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FILED
Superior Court of California
County of Los Angeles

03/30/2022

Sherri R. Carter, Executive Officer / Clerk of Court

By: E. Menjivar Deputy

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

ELIA PAREDES ACOSTA, as an individual
and on behalf of all others similarly situated,

Plaintiff,

vs.

SMG/LONG BEACH CONVENTION AND
ENTERTAINMENT CENTER, a business
entity form unknown; ASM GLOBAL
FRESNO, LLC, a Delaware limited liability
company; and DOES 1 through 100, inclusive,

Defendants.

Case No.: 21STCV27103

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

- (1) FAILURE TO PAY ALL
OVERTIME WAGES OWED
(LABOR CODE §§ 204, 510, 558,
1194, 1198);**
- (2) FAILURE TO PAY ALL MINIMUM
WAGES OWED (LABOR CODE §§
1194, 1194.2, 1197);**
- (3) UNFAIR COMPETITION (BUS &
PROF CODE § 17200 et seq.);**
- (4) CIVIL PENALTIES UNDER THE
PRIVATE ATTORNEYS GENERAL
ACT (LABOR CODE § 2698, et seq.)**

**DEMAND FOR JURY TRIAL
UNLIMITED CIVIL CASE**

1 Plaintiff Elia Paredes Acosta (“Plaintiff”), on behalf of herself and all others similarly
2 situated, hereby brings this First Amended Class and Representative Action Complaint
3 (“Complaint”) against SMG/Long Beach Convention and Entertainment Center, a business entity
4 form unknown; ASM Global Fresno, LLC, a Delaware limited liability company; and DOES 1 to
5 100, inclusive (collectively “Defendants”), and on information and belief alleges as follows:

6 **JURISDICTION**

7 1. Plaintiff, on behalf of herself and all others similarly situated, hereby brings this
8 Complaint for recovery of unpaid wages under California Business & Professions Code § 17200
9 *et. seq.*, Labor Code §§ 204, 510, 558, 1194, 1194.2, 1197, 1198, and 2698 *et seq.*, and Industrial
10 Welfare Commission Wage Order 10 (“Wage Order 10”), in addition to seeking declaratory relief
11 and restitution. This Complaint is brought pursuant to California Code of Civil Procedure § 382.
12 This Court has jurisdiction over Defendants’ violations of the California Labor Code because the
13 amount in controversy exceeds this Court’s jurisdictional minimum.

14 **VENUE**

15 2. Venue is proper in this judicial district pursuant to Cal. Code of Civ. Proc. §§
16 395(a) and 395.5, as at least some of the acts and omissions complained of herein occurred in the
17 County of Los Angeles. Defendants own, maintain offices, transact business, have agent(s) within
18 the County of Los Angeles, and/or otherwise are found within the County of Los Angeles, and
19 Defendants are within the jurisdiction of this Court for purposes of service of process.

20 **PARTIES**

21 3. Plaintiff is an individual over the age of eighteen (18). At all relevant times herein,
22 Plaintiff was and currently is, a California resident. Within the statute of limitations periods
23 applicable to each cause of action pled herein, Plaintiff was employed by Defendants as a non-
24 exempt employee. Plaintiff was, and is, a victim of Defendants’ policies and/or practices
25 complained of herein, lost money and/or property, and has been deprived of the rights guaranteed
26 by Labor Code §§ 204, 510, 558, 1194, 1194.2, 1197 and 1198, California Business & Professions
27 Code § 17200 *et seq.* (“Unfair Competition Law”); and Wage Order 10, which sets employment
28 standards for the amusement and recreation industry.

1 4. Plaintiff is informed and believes, and based thereon alleges, that during the statute
2 of limitations periods applicable to this action through the present, Defendants did (and continue
3 to do) business and employed Plaintiff and other, similarly-situated non-exempt employees
4 within, among other counties, Los Angeles County and the state of California and, therefore, were
5 (and are) doing business in Los Angeles County and the State of California.

6 5. Plaintiff does not know the true names or capacities, whether individual, partner,
7 or corporate, of the defendants sued herein as DOES 1 to 100, inclusive, and for that reason, said
8 defendants are sued under such fictitious names, and Plaintiff will seek leave from this Court to
9 amend this Complaint when such true names and capacities are discovered. Plaintiff is informed,
10 and believes, and based thereon alleges, that each of said fictitious defendants, whether individual,
11 partners, or corporate, were responsible in some manner for the acts and omissions alleged herein,
12 and proximately caused Plaintiff and the Classes (as defined in Paragraph 13) to be subject to the
13 unlawful employment practices, wrongs, injuries and damages complained of herein.

14 6. Plaintiff is informed, and believes, and thereon alleges, that at all times mentioned
15 herein, Defendants were and are the employers of Plaintiff and all members of the Classes.

16 7. At all times herein mentioned, each of said Defendants participated in the doing
17 of the acts hereinafter alleged to have been done by the named Defendants; and furthermore, the
18 Defendants, and each of them, were the agents, servants, and employees of each and every one of
19 the other Defendants, as well as the agents of all Defendants, and at all times herein mentioned
20 were acting within the course and scope of said agency and employment. Defendants, and each
21 of them, approved of, condoned, and/or otherwise ratified each and every one of the acts or
22 omissions complained of herein.

23 8. At all times mentioned herein, Defendants, and each of them, were members of
24 and engaged in a joint venture, partnership, and common enterprise, and acting within the course
25 and scope of and in pursuance of said joint venture, partnership, and common enterprise. Further,
26 Plaintiff alleges that all Defendants were joint employers for all purposes of Plaintiff and all
27 members of the Classes.

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GENERAL FACTUAL ALLEGATIONS

9. Defendants own and operate the Long Beach Convention and Entertainment Center in Long Beach, California. Plaintiff has been employed by Defendants as a non-exempt employee since approximately March 2018, although she has been on a leave of absence since approximately July 2019.

10. During her employment with Defendants, Plaintiff clocked in to work through a finger scanner, and on information and belief, Defendants' electronic timekeeping system recorded her clock-in and clock-out times to the minute. However, during the relevant time period, Defendants' timekeeping system rounded and/or time-shaved Plaintiff's hours, such that Plaintiff was only paid in quarter of an hour increments, and which resulted in Plaintiff not being compensated for all hours actually worked. Defendants regularly, systematically, and impermissibly rounded and/or shaved the time worked by Plaintiff and other non-exempt employees in Defendants' favor. This time shaving/rounding practice utilized by Defendants was not-even handed over time and would round and shave in Defendants' favor such that Plaintiff was routinely underpaid for her time worked. Due to Defendants' timekeeping policies and practices that fail to compensate for all hours worked, Plaintiff and other non-exempt employees were deprived of all required minimum wages. Further, on occasions when Plaintiff worked over eight hours in a day and/or forty hours in a workweek, this process of time-shaving or rounding also deprived her of all overtime wages owed. As such, Plaintiff and other non-exempt employees were not compensated for all required minimum and overtime wages.

11. In addition to failing to pay Plaintiff and other non-exempt employees for all time they were on the clock as a result of its unlawful rounding/time-shaving practice, Defendants also failed to pay Plaintiff and other non-exempt employees for time spent undergoing security checks prior to clocking in. Specifically, Defendants' written policy provides that Defendants have the right to search employees' backpacks, purses, briefcases, and similar items, and Defendants did in fact search Plaintiff's and other employees' bags on a daily basis. Defendants would conduct these searches prior to employees clocking in, such that the searches were done off-the-clock and the time employees spent under Defendants' control during these searches was not compensated.

1 In addition, Plaintiff would sometimes need to wait in line before having her bag searched, since
2 there were other employee(s) having their bags searched when she arrived. This time spent
3 waiting in line was also not compensated by Defendants, even though Plaintiff was subject to
4 Defendants' control during this time. Defendants' practices violate California law, as held by the
5 Supreme Court of California in *Frlekin v. Apple, Inc.*, 8 Cal.5th 1038 (2020) (holding employer
6 must compensate employees for time spent undergoing, and waiting for, bag searches)

7 12. Pursuant to California Judicial Council Emergency Rule 9, statutes of limitations
8 of more than 180 days were suspended for 178 days, from April 6, 2020 through October 1, 2020.
9 Accordingly, the relevant time period for each cause of action pled herein has been calculated to
10 include 178 days preceding the filing of this action.

11 **CLASS ACTION ALLEGATIONS**

12 13. **Class Definitions:** Plaintiff brings this action on behalf of herself and the
13 following Classes pursuant to § 382 of the Code of Civil Procedure:

14 a. The Overtime Class consists of all of Defendants' current and former non-exempt
15 employees in California who worked in excess of 8 hours in a work day and/or in
16 excess of 40 hours in a work week, and were subject to (i) Defendants'
17 timekeeping policies/practices and/or (ii) Defendants' bag search
18 policies/practices during the four years plus 178 days preceding the filing of this
19 action through the present.

20 b. The Minimum Wage Class consists of all of Defendants' current and former non-
21 exempt employees in California who were subject to (i) Defendants' timekeeping
22 policies/practices and/or (ii) Defendants' bag search policies/practices during the
23 four years plus 178 days preceding the filing of this action through the present.

24 14. Plaintiff reserves the right under Rule 3.765(b) of the California Rules of Court,
25 to amend or modify the description of the various classes with greater specificity or further
26 division into subclasses or limitation to particular issues.

27 15. **Numerosity/Ascertainability:** The members of the Classes are so numerous that
28 joinder of all members would be unfeasible and not practicable. The membership of the Classes

is unknown to Plaintiff at this time; however, it is estimated that the members of the Classes number greater than fifty (50) individuals. The identity of such membership is readily ascertainable via inspection of Defendants' employment records.

16. **Common Questions of Law and Fact Predominate/Well Defined Community of Interest:** There are common questions of law and fact as to Plaintiff and all other similarly situated employees, which predominate over questions affecting only individual members. Those common questions include, without limitation:

- i. Whether Defendants properly paid all minimum wages and/or overtime wages to the members of the Minimum Wage Class and Overtime Class pursuant to Labor Code §§ 204, 510, 558, 1192, 1194, 1194.2, 1197, 1197.1 and 1198;
- ii. Whether Defendants engaged in unlawful, unfair, illegal, and/or deceptive business practices by and through the wage and hour policies and practices described above, and whether as a result Defendants owe the classes restitution.

17. **Predominance of Common Questions:** Common questions of law and fact predominate over questions that affect only individual members of the Classes. The common questions of law set forth above are numerous and substantial and stem from Defendants' policies and/or practices applicable to each individual class member, such as Defendants' uniform timekeeping policies/practices. As such, the common questions predominate over individual questions concerning each individual class member's showing as to their eligibility for recovery or as to the amount of their damages.

18. **Typicality:** The claims of Plaintiff are typical of the claims of the Classes because Plaintiff was employed by Defendants as a non-exempt employee in California during the statute(s) of limitations period applicable to each cause of action pled in the Complaint. As alleged herein, Plaintiff, like the members of the Classes, was not paid all minimum and overtime wages due, as a result of the unlawful policies/practices alleged herein.

19. **Adequacy of Representation:** Plaintiff is fully prepared to take all necessary steps to represent fairly and adequately the interests of the members of the Classes. Moreover, Plaintiff's attorneys are ready, willing and able to fully and adequately represent the members of

1 the Classes and Plaintiff. Plaintiff's attorneys have prosecuted and defended numerous wage-
2 and-hour class actions in state and federal courts in the past and are committed to vigorously
3 prosecuting this action on behalf of the members of the Classes.

4 20. **Superiority:** The California Labor Code is broadly remedial in nature and serves
5 an important public interest in establishing minimum working conditions and standards in
6 California. These laws and labor standards protect the average working employee from
7 exploitation by employers who have the responsibility to follow the laws and who may seek to
8 take advantage of superior economic and bargaining power in setting onerous terms and
9 conditions of employment. The nature of this action and the format of laws available to Plaintiff
10 and members of the Classes make the class action format a particularly efficient and appropriate
11 procedure to redress the violations alleged herein. If each employee were required to file an
12 individual lawsuit, Defendants would necessarily gain an unconscionable advantage since they
13 would be able to exploit and overwhelm the limited resources of each individual plaintiff with
14 their vastly superior financial and legal resources. Moreover, requiring each member of the
15 Classes to pursue an individual remedy would also discourage the assertion of lawful claims by
16 employees who would be disinclined to file an action against their former and/or current employer
17 for real and justifiable fear of retaliation and permanent damages to their careers at subsequent
18 employment. Further, the prosecution of separate actions by the individual class members, even
19 if possible, would create a substantial risk of inconsistent or varying verdicts or adjudications
20 with respect to the individual class members against Defendants herein; and which would
21 establish potentially incompatible standards of conduct for Defendants; and/or legal
22 determinations with respect to individual class members which would, as a practical matter, be
23 dispositive of the interest of the other class members not parties to adjudications or which would
24 substantially impair or impede the ability of the class members to protect their interests. Further,
25 the claims of the individual members of the Classes are not sufficiently large to warrant vigorous
26 individual prosecution considering all of the concomitant costs and expenses attending thereto.
27 As such, the Classes identified in Paragraph 13 are maintainable as a Class under § 382 of the
28 Code of Civil Procedure.

1 **FIRST CAUSE OF ACTION**

2 **FAILURE TO PAY ALL OVERTIME WAGES**

3 **(AGAINST ALL DEFENDANTS)**

4 21. Plaintiff re-alleges and incorporates by reference all previous paragraphs.

5 22. This cause of action is brought pursuant to Labor Code §§ 204, 510, 558, 1194 and
6 1198, which provide that all non-exempt employees are entitled to all overtime wages for all
7 overtime worked (hours in excess of 8 in one day and/or 40 in one week), and provide a private
8 right of action for the failure to pay all overtime compensation for overtime work performed.

9 23. At all times relevant herein, Defendants were required to properly compensate
10 Plaintiff and the members of the Overtime Class for all overtime hours worked pursuant to
11 California Labor Code §§ 510 and 1194, and Wage Order 10. Labor Code § 510 and Wage Order
12 10, Section 3 require an employer to pay an employee “one and one-half (1½) times the regular
13 rate of pay” for work in excess of 8 hours per workday and/or in excess of 40 hours per workweek.
14 Labor Code § 510 and Wage Order 10, Section 3 also require an employer to pay an employee
15 double the employee’s regular rate for work in excess of 12 hours each workday and/or in excess
16 of 8 hours on the seventh consecutive day of work in the workweek. Defendants caused Plaintiff
17 and the members of the Overtime Class to work in excess of 8 hours in a workday and/or 40 hours
18 in a workweek but did not properly compensate Plaintiff and the members of the Overtime Class
19 at one and one-half their regular rate of pay for such hours. Defendants also caused Plaintiff and
20 the members of the Overtime Class to work in excess of 12 hours in a workday but did not
21 properly compensate Plaintiff and the members of the Overtime Class at double their regular rate
22 of pay for such hours.

23 24. The foregoing practices and policies are unlawful and create entitlement to
24 recovery by Plaintiff and the members of the Overtime Class in a civil action for the unpaid
25 amount of overtime premium owing, including interest thereon, as well as statutory penalties,
26 civil penalties, and attorneys’ fees and costs of suit, pursuant to Labor Code §§ 204, 218.6, 510,
27 558, 1194 and 1198, Wage Order 10, California Code of Civil Procedure § 1021.5, and Civil
28 Code §§ 3287(b) and 3289.

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1 **THIRD CAUSE OF ACTION**

2 **UNFAIR COMPETITION**

3 **(AGAINST ALL DEFENDANTS)**

4 30. Plaintiff re-alleges and incorporates by reference all previous paragraphs.

5 31. Defendants have engaged and continue to engage in unfair and/or unlawful
6 business practices in California in violation of California Business and Professions Code § 17200
7 *et seq.*, by failing to pay all minimum and overtime wages owed to their employees.

8 32. Defendants' utilization of these unfair and/or unlawful business practices deprived
9 Plaintiff and continues to deprive members of the Classes of compensation to which they are
10 legally entitled, constitutes unfair and/or unlawful competition, and provides an unfair advantage
11 over Defendants' competitors who have been and/or are currently employing workers and
12 attempting to do so in honest compliance with applicable wage and hour laws.

13 33. Because Plaintiff is a victim of Defendants' unfair and/or unlawful conduct alleged
14 herein, Plaintiff for herself and on behalf of the members of the Classes, seeks full restitution of
15 monies, as necessary and according to proof, to restore any and all monies withheld, acquired
16 and/or converted by Defendants pursuant to Business and Professions Code §§ 17203 and 17208.

17 34. The acts complained of herein occurred during the four years plus 178 days prior
18 to the filing of this action.

19 35. Plaintiff was compelled to retain the services of counsel to file this court action to
20 protect his interests and those of the Classes, to obtain restitution and injunctive relief on behalf
21 of Defendants' current non-exempt employees, and to enforce important rights affecting the
22 public interest. Plaintiff has thereby incurred the financial burden of attorneys' fees and costs,
23 which she is entitled to recover under Code of Civil Procedure § 1021.5.

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1 **FOURTH CAUSE OF ACTION**

2 **PRIVATE ATTORNEYS GENERAL ACT**

3 **(AGAINST ALL DEFENDANTS)**

4 36. Plaintiff re-alleges and incorporates by reference all prior paragraphs as though
5 fully set forth herein.

6 37. Defendants have committed several Labor Code violations against Plaintiff and
7 other aggrieved employees. Plaintiff, an “aggrieved employee” within the meaning of Labor Code
8 § 2698 *et seq.*, acting on behalf of herself and other aggrieved employees, brings this
9 representative action against Defendants to recover the civil penalties due to Plaintiff, other
10 aggrieved employees, and the State of California according to proof pursuant to Labor Code §§
11 558 and 2699 (a) and (f) including, but not limited to: (1) \$100.00 for each initial violation for
12 each failure to pay each employee and \$200.00 for each subsequent violation or willful or
13 intentional violation pursuant to Labor Code § 210 for each failure to pay each employee, plus
14 25% of the amount unlawfully withheld; (2) \$50.00 for each initial violation and \$100.00 for each
15 subsequent violation pursuant to Labor Code § 558 per employee per pay period; (3) \$100.00 for
16 each initial violation and \$250.00 for each subsequent violation pursuant to Labor Code § 1197.1
17 per employee per pay period; (4) \$250.00 for each initial violation and \$1,000.00 for each
18 subsequent violation pursuant to Labor Code § 226.3 per employee per pay period; and/or (5)
19 \$100.00 for each initial violation and \$200.00 for each subsequent violation per employee per pay
20 period for those violations of the Labor Code for which no civil penalty is specifically provided,
21 based on the following Labor Code violations:

22 a. Failing to pay Plaintiff and other aggrieved employees all overtime and/or
23 double time compensation earned in violation of Labor Code §§ 204, 510, 558,
24 1194, and 1198;

25 b. Failing to pay Plaintiff and other aggrieved employees at least the statutory
26 minimum wage for all hours worked in violation of Labor Code §§ 1182.12,
27 1194, 1194.2, 1197 and 1198;

28 c. Failing to provide aggrieved employees with complete, accurate, itemized

1 wage statements in violation of Labor Code § 226;

2 d. Failing to pay aggrieved former employees all wages due at the end of their
3 employment in violation of Labor Code § 201-203; and

4 e. Failing to pay Plaintiff and other aggrieved employees all earned wages at least
5 twice each calendar month in violation of Labor Code § 204.

6 38. On or about July 23, 2021 Plaintiff notified Defendants via certified mail and
7 notified the California Labor and Workforce Development Agency (“LWDA”) via its website, of
8 Defendants’ violations of the California Labor Code and Plaintiff’s intent to bring a claim for
9 civil penalties under California Labor Code § 2698 *et seq.* with respect to the violations of the
10 California Labor Code identified in Paragraph 37 (a)-(e). Now that sixty-five days have passed
11 from Plaintiff notifying Defendants and the LWDA of these violations, and the LWDA has not
12 provided notice that it intends to investigate the violations, Plaintiff has exhausted her
13 administrative requirements for bringing a claim under the Private Attorneys General Act with
14 respect to these violations.

15 39. Based on the foregoing, Plaintiff seeks to represent herself, the State of California,
16 and all aggrieved employees, as defined by Labor Code § 2699(c), which includes all current and
17 former aggrieved employees who worked for Defendants in California between the one year and
18 178 days prior to the submission of Plaintiff’s PAGA notice to the present.

19 40. Plaintiff was compelled to retain the services of counsel to file this court action to
20 protect her interest and the interests of other aggrieved employees, and to assess and collect the
21 civil penalties owed by Defendants. Plaintiff has thereby incurred attorneys’ fees and costs, which
22 she is entitled to recover under California Labor Code § 2699.

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1 **PRAYER**

2 WHEREFORE, Plaintiff prays for judgment for herself and for all others on whose behalf
3 this suit is brought against Defendants, as follows:

- 4 1. For an order certifying the proposed Classes;
- 5 2. For an order appointing Plaintiff as representative of the Classes;
- 6 3. For an order appointing counsel for Plaintiff as Counsel for the Classes;
- 7 4. Upon the First Cause of Action, for compensatory, consequential, general and
8 special damages according to proof pursuant to Labor Code §§ 204, 510, 558, 1194 and 1198.
- 9 5. Upon the Second Cause of Action, for compensatory, consequential, general,
10 special, and liquidated damages according to proof pursuant to Labor Code §§ 204, 558, 1194,
11 1194.2, 1197, 1197.1 and 1198;
- 12 6. Upon the Third Cause of Action, for restitution to Plaintiff and members of the
13 Classes of all money and/or property unlawfully acquired by Defendants by means of any acts or
14 practices declared by this Court to be in violation of Business and Professions Code § 17200 *et*
15 *seq.*;
- 16 7. Upon the Fourth Cause of Action, for civil penalties due to Plaintiff, other
17 aggrieved employees, and the State of California according to proof pursuant to Labor Code §
18 2699, including, but not limited to: (1) \$100.00 for each initial violation for each failure to pay
19 each employee and \$200.00 for each subsequent violation or willful or intentional violation
20 pursuant to Labor Code § 210 for each failure to pay each employee, plus 25% of the amount
21 unlawfully withheld; (2) \$50.00 for each initial violation and \$100 for each subsequent violation
22 pursuant to Labor Code § 558 per employee per pay period; (3) \$100.00 for each initial violation
23 and \$250.00 for each subsequent violation pursuant to Labor Code § 1197.1 per employee per
24 pay period; (4) \$250.00 for each initial violation of Labor Code § 226 and \$1,000.00 for each
25 subsequent violation, pursuant to Labor Code § 226.3 per employee per pay period; and/or (5)
26 \$100.00 for each initial violation and \$200.00 for each subsequent violation per employee per pay
27 period for those violations of the Labor Code for which no civil penalty is specifically provided,
28 pursuant to Labor Code § 2699(f);

1 8. Prejudgment interest on all due and unpaid wages pursuant to California Labor
2 Code § 218.6 and Civil Code §§ 3287 and 3289;

3 9. On all causes of action, for attorneys' fees and costs as provided by Labor Code
4 §§ 1194 and 2699(g), and Code of Civil Procedure § 1021.5 and all other applicable statutes; and

5 10. For such other and further relief the Court may deem just and proper.

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7 Dated: March 28, 2022

Respectfully submitted,
HAINES LAW GROUP, APC

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9 By:


Paul K. Haines
Attorneys for Plaintiff

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12 **DEMAND FOR JURY TRIAL**

13 Plaintiff hereby demands a jury trial with respect to all issues triable by jury.

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15 Dated: March 28, 2022

Respectfully submitted,
HAINES LAW GROUP, APC

16
17 By:


Paul K. Haines
Attorneys for Plaintiff

PROOF OF SERVICE

Elia Paredes Acosta v. SMG/Long Beach Convention and Entertainment Center, et. al.
Los Angeles County Superior Court Case No. 21STCV27103

STATE OF CALIFORNIA)
) ss.
COUNTY OF LOS ANGELES)

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 2155 Campus Drive, Suite 180, El Segundo, California 90245.

On May 12, 2022, I served the foregoing document(s) described as:

FIRST AMENDED CLASS AND REPRESENTATIVE ACTION COMPLAINT

on the interested party(ies) in this action as follows:

Steven M. Kroll, Esq.
Email: skroll@bkcllegal.com
BENT CARYL & KROLL, LLP
6300 Wilshire Boulevard, Suite 1415
Los Angeles, CA 90048
Attorneys for Defendants SMG/Long Beach Convention and Entertainment Center and ASM GLOBAL FRESNO, LLC

[X] (VIA ELECTRONIC MAIL) I caused a true and correct copy of the document(s) described above to be electronically served on counsel of record at the electronic service addresses listed above by transmission to CASE ANYWHERE

[X] (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on May 12, 2022, at El Segundo, California.



Nestor Castillo