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Superior Court of California
County of Los Angeles

DEC 21 2020

Sherri R. Carter, Executive Officer/Clerk of Court

By: Tanya Herrera, Deputy

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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **FOR THE COUNTY OF LOS ANGELES**

11 MARRIANA ZAPATA, individually, and on
12 behalf of all others similarly situated,

13 *Plaintiff,*

14 vs.

15
16 SBE ENTERTAINMENT GROUP, LLC, a
17 limited liability company;
18 MORGANS HOTEL GROUP MANAGEMENT,
19 LLC DBA THE MONDRIAN HOTEL, LLC, a
20 Delaware limited liability company; and,
21 DOES 2 through 10, inclusive,

22 *Defendants*

Case No.: 20STCV28106

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

[Amended As of Right Pursuant to Labor
Code Section 2699.3(2)(C)]

1. Failure to Pay Minimum and Regular Rate Wages [Cal. Lab. Code §§ 204, 1194, 1194.2, and 1197];
2. Failure to Pay Overtime Compensation [Cal. Lab. Code §§ 1194 and 1198];
3. Failure to Provide Meal Periods [Cal. Lab. Code §§ 226.7, 512];
4. Failure to Authorize and Permit Rest Breaks [Cal. Lab. Code §§ 226.7];
5. Failure to Timely Pay Final Wages at Termination [Cal. Lab. Code §§ 201-203];
6. Failure to Provide Accurate Itemized Wage Statements [Cal. Lab. Code § 226]; and
7. Unfair Business Practices [Cal. Bus. & Prof. Code §§ 17200, et seq.].
8. Civil Penalties Under PAGA [Cal. Lab. Code § 2699, et seq.]

DEMAND FOR JURY TRIAL