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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF RIVERSIDE**

JOSE HERNANDEZ, individually and on
behalf of all others similarly situated,

Plaintiff,
vs.

DSC INTEGRATED LOGISTICS, LLC, a
Limited Liability Company; and DOES 1
through 50, inclusive,

Defendants.

Case No. **RIC2003898**

**CLASS ACTION COMPLAINT FOR
DAMAGES FOR:**

- (1) VIOLATION OF LABOR CODE
§§510 AND 1194;**
- (2) VIOLATION OF CAL. LABOR
CODE § 201-203;**
- (3) VIOLATION OF CAL. LABOR
CODE § 226;**
- (4) VIOLATION OF CAL. BUS. &
PROF. CODE § 17200, ET SEQ.;
AND**
- (5) VIOLATION OF LABOR CODE
§2698, ET SEQ.**

DEMAND OVER \$25,000

1 Plaintiff JOSE HERNANDEZ (“Plaintiff”), hereby submits this Class Action Complaint
2 (“Complaint”) against Defendants DSC INTEGRATED LOGISTICS, LLC (“Defendant” or the
3 “Company”), and Does 1-50 (hereinafter collectively referred to as “Defendants”), individually and on
4 behalf of a Class of all other similarly situated current and former employees of Defendants for penalties
5 for violations of the California Labor Code, including without limitation, failure to pay employees their
6 proper overtime wages, sick pay at their regular rate of pay, and provide employees with accurate
7 itemized wage statements, restitution for unfair business practices in violation of Business and
8 Professions Code § 17200, *et seq.* (“UCL”) and violations of the Private Attorneys General Act (the
9 “PAGA”) as follow:

10 **INTRODUCTION**

11 1. This class and representative PAGA action is within the Court’s jurisdiction under
12 California Labor Code §§ 201-203, 226, 246, 510, 1194, and 2698, *et seq.*, the California Industrial
13 Welfare Commission’s (“IWC”) Wage Orders, and the California Unfair Competition Law, codified at
14 California Business and Professions Code § 17200, *et seq.* (the “UCL”).

15 2. This Complaint challenges systemic illegal employment practices resulting in violations
16 of the California Labor Code against employees of Defendants.

17 3. Plaintiff is informed and believes, and based thereon alleges, that Defendants jointly and
18 severally have acted knowingly and intentionally by failing to provide accurate itemized wage
19 statements identifying all required information, including without limitation, the correct overtime rate,
20 and paying overtime at the correct rate of pay.

21 **JURISDICTION AND VENUE**

22 4. The Court has jurisdiction over the violations of the California Labor Code §§ 201-
23 203, 226, 246, 510, 1194, and 2698, *et seq.*

24 5. Venue is proper in Riverside County because Defendant does business in Riverside
25 County and Plaintiff worked for Defendant in Riverside County.

26 **PARTIES**

27 6. On or about July 17, 2017, Plaintiff began working for Defendant as a forklift operator.
28 Plaintiff was terminated on August 18, 2020 at Defendant’s Perris, California location. During
Plaintiff’s employment, he was paid sick pay, overtime, shift differential wages and non-discretionary