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FILED
Superior Court of California
County of Riverside
11/2/2020
M. Preciado
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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **COUNTY OF RIVERSIDE, RIVERSIDE COURT**
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11 KENDRA BAPTIST, individually, and on behalf
of all aggrieved employees,

12 Plaintiffs,

13 v.
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CHILDHELP, INC., a California corporation,
15 and DOES 1-25, inclusive,

16 Defendants.
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Case No. **RIC2004412**

) **COMPLAINT FOR DAMAGES FOR:**
) **1. DISCRIMINATION IN VIOLATION**
) **OF FEHA;**
) **2. FAILURE TO PREVENT**
) **DISCRIMINATION IN VIOLATION OF**
) **FEHA;**
) **3. WRONGFUL TERMINATION IN**
) **VIOLATION OF FEHA;**
) **4. WRONGFUL TERMINATION IN**
) **VIOLATION OF PUBLIC POLICY;**
) **5. FAILURE TO PAY ALL WAGES**
) **INCLUDING OVERTIME WAGES AND**
) **MINIMUM WAGE;**
) **6. FAILURE TO PROVIDE MEAL AND**
) **REST PERIODS;**
) **7. FAILURE TO REIMBURSE**
) **EXPENSES;**
) **8. FAILURE TO PROVIDE ACCURATE**
) **ITEMIZED WAGE STATEMENTS;**
) **9. FAILURE TO PAY ALL WAGES DUE**
) **AND PAYABLE AT SEPARATION OF**
) **EMPLOYMENT; and**
) **10. CIVIL PENALTIES PURSUANT TO**
) **PAGA.**

) DEMAND FOR JURY TRIAL
)

26 COMES NOW Plaintiff KENDRA BAPTIST ("Plaintiff"), individually and on behalf of all
27 aggrieved employees, assert claims against Defendants CHILDHELP, INC., a California
28 corporation, and DOES 1 through 25 inclusive, and hereby alleges as follows:



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