

Court Services - STANDARD



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Date Submitted: 11/9/2021

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Stansbury Brown Law
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Venice CA, 90291

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

CONTACT: Daniel J. Brown

Documents: 1) First Amended Class & Representative Action Complaint (21 pgs).

CASE# VCU288464

BILLING / FILE #: 120

CASE TITLE: Emiliano Rodriguez Gutierrez VS. Sun Pacific Farming Cooperative

113
COURT / DESTINATION:
Superior Court of California, County of Tulare
221 South Mooney Blvd., Visalia, CA 93291

INSTRUCTIONS: PLEASE NOTE ANY SPECIFIC OR TIMELY FILING REQUIREMENTS

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7 Attorneys for Plaintiff

FILED
TULARE COUNTY SUPERIOR COURT
VISALIA DIVISION

NOV 10 2021

STEPHANIE CAMERON, CLERK

BY: ~~Leticia Hernandez-Sandoval~~

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

9 **FOR THE COUNTY OF TULARE**

10 EMILIANO RODRIGUEZ GUTIERREZ, as
11 an individual and on behalf of all others
12 similarly situated,

13 Plaintiff,

14 vs.

15 SUN PACIFIC FARMING COOPERATIVE,
16 INC., a California corporation; and DOES 1
17 through 100,

18 Defendants.

Case No.: VCU288464

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

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

- (1) **FAILURE TO PAY ALL
OVERTIME WAGES (LABOR
CODE §§ 204, 510, 551, 552, 558,
1194, AND 1198);**
- (2) **MEAL PERIOD VIOLATIONS
(LABOR CODE §§ 226.7, 512);**
- (3) **REST PERIOD VIOLATIONS
(LABOR CODE §§ 226.7, 516);**
- (4) **FAILURE TO REIMBURSE FOR
NECESSARY BUSINESS
EXPENSES (LABOR CODE § 2802);**
- (5) **FAILURE TO PROVIDE
ACCURATE, ITEMIZED WAGE
STATEMENTS (LABOR CODE
§ 226 *et seq.*);**
- (6) **WAITING TIME PENALTIES
(LABOR CODE §§ 201-203);**
- (7) **UNFAIR COMPETITION (BUS &
PROF CODE § 17200 *et seq.*); and**
- (8) **CIVIL PENALTIES UNDER THE
PRIVATE ATTORNEYS GENERAL
ACT (LABOR CODE § 2698 *et seq.*)**

**DEMAND FOR JURY TRIAL
UNLIMITED CIVIL CASE**

BY FAX

NOV 10 2021