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By /s/ Anthony Berini
Deputy Clerk

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Attorney for Plaintiff Sara Craba

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN MATEO

SARA CRABA,

Plaintiff,

v.

HEADSPACE, INC.; and **DOES** 1 through 20, inclusive,

Defendants.

CASE NO.: 25-CIV-09923

Unlimited Jurisdiction

COMPLAINT FOR:

1) **FEHA Sex/Gender Discrimination**
2) **FEHA Retaliation**
3) **Failure to Prevent Discrimination and Retaliation**
4) **Wrongful Termination in Violation of Public Policy**

JURY TRIAL DEMANDED

Plaintiff **SARA CRABA** brings this action, by and through counsel, for damages against Defendant **HEADSPACE, INC.** ("Headspace") and **DOES** 1 through 20, inclusive (collectively, "Defendants"), and each of them. Plaintiff hereby complains of Defendants, and/or each of them, named hereinabove as follows:

JURISDICTION AND VENUE

1. Jurisdiction is proper because Ms. Craba worked for Headspace in the State of California, County of San Mateo, and Defendants committed all and/or the majority of the unlawful conduct in the State of California, County of San Mateo. Significant relief is being sought against Defendants whose violations of California employment laws form a significant basis for Ms. Craba's claims.

2. Venue is proper because Ms. Craba primarily performed work for Defendants in the County of San Mateo and a substantial portion of the transactions and occurrences related to this action occurred in this County. Civ. Proc. Code § 395. Ms. Craba was discriminated against, retaliated against, and wrongfully terminated in the County of San Mateo.

3. Prior to the filing of this action, Ms. Craba exhausted her administrative remedies. She filed her complaint with the California Civil Rights Department ("CRD") alleging that the acts of Defendants, including without limitation, Headspace, constituted multiple violations of California's Fair Employment and Housing Act ("FEHA"), among other things, and obtained a "right to sue" letter from CRD against Defendants, including without limitation Headspace, on or around December 16, 2025. She subsequently brought this action on a timely basis.

PARTIES

4. Plaintiff **SARA CRABA** is a natural person who, for the majority of the time of the misconduct including, without limitation, the wrongful termination, worked for Headspace primarily in San Mateo County.

5. Ms. Craba is informed and believes, and thereon alleges, that Defendant **HEADSPACE, INC.** (Headspace) is, and at all times relevant to this claim, was, a Delaware

formed corporation with its registered principal address of 24155 Michigan Avenue, Santa Monica, CA 90404.

6. Headspace is a popular digital mental health company offering an app with guided meditations, sleep aids, and mindfulness exercises, plus integrated online therapy, coaching, and psychiatry for stress relief, better sleep, focus, and overall well-being.

7. The true names and capacities, whether individual, corporate, associate or otherwise of Defendants DOES 1 through DOES 20, inclusive, are unknown to Ms. Craba who therefore sues said Defendants by such fictious names pursuant to Code of Civil Procedure section 474. Ms. Craba further alleges that each of said fictitious Defendants are in some manner responsible for the acts and occurrences hereinafter set forth. Ms. Craba will amend this Complaint to show their true names and capacities when the same are ascertained, as well as the manner in which each fictitious Defendant is responsible.

FACTS

8. Ms. Craba was hired by Headspace on or about February 28, 2022.

9. She last held the title, Senior Software Engineer.

10. Prior to her tenure at Headspace, Ms. Craba gained significant relevant experience at prior companies.

11. After graduating from Università di Pisa with a Bachelor of Engineering Degree in Computer Engineering, she worked as a Software Engineer at numerous companies including Intecs, Intel, Motiv, and Lyft.

12. Needless to say, Ms. Craba has an extensive background in writing clean and maintainable code and developing complex Android applications. She is a team player and an effective leader.

13. Ms. Craba thrived at Headspace and, within her first year of employment, was rated "Achieved Expectations" by Premal Mistry.

14. Ms. Craba's success was met with a 3% salary merit increase and a yearly bonus.

15. On or about March 5, 2024, Ms. Craba received an end of year performance review by manager Sebastain Nystrom with the rating Met Expectations and the comment: "*You performed at the higher level (T4 – Staff Software Engineer) for most if not all dimensions.*"

16. Later in 2024, Ms. Craba was commended by Florent Bachelier, the company's Director of Engineering, for strong contributions.

17. Ms. Craba was appointed as Android Chapter Lead, serving as the Company's primary point of reference for Android-related matters, with responsibility for technical oversight of the Android codebase.

18. Consistent with her level of engineering seniority and experience, she managed task allocation and coordination within the Android team, working across technical and non-technical teams to resolve issues and deliver on production deadlines.

19. Despite Ms. Craba's high performance at Headspace, she began to endure discrimination based on her female sex at the hands of Julio Ceballos.

20. Mr. Ceballos complained about Ms. Craba's workload prioritization and accused Ms. Craba of insincerity when raising issues about prioritization.

21. These comments, especially in public, were never directed at male colleagues, even when they delegated or delayed tasks.

22. Ms. Craba took pride in her work at Headspace and wanted a safe environment where she could succeed.

23. Thus, Ms. Craba escalated her concerns about Mr. Ceballo's discriminatory behavior to then manager Florent Bachelier on or about August 7, 2024.

24. Unfortunately, discrimination continued.

25. On or about September 6, 2024, Parshav Chauchan was transferred from the Membership Team to a high-impact, Flutter Team without having completed the required training.

26. This sort of opportunity was not presented to female employees like Ms. Craba, even though Ms. Craba was gaining the praise of senior leaders including CTO Ritwik Bhattacharya, and had more training and experience.

27. Notwithstanding her high performance and despite demonstrating prompt responsiveness and strong leadership during critical incidents, Ms. Craba received unwarranted questioning from manager, Chris Oh (Chief of Staff), which never happened to male employees on her team.

28. Nevertheless, Ms. Craba remained a committed member of her team.

29. Conversely, Mr. Oh failed to respond to meeting requests related to team projects, career development, and prioritization.

30. Ms. Craba escalated concerns to CTO Bhattacharya regarding Mr. Oh's inability to maintain the organization of the team.

31. In November 2024, Headspace had its third round of layoffs, with a 13% reduction of the workforce.

32. Ms. Craba was not selected for layoffs since she was such an important contributor to the company.

33. Later that year, Mr. Ceballos bypassed protocols by imposing a quick fix in part of a codebase under Ms. Craba's responsibility, without her consultation.

34. Ms. Craba promptly raised concerns about technical debt but was publicly accused of avoiding work.

35. This incident reflects a broader pattern of gender-based undermining and unequal treatment not experienced by her male colleagues.

36. On or about December 18, 2024, Ms. Craba began sick leave through January 5, 2025, which was subsequently extended to January 12, 2025, with approval by then manager Catalina Laverde.

37. On or about January 6, 2025, Kunal Parakh was assigned Engineer Manager for the Paysum Team (previously the Membership Team).

38. Subsequently, Ms. Craba was given the opportunity to submit an end of year summary on or about January 9, 2025.

39. Ms. Craba reiterated concerns about understaffing, a lack of active projects, and frequent changes in squad management with shifting priority perspectives.

40. Although Mr. Parakh assigned work to other engineers, on multiple occasions Mr. Ceballos repeatedly overrode those decisions, resulting in workload imbalances against Ms. Craba.

41. There was one particular instance of Mr. Ceballos overwriting a decision that disfavored Ms. Craba on or about January 13, 2025.

42. Consequently, roughly a few days later, Ms. Craba raised concerns, again, to Mr. Parakh and provided evidence including screenshots and Slack messages demonstrating the repeated undermining of Ms. Craba's work, the misrepresentation of Ms. Craba's contributions in team discussions and the directive behavior that ignored Ms. Craba's expertise and responsibilities.

43. On or about January 24, 2025, Joanna Xue requested a document review for a new feature, and Mr. Ceballos set an unrealistic one-day deadline for implementation, despite having been previously estimated as one week of work.

44. A male colleague, Marco Perez, also noted that the work would not be ready in time.

45. Despite both Ms. Craba and Mr. Perez raising concerns about the short deadline, only Mr. Perez received a deadline extension, indicative of the gender/sex discrimination at play.

46. Roughly a few days after imposing the unrealistic deadline, Mr. Ceballos falsely claimed to Mr. Parakh and Ms. Xue that Ms. Craba's work was not ready, attempting to block her contributions to the project.

47. Ms. Craba simply wanted a fair playing field; thus, she requested Mr. Parakh for the second time to move teams due to Mr. Ceballo's discriminatory conduct.

48. Ms. Craba took this action on or about January 31, 2025.

49. Ms. Craba again requested a team change on or about February 18, 2025, due to Mr. Ceballo's discriminatory conduct, but Mr. Parakh imposed conditions that were not applied to male engineers, like Mr. Chauhan, with fewer qualifications, and rejected this request.

50. Instead, Mr. Parakh assigned Ms. Craba tasks that actively interfered with her ability to meet those conditions.

51. On or about March 13, 2025, Ms. Craba submitted a complaint to the HR department against Mr. Ceballos for his gender/sex discrimination, ongoing interference of Ms. Craba's work, public misconduct, and other contributions to a hostile work environment.

52. Ms. Craba's report also included a request for review of Mr. Oh and Mr. Parakh's handling of Ms. Craba's prior discrimination complaints and their failure to implement corrective measures, despite clear evidence and repeated escalations.

53. This investigation was assigned to Susan George from HR.

54. A few days later, on or about March 18, 2025, a close colleague resigned due to unresolved gender discrimination involving a manager that created a psychologically unsafe environment, which HR, led by Ms. George, failed to address.

55. Ms. Craba's negative experience with Headspace is not isolated.

56. Ms. Craba again raised concerns about gender discrimination with Director of Engineering Cataline Laverde and informed her of the formal HR complaint.

57. While Ms. Laverde initially expressed support, her tone changed after speaking with HR's Ms. George, who later accused Ms. Craba of "putting Catalina on the spot."

58. A colleague privately messaged Ms. Craba, referencing something he had heard at work: *"idk what exactly is going on but the narrative from the other side is not looking much like it's in your favor."*

59. This comment implied that confidential information had been disclosed, potentially by HR, and suggested that a decision regarding Ms. Craba's complaint may have already been made.

60. Ms. Craba was left feeling unheard and dismissed.

61. Meanwhile, Mr. Ceballos continued to single out Ms. Craba for non-mandatory document signoffs, and Ms. Parakh publicly ridiculed Ms. Craba and dismissed Ms. Craba's concerns in a condescending manner.

62. In contrast, these two individuals were incredibly respectful toward male colleagues in similar situations.

63. Ms. George verbally summarized the HR investigation results with Ms. Craba on April 2, 2025.

64. The investigation concluded by challenging Ms. Craba's interpretation of the events, implying that her concerns may have been the result of "personal frustration" rather than substantive issues.

65. Then, on or about April 3, 2025, Ms. Craba received her end-of-year performance review from Mr. Oh, with Ms. George present. For the first time, she received significant negative feedback in her review. Their feedback was both condescending and untrue.

66. The feedback was in retaliation for speaking up about gender/sex discrimination.

67. In contrast to what the review stated, Ms. Craba had performed very strongly, met all training requirements, and had an exceptionally low unresolved task rate (far lower than her male peers). Additionally, all of Ms. Craba's PTO dates were properly approved and communicated across official channels and team chats.

68. The review also appears to have been signed by Ms. Laverde and recorded as delivered by Mr. Parakh, although it was written and delivered by Mr. Oh as confirmed by Ms. Laverde and Mr. Oh.

69. The performance review was not based on data; it was a retaliatory attack. The timeline is clear. Headspace sought to retaliate against Ms. Craba for complaining about gender discrimination. It sought to push her out.

70. On or about April 24, 2025, Ms. Craba requested a private meeting with Mr. Oh, however, Ms. George insisted on joining.

71. In the meeting, Ms. Craba asked for clarification and evidence supporting the negative performance review.

72. Mr. Oh provided no documentation and alleged that the feedback came from a former manager who had already left the company, Sebastian Nystorm, which is not standard practice.

73. Mr. Nystrom later confirmed privately to Ms. Craba that he had never given such feedback, stating, "I don't remember saying that."

74. Ms. Craba again complained to HR and CTO Bhattacharya.

75. On or about May 5, 2025, Ms. Craba reached out via direct message to Ms. George to follow up on the status of the HR complaint.

76. Ms. George acknowledged the request and assured Ms. Craba she would check the status and follow up accordingly.

77. On or about May 9, 2025, Ms. Craba emailed Headspace's CEO Tom Pickett to convey her deep distress over ongoing gender-based discrimination and retaliation in the workplace.

78. Ms. Craba proposed a negotiated, amicable separation from the company.

79. On or about May 15, 2025, less than a week later, Ms. Craba was notified by Danielle Young from HR that her employment was terminated.

80. Ms. Young indicated that they took Ms. Craba's letter to CEO Pickett as a resignation, even though it is clearly not a resignation whatsoever.

81. On or about May 16, 2025, Ms. Craba's access to the company network was revoked at 5:00 PM PT.

82. Just one hour prior to being locked out, she received the Investigation Closure letter from HR.

83. The findings presented in the letter were deeply flawed, containing inaccurate statements and timelines that contradict the documented evidence Ms. Craba had already submitted.

84. Ms. Craba remains unemployed. She has suffered and will continue to suffer substantial emotional distress and pain and suffering, among other things, because of Headspace's unlawful conduct.

FIRST CAUSE OF ACTION

FEHA Sex/Gender Discrimination

(Against all Defendants)

85. Ms. Craba re-alleges and incorporates by reference each and every allegation set forth above and below.

86. FEHA prohibits discrimination based on sex/gender. Gov. Code § 12940(a).

87. Ms. Craba was an employee of Headspace, and Headspace was an employer within the meaning of the FEHA.

88. Ms. Craba is of female gender/sex.

89. As alleged in detail above, Ms. Craba was subjected to discrimination based on her female sex/gender when she was treated worse than her male colleagues.

90. Ms. Craba was subject to adverse employment actions as a result of the discrimination, including unfair treatment at work and termination from employment.

91. Ms. Craba was harmed.

92. Headspace's discriminatory conduct was a substantial factor in causing Ms. Craba's harm.

93. As a direct result of the unlawful employment practices of Defendants as alleged hereinabove, Ms. Craba has suffered damages including, without limitation, lost income, compensation and benefits, physical distress, emotional distress, pain and suffering, humiliation, loss of reputation and other injuries in an amount to be proven at trial.

94. Defendants' actions were fraudulent, malicious, and oppressive, because, among other things, the conduct was carried out and ratified by Headspace's HR department and CEO with zero regard for Ms. Craba's emotional and/or physical safety or legal rights. It was deliberate. Thus, Ms. Craba is entitled to recover punitive damages from Defendants, and each of them.

SECOND CAUSE OF ACTION

FEHA Retaliation

(Against all Defendants)

95. Ms. Craba re-alleges and incorporates by reference each and every allegation set forth above and below.

96. FEHA prohibits retaliation against an employee who has opposed or reported any practice forbidden by FEHA. Gov. Code. § 12940(h).

97. Ms. Craba was an employee of Headspace, and Headspace was an employer within the meaning of the FEHA.

98. Ms. Craba complained of conduct prohibited by FEHA including discrimination based on sex/gender.

99. As alleged in detail above, Ms. Craba was subjected to retaliation by Headspace, its HR department, CEO, and her managers based on her complaint, resulting in her termination of employment.

100. Ms. Craba was harmed.

101. Headspace's retaliatory conduct was a substantial factor in causing Ms. Craba's harm.

102. As a direct result of the unlawful employment practices of Defendants as alleged hereinabove, Ms. Craba has suffered damages including, without limitation, lost income, compensation and benefits, physical distress, emotional distress, pain and suffering, humiliation, loss of reputation and other injuries in an amount to be proven at trial.

103. Defendants' actions were fraudulent, malicious, and oppressive, because, among other things, the conduct was carried out and ratified by Headspace's HR department and CEO with zero regard for Ms. Craba's emotional and/or physical safety or legal rights. It was deliberate. Thus, Ms. Craba is entitled to recover punitive damages from Defendants, and each of them.

THIRD CAUSE OF ACTION

FEHA Failure to Prevent Discrimination and Retaliation

(Against all Defendants)

104. Ms. Craba re-alleges and incorporates by reference each and every allegation set forth above and below.

105. Ms. Craba was an employee of Headspace, and Headspace was an employer within the meaning of the FEHA.

106. FEHA provides in pertinent part that employers must take all reasonable steps to prevent discrimination and retaliation. Gov. Code § 12940(k).

107. The actions and conduct of Defendants, as alleged hereinabove, constitute failure to prevent discrimination and retaliation in violation of FEHA.

108. For example, among other things, Headspace turned a blind eye to the sex/gender discrimination and retaliation and, once aware, failed to take adequate remedial steps once it was reported.

109. Defendants had inadequate policies and procedures in place to prevent discrimination and retaliation and stop discrimination and retaliation.

110. Senior Headspace leaders, including its HR department and CEO, were aware of discrimination and retaliation, but allowed it to be carried out anyways without taking any corrective actions.

111. There were inadequate remedial actions.

112. Ms. Craba was harmed.

113. Headspace's failure to prevent discrimination and retaliation was a substantial factor in causing Ms. Craba's harm.

114. As a direct result of the unlawful employment practices of Defendants as alleged hereinabove, Ms. Craba has suffered damages including, without limitation, lost income, compensation and benefits, physical distress, emotional distress, pain and suffering, humiliation, loss of reputation and other injuries in an amount to be proven at trial.

115. Defendants' actions were fraudulent, malicious, and oppressive, because, among other things, the conduct was carried out and ratified by Headspace's HR department and CEO with zero regard for Ms. Craba's emotional and/or physical safety or legal rights. It was deliberate. Thus, Ms. Craba is entitled to recover punitive damages from Defendants, and each of them.

FOURTH CAUSE OF ACTION

Wrongful Termination in Violation of Public Policy

(Against all Defendants)

116. Ms. Craba re-alleges and incorporates by reference each and every allegation set forth above and below.

117. Ms. Craba was an employee of Headspace, and Headspace was an employer within the meaning of the FEHA.

118. It is an unlawful employment practice and in violation of public policy to discharge an employee based on her sex/gender and/or protected complaints, which is exactly what Defendants did.

119. Ms. Craba was harmed.

120. Headspace's wrongful termination was a substantial factor in causing Ms. Craba's harm.

121. As a direct result of the unlawful employment practices of Defendants as alleged hereinabove, Ms. Craba has suffered damages including, without limitation, lost income,

compensation and benefits, physical distress, emotional distress, pain and suffering, humiliation, loss of reputation and other injuries in an amount to be proven at trial.

122. Defendants' actions were fraudulent, malicious, and oppressive, because, among other things, the conduct was carried out and ratified by Headspace's HR department and CEO with zero regard for Ms. Craba's emotional and/or physical safety or legal rights. It was deliberate. Thus, Ms. Craba is entitled to recover punitive damages from Defendants, and each of them.

PRAYER FOR RELIEF

WHEREFORE, Ms. Craba prays that this Court enter judgment in her favor on every claim and relief against Defendants and each of them, as follows:

1. For compensatory damages;
2. For punitive damages;
3. For pre-judgment and post-judgment interest, at the legal rate;
4. For attorney's fees and costs;
5. For applicable penalties;
6. For costs of suit;
7. For declaratory relief; and
8. For all such other and further relief as the court may deem just, proper and equitable.

Dated: December 19, 2025

Chizen Law, Professional Corporation

/s/ Steven Chizen
Steven Chizen

Attorney for Plaintiff Sara Craba

JURY DEMAND

PLAINTIFF SARA CRABA demands trial by jury on all issues so triable.

Dated: December 19, 2025

Chizen Law, Professional Corporation

/s/ Steven Chizen
Steven Chizen

Attorney for Plaintiff Sara Craba