

FOR COURT USE ONLY

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):
 Galen T. Shimoda (SBN 226752) Justin P. Rodriguez (SBN 278275)
 Brittany V. Berzin (SBN 325121) Renald Konini (SBN 312080)
 SHIMODA LAW CORP
 9401 E. Stockton Blvd, Suite 120, Elk Grove, California 95624
 TELEPHONE NO.: 916-525-0716 FAX NO.: 916-760-3733

ATTORNEY FOR (Name): Plaintiff Shiela Kee

SUPERIOR COURT OF CALIFORNIA, COUNTY OF Sacramento

STREET ADDRESS: 720 Ninth Street

MAILING ADDRESS: 720 Ninth Street

CITY AND ZIP CODE: Sacramento 95814

BRANCH NAME: Civil Division

CASE NAME:

Kee v Dr. Jeffrey A. Saladin, Dental Corporation, et al.

FILED/ENDORSED

DEC 08 2020

By: K. Johnson
Deputy Clerk

CIVIL CASE COVER SHEET

☒ **Unlimited** (Amount demanded exceeds \$25,000) ☐ **Limited** (Amount demanded is \$25,000 or less)

Complex Case Designation

☐ **Counter** ☐ **Joinder**
 Filed with first appearance by defendant
 (Cal. Rules of Court, rule 3.402)

CASE NUMBER:

34-2020-00290072

JUDGE:

DEPT:

Items 1-6 below must be completed (see instructions on page 2).

1. Check one box below for the case type that best describes this case:

Auto Tort

☐ Auto (22)
☐ Uninsured motorist (46)

Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort

☐ Asbestos (04)
☐ Product liability (24)
☐ Medical malpractice (45)
☐ Other PI/PD/WD (23)

Non-PI/PD/WD (Other) Tort

☐ Business tort/unfair business practice (07)
☐ Civil rights (08)
☐ Defamation (13)
☐ Fraud (16)
☐ Intellectual property (19)
☐ Professional negligence (25)
☐ Other non-PI/PD/WD tort (35)

Employment

☐ Wrongful termination (36)
☒ Other employment (15)

Contract

☐ Breach of contract/warranty (06)
☐ Rule 3.740 collections (09)
☐ Other collections (09)
☐ Insurance coverage (18)
☐ Other contract (37)

Real Property

☐ Eminent domain/Inverse condemnation (14)
☐ Wrongful eviction (33)
☐ Other real property (26)

Unlawful Detainer

☐ Commercial (31)
☐ Residential (32)
☐ Drugs (38)

Judicial Review

☐ Asset forfeiture (05)
☐ Petition re: arbitration award (11)
☐ Writ of mandate (02)
☐ Other judicial review (39)

Provisionally Complex Civil Litigation
(Cal. Rules of Court, rules 3.400-3.403)

☐ Antitrust/Trade regulation (03)
☐ Construction defect (10)
☐ Mass tort (40)
☐ Securities litigation (28)
☐ Environmental/Toxic tort (30)
☐ Insurance coverage claims arising from the above listed provisionally complex case types (41)

Enforcement of Judgment

☐ Enforcement of judgment (20)

Miscellaneous Civil Complaint

☐ RICO (27)
☐ Other complaint (not specified above) (42)

Miscellaneous Civil Petition

☐ Partnership and corporate governance (21)
☐ Other petition (not specified above) (43)

2. This case ☐ is ☒ is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:

- a. ☐ Large number of separately represented parties d. ☐ Large number of witnesses
 b. ☐ Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve e. ☐ Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court
 c. ☐ Substantial amount of documentary evidence f. ☐ Substantial postjudgment judicial supervision

3. Remedies sought (check all that apply): a. ☒ monetary b. ☐ nonmonetary; declaratory or injunctive relief c. ☐ punitive

4. Number of causes of action (specify): One

5. This case ☐ is ☒ is not a class action suit.

6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)

Date: December 7, 2020

Galen T. Shimoda

(TYPE OR PRINT NAME)

(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

NOTICE

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
- Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

Page 1 of 2

FILED BY FAX

SUMMONS (CITACION JUDICIAL)

FOR COURT USE ONLY
(SOLO PARA USO DE LA CORTE)

NOTICE TO DEFENDANT: (AVISO AL DEMANDADO):

DR. JEFFREY A. SALADIN, DENTAL CORPORATION (D/B/A CHILDREN'S CHOICE PEDIATRIC DENTAL CARE), a California Corporation; "Additional Parties Attachment form is attached"

YOU ARE BEING SUED BY PLAINTIFF: (LO ESTÁ DEMANDANDO EL DEMANDANTE):

SHIELA KEE, on behalf of herself and Aggrieved Employees

FILED/ENDORSED

DEC 10 2020

By: K. Johnson
Deputy Clerk

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), or by contacting your local court or county bar association.

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.courtinfo.ca.gov/selfhelp/espanol/), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California, (www.courtinfo.ca.gov/selfhelp/espanol/) o poniéndose en contacto con la corte o el colegio de abogados locales.

The name and address of the court is:

(El nombre y dirección de la corte es):

Superior Court of California, County of Sacramento
720 Ninth Street

Sacramento, CA 95814

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is:

(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):

Galen T. Shimoda (SBN 226752) Justin Rodriguez (SBN 278275) Brittany V. Berzin (SBN 325121)
Renald Konini (SBN 312080) 9401 East Stockton Blvd, # 120, Elk Grove, California 95624 (916) 525-0716

DATE: **DEC 10 2020**
(Fecha)

Clerk, by K. JOHNSON, Deputy
(Secretario) (Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)

(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010)).

[SEAL]



NOTICE TO THE PERSON SERVED: You are served

1. ☐ as an individual defendant.
2. ☐ as the person sued under the fictitious name of (specify):

3. ☐ on behalf of (specify):

- under: ☐ CCP 416.10 (corporation) ☐ CCP 416.60 (minor)
☐ CCP 416.20 (defunct corporation) ☐ CCP 416.70 (conservatee)
☐ CCP 416.40 (association or partnership) ☐ CCP 416.90 (authorized person)
☐ other (specify):

4. ☐ by personal delivery on (date):

SHORT TITLE:

Kee v Dr. Jeffrey A. Saladin, Dental Corporation, et al.

CASE NUMBER:

INSTRUCTIONS FOR USE

- This form may be used as an attachment to any summons if space does not permit the listing of all parties on the summons.
- If this attachment is used, insert the following statement in the plaintiff or defendant box on the summons: "Additional Parties Attachment form is attached."

List additional parties (Check only one box. Use a separate page for each type of party.):

☐ Plaintiff ☒ Defendant ☐ Cross-Complainant ☐ Cross-Defendant

DR. JEFFREY A. SALADIN COMPANY, INC., A DENTAL CORPORATION, a California Corporation;
 PREMIER ORTHODONTICS, Unknown Business Entity;
 JEFFREY A. SALADIN, an Individual;
 PAGE HUDSON, an Individual;
 and DOES 1 to 100, inclusive,

FILED/ENDORSED

DEC 08 2020

By: K. Johnson
Deputy Clerk

Galen T. Shimoda (Cal. State Bar No. 226752)
Justin P. Rodriguez (Cal. State Bar No. 278275)
Brittany V. Berzin (Cal. State Bar No. 325121)
Renald Konini (Cal. State Bar No. 312080)
Jessica L. Hart (Cal State Bar No 331441)
Shimoda Law Corp.
9401 East Stockton Boulevard, Suite 120
Elk Grove, CA 95624
Telephone: (916) 525-0716
Facsimile: (916) 760-3733

Attorneys for Plaintiff SHIELA KEE,
on behalf of herself and Aggrieved Employees

**SUPERIOR COURT OF CALIFORNIA
FOR THE COUNTY OF SACRAMENTO**

SHIELA KEE, on behalf of herself and
Aggrieved Employees

Plaintiff,

vs.

DR. JEFFREY A. SALADIN, DENTAL
CORPORATION (D/B/A CHILDREN'S
CHOICE PEDIATRIC DENTAL CARE), a
California Corporation; DR. JEFFREY A.
SALADIN COMPANY, INC., A DENTAL
CORPORATION, a California Corporation;
PREMIER ORTHODONTICS, Unknown
Business Entity; JEFFREY A. SALADIN, an
Individual; PAGE HUDSON, an Individual;
and DOES 1 to 100, inclusive,

Defendants.

Case No. **34-2020-0029007 2**

COMPLAINT FOR CIVIL PENALTIES:

**Private Attorneys General Act
(Labor Code § 2699, et seq.)**

Plaintiff SHIELA KEE ("Plaintiff"), hereby files this Complaint against Defendants DR.
JEFFREY A. SALADIN, DENTAL CORPORATION (D/B/A CHILDREN'S CHOICE
PEDIATRIC DENTAL CARE), a California Corporation; DR. JEFFREY A. SALADIN
COMPANY, INC., A DENTAL CORPORATION, a California Corporation; PREMIER

1 ORTHODONTICS, an Unknow Business Entity; JEFFREY A. SALADIN, an Individual; PAGE
2 HUDSON, an Individual and DOES 1 to 100, inclusive (hereinafter all collectively referred to as
3 "Defendants"). On information and belief, Plaintiff alleges the following:

4 **JURISDICTION AND VENUE**

5 1. The Sacramento County Superior Court has jurisdiction in this matter pursuant to
6 California Code of Civil Procedure section 410.10 to determine alleged violations of the California
7 Labor Code and Wage Order Number 4.

8 2. Venue is proper pursuant to Civil Procedure Code sections 395(a) and 395.5, in that some
9 of the wrongful acts and violations of law asserted herein occurred within Sacramento County.
10 Additionally, Defendant's obligation to pay wages, including violations of California Labor Code
11 sections 201, 202, 203, 226, 226.7, 226.8, 246, 247, 247.5, 248.5, 510, 512, 1174, 1194, 2802, 2810.5,
12 and the applicable Industrial Welfare Commission Wage Order ("Wage Order") arose in Sacramento
13 County pursuant to *Madera Police Officers Assn. v. City of Madera*, 36 Cal.3d 403, 414 (1984).

14 3. Plaintiff has sought permission pursuant to California Labor Code section 2699 *et seq.* to
15 pursue the claims set forth in this Complaint against Defendants as a Private Attorney General on behalf
16 of herself and other similarly situated employees. Pursuant to California Labor Code section 2699.3,
17 Plaintiff gave written notice via online submission to the Labor and Workforce Development Agency
18 ("LWDA") on approximately September 30, 2020. Plaintiff provided facts and legal bases for her
19 claims within the notice to the LWDA on all violations asserted under the Private Attorneys General Act
20 cause of action. Plaintiff also submitted the \$75.00 filing fee. The September 30, 2020, notice was also
21 sent via certified mail to Defendants on the same day. To date, the LWDA has not provided any
22 response to Plaintiff's notice correspondence. Accordingly, Plaintiff has exhausted all administrative
23 remedies pursuant to the Private Attorneys General Act ("PAGA") and may bring this action on behalf
24 of herself and all similarly situated employees, *i.e.* Aggrieved Employees. *See* Cal. Lab. Code §
25 2699.3(a)(2)(A), (c)(3); *Caliber Bodyworks, Inc., v. Sup. Ct.*, 134 Cal. App. 4th 365, 383 n.18, 385 n.19
26 (2005). Aggrieved Employees includes but are not limited to the following: all non-exempt employees
27 who have worked, or continue to work, for Defendants in California from September 30, 2019 to the
28 present.

PARTIES

4. SHIELA KEE is an individual over the age of eighteen (18) and is a resident of the State of California.

5. On information and belief, Plaintiff alleges, DR. JEFFREY A. SALADIN, DENTAL CORPORATION (D/B/A CHILDREN'S CHOICE PEDIATRIC DENTAL CARE), is now and/or at all times mentioned in this Complaint was a California Corporation and the owner and operator of an industry, business and/or facility doing business in the State of California.

6. On information and belief, Plaintiff alleges, DR. JEFFREY A. SALADIN COMPANY, INC., A DENTAL CORPORATION, is now and/or at all times mentioned in this Complaint was a California Corporation and the owner and operator of an industry, business and/or facility doing business in the State of California.

7. On information and belief, Plaintiff alleges, PREMIER ORTHODONTICS, is now and/or at all times mentioned in this Complaint was an Unknow Business Entity and the owner and operator of an industry, business and/or facility doing business in the State of California.

8. Plaintiff is informed and believes, and thereupon alleges, that DR. JEFFREY A. SALADIN is an individual over the age of eighteen (18) and is a resident of the State of California. Plaintiff further alleges that DR. JEFFREY A. SALADIN is an owner, director, officer, and/or managing agent of DR. JEFFREY A. SALADIN, DENTAL CORPORATION (D/B/A CHILDREN'S CHOICE PEDIATRIC DENTAL CARE), DR. JEFFREY A. SALADIN COMPANY, INC., A DENTAL CORPORATION and PREMIER ORTHODONTICS responsible for causing the violations of the California Labor Code asserted in this Complaint. As such, DR. JEFFREY A. SALADIN is individually liable pursuant to California Labor Code section 558.1.

9. Plaintiff is informed and believes, and thereupon alleges, that PAGE HUDSON is an individual over the age of eighteen (18) and is a resident of the State of California. Plaintiff further alleges that PAGE HUDSON is an owner, director, officer, and/or managing agent of DR. JEFFREY A. SALADIN, DENTAL CORPORATION (D/B/A CHILDREN'S CHOICE PEDIATRIC DENTAL CARE), DR. JEFFREY A. SALADIN COMPANY, INC., A DENTAL CORPORATION and PREMIER ORTHODONTICS responsible for causing the violations of the California Labor Code

1 asserted in this Complaint. As such, PAGE HUDSON is individually liable pursuant to California
2 Labor Code section 558.1.

3 10. Defendants DOES 1 through 100 are affiliates, subsidiaries and related entities and the
4 alter egos of each of the other Defendants named herein, corporate or otherwise, who participated in and
5 are liable for the actions herein alleged. Plaintiff will seek to amend this Complaint to allege the true
6 names and capacities of these DOE Defendants when they are ascertained. At all times mentioned
7 herein, each Defendant was the agent or employee of each of the other Defendants and was acting within
8 the course and scope of such agency or employment. The Defendants are jointly and severally liable to
9 Plaintiff.

10 11. At all times mentioned herein, each Defendant was the agent or employee of each of the
11 other Defendants and was acting within the course and scope of such agency or employment. The
12 Defendants are jointly and severally liable to Plaintiff.

13 12. Defendants, and each of them, are now and/or at all times mentioned in this Complaint
14 were members of and/or engaged in a joint employment, joint venture, partnership and common
15 enterprise, and were acting within the course and scope of, and in pursuance of said joint employment,
16 joint venture, partnership and common enterprise.

17 13. Defendants, and each of them, now and/or at all times mentioned in this Complaint
18 approved, ratified, acquiesced, aided or abetted the acts and omissions alleged in this Complaint.

19 14. Defendants proximately caused Plaintiff to be subjected to the unlawful practices,
20 wrongs, complaints, injuries and/or damages alleged in this Complaint.

21 GENERAL ALLEGATIONS

22 15. Plaintiff incorporates by reference and re-alleges paragraphs 1 through 14 as though fully
23 set forth herein.

24 16. Plaintiff worked for Defendants from approximately September 2019 through September
25 8, 2020, as a non-exempt Dental Assistant. Initially, Plaintiff worked out of the Natomas location, but
26 was, thereafter, transferred to the Stockton location when it opened in the summer of 2020.

27 17. Aggrieved Employees also worked for Defendants as non-exempt employees. Plaintiff
28 and Aggrieved Employees regularly worked over eight (8) hours in a day and/or forty (40) hours in a

1 week, incurring overtime. Plaintiff and Aggrieved Employees were also paid non-discretionary
2 remuneration, such as bonuses, for performing certain tasks – such as dental sealants.

3 18. Due to Defendants' policies and staffing and workflow issues, Plaintiff and Aggrieved
4 Employees were not authorized and permitted to take all meal and rest periods they were entitled to,
5 being paid meal period premiums on occasions. Additionally, Defendants did not correctly incorporate
6 the value of the non-discretionary remuneration, such as bonuses, into Plaintiff and Aggrieved
7 Employees' regular rate of pay when calculating overtime, double time, meal and rest period premiums,
8 or sick leave pay.

9 19. Defendants also failed to pay Plaintiff and Aggrieved Employees for all hours worked.
10 Plaintiff and Aggrieved Employees would sometimes have to wait a few minutes for a computer to be
11 available to log into their shifts in the morning and when they were returning from break. Plaintiff and
12 Aggrieved Employees were not paid for this time. Further, Plaintiff and Aggrieved Employees were not
13 consistently, or properly, paid Reporting Time Pay of no less than two (2) hours and no more than four
14 (4) hours when they reported to work and were sent home by management. As a result, Plaintiff and
15 Aggrieved Employees were not paid at least the minimum wage for each hour they worked. Defendants
16 also failed to maintain accurate records of the hours Plaintiff and Aggrieved Employees worked.

17 20. Defendants further failed to pay Plaintiff and Aggrieved Employees for use of their
18 personal cell phones for work purposes and car mileage for work-related car travel. For instance, at
19 times, when the office needed repairs, Plaintiff would use applications on her cell phone to communicate
20 and make arrangement with repair personnel. Additionally, Plaintiff and Aggrieved Employees would
21 sometimes have to travel to other worksites during the day to pick up supplies. Plaintiff and Aggrieved
22 Employees were not reimbursed for their cell phone use or mileage for supply runs.

23 21. Finally, Defendants failed to provide Plaintiff and Aggrieved Employees with legally
24 compliant paystubs. Specifically, the paystubs Defendants issued did not: (1) correctly identify the
25 employer's legal name and address and (2) did not properly itemize the total hours worked, accurately
26 state the regular and overtime rates of pay, accurately list missed meal and rest period premiums owed,
27 or accurately state gross and net wages earned. As a result, Plaintiff and Aggrieved Employees were
28

1 neither able to determine their employer's legal name nor the total wages owed to them from their
2 paystubs alone.

3 22. As of this date of this letter, Defendants have not paid Plaintiff and Aggrieved Employees
4 all minimum wages, Reporting Time Pay, overtime and double time wages, reimbursement expenses,
5 paid sick time, and meal and rest period premiums owed to them.

6
7 **FIRST CAUSE OF ACTION**
8 **PRIVATE ATTORNEYS GENERAL ACT**
9 **(As to all Defendants)**

10 23. Plaintiff incorporates by reference and re-alleges paragraphs 1 through 22 as though fully
11 set forth herein.

12 24. Plaintiff has alleged to the Labor Commissioner that Defendants have violated the
13 following provisions of the Labor Code in their dealings with Plaintiff and other Aggrieved Employees:

- 14 • Violation of Labor Code §§ 510, 1194; IWC Wage Order 4, § 3 (Failure to Pay Overtime
15 Wages);
- 16 • Violation of Labor Code §§ 1194, 1197.1; IWC Wage Order 4, §§ 4, 5 (Failure to Pay
17 Minimum Wages, and Reporting Time Pay);
- 18 • Violation of Labor Code §§ 226.7, 512 and Wage Order No. 4, §§ 11(A) and 11(B)
19 (Failure to Provide Meal Periods or Pay Premiums in Lieu Thereof);
- 20 • Violation of Labor Code § 226.7 and Wage Order No. 4, § 12(A) (Failure to Provide Rest
21 Periods or Pay Premiums in Lieu Thereof);
- 22 • Violation of Labor Code §§ 226, 226.3 (Failure to Provide Accurate Wage Statements);
- 23 • Violation of Labor Code §§ 201-203, 256 (Failure to Pay Final Wages);
- 24 • Violation of Labor Code § 2802 (Failure to Pay Reimbursements for Expenses);
- 25 • Violation of Labor Code §§ 558, 558.1 (Provisions Regulating Hours and Days of
26 Work in Any Industrial Welfare Commission Order); and
- 27 • Violation of Labor Code §§ 226.3, 1174, 1198 and Wage Order No. 4, § 7(A) (Failure to
28 Maintain Accurate Records).

//

1 25. Plaintiff seeks civil penalties against Defendants as provided in the California Labor
2 Code, or, if no civil penalty is provided, default penalties pursuant to California Labor Code section
3 2699(f)(2).

4 26. Plaintiff seeks these civil penalties from Defendants pursuant to California Labor Code
5 sections 2699(a) and 2699.3.

6 27. As a proximate result of Defendants' conduct, Plaintiff and Aggrieved Employees have
7 been damaged as stated in the section below entitled "DAMAGES," which is incorporated here to the
8 extent pertinent as if set forth here in full.

9 **DAMAGES**

10 WHEREFORE Plaintiff requests relief as follows:

11 1. As to the First Cause of Action:

- 12 a. For civil penalties as provided for in the Labor Code for each enumerated
13 violation;
- 14 b. For those Labor Code sections, the violation of which there is no civil penalty
15 provided, the default penalty provided in Labor Code section 2699(f): for any
16 initial violation, one hundred dollars (\$100) for each Aggrieved Employee per pay
17 period; For any subsequent violation, two hundred dollars (\$200) for each
18 Aggrieved Employee per pay period;
- 19 c. Reasonable attorney's fees and costs pursuant to Labor Code section 2699; and
- 20 d. For any other remedies as allowed by law and/or deemed appropriate by the
21 Court.

22 Dated: December 7, 2020

23 **Shimoda Law Corp.**

24 By: 

25 Galen T. Shimoda
26 Justin P. Rodriguez
27 Brittany V. Berzin
28 Renald Konini
Jessica L. Hart
Attorneys for Plaintiff