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Superior Court of California
County of Los Angeles

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Sherri R. Carter, Executive Officer/Clerk of Court

By Steven Drew, Deputy

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Attorneys for Plaintiff, JUAN RAMON HERNANDEZ,
on behalf of himself and all others similarly situated and aggrieved

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

JUAN RAMON HERNANDEZ, on behalf of
himself and all others similarly situated,

Plaintiff,

v.

C.R. LAURENCE CO, INC., a California
corporation; C.R. LAURENCE
INTERNATIONAL, INC., a California
corporation; and DOES 1 through 100,
inclusive,

Defendants.

CASE NO.: 20STCV32372

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. VIOLATION OF LABOR CODE § 227.3;
6. WAITING TIME PENALTIES;
7. WAGE STATEMENT VIOLATIONS;
8. FAILURE TO TIMELY PAY WAGES;
9. FAILURE TO INDEMNIFY;
10. UNFAIR COMPETITION;
11. CIVIL PENALTIES UNDER LABOR CODE § 210;
12. CIVIL PENALTIES UNDER LABOR CODE § 226.3;
13. VIOLATION OF LABOR CODE § 558;
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]