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14 Attorneys for Plaintiffs
15 ALEXANDER HERNANDEZ and
16 JOHN MARTIN GARCIA

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

14 ALEXANDER HERNANDEZ and JOHN
15 MARTIN GARCIA on behalf of themselves
16 and others similarly situated,

17 Plaintiffs,

18 vs.

20 FEDEX SUPPLY CHAIN, INC., a Delaware
21 Corporation; and DOES 1 to 100, inclusive,

22 Defendants.

Case No.: CVR12000402

**FIRST AMENDED CLASS AND
REPRESENTATIVE ACTION
COMPLAINT**

JURY TRIAL DEMANDED

1 Plaintiffs ALEXANDER HERNANDEZ and JOHN MARTIN GARCIA, individuals, on
2 behalf of themselves and all other employees similarly situated and aggrieved, hereby file this First
3 Amended Complaint against Defendant FEDEX SUPPLY CHAIN, INC., a Delaware Corporation
4 and DOES 1 to 100, inclusive. Plaintiffs are informed and believe, and on the basis of that
5 information and belief, allege as follows:

6 **THE PARTIES**

7 1. Plaintiff ALEXANDER HERNANDEZ is, and at relevant times was, an individual
8 domiciled in the State of California and a citizen of the State of California who worked as a non-
9 exempt technician for Defendant in the State of California.

10 2. Plaintiff JOHN MARTIN GARCIA is, and at relevant times was, an individual domiciled
11 in the State of California and a citizen of the State of California who worked as a non-exempt
12 technician for Defendant in the State of California.

13 3. Defendant FEDEX SUPPLY CHAIN, INC. (“Defendant” or “Fedex Supply”) is a
14 Delaware Corporation that, at all relevant times, was authorized to do business within the State of
15 California and is doing business in the State of California.

16 4. Defendant Fedex Supply is a is a major third-party logistics provider in the United States
17 and Canada, which services industries including technology & electronics, retail & e-commerce,
18 consumer & industrial goods, and healthcare industries. The company manages 130 warehouse and
19 distribution center operations in North America with a total of 35 million square feet of warehouse
20 space under its management.¹

21 5. The true names and capacities of the DOE Defendants sued herein as DOES 1 through 100,
22 inclusive, are currently unknown to Plaintiffs, who therefore sues each such Defendant by said
23 fictitious names. Each of the Defendants designated herein as a DOE is legally responsible for the
24 unlawful acts alleged herein. Plaintiffs will seek leave of Court to amend this Complaint to reflect
25 the true names and capacities of the Doe Defendants when such identities become known.

26 6. Plaintiffs are further informed and believe that, at all relevant times, each Defendant was
27

28 ¹ https://en.wikipedia.org/wiki/FedEx_Supply_Chain