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Attorneys for Plaintiff, RAHUL KHARB
on behalf of himself and all others similarly situated

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

RAHUL KHARB, on behalf of himself and all
others similarly situated,

Plaintiff,

v.

AVANI & K, INC., a California corporation;
K & A FOODS, INC., a California
corporation; KEERAT, INC., a California
corporation, PRITPAL SINGH BHATIA, an
individual, and DOES 1 through 50, inclusive,

Defendants.

CONFORMED COPY
ORIGINAL FILED
Superior Court of California
County of Los Angeles

JAN 08 2021

Sherri R. Carter, Executive Officer/Clerk of Court

CASE NO.: 20STCV31610

CLASS ACTION

**FIRST AMENDED CLASS ACTION
COMPLAINT FOR:**

1. FAILURE TO PAY OVERTIME WAGES;
2. FAILURE TO PAY MINIMUM WAGES;
3. FAILURE TO PROVIDE MEAL PERIODS;
4. FAILURE TO PROVIDE REST PERIODS;
5. WAITING TIME PENALTIES;
6. WAGE STATEMENT VIOLATIONS;
7. FAILURE TO TIMELY PAY WAGES;
8. FAILURE TO INDEMNIFY;
9. UNFAIR COMPETITION;
10. CIVIL PENALTIES UNDER LABOR CODE § 210;
11. CIVIL PENALTIES UNDER LABOR CODE § 226.3;
12. VIOLATION OF LABOR CODE § 558;
13. VIOLATION OF LABOR CODE § 1174.5;
14. VIOLATION OF LABOR CODE § 1197.1; and
15. CIVIL PENALTIES UNDER LABOR CODE § 2699

DEMAND FOR JURY TRIAL

[Amount in Controversy Exceeds \$25,000.00]