

FILEDSuperior Court of California
County of Los Angeles

APR 05 2021

BERTI K. LOMAX, Executive Officer/Clerk


Deputy

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Attorneys for Plaintiff
OLRIM KANG

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
 FOR THE COUNTY OF LOS ANGELES**

OLRIM KANG, individually and on
 behalf of all others similarly situated,

Plaintiff,

v.

SAMSUNG ELECTRONICS
 AMERICA, INC.; STAFFMARK
 INVESTMENT LLC d/b/a ATTERRO
 WORKFORCE SOLUTIONS; and DOES
 1 through 10, inclusive,

Defendants.

Case No. 20STCV09407

Unlimited Civil Case Over \$25,000

**FIRST AMENDED COMPLAINT
 [CLASS ACTION]**

1. Cal. Lab. Code §§ 510, 558, 1174, 1194—
Recovery of Unpaid Minimum Wage and
Overtime
2. Cal. Lab. Code §§ 226.7, 510, 512, 558,
1198—Meal and Rest Period Violations
3. Cal. Lab. Code §§ 201-203, and 204—
Timely Payment of Final Wages at
Separation Violation
4. Cal. Lab. Code §§ 226 *et seq.*, 1174—
Maintenance of Required Business
Records and Itemized Wage Statements
Violation
5. Cal. Bus. & Prof. Code § 17200 *et*
seq.—Disgorgement of Profits
6. Violation of Cal. Labor Code § 2699

[DEMAND FOR JURY TRIAL]

COMES NOW Plaintiff, and for his causes of action against Defendants, allege: