

ORIGINAL

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Superior Court of California
County of Los Angeles

FEB 17 2021

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Attorneys for Plaintiff, MARIA MENDOZA,
on behalf of herself and all others similarly situated and aggrieved

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES - SPRING STREET COURTHOUSE

MARIA MENDOZA, on behalf of herself and
all others similarly situated,

Plaintiffs,

v.

NAYANA LLC, a California limited liability
company doing business as LA QUINTA INN;
AMIR PATEL, an individual; AMIT PATEL,
an individual, and DOES 1 through 100,
inclusive,

Defendants.

CASE NO.: 20STCV21191

CLASS ACTION

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
OR COMPENSATION IN LIEU THEREOF;
4. FAILURE TO PROVIDE REST PERIODS
OR COMPENSATION IN LIEU THEREOF;
5. FAILURE TO PAY DUE WAGES AT
TERMINATION;
6. WAGE STATEMENT VIOLATIONS;
7. VIOLATION OF LABOR CODE § 2802;
8. VIOLATION OF LABOR CODE § 226(c);
9. VIOLATION OF LABOR CODE § 1198.5;
10. VIOLATION OF BUSINESS AND
PROFESSIONS CODE § 17200, *et seq.*;
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 §
1174.5;
15. VIOLATION OF LABOR CODE §
1197.1; and
16. CIVIL PENALTIES UNDER LABOR
CODE § 2699

DEMAND FOR JURY TRIAL

[Amount in Controversy Exceeds \$25,000]