

ELECTRONICALLY FILED
Superior Court of California
County of Alameda
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Chad Finke, Executive Officer / Clerk of the Court

By: Suzanne Pesko Deputy

HUNTER PYLE, SBN 191125
KATHERINE FIESTER, SBN 301316
HUNTER PYLE LAW
1300 Broadway, 11th Floor
Oakland, California 94612
Telephone: (510) 444-4400
Facsimile: (510) 444-4410
Email: hunter@hunterpylelaw.com
kfiester@hunterpylelaw.com

Attorneys for Plaintiff and the Putative Class

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF ALAMEDA

BRITNEY GUEDON, on behalf of herself and
all others similarly situated;

Plaintiffs,

v.

NEOGREEN SOLUTIONS, INC., a California
Corporation doing business as NEOGEN
CARE, and DOES 1 through 10, inclusive,

Defendants.

Case No.: RG21102962

CLASS ACTION

**FIRST AMENDED COMPLAINT FOR
DAMAGES AND INJUNCTIVE RELIEF**

- 1. FAILURE TO PAY MINIMUM WAGES (Labor Code §§ 226.2, 1182.11-1182.13, 1194, 1194.2, 1197 & 1198; Wage Order No. 4);**
- 2. FAILURE TO PAY OVERTIME (Labor Code §§ 510 & 1194; Wage Order No. 4);**
- 3. FAILURE TO PROVIDE OFF-DUTY MEAL PERIODS (Labor Code §§ 226.7 & 512; Wage Order No. 4);**
- 4. FAILURE TO AUTHORIZE AND PERMIT REST PERIODS (Labor Code §§ 226.2 & 226.7; Wage Order No. 4);**
- 5. FAILURE TO REIMBURSE BUSINESS EXPENSES (Labor Code § 2802);**
- 6. FAILURE TO FURNISH ADEQUATE WAGE STATEMENTS (Labor Code §§ 226, 226.2 & 226.3; Wage Order No. 4);**
- 7. WAITING TIME PENALTIES (Labor Code §§ 201, 202 & 203)**
- 8. UNLAWFUL BUSINESS PRACTICES (Business & Professions Code §§ 17200 *et seq.*); and**
- 9. VIOLATIONS OF THE LABOR CODE PRIVATE ATTORNEYS GENERAL ACT OF 2004 (Labor Code § 2698, *et seq.*)**

DEMAND FOR JURY TRIAL