

STANSBURY BROWN LAW  
DANIEL J. BROWN (SBN 307604)  
dbrown@stansburybrownlaw.com  
ETHAN C. SURLS (SBN 327605)  
esurls@stansburybrownlaw.com  
2610 1/2 Abbot Kinney Blvd.  
Venice, CA 90291  
Tel: 323-207-5925

Attorneys for Plaintiff  
MARCOS GARNICA

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Superior Court of California  
County of Los Angeles

MAY 28 2021

Sherri R. Carter, Executive Officer/Clerk of Court  
By: Brigitte De La Rosa, Deputy

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**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES**

MARCOS GARNICA, as an individual and  
on behalf of all others similarly situated,

Plaintiff,

vs.

SOCAL RETAIL SERVICES, INC., a  
California corporation; and DOES 1  
through 100,

Defendants.

Case No.: 21STCV08762

**FIRST AMENDED CLASS AND  
REPRESENTATIVE ACTION  
COMPLAINT:**

- (1) MINIMUM WAGE VIOLATIONS  
(LABOR CODE §§ 1182.12, 1194,  
1194.2, AND 1197);
- (2) FAILURE TO PAY ALL  
OVERTIME WAGES (LABOR  
CODE §§ 204, 510, 558, 1194, AND  
1198);
- (3) MEAL PERIOD VIOLATIONS  
(LABOR CODE §§ 226.7, 512);
- (4) REST PERIOD VIOLATIONS  
(LABOR CODE §§ 226.7, 516);
- (5) FAILURE TO REIMBURSE FOR  
NECESSARY BUSINESS  
EXPENSES (LABOR CODE § 2802);
- (6) FAILURE TO PROVIDE  
ACCURATE, ITEMIZED WAGE  
STATEMENTS (LABOR CODE  
§ 226 *et seq.*);
- (7) WAITING TIME PENALTIES  
(LABOR CODE §§ 201-203);
- (8) UNFAIR COMPETITION (BUS &  
PROF CODE § 17200 *et seq.*); AND
- (9) CIVIL PENALTIES UNDER THE  
PRIVATE ATTORNEYS GENERAL  
ACT (LABOR CODE § 2698 *et seq.*).