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

AUG 19 2020

BY JESSICA JOANIS
JESSICA JOANIS, DEPUTY

STANSBURY BROWN LAW
DANIEL J. BROWN (SBN 307604)
dbrown@stansburybrownlaw.com
ETHAN C. SURLS (SBN 327605)
esurls@stansburybrownlaw.com
2610 1/2 Abbot Kinney Blvd.
Venice, CA 90291
Tel: 323-207-5925

Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO

VERONICA GRAHAM, as an individual and
on behalf of all others similarly situated,

Plaintiff,

vs.

GAFE PIZZA, INC., a California corporation;
and DOES 1 through 100,

Defendants.

Case No.: CIV-DS-2013279

Amended as a Matter of Right Pursuant to
Labor Code Section 2699.3(a)(2)(C)

FIRST AMENDED CLASS AND
REPRESENTATIVE ACTION
COMPLAINT:

- (1) MINIMUM WAGE VIOLATIONS
(LABOR CODE §§ 1182.12, 1194,
1194.2, AND 1197);
- (2) FAILURE TO PAY ALL
OVERTIME WAGES (LABOR
CODE §§ 204, 510, 558, 1194, AND
1198);
- (3) REST PERIOD VIOLATIONS
(LABOR CODE §§ 226.7, 516);
- (4) FAILURE TO REIMBURSE FOR
NECESSARY BUSINESS
EXPENSES (LABOR CODE § 2802);
- (5) FAILURE TO PROVIDE
ACCURATE, ITEMIZED WAGE
STATEMENTS (LABOR CODE
§ 226 ET SEQ.);
- (6) WAITING TIME PENALTIES
(LABOR CODE §§ 201-203);
- (7) UNFAIR COMPETITION (BUS &
PROF CODE § 17200 et seq.); and
- (8) CIVIL PENALTIES UNDER THE
PRIVATE ATTORNEYS
GENERAL ACT (LABOR CODE §
2698 et seq.)

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