

COPY

CONFORMED COPY
ORIGINAL FILED
Superior Court of California
County of Los Angeles

AUG 13 2021

Sherri B. Carter, Executive Office/Clerk
By: *Maisha Pryor*, Deputy
Maisha Pryor

1 Zorik Mooradian, Esq., CSB No. 136636

2 zorik@mooradianlaw.com

3 Haik Hacopian, Esq., CSB No. 282361

4 haik@mooradianlaw.com

5 MOORADIAN LAW, A PROFESSIONAL CORPORATION

6 24007 Ventura Blvd., Suite 210

7 Calabasas, CA 91302

8 Telephone: (818) 487-1998

9 Facsimile: (888) 783-1030

10 Attorneys for: Plaintiff MARIO MUNIZ, individually and on behalf of other
11 persons similarly situated and similarly aggrieved employees,

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

14 MARIO MUNIZ, individually and on behalf
15 of other persons similarly situated and
16 similarly aggrieved employees,

17 Plaintiffs,

18 v.

19 CORTECH WEST STAFFING LLC, an active
20 California Limited Liability Company;
21 MITSUI-SOKO (U.S.A.) INCORPORATED, an
22 active New York Corporation; and DOES 1
23 through 10,

24 Defendants.

RECEIVED

AUG 13 2021

Filing Window

Case No.: 21STCV08937

Assigned to: Hon. Yvette M.
Palazuelos
Department: SS-9

FIRST AMENDED COMPLAINT –
CLASS AND REPRESENTATIVE
ACTION
JURY TRIAL DEMANDED

1. Failure to Pay Wages;
2. Failure to Pay for Reporting Time;
3. Failure to Timely Pay Wages at Termination/Separation;
4. Failure to Provide Accurate Wage Statements;
5. Violation of Unfair Business Practices Act – Bus. & Prof. Code §§ 17200, *et seq.*
6. Penalties Pursuant to Private Attorneys General Act (“PAGA”)

1 Plaintiff MARIO MUNIZ ("Plaintiff"), on behalf of himself and all others
2 similarly situated and similarly aggrieved employees, based on information and belief,
3 complains and alleges:

4 I.

5 **INTRODUCTION**

- 6 1. This class and representative action lawsuit arises out of the failure of
7 Defendant CORTECH WEST STAFFING LLC and Defendant MITSUI-SOKO
8 (U.S.A.) INCORPORATED (referred herein as "Defendants") to pay all wages
9 owed including reporting time pay wages, and to pay all wages owed to
10 terminated or separated employees in a timely manner.
- 11 2. Defendants employed Plaintiff during the applicable time period, utilizing
12 consistent policies and procedures in violation of Labor Code §200, et seq.,
13 Labor Code §500, et seq., Labor Code §1194, et seq., and the applicable Wage
14 Orders issued by the California Industrial Welfare Commission.
- 15 3. Defendant CORTECH WEST STAFFING LLC is engaged in the business of
16 temporary staffing and direct hire services. Defendant MITSUI-SOKO (U.S.A.)
17 INCORPORATED is engaged in the business of logistics, distribution, and
18 warehousing. Plaintiff was hired in 2016, until his separation on or about March
19 5, 2020. During said employment, Plaintiff was jointly employed by both
20 Defendants and worked at Defendant MITSUI-SOKO (U.S.A.)
21 INCORPORATED's warehousing facility in Carson, California. Plaintiff had a
22 non-exempt classification.
- 23 4. At the time of his termination, Plaintiff was not paid all his wages, including
24 wages for reporting time pay.
- 25 5. Defendants had a consistent policy of not paying wages for all hours worked.
- 26 6. Defendants had a consistent policy of failing to pay employees reporting time
27 pay after employees reported to work but were turned away by Defendants.
- 28

- 1 7. Defendants had a consistent policy of failing to pay their employees, including
2 Plaintiff, all wages due at the termination or separation, in violation of
3 California state wage and hour laws.
- 4 8. Defendants knowingly provided inaccurate wage statements to their
5 employees, including Plaintiff, that did not include the correct wages.
- 6 9. Plaintiff, on behalf of himself and all Class Members, brings this action
7 pursuant to Lab. Code §§ 201, 202, 203, 226, 510, 1194, 1194.2, and the applicable
8 Wage Order(s) seeking unpaid wages, penalties, equitable relief, and
9 reasonable attorneys' fees and costs.
- 10 10. Plaintiff, on behalf of himself and the putative class members, also brings
11 this action pursuant to Bus. & Prof. Code §§ 17200, *et seq.*, seeking injunctive
12 relief, restitution, and disgorgement of all benefits obtained by Defendants as a
13 result of Labor Code and applicable Wage Order violations.
- 14 11. Plaintiff, on behalf of the State of California, himself, and other similarly
15 aggrieved employees, also brings this action pursuant to California Private
16 Attorney General Act ("PAGA"), Cal. Lab. Code §2698, *et seq.* seeking unpaid
17 wages and other compensation, penalties, and reasonable attorneys' fees and
18 costs.

19 II.

20 JURISDICTION AND VENUE

- 21
- 22 12. Venue as to each defendant is proper in this judicial district, pursuant to Code
23 of Civil Procedure § 395. The County of Los Angeles is the proper venue,
24 because work for Defendants was performed by Plaintiff and other class
25 members in the County of Los Angeles and the legal obligations owed by
26 Defendants to Plaintiff and other class members were breached in the County
27 of Los Angeles.
- 28

1 13. The California Superior Court has jurisdiction in this matter, because Plaintiff is
2 a resident of California, Defendants are qualified to do business in California,
3 are headquartered in California, and regularly conduct business in California.

4 **III.**

5 **THE PARTIES**

6 14. Plaintiff MARIO MUNIZ is a resident of the State of California, and was
7 employed by Defendants in Los Angeles County from 2016 through on or about
8 March 5, 2020.

9 15. Defendant CORTECH WEST STAFFING LLC was an active California Limited
10 Liability Company at all times during the claims of Plaintiff and the putative
11 class, was doing business in California, and was headquartered in California.

12 16. Defendant MITSUI-SOKO (U.S.A.) INCORPORATED was an active New York
13 Corporation at all times during the claims of Plaintiff and the putative class,
14 was doing business in California, and was headquartered in California.

15 17. Plaintiff is ignorant of the true names, capacities, relationships and extent of
16 participation in the conduct herein alleged, of the Defendants sued herein as
17 Does 1 through 10, but he is informed and believes and thereon alleges that said
18 Defendants are legally responsible for the wrongful conduct alleged herein and
19 therefore sues these Defendants by such fictitious names under Code of Civil
20 Procedure § 474. Plaintiff will amend this First Amended Complaint to allege
21 their true names and capacities when ascertained.

22 18. Plaintiff is informed and believes and thereon alleges that each Defendant acted
23 in all respects pertinent to this action as the agent of the other Defendants,
24 carried out a joint scheme, business plan or policy in all respects pertinent
25 hereto, and the acts of each Defendant are legally attributable to the other
26 Defendants.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

IV.

GENERAL ALLEGATIONS

19. At all times relevant here and as set forth in the following paragraphs of this First Amended Complaint, Defendants employed more than 100 people; and Plaintiff and each member of the putative class was employed by Defendants, and each of them, in the State of California.
20. Defendants failed to pay employees wages owed for all hours worked, including overtime hours as applicable.
21. Defendants failed to pay for employee reporting time to employees reporting to work and being turned away by Defendants.
22. Defendants failed to pay Plaintiff and the members of his putative class upon separation the wages earned and unpaid at the time of discharge.
23. Plaintiff asserts claims for relief on behalf of himself and other similarly situated persons as a class action pursuant to Code of Civil Procedure § 382. Plaintiff and all members of his putative class are described below with specificity and fall in several categories of subclasses whose rights have been violated under the law. Defendants have made no effort as of the filing of this Complaint to correct or remedy the violations of law specified here.

V.

CLASS ACTION ALLEGATIONS

24. Plaintiff brings this action on behalf of himself and all other employees of CORTECH WEST STAFFING LLC and MITSUI-SOKO (U.S.A.) INCORPORATED who are similarly-situated persons as a class action pursuant to California Code of Civil Procedure § 382. There is a well-defined common interest by and among Plaintiff and the putative class members, and it is impractical to bring all those individuals before the court under separate, different and repetitive actions. Plaintiff also reserves the right to amend or

1 modify the class descriptions set forth below in greater specificity or clarity if
2 required in the future in accordance with Rule 3.765 (b), California Rules of
3 Court. The class which Plaintiff seeks to represent is composed of and defined
4 as follows:

5 "Plaintiff Class" – All of Defendants' current and former non-exempt
6 employees in California, during the four years before the filing of the
7 Complaint through the time of class certification.

8 25. Plaintiff seeks to certify the following subclasses of employees:

- 9 a) "Unpaid Wage Subclass" – All members of Plaintiff Class who were
10 not paid their minimum/actual wages, including any time that was
11 rounded and/or unlawfully considered by Defendants as off-the-clock,
12 as well as overtime wages for hours worked in excess of eight hours
13 per day at the one and a half rate or at a double time rate as applicable.
- 14 b) "Reporting Time Subclass" – All members of Plaintiff Class who were
15 not paid their regular rate of pay for at least half of their usual or
16 scheduled day's work but in no event less than two hours due to being
17 turned away for reporting to work.
- 18 c) "Waiting Time Subclass" – All members of Plaintiff Class to whom
19 Defendants failed to pay all wages due to them upon termination or
20 resignation under Labor Code §§ 201-203.
- 21 d) "Wage Statement Subclass" – All members of Plaintiff Class to whom
22 Defendants improperly failed to provide accurate itemized wage
23 statements under Labor Code §§ 226.
- 24 e) "UCL Subclass" – All members of the Unpaid Wage, Reporting Time,
25 Waiting Time, and Wage Statement Subclasses who were subject to
26 unlawful, illegal, unfair and/or deceptive business acts and practices by
27 Defendants and are entitled to disgorgement and restitution of unpaid
28 wages.

1 26. There is a well-defined community of interest among many persons who
2 comprise a readily ascertainable class:

- 3 a) Numerosity - The potential members of the Class and Subclasses as
4 defined here are so numerous that the individual joinder of all of them as
5 named plaintiffs is impracticable. The number of members of the Class
6 and Subclasses is unknown to Plaintiff. It is however estimated that the
7 members are more than 100 individuals, and their identities may readily
8 be ascertained from Defendants' records.
- 9 b) Typicality – The claims of Plaintiff are typical of the claims of all
10 members of the Class and Subclasses, who sustained similar damages
11 arising out of Defendants' common course of conduct in violation of law
12 as alleged.
- 13 c) Ascertainable Class – The proposed Class and Subclasses are
14 ascertainable as the members can readily be identified and located based
15 on the Defendants' payroll and personnel records.
- 16 d) Adequacy – Plaintiff is an adequate representative of the Class and
17 Subclasses: Plaintiff will fairly protect the interests of the members, he
18 has no interest adverse to the members, and he will vigorously pursue
19 this lawsuit on behalf of all the members of the Class and Subclasses.
20 Plaintiff's attorneys are competent, skilled and experienced in litigating
21 large employment law class actions.
- 22 e) Superiority - Class action treatment will allow a large number of
23 similarly situated persons to prosecute their common claims in a single
24 forum simultaneously, efficiently, and without the unnecessary
25 duplication of effort and expense that numerous individual actions
26 would require. Further, the monetary amounts due to many individual
27 members of the Class and Subclasses are likely to be relatively small, and
28 the burden and expense of individual litigation would make it difficult

1 or impossible for the members to seek and obtain relief. A class action
2 will serve an important public interest by permitting employees harmed
3 by Defendants' unlawful practices to effectively pursue recovery of the
4 sums owed to them.

- 5 f) Common Questions of Law and Fact – There are common questions of
6 law and fact as to the members of the Class and Subclasses which are
7 superior to questions affecting only individual members of the Class and
8 Subclasses. The common questions of law and fact may be summarized
9 as follows and if necessary will be refined with the progress of formal
10 discovery in the case:
- 11 g) Whether Defendants failed to provide members of Plaintiff Class who
12 ceased employment with Defendants all wages owed at the time of the
13 cessation of the employee-employer relationship?
- 14 h) Whether Defendants violated California law, including the applicable
15 Wage Orders, by failing to properly compensate Plaintiff Class members
16 for all hours worked?
- 17 i) Whether Defendants violated California law, including applicable Wage
18 Orders, by failing to employees their regular rate of pay for at least half
19 of their usual or scheduled day's work but in no event less than two
20 hours to the extent an employee reported to work and was turned away?
- 21 j) Whether Plaintiff Class is entitled to waiting time penalties under Labor
22 Code § 203?
- 23 k) Whether Defendants violated California law by their failure to provide
24 Plaintiff Class with accurate and itemized wage statements?
- 25 l) Whether Defendants violated Business and Professions Code §§ 17200 et.
26 seq., Labor Code §§ 201, 202, 203, 226, 510, 1194, 1194.2, and applicable
27 Wage Orders which constitute violations of the public policy?
28

- 1 m) Whether Plaintiff Class is entitled to an equitable relief in accordance
2 with Business and Professions Code §§ 17200 et. seq.
3 n) Whether Defendants' affirmative defenses, if any, raise common issues
4 of law and fact as to Plaintiff Class as a whole and/or Subclasses in
5 particular?
6

7 VI.

8 **FIRST CAUSE OF ACTION**

9 **FAILURE TO PAY WAGES**

10 **(Labor Code §§ 510, 1194, 1194.2)**

11 **(By Plaintiff and the Unpaid Wage Subclass against Defendants)**

- 12 27. Plaintiff incorporates paragraphs 1 through 26 of this First Amended Complaint
13 as if fully alleged herein.
14 28. At all relevant times, Plaintiff and the other members of the Unpaid Wage Class
15 were employees of Defendants covered by Labor Code §§ 510, 1194, 1194.2 and
16 applicable Wage Orders, and they were entitled to receive minimum and
17 overtime wages for all hours worked and liquidated damages equal to
18 unlawfully unpaid minimum wages with interest.
19 29. Defendants have violated California law and the specified provisions of the
20 Labor Code and applicable Wage Orders by their failure to pay all wages due in
21 accordance, including minimum wages, wrongfully classified off-the-clock
22 wages and overtime pay. As a result of Defendants' unlawful conduct, Plaintiff
23 and other members of the Subclass have suffered damages as articulated in the
24 Prayer for Relief, set forth below, and fully incorporated here as applicable.
25
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

VII.

SECOND CAUSE OF ACTION

FAILURE TO PAY FOR REPORTING TIME

(8 Cal Code Regulations §§ 11010-11160)

(By Plaintiff and Reporting Time Subclass against Defendants)

30. Plaintiff incorporates paragraphs 1 through 26 of this First Amended Complaint as if fully alleged herein.

31. During the Class Period, Plaintiff and other class members were required to report to work and did report to work only to be told that business was light and/or they weren't needed or no longer needed, and they were sent home but they did not receive their regular rate of pay for at least half of their usual or scheduled day's work but in no event less than two hours.

32. As such, Defendants have violated California's Wage Order pertaining to "Pay for Reporting to Work" and 8 Cal Code Regulations §§ 11010-11160 and all other applicable laws and statutes.

33. As a result of Defendants' unlawful conduct, Plaintiff and other members of the Subclass have suffered damages as articulated in the Prayer for Relief, set forth below, and fully incorporated here as applicable.

VIII.

THIRD CAUSE OF ACTION

FAILURE TO PAY WAGES DUE AT TERMINATION

(Labor Code §§ 201, 202, 203)

(By Plaintiff and Waiting Time Subclass against Defendants)

34. Plaintiff incorporates paragraphs 1 through 26 of this First Amended Complaint as if fully alleged herein.

35. By their failure to timely pay Plaintiff and Waiting Time Subclass, Defendants willfully violated the provisions of Labor Code §§ 201, 202, 203 and applicable Wage Orders. Sec. 203 of Labor Code provides that if an employer willfully fails

1 to timely pay such wages, the employer must, as penalty, continue to pay the
2 employee's wages until the back wages are paid in full or an action is
3 commenced.

4 36. As a result of Defendants' unlawful conduct, Plaintiff and other members of the
5 Subclass have suffered damages as articulated in the Prayer for Relief, set forth
6 below, and fully incorporated here as applicable.

7
8 **IX.**

9 **FOURTH CAUSE OF ACTION**
10 **FAILURE TO PROVIDE ITEMIZED WAGE STATEMENTS**
11 **(Labor Code §226)**
12 **(By Plaintiff and Wage Statement Subclass against Defendants)**

13 37. Plaintiff incorporates paragraphs 1 through 26 of this First Amended Complaint
14 as if fully alleged herein.

15 38. By their failure to provide accurate itemized wage statements, semimonthly or
16 at the time of each payment of wages, Defendants willfully violated the
17 provisions of Labor Code §226 and applicable Wage Orders.

18 39. As a result of Defendants' unlawful conduct, Plaintiff and other members of the
19 Subclass have suffered damages as articulated in the Prayer for Relief, set forth
20 below, and fully incorporated here as applicable.

21
22 **X.**

23 **FIFTH CAUSE OF ACTION**
24 **VIOLATION OF UNFAIR BUSINESS PRACTICES ACT**
25 **(Bus. & Prof. Code §§ 17200, *et seq.*)**
26 **(By Plaintiff, Plaintiff Class and All Subclasses against Defendants)**

27 40. Plaintiff incorporates paragraphs 1 through 39 of this First Amended Complaint
28 as if fully alleged herein.

41. The alleged unlawful conduct of Defendants constitutes unfair competition

1 pursuant to Business and Professions Code §§ 17200 *et seq.*, and this cause of
2 action is brought as a cumulative remedy under Bus. & Prof. Code § 17205 for
3 the time period starting four (4) years before the filing of the Complaint.

4 42. As a result, Plaintiff and other members of Plaintiff Class and Subclasses have
5 suffered injury in fact and lost money or property. Plaintiff and said members
6 have been deprived of their rights as set forth in this First Amended Complaint,
7 including, but not limited to, payment of minimum, actual, and/or other wages
8 for all hours worked.

9 43. Pursuant to Business and Professions Code § 17203, Plaintiff and other
10 members of Plaintiff Class and Subclasses are entitled to restitution of all wages
11 owed to them under the Labor Code, and interest thereon, in which they had a
12 property interest, which Defendants failed to pay to them but withheld and
13 retained for themselves. Restitution of the money owed to Plaintiff, Plaintiff
14 Class and Subclasses is necessary to prevent Defendants from becoming
15 unjustly enriched by their failure to comply with the Labor Code provisions.

16 44. Plaintiff and members of Plaintiff Class and Subclasses are entitled to recover
17 reasonable attorney's fees in connection with their unfair competition claims
18 pursuant to Code of Civil Procedure § 1021.5, the substantial benefit doctrine
19 and/or the common fund doctrine.

20 45. Plaintiff requests the court to issue a preliminary and permanent injunction
21 prohibiting Defendants from committing the Labor Code and applicable Wage
22 Order violations set forth in this First Amended Complaint, and Plaintiff and
23 the members of Plaintiff Class and Subclasses have suffered further damages as
24 articulated in the Prayer for Relief, set forth below, also incorporated here fully
25 as applicable.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

XI.

SIXTH CAUSE OF ACTION

VIOLATION OF CALIFORNIA'S PRIVATE ATTORNEY GENERAL ACT

(LABOR CODE § 2699 *et seq.*)

(By Plaintiff and Aggrieved Employees Against Each Defendant)

46. Plaintiff incorporates paragraphs 1 through 45 of this First Amended Complaint as if fully alleged herein.

47. Under the Private Attorney General Act, Labor Code §§ 2698-99 ("PAGA"), private parties may recover civil penalties for violations of the California Labor Code. PAGA penalties are in addition to any other relief available under the Labor Code.

48. As set forth above, Defendants violated the California Labor Code by consistently failing to employ Plaintiff and other similarly situated employees in compliance with California law.

49. Plaintiff provided written notice by certified mail to Defendants on March 5, 2021, and electronic notice thereafter to the State Labor & Workforce Development Agency ("LWDA"), of the legal claims and theories of this case. To date, and after 65 days from the date of mailing of notice, the LWDA has not notified Plaintiff that the LWDA intends to exercise jurisdiction over the claim for civil penalties under the PAGA. Accordingly, Plaintiff exhausted administrative remedies as required by Labor Code § 2699.3. Plaintiff's PAGA claim was assigned case number LWDA-CM-824881-21 by the LWDA.

50. Under the PAGA, Plaintiff and all other aggrieved employees are entitled to recover the maximum civil penalties permitted by law from Defendant for the violations of Labor Code alleged in this First Amended Complaint.

51. Plaintiff and all other aggrieved employees are also entitled to recover their attorneys' fees and costs under Labor Code § 2699.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

XII.

PRAYER FOR RELIEF

WHEREFORE, on behalf of himself and all others similarly situated, Plaintiff prays for relief and judgment against Defendants as follows:

- A. An order certifying that Plaintiff may pursue his claims as a class action under Section 382 of the Code of Civil Procedure; and it is further requested that Plaintiff Class and each Plaintiff Subclass be certified;
- B. An order appointing Plaintiff as Class representative;
- C. An order appointing Plaintiff's counsel as Class counsel;
- D. Disgorgement of Defendants' wrongfully obtained profits and restitution of unpaid wages under Business and Professions Code §§ 17203, 17204;
- E. Damages for unpaid minimum wages under Labor Code § 1194;
- F. Liquidated damages under Labor Code § 1194.2;
- G. Damages for unpaid reporting time pay under the applicable Wage Order(s);
- H. Damages for unpaid penalty wages under Labor Code § 203;
- I. Civil penalties under Labor Code § 226(e);
- J. Reasonable attorney's fees and costs pursuant to statute, including, but not limited to Labor Code § 218.5 and Code of Civ. Proc. § 1021.5;
- K. Enjoinment of Defendants from further acts of unfair competition and continuous violations of the Labor Code and applicable Wage Orders;
- L. Civil penalties under Labor Code Section 2699 (75% payable to the LWDA and 25% payable to aggrieved employees); and

//

//

//

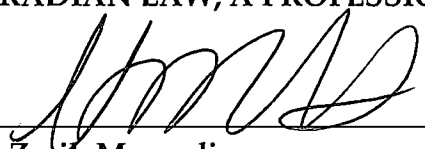
//

//

1 M. For such other relief that the Court may deem just and proper, including
2 prejudgment interest and costs.

3
4 DATED: August 13, 2021

MOORADIAN LAW, A PROFESSIONAL CORP.

5
6 By: 

7 Zorik Mooradian,

8 Haik Hacopian,

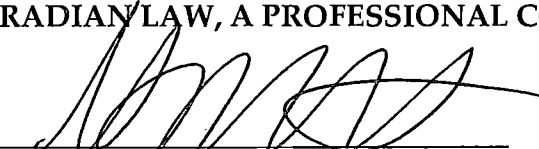
9 Attorneys for Plaintiff and the putative class

10 **DEMAND FOR A JURY TRIAL**

11 Plaintiff MARIO MUNIZ hereby demands a jury trial in the above case.

12 DATED: August 13, 2021

MOORADIAN LAW, A PROFESSIONAL CORP.

13
14 By: 

15 Zorik Mooradian,

16 Haik Hacopian,

17 Attorneys for Plaintiff and the putative class
18
19
20
21
22
23
24
25
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PROOF OF SERVICE

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and am not a party to the within action, my business address is 24007 Ventura Blvd., Suite 210, Calabasas, CA 91302.

On August 13, 2021, I served on the parties of record in this action the foregoing document(s) described as:

FIRST AMENDED COMPLAINT – CLASS AND REPRESENTATIVE ACTION

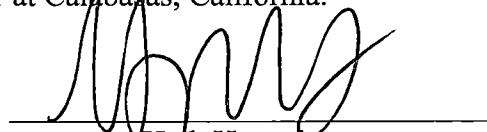
on the parties to this action by placing them in a sealed envelope(s) addressed as follows:

Shannon Marie Jenkins, Esq. sjenkins@tldlaw.com R. Scott Harlan, Esq. sharlan@tldlaw.com TREDWAY, LUMSDAINE & DOYLE LLP 2010 Main Street, Suite 1000 Irvine, CA 92614 Telephone: (949) 756-0684 Facsimile: (866) 298-9254	Thomas G. Mackey, Esq. thomas.mackey@jacksonlewis.com JACKSON LEWIS, P.C. 725 South Figueroa Street, Suite 2500 Los Angeles, CA 90017-5408 Telephone: (213) 689-0404 Facsimile: (213) 689-0430
Attorneys for Defendant Cortech West LLC	Attorneys for Defendant Mitsui-Soko (U.S.A.) Inc.

☒ **VIA ELECTRONIC SERVICE** – Based on a court order or agreement of the parties to accept service by electronic transmission, I caused the document(s) to be sent to the above persons listed at their electronic notification addresses by uploading the document(s) to the CASEANYWHERE service.

☒ **STATE** – I declare under penalty of perjury under the laws of the “State of California that the above is true and correct.

Executed on August 13, 2021 at Calabasas, California.


Haik Hacopian