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Superior Court of California
County of Los Angeles

FEB 10 2021

Sherri R. Carter, Executive Officer/Clerk of Court

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Attorneys for Plaintiff, ROSA FRANCO, on behalf of
herself and all others similarly situated and aggrieved

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE**

ROSA FRANCO, on behalf of herself and all
others similarly situated,

Plaintiff,

v.

VINCENT RAGS, INC., a California
corporation; RAJESH CHOLLERA, an
individual; and DOES 1 through 100,
inclusive,

Defendants.

CASE NO.: 20STCV07768

**FIRST AMENDED CLASS ACTION
COMPLAINT FOR:**

1. FAILURE TO PAY OVERTIME WAGES;
2. FAILURE TO PAY MINIMUM WAGES;
3. MEAL PERIOD VIOLATIONS;
4. REST PERIOD VIOLATIONS
5. WAITING TIME PENALTIES;
6. WAGE STATEMENT VIOLATIONS;
7. UNFAIR COMPETITION;
8. PENALTIES UNDER LABOR CODE § 210;
9. PENALTIES UNDER LABOR CODE § 226.3;
10. PENALTIES UNDER LABOR CODE § 558;
11. PENALTIES UNDER LABOR CODE § 1197.1; and
12. PENALTIES UNDER LABOR CODE § 2699

DEMAND FOR JURY TRIAL

[Amount in Controversy Exceeds \$25,000]