

FILED
SUPERIOR COURT
COUNTY OF SAN BERNARDINO
SAN BERNARDINO DISTRICT

MAY 31 2022

BY Charlene Johnson
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similarly situated

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF SAN BERNARDINO

10
11 PETER RODARTE, individually, on a
12 representative basis, and on behalf of all
others similarly situated;

13 Plaintiff,

14 vs.

15 WRIGHT BUSINESS GRAPHICS CA, a
16 California Limited Liability Company;
17 WRIGHT BUSINESS GRAPHICS LLC, an
Oregon Limited Liability Company; ENNIS,
18 INC., a Texas Corporation; and DOES 1
through 20, inclusive;

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20 Defendants.
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Case No.: CIVSB2206705
[Assigned to Hon. Judge David Cohn, Dept
S26, for all purposes]

FIRST AMENDED COMPLAINT

CLASS ACTION CLAIMS

- (1) Failure to Pay Minimum Wages;
- (2) Failure to Pay Overtime Wages;
- (3) Failure to Provide Meal Periods;
- (4) Failure to Provide Rest Breaks;
- (5) Failure to Timely Pay Final Wages;
- (6) Failure to Provide Accurate Itemized Wage Statements;
- (7) Unfair and Unlawful Competition;

PAGA CLAIMS

- (8) Failure to Pay Minimum Wages;
- (9) Failure to Pay Overtime Wages;
- (10) Failure to Provide Meal Periods;
- (11) Failure to Provide Rest Breaks;
- (12) Failure to Timely Pay Wages Each Period;
- (13) Failure to Timely Pay Final Wages; and
- (14) Failure to Provide Accurate Itemized Wage Statements

JURY TRIAL DEMANDED

Complaint filed: 3/25/2022

FIRST AMENDED CLASS AND REPRESENTATIVE ACTION (PAGA) COMPLAINT

By Fax

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SAN BERNARDINO DISTRICT

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RECEIVED