

# Buchalter

## California Employer Considerations and Best Practices for Returning to Work in the Wake of COVID-19



**Robert S. Cooper**

Shareholder  
(213) 891-5230  
rcooper@buchalter.com



**Jessica Hawk**

Labor & Employment  
(619) 219-5335  
jhawk@buchalter.com

June 16, 2020

LOS ANGELES  
NAPA VALLEY  
ORANGE COUNTY  
PORTLAND  
SACRAMENTO  
SAN DIEGO  
SAN FRANCISCO  
SCOTTSDALE  
SEATTLE  
BUCHALTER.COM

## Agenda/Roadmap

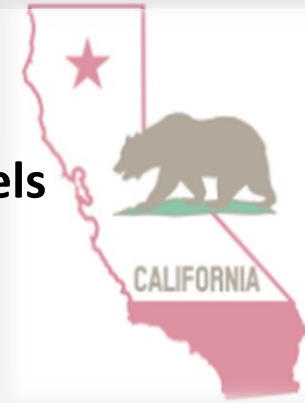
- **Local and State Reopening Orders and Guidance, Including Industry Guidance**
- **Health and Safety Considerations in Returning to the Physical Workplace**
- **FAQs on COVID-19 Symptoms, Screenings, and Testing**
- **Workers' Compensation Issues**
- **Workplace Litigation Mitigation Considerations**
  - Avoiding wrongful termination, discrimination, and retaliation issues; reasonable accommodation issues
- **Additional Considerations: Leave Laws and Wage and Hour Obligations**

# Orders and Governmental Guidance Regarding Reopening



- **Review orders and governmental guidance regarding reopening at the state, county, and city levels**
  - **California**: Currently in “Stage 2: Lower-risk workplaces” of the Resilience Roadmap - Retail (curbside and delivery only); related logistics and manufacturing; office workplaces; limited personal services; outdoor museums; child care; and essential businesses can open with modifications.
  - **Los Angeles County**: Los Angeles County has been approved to move further ahead in the State’s Resilience Roadmap.
    - **Now Open:**
      - **Recreation/Travel/Leisure**: Parks (public playgrounds closed); public trails (walking and hiking); public pools; gyms/fitness centers; golf courses; drive-in movie theatres; professional sports without live audiences; music, film, and TV production; hotels for leisure travel; campgrounds, RV parks, outdoor recreation; day camps; libraries (for curbside pick-up only); museums, galleries, zoos and aquariums; and more
      - **In-Store Shopping/Services**: Grocery stores and pharmacies; home appliance and hardware stores; lower-risk retail stores (books, jewelry, furniture, toys, clothing); pet stores, animal care; hair salon and barber shops for certain services only; restaurants and cafes, including for on-site dining
      - **Healthcare**: Clinics, Hospitals, Dental Clinics, Physical Therapy and Chiropractic Offices, Optometrists, Mental or Behavioral Health Providers, and other Healthcare Settings
      - **Essential Businesses**
      - **Non-Essential Office-Based Businesses** (telework still encouraged)





# Orders and Governmental Guidance Regarding Reopening

- Review orders and governmental guidance regarding reopening at the state, county, and city levels
  - Los Angeles County
    - Check the County of Los Angeles Public Health COVID-19 Resources Page for:
      - List of sectors/businesses approved to reopen in Los Angeles County
      - Los Angeles County Reopening Protocols
      - The County Health Order, including appendices with a Social Distancing Protocol, and County Protocols for certain industries
      - Guidance for businesses and employees including:
        - FAQs for Managers; Notice to Customers Poster; Guidance for Cloth Face Coverings; General Cleaning and Handwashing Guidance
      - More
    - See: <http://publichealth.lacounty.gov/media/Coronavirus/>

# Orders and Governmental Guidance Regarding Reopening

- **Review orders and governmental guidance regarding reopening at the state, county, and city levels**

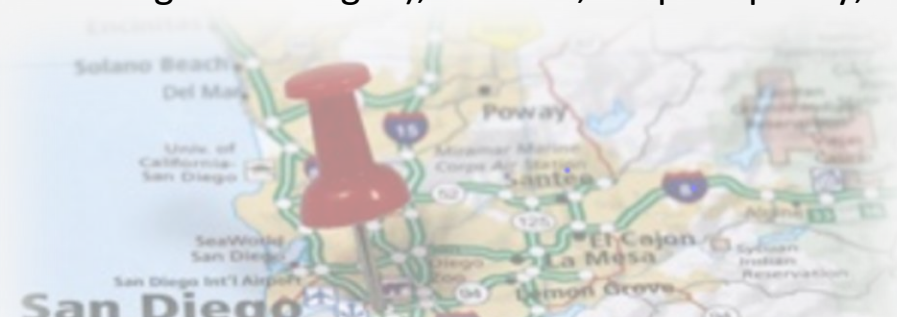
- **San Diego County**: San Diego County has also been approved to move further ahead in the State's Resilience Roadmap.



- **Now Open:**

- Gyms and fitness facilities; community pools; restaurants, bars, and wineries; hotels; card rooms, satellite wagering, and race tracks; family entertainment, including bowling alleys and arcades; museums, galleries, zoos, and aquariums; day camps; campgrounds, RV parks, outdoor recreation
- In-store retail; places of worship; hair salons and barbershops; office-based businesses (telework still strongly encouraged); car dealers; car washes; pet grooming; tanning salons; landscape gardening; outdoor museums, open gallery spaces; physical therapy, medical massage; therapeutic and peer support groups (virtual meetings encouraged); libraries, for pickup only; restaurants with modified dine-in service
- Essential workforce
- Outdoor recreation

- See: [https://www.sandiegocounty.gov/content/sdc/hhsa/programs/phs/community\\_epidemiology/dc/2019-nCoV/reopening.html](https://www.sandiegocounty.gov/content/sdc/hhsa/programs/phs/community_epidemiology/dc/2019-nCoV/reopening.html)




# Orders and Governmental Guidance Regarding Reopening

- **San Diego County**
  - **Coming Soon**
    - Reopening of the following San Diego personal care service businesses is expected on June 19, 2020:
      - Nail salons
      - Facial salons
      - Cosmetology
      - Body art, including tattoo parlors and piercing
      - Massage therapy in non-healthcare settings
  - See: [https://www.sandiegocounty.gov/content/sdc/hhsa/programs/phs/community\\_epidemiology/dc/2019-nCoV/reopening.html#OpenNow](https://www.sandiegocounty.gov/content/sdc/hhsa/programs/phs/community_epidemiology/dc/2019-nCoV/reopening.html#OpenNow)

# Orders and Governmental Guidance Regarding Reopening

- San Diego County
  - Safe Reopening Plan:
    - Mandatory signage
    - Mandatory measures to protect employee health
- See: [https://www.sandiegocounty.gov/content/sdc/hhsa/programs/phs/community\\_epidemiology/dc/2019-nCoV/health-order.html](https://www.sandiegocounty.gov/content/sdc/hhsa/programs/phs/community_epidemiology/dc/2019-nCoV/health-order.html) (including San Diego's Public Health Order and Safe Reopening Plan)
- Note that San Diego restaurants have a separate plan to follow. See: [https://www.sandiegocounty.gov/content/sdc/hhsa/programs/phs/community\\_epidemiology/dc/2019-nCoV/CommunitySectors/Restaurants\\_Food\\_and\\_Beverage\\_Providers.html](https://www.sandiegocounty.gov/content/sdc/hhsa/programs/phs/community_epidemiology/dc/2019-nCoV/CommunitySectors/Restaurants_Food_and_Beverage_Providers.html)



## SAFE REOPENING PLAN

Business Name:

Facility Address:

*This plan does not need to be submitted at this time. This plan is to be used to prepare when businesses open per the Governor's Order. The County will not require approval for this plan. Businesses must implement all mandatory measures listed in A and B below. Businesses shall select applicable measures listed in C and D below and be prepared to explain why any measure that is not implemented is inapplicable to the business. Businesses shall also provide specific details regarding their Safe Reopening Plan pertaining to their business in section E below.*

**A. Signage (Mandatory):**

- ☐ Signage at each public entrance of the facility to inform all employees and customers that they should: avoid entering the facility if they have a cough or fever; wear facial coverings, maintain a minimum six-foot distance from one another; and not shake hands or engage in any unnecessary physical contact.
- ☐ Signage posting a copy of the Safe Reopening Plan at each public entrance to the facility.

**B. Measures To Protect Employee Health (Mandatory):**

- ☐ Teleworking opportunities have been maximized.
- ☐ All employees have been told not to come to work if sick.
- ☐ All employees must have temperature taken upon reporting to work; if 100 degrees or more, should not be allowed in workplace. If a thermometer is not available, employees must be screened for symptoms (cough, shortness of breath or trouble breathing, headache, fever, chills, muscle or body aches, fatigue, sore throat, congestion or runny nose, new loss of taste or smell, nausea or vomiting, diarrhea)
- ☐ All employees must wear facial coverings in the workplace, if within six feet of others.
- ☐ All desks or individual work stations are separated by at least six feet.
- ☐ Break rooms, bathrooms, and other common areas are being disinfected frequently, on the following schedule:



# Orders and Governmental Guidance Regarding Reopening

- **Closed statewide:**
  - Indoor playgrounds such as bounce centers, ball pits and laser tag
  - Live theater
  - Saunas and steam rooms
  - Nightclubs
  - Concert venues
  - Festivals
  - Theme parks
  - Higher education
- **For the latest in your area, see your county website:** <https://covid19.ca.gov/get-local-information/>



# Orders and Governmental Guidance Regarding Reopening: Statewide Industry Guidance

- Before re-opening, all employers must:
  - 1. Perform a detailed **risk assessment** and implement a **site-specific protection plan**.
  - 2. **Train employees** on how to limit the spread of COVID-19, including how to screen themselves for symptoms and stay home if they have them.
  - 3. Implement individual **control measures and screenings**.
  - 4. Implement **disinfecting** protocols.
  - 5. Implement **physical distancing** guidelines.
- **Industry-Specific Guidance:**
  - The state has set forth **specific guidance and checklists by industry**. **Review the state's guidance for your industry.**
  - Employers can post the COVID-19 industry-specific checklists in the workplace.
  - See: <https://covid19.ca.gov/industry-guidance/>;  
[https://www.sandiegocounty.gov/content/sdc/hhsa/programs/phs/community\\_epidemiology/dc/2019-nCoV/reopening.html](https://www.sandiegocounty.gov/content/sdc/hhsa/programs/phs/community_epidemiology/dc/2019-nCoV/reopening.html)



# Health and Safety

- Review health and safety guidance from OSHA, Cal/OSHA, and the CDC, and make sure a written COVID-19 plan reflects this guidance.
- Injury and Illness Prevention Program
  - California employers are required to implement and maintain an effective Injury and Illness Prevention Program (“IIPP”) to protect employees from workplace hazards, per California’s general industry safety regulations and the California Labor Code. The IIPP must be in writing, and accessible to all employees.
  - Per pre-COVID-19 regs, **IIPPs must include info re:**
    - Responsibility
    - Compliance
    - Communication
    - Hazard Assessment
    - Accident or Exposure Investigation
    - Hazard Correction
    - Training and Instruction
    - Recordkeeping



# Health and Safety

- **Injury and Illness Prevention Program**
  - **Infection Prevention/Control Measures:** Because of widespread community transmission, Cal/OSHA has stated that it is now mandatory for most California employers to **adopt changes to the IIPP to include infection control measures**:
    - **Actively encourage sick employees to stay home**
    - **Immediately send employees home** (or to medical care) if they have COVID-19-related symptoms
    - Ensure **employees who have COVID-19 symptoms do not return to work** until: (1) at least three full days pass with no fever (without the use of fever-reducing medications) and no acute respiratory illness symptoms; and (2) at least 10 days pass since the symptoms first appeared
    - **Provide paid sick leave or expanded family and medical leave**
    - Ensure employees that return to work following an illness promptly **report any recurrence of symptoms**

# Health and Safety

- Injury and Illness Prevention Program

- Infection Prevention/Control Measures: Because of widespread community transmission, Cal/OSHA has stated that it is now mandatory for most California employers to **adopt changes to the IIPP to include infection control measures (cnt'd. from last slide)**:

- Encourage telework
- Ensure physical distancing
- Provide cloth face covers
- Avoid shared workspaces
- Develop and implement cleaning and disinfecting procedures
- Plan for when an employee is confirmed to have COVID-19 infection
- Avoid non-essential travel





# Health and Safety

- **Provide Employee Training**

- Per Cal/OSHA, employers should provide training on the following topics, in a language readily understood by all employees:
  - COVID-19 symptoms; preventing spread
  - Coughing and sneezing etiquette
  - Proper handwashing procedure
  - Avoiding touching eyes, nose, and mouth with unwashed hands
  - Avoiding sharing personal items with co-workers
  - Providing tissues, no-touch disposal trash cans and hand sanitizer for use by employees
  - Safely using cleaners and disinfectants



# Health and Safety

- **Provide Washing Facilities**
  - Per Cal/OSHA, **regardless of COVID-19 risk, all employers are required to provide washing facilities** that have an adequate supply of suitable cleaning agents, water, and single-use towels or blowers (title 8 sections 1527, 3366, 3457 and 8397.4).
- **Provide Personal Protective Equipment (PPE)**
  - Per Cal/OSHA, employers must conduct a hazard assessment to determine if any PPE is needed to protect employees from workplace hazards. If so, employers must select and provide employees with properly fitting and sanitary PPE and ensure that the appropriate PPE is provided to and used by employees who use cleaners and disinfectants.

## Health and Safety

- **Resources:**
  - **Cal/OSHA's full Interim General Guidelines on Protecting Workers from COVID-19:**  
<https://www.dir.ca.gov/dosh/coronavirus/General-Industry.html>
  - **Additional industry-specific guidance by Cal/OSHA:**  
<https://www.dir.ca.gov/dosh/coronavirus/Health-Care-General-Industry.html>
  - **Federal OSHA Guidance on Preparing Workplaces for COVID-19:**  
<https://www.osha.gov/Publications/OSHA3990.pdf>
  - **CDC Guidance for Businesses and Workplaces/Employer Information for Office Buildings:**  
<https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/businesses-employers.html>; <https://www.cdc.gov/coronavirus/2019-ncov/community/office-buildings.html>

# Health and Safety

- **Communicate About Health and Safety**
  - Develop a **communication plan, and create a culture focused on safety**. This can be accomplished by:
    - Having employees sign **written acknowledgments** of safety and prevention procedures
    - Providing **signage** in the workplace regarding sanitation and hygiene
    - Having employee **safety meetings and trainings** where applicable
    - **Including reminders regarding proper hygiene** and safety procedures
    - Auditing to ensure **physical distancing**
    - Responding to **employee safety concerns**





# Health and Safety

- **Takeaways and Best Practices Re: Health and Safety**
  - Update current IPPs to align with Cal/OSHA's guidance, including industry-specific guidance
  - Implement **general infection prevention** control measures per OSHA/Cal/OSHA/CDC guidance
  - Provide **employee training** on COVID-19-related topics
  - **Communicate with the workforce** regarding infection prevention control measures and create a safety-focused culture
  - Maintain **documentation** on safety and health measures and training provided to employees

# U.S. Supreme Court Upholds California Limits on Place of Worship

- ***South Bay United Pentecostal Church v. Gavin Newsom***
  - On May 29, 2020, the U.S. Supreme Court Upheld Gov. Newsom's Executive Order Which Limits Attendance to 25% of Building Capacity or a Max of 100 attendees
  - Church argued that a different standard was being applied to it compared to secular businesses not subject to 25% occupancy cap, including:
    - A) factories
    - B) offices
    - C) supermarkets
    - D) restaurants
    - E) retail stores
    - F) pharmacies
    - G) shopping malls
    - H) pet grooming shops
    - I) bookstores
    - J) florists
    - K) hair salons
    - L) cannabis dispensaries
  - **Supreme Court upheld the 25% occupancy cap, indicating that the First Amendment was not violated because the Constitution leaves safety up to the States and not unelected judges.**

# Workers' Compensation Issues

- **How will COVID-19 illness issues be handled by the Workers' Compensation System in California?**
- Normally Illness Covered by Employee Leave Laws: FMLA, CFRA and now Paid Medical Leave—or Disability if Illness is Chronic
- Difficult for Employee to Prove Industrial Causation
- **Employers' Worst Fear: GETTING SUED** for COVID-19 illness or death in the Workplace!
  - But Employers Have Protections:
    - (1) Workers' Comp Exclusive Remedy Provisions Protects Employers and puts it on their Workers' Comp Insurer
    - (2) Narrow Exceptions to Workers' Comp Exclusive Remedy Provisions—4 exceptions only
    - (3) Gov. Newsom's Executive Order Shifting the Burden in Workers' Compensation Cases in CA

# Employer FAQs on Symptoms and Screenings per the Equal Employment Opportunity Commission (EEOC) and California Department of Fair Employment and Housing (DFEH)

- **COVID-19 Symptoms and Screening**
  - Q. Can an employer ask employees if they are experiencing COVID-19-related symptoms?
    - A. Yes (but . . .)





# Employer FAQs on Symptoms and Screenings per the Equal Employment Opportunity Commission (EEOC) and California Department of Fair Employment and Housing (DFEH)

- **COVID-19 Symptoms and Screening**
  - Q. Can an employer send an employee home if he/she is displaying COVID-19 symptoms?
    - A. Yes.



# Employer FAQs on Symptoms and Screenings per the Equal Employment Opportunity Commission (EEOC) and California Department of Fair Employment and Housing (DFEH)

- **COVID-19 Symptoms and Screening**
  - Q. Can an employer require an employee to stay home if he/she has symptoms of COVID-19?
    - A. Yes.



# Employer FAQs on Symptoms and Screenings per the Equal Employment Opportunity Commission (EEOC) and California Department of Fair Employment and Housing (DFEH)

- **COVID-19 Symptoms and Screening**

- Q. During a pandemic, can an employer ask employees to self-report symptoms?

- A. Yes.



# Employer FAQs on Symptoms and Screenings per the Equal Employment Opportunity Commission (EEOC) and California Department of Fair Employment and Housing (DFEH)

- **Temperature Screenings and COVID-19 Testing**
  - Q. During a pandemic, can an employer take employees' temperature prior to entering the workplace?
    - A. Yes (but . . .)





# Employer FAQs on Symptoms and Screenings per the Equal Employment Opportunity Commission (EEOC) and California Department of Fair Employment and Housing (DFEH)

- **Temperature Screenings and COVID-19 Testing**

- Q. During a pandemic, can an employer require employees to take COVID-19 tests before permitting employees to enter the workplace?
  - A. Yes (but . . .)



# Employer FAQs on Symptoms and Screenings per the Equal Employment Opportunity Commission (EEOC) and California Department of Fair Employment and Housing (DFEH)

- **Keep in Mind:**

- Decisions to test or screen must be based on **objective facts** and implemented on a **non-discriminatory basis**.
- Testing must be done in the **most private and least intrusive manner** possible.
- Testing must be **accurate and reliable**.
- Employers will also need to be aware of **confidentiality** and **privacy** issues under federal and state law.
- California employers should compensate non-exempt employees for additional time spent submitting to safety protocols, as this could constitute **“off the clock work.”**



# Employer FAQs on Symptoms and Screenings per the Equal Employment Opportunity Commission (EEOC) and California Department of Fair Employment and Housing (DFEH)



## U.S. Equal Employment Opportunity Commission

- **Resources Re: What We Just Covered:**

- EEOC Technical Guidance for Employers: <https://www.eeoc.gov/wysk/what-you-should-know-about-covid-19-and-ada-rehabilitation-act-and-other-eeo-laws>
- DFEH Employment Information on COVID-19: [https://www.dfeh.ca.gov/wp-content/uploads/sites/32/2020/03/DFEH-Employment-Information-on-COVID-19-FAQ\\_ENG.pdf](https://www.dfeh.ca.gov/wp-content/uploads/sites/32/2020/03/DFEH-Employment-Information-on-COVID-19-FAQ_ENG.pdf)

**DFEH Employment  
Information on  
COVID-19**



**FAQ**

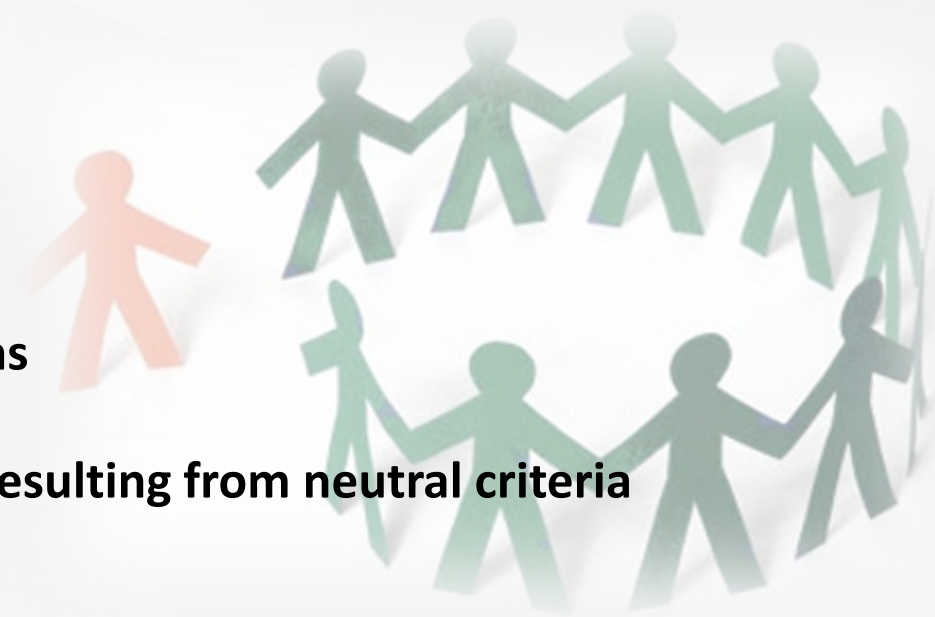
# Workplace Litigation Mitigation

- **Consider Wrongful Termination, Discrimination, and Retaliation Issues**
  - **Issue**: Employees may bring discrimination claims as employers decide whom to bring back to the physical workplace, and when.
  - **Mitigation Considerations**:
    - Determine which positions or functions are needed most immediately
    - Use neutral criteria based on business necessity
    - Create a consistent, non-discriminatory selection policy
    - Document in writing
    - Consider statistical analysis



# Workplace Litigation Mitigation

- **Consider Wrongful Termination, Discrimination, and Retaliation Issues**
  - **Issue**: Terminated employees may bring suit under federal and state anti-discrimination laws, challenging the reason(s) they were subject to an adverse employment action.
  - **Mitigation Considerations**:
    - As always:
      - **Use objective criteria in making layoff determinations**
      - **Assess whether there may be any disparate impact resulting from neutral criteria**
      - **Document, document, document**





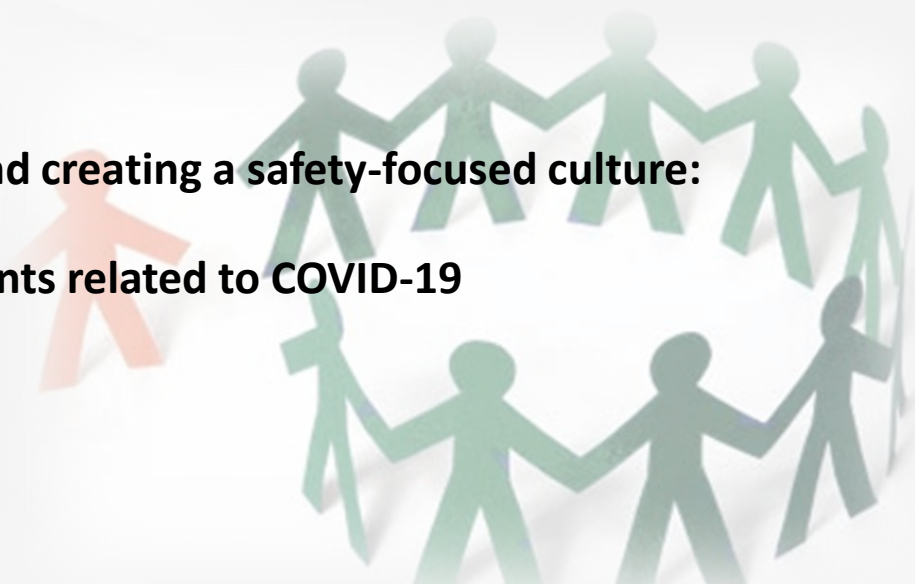
# Workplace Litigation Mitigation

- **Consider Wrongful Termination, Discrimination, and Retaliation Issues**
  - **Issue**: There maybe increased pandemic-related harassment and/or discrimination of employees due to a protected characteristic (race, national origin, disability, etc.)
  - **Mitigation Considerations**:
    - **Communication**
    - **Update anti-harassment and discrimination policies**
    - **Consider additional compliance training of managers**



# Workplace Litigation Mitigation

- **Consider Wrongful Termination, Discrimination, and Retaliation Issues**
  - **Issue**: Employees may raise complaints about health and safety concerns, and whistleblower retaliation claims are on the rise under both federal and California law.
  - **Mitigation Considerations**:
    - In addition to complying with OSHA/Cal/OSHA/CDC guidance and creating a safety-focused culture:
      - Consider updating anti-retaliation policies to cover complaints related to COVID-19
      - Consider training of supervisors
      - Maintain a channel for reporting health concerns
      - Closely vet any decision regarding potential adverse employment action against an individual who has complained about health and safety



# Workplace Litigation Mitigation

- **Consider Reasonable Accommodation Issues**
  - **Reasonable Accommodations Related to COVID-19**
    - Per the DFEH, all employers of five or more employees must provide reasonable accommodation to employees with disabilities unless doing so would pose an undue hardship—this rule applies during a pandemic.
      - Does an illness related to COVID-19 rise to the level of a disability?
      - What are some forms of reasonable accommodations during the pandemic?
      - What is considered “undue hardship” to the employer during the pandemic?



# Workplace Litigation Mitigation

- **Consider Reasonable Accommodation Issues**
  - **A Note on Medical Documentation and COVID-19**
    - Generally, employers may request reasonable documentation confirming the existence of the disability and the need for reasonable accommodation.
    - But per the DFEH, during the current pandemic, it may be impractical for employees to obtain medical documentation of a COVID-19-related disability from their medical provider. The DFEH recommends waiving such requirements until employees can reasonably obtain documentation.
  - **A Note on “Higher Risk” Individuals and COVID-19**
    - **Q. Can an employer exclude an employee from the workplace because the employee is considered at “higher risk” for severe illness if they contract COVID-19 (due to a pre-existing medical condition, being 65 or older, or pregnant)?**
    - **A. No, per EEOC guidance. Treating vulnerable employees differently from their peers—even with the best of intentions—can lead to discrimination claims under the ADA, ADEA, Title VII of the Civil Rights Act, and California law. Bottom line: do not make blanket assumptions or policies regarding such individuals.**
    - See: <https://www.eeoc.gov/wysk/what-you-should-know-about-covid-19-and-ada-rehabilitation-act-and-other-eeo-laws>

## Workplace Litigation Mitigation

- **Consider Reasonable Accommodation Issues**
  - **A Note on Family Members at Higher-Risk of Severe Illness from COVID-19**
    - **Q.** Is an employee entitled to an accommodation under the ADA in order to avoid exposing a family member who is at higher risk of severe illness from COVID-19 due to an underlying medical condition?
    - **A. No.** The ADA does not require that an employer accommodate an employee without a disability in order to protect a family member with a disability from potential COVID-19 exposure. For example, an employee without a disability is not entitled under the ADA to telework to protect a family member with a disability from potential COVID-19 exposure.
    - **See:** <https://www.eeoc.gov/wysk/what-you-should-know-about-covid-19-and-ada-rehabilitation-act-and-other-eeo-laws>





## Workplace Litigation Mitigation

- **Consider That Some Employees May Be Fearful of Returning to Work**
  - Some employees will express fear of returning to work, or may simply refuse to do so.
  - Proceed with caution:
    - Employees may have rights to paid time off under federal, state, and local leave laws.
    - A refusal to return to work may in some limited circumstances be considered protected conduct under OSHA regulations, and the NLRA, and the employer may have an obligation to provide reasonable accommodations to certain employees under the ADA and state law.
- **What can an employer worried about fearful or vulnerable employees do?**



# Workplace Litigation Mitigation

- **Maintain Compliance with Leave Laws**
  - Paid protected leaves can include:
    - Normal state and local paid sick laws/ordinances
    - Normal PTO/vacation time
    - The federal **Families First Coronavirus Response Act** (if fewer than 500 employees)
    - **Sector-specific emergency paid leave**, for example, California Supplemental Paid Leave for Food Sector Employees (if 500 or more employees)
  - Unpaid protected leave can include:
    - FMLA/CFRA leave
    - ADA/FEHA disability accommodation law
    - Workers' compensation leave
  - **Resources:**
    - Side by Side Comparison of COVID-19 Paid Sick Leave, issued by the California Department of Industrial Relations:  
<https://www.dir.ca.gov/dlse/Comparison-COVID-19-Paid-Leave.html>



# Workplace Litigation Mitigation

- **Consider Wage and Hour Issues**
  - Misclassification Issues
  - Off the Clock Work
  - Remember Ongoing Wage and Hour Obligations:
    - Paying wages in a timely manner
    - Paying final wages
    - Furnishing compliant wage statements
    - Providing business expense reimbursements



# Buchalter

## California Employer Considerations and Best Practices for Returning to Work in the Wake of COVID-19

Thank you.

**Questions? Speak to your Buchalter contact or contact our presenters.**



**Robert S. Cooper**

Shareholder  
(213) 891-5230  
rcooper@buchalter.com



**Jessica Hawk**

Labor & Employment  
(619) 219-5335  
jhawk@buchalter.com

LOS ANGELES  
NAPA VALLEY  
ORANGE COUNTY  
PORTLAND  
SACRAMENTO  
SAN DIEGO  
SAN FRANCISCO  
SCOTTSDALE  
SEATTLE  
BUCHALTER.COM