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Attorneys for Plaintiff Andres Campos

**FILED**  
SUPERIOR COURT OF CALIFORNIA  
COUNTY OF SAN BERNARDINO  
SAN BERNARDINO DISTRICT

MAY 29 2020

BY   
EDUARDO HERNANDEZ, DEPUTY

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN BERNARDINO

Andres Campos, an individual, on behalf of  
himself and all others similarly situated and as a  
private attorney general pursuant to the Private  
Attorneys General Act,

Plaintiff,

vs.

Wal-Mart Associates, Inc., Walmart, Inc., and  
Does 1 through 10,

Defendants.

Case No. **CIV DS 2009585**  
**CLASS ACTION**

**Complaint for:**

1. Failure to Pay Compensation Due
2. Meal Period Violations
3. Rest Period Violations
4. Wage Statement Violations
5. Failure to Pay Wages Timely Upon Termination
6. Violation of Cal. Business & Professions Code Section 17203
7. Recovery of Civil Penalties pursuant to the California Private Attorney General Act

**Demand for Jury Trial**

Plaintiff Andres Campos ("Plaintiff"), individually, on behalf of all other persons similarly situated and as a private attorney general pursuant to the California Private Attorneys General Act,

1 alleges:

- 2 1. Plaintiff is a California resident and was employed in San Bernardino County by Defendants as a  
3 non-exempt employee.
  - 4 2. Defendant Wal-Mart Associates, Inc. is a corporation with its principal place of business located  
5 at 708 SW 8th Street, Bentonville, AR 72716.
  - 6 3. Defendant Walmart, Inc. is a corporation with its principal place of business located at 708 SW  
7 8th Street, Bentonville, AR 72716.
  - 8 4. Defendants acted as employers, co-employers and/or joint employers of Plaintiff and the class  
9 members and PAGA members.
  - 10 5. Plaintiff does not presently know the true names and capacities of the defendants named as Does  
11 I through 10 and therefore sues such defendants by these fictitious names. Plaintiff believes that  
12 the Doe defendants are persons or entities who are involved in the acts set forth below, either as  
13 employers, independent contractors, suppliers, agents, servants or employees of the known  
14 defendants, or through conspiring with the known Defendants to perform these acts for financial  
15 gain and profit in violation of Plaintiff's, class members', and PAGA members' rights. Plaintiff  
16 will request leave of Court to amend this Complaint to set forth their true names, identities and  
17 capacities when Plaintiff ascertains them.
  - 18 6. Each of the Defendants has been or is the principal, officer, director, agent, employee, joint  
19 employer, representative and/or co-conspirator of each of the other defendants and in such  
20 capacity or capacities participated in the acts or conduct alleged herein and incurred liability  
21 therefor. At an unknown time, some of the Defendants conspired with other Defendants to  
22 commit the wrongful acts described herein. These wrongful acts were committed in furtherance  
23 of such conspiracy. Defendants aided and abetted each other in committing the wrongful acts  
24 alleged herein. Each of the Defendants acted for personal gain or in furtherance of their own  
25 financial advantage in committing the acts alleged herein.
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