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Order# E358292

Madera Court Filings

Date Submitted: 12/9/2021

PLEASE FILL OUT AND PRINT A NEW SEPARATE INVOICE FOR EACH ASSIGNMENT.

FIRM NAME: & ADDRESS:

ACCOUNT# 3104200158

Stansbury Brown Law

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PHONE #:(323) 207-5925 FAX #:

CONTACT: Ethan Surls

Documents: 1) FIRST AMENDED CLASS AND REPRESENTATIVE ACTION COMPLAINT:

COURT / DESTINATION:

Madera County Superior Court
200 South G Street, Madera, CA 93637

CASE# MCV086092

BILLING / FILE #: 0098

CASE TITLE: Jacinto Bravo VS. Debenedetto Exports, Inc., et al.

INSTRUCTIONS: PLEASE NOTE ANY SPECIFIC OR TIMELY FILING REQUIREMENTS

☒ FILE	LAST DAY TO FILE	12/9/2021	HEARING DATE	
☐ ISSUE				
☐ RECORD	Additional / Special Instructions			
☒ CONFORM	Please file and return conformed copies. First Amended Complaint to be filed as a matter of right. Please contact Ethan Surls at esurls@stansburybrownlaw.com or 310-344-3936 if any issues arise in completing this filing.			
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MADERA SUPERIOR COURT

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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF MADERA

JACINTO BRAVO, as an individual, and on
behalf of all others similarly situated,

Plaintiff,

v.

J & R DEBENEDETTO ORCHARDS, INC., a
California corporation; DEBENEDETTO
EXPORTS, INC., a California corporation; and
DOES 1 through 100, inclusive,

Defendants.

Case No. MCV086092

Amended As a Matter of Right Pursuant to
Labor Code Section 2699.3(a)(2)(C).

FIRST AMENDED CLASS AND
REPRESENTATIVE ACTION
COMPLAINT:

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

BY FAX