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Beverly Hills, CA 90211

October 23, 2025

By Certified Mail

Labor and Workforce Development Agency
455 Golden Gate Ave., 10th Floor
San Francisco, CA 94102

RE: *Melissa Hirabayashi, Sylvia LeMay, and Katherine Wurdinger, et al. v. Stanford Health Care, et al*

Dear Labor and Workforce Development Agency:

We represent MELISSA HIRABAYASHI ("HIRABAYASHI"), SYLVIA LEMAY ("LEMAY"), KATHERINE WURDINGER ("WURDINGER"), and all similarly situated employees who worked as nonexempt employees for the STANFORD HEALTH CARE in a lawsuit against STANFORD HEALTH CARE.

We believe that STANFORD HEALTH CARE has violated numerous Labor Code sections including §§ 201-204, § 210, §§212-213, and §§ 226, 226.7, 432, 512, 558, 1198.5, and 2699(f)(2). We are hereby giving you notice that it is our intention to proceed as a private attorneys general on behalf of both Ms. Hirabayashi, Ms. LeMay, Ms. Wurdinger, and on behalf of all similarly situated persons as set forth above if the Labor of Workforce Development Agency does not investigate and prosecute these violations. Please see enclosed draft complaint.

We hereby request that the LWDA immediately issue a right-to-sue notice to us for this purpose. Thank you for your anticipated cooperation.

Very truly yours,

Rachel Hallam

Rachel Hallam

Enclosure