

1 **BIBIYAN LAW GROUP, P.C.**
David D. Bibiyan (Cal. Bar No. 287811)
2 *david@tomorrowlaw.com*
Sara Ehsani-Nia (Cal. Bar No. 326501)
3 *sara@tomorrowlaw.com*
Diego Aviles (Cal. Bar No. 315533)
4 *diego@tomorrowlaw.com*
8484 Wilshire Boulevard, Suite 500
Beverly Hills, California 90211
5 Tel: (310) 438-5555 Fax: (310) 300-1705

6 Attorneys for Plaintiff, BERNADETTE
MADRONO and on behalf of herself and
7 all others similarly situated

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

11 BERNADETTE MADRONO, an individual
and on behalf of all others similarly situated,

13
14 Plaintiff,

15 v.

16 VITALE NURSING, INC., a California
corporation; JULIE MARIE WOZNAK, an
individual; and DOES 1 through 100,
17 inclusive,

18 Defendant.

20 **RECEIVED**
21 **JUN 23 2021**
22 **FILING WINDOW**

CASE NO.: 21STCV09845

[Assigned to the Hon. Amy D. Hogue in Dept.
7] *By Fax*

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 INDEMNIFY;
8. UNFAIR COMPETITION; and
9. CIVIL PENALTIES UNDER THE PRIVATE ATTORNEYS GENERAL ACTION.

DEMAND FOR JURY TRIAL

[Amount in Controversy Exceeds \$25,000.00]

FILED
Superior Court of California
County of Los Angeles

JUN 23 2021

Sherri R. Carter, Executive Officer/Clerk
By *[Signature]*, Deputy
Yuliya Tarasyuk

06/24/2021