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Superior Court of California
County of Los Angeles

APR 21 2020

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By: Glorietta Robinson, Deputy

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15 individually and on behalf of all others similarly situated

12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

13 **FOR THE COUNTY OF LOS ANGELES**

14 CHAFEN SUTTLE, individually and on
15 behalf of all others similarly situated

16 Plaintiff,

17 vs.

18 CHILDREN'S HOSPITAL LOS
19 ANGELES, a California corporation; and
20 DOES 1 through 20, inclusive,

21 Defendants.

Case No. 19STCV46960

**AMENDED AS A MATTER OF RIGHT
PURSUANT TO CAL. LABOR CODE §
2699.3(a)(2)(c)**

**FIRST AMENDED CLASS ACTION AND
REPRESENTATIVE ACTION COMPLAINT
FOR:**

1. Failure to Pay Minimum Wages;
2. Failure to Pay Overtime Wages;
3. Failure to Provide Meal Periods;
4. Failure to Permit Rest Breaks;
5. Failure to Provide Accurate Itemized Wage Statements;
6. Failure to Pay All Wages Due Upon Separation of Employment;
7. Violation of Business and Professions Code §§ 17200, *et seq*
8. Enforcement of Labor Code § 2698 *et seq.* ("PAGA")