-UCLA Medical Center
Agent for Service of Process
Michael Jones
1124 West Carson Street, Bldg MRL
Torrance, California 90502

In re: *Carolina Rose Cherry* ▪ Notice of PAGA Claim

To Whom It May Concern:

This office has been retained by Carolina Rose Cherry (hereinafter "Plaintiff"), an employee of The Lundquist Institute for Biomedical Innovation ("The Lundquist Institute"). Pursuant to Labor Code § 2699.3(a) ("PAGA"), we are providing written notice to The Lundquist Institute that it has violated various provisions of the California Labor Code. Plaintiff intends on filing a complaint against The Lundquist Institute in the Los Angeles Superior Court pursuant to Labor Code § 2699 et. seq. on behalf of herself and others ("Aggrieved Employees") including but not limited to Diane Aguilar and Alondra Pena regarding the various labor code violations as described below.

Since in or about August of 2020, Ms. Cherry and other Aggrieved Employees were misclassified as independent contractors. Accordingly, they were not given proper wage statements, were denied meal and rest breaks, and were not properly compensated for work performed in excess of 40 hours per week. Accordingly, The Lundquist Institute is in violation of the following Labor Code section on a PAGA basis:

Labor Code section 226.8 (misclassification); sections 510-515, 194 & 1198 (unpaid overtime); section 226(a) (inaccurate wage statements); sections 200-204 (waiting time penalties); and sections 226.7 & 512 (missed meal and rest breaks).

Please be advised Plaintiff and Aggrieved Employees intend to enforce these claims against all owners, directors, officers, and managing agents of The Lundquist Institute pursuant to Labor Code § 558.1. Finally, pursuant to Labor Code § 2699.3(a)(1), Plaintiff will serve the same written notice to The Lundquist Institute by and through its respective agent of service of process by certified mail.

Very truly yours,


Ashley G. Garay, Esq.

CC: California Labor and Workforce
Development Agency