

FILED
Superior Court Of California,
Sacramento
03/11/2022
rsanmiguel
By _____, Deputy
Case Number:
34-2021-00311945

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Attorneys for Plaintiff,
MARTIN HERNANDEZ, and all putative class members

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SACRAMENTO**

MARTIN HERNANDEZ, an individual, on
behalf of himself and all others similarly
situated,

Plaintiffs,

vs.

ADCO DRYWALL AND METAL
FRAMING, INC., a California Corporation,
and DOES 1-50, inclusive,

Defendants.

Case No.: 34-2021-00311945

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

1. Failure to Pay Wages, Including Overtime
2. Failure to Properly Calculate and Pay Sick Leave Wages
3. Failure to Provide Rest Breaks
4. Failure to Provide Timely, Uninterrupted Meal Breaks
5. Failure to Reimburse for Required Business Expenses
6. Failure to Timely Pay All Wages Owed
7. Failure to Provide Timely, Accurate, Itemized Wage Statements
8. Unlawful Business Practices
Bus & Prof. Code §17200
9. Private Attorneys General Act
Penalties (Lab. Code §2699)

BY FAX



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Job: 6801653 *P* Due: 03/11/2022
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Case #	34-2021-00311945	Plaintiff	Martin Hernandez, an individual, on behalf of himself and all others similarly situated
Court	Sacramento County Superior Court - Gordon D. Schaber Courthouse - Civil	Defendant	ADCO Drywall and Metal Framing, Inc., a California Corporation, et al.
Documents			
Instructions	File and conform.		
-First Amended Complaint			

RUSH
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Date/Time/Initials:

Description of Service / Recipient:

3/11/22: submitted to Court
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Age: _____ Gender: _____ Ethnicity: _____ Weight: _____

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