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10 **SUPERIOR COURT FOR THE STATE OF CALIFORNIA**
11 **IN AND FOR THE COUNTY OF LOS ANGELES**
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14 CHARLES SAN NICOLAS, on behalf of the
15 State of California, as a private attorney
general,

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17 Plaintiffs,

18 vs.

19 WEST COVINA CORPORATE FITNESS,
INC., a California Corporation; and Does 1
20 through 50, Inclusive,

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22 Defendants.
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CASE No. **BC616304**

**NOTICE OF ERRATA TO THIRD
AMENDED REPRESENTATIVE
ACTION COMPLAINT**

Action Filed: April 8, 2016

1 **TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:**

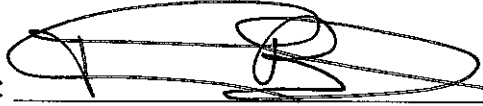
2 PLEASE TAKE NOTICE THAT in the Third Amended Representative Action
3 Complaint filed on February 4, 2019, the following Defendants were inadvertently not identified
4 as DOE Defendants and are now so identified: **Muscle Head, Inc.** - Upon the filing of the
5 complaint, the plaintiff, being ignorant of the true name of this defendant and having designated
6 this defendant in the complaint by the fictitious name of DOE 1 and having discovered the true
7 name of this defendant to be Muscle Head, Inc. amends the complaint by substituting the true
8 name for the fictitious name of DOE 1 wherever it appears in the complaint; **Muscle Bound,**
9 **Inc.** - Upon the filing of the complaint, the plaintiff, being ignorant of the true name of this
10 defendant and having designated this defendant in the complaint by the fictitious name of DOE
11 2 and having discovered the true name of this defendant to be Muscle Bound, Inc. amends the
12 complaint by substituting the true name for the fictitious name of DOE 2 wherever it appears
13 in the complaint; **LA Corporate Fitness, Inc.**- Upon the filing of the complaint, the plaintiff,
14 being ignorant of the true name of this defendant and having designated this defendant in the
15 complaint by the fictitious name of DOE 3 and having discovered the true name of this
16 defendant to be LA Corporate Fitness, Inc. amends the complaint by substituting the true name
17 for the fictitious name of DOE 3 wherever it appears in the complaint; **Thousand Oaks**
18 **Corporate Fitness, Inc.**-Upon the filing of the complaint, the plaintiff, being ignorant of the
19 true name of this defendant and having designated this defendant in the complaint by the
20 fictitious name of DOE 4 and having discovered the true name of this defendant to be Thousand
21 Oaks Corporate Fitness, Inc. amends the complaint by substituting the true name for the
22 fictitious name of DOE 4 wherever it appears in the complaint; **Simi Valley Corporate Fitness,**
23 **Inc.** - Upon the filing of the complaint, the plaintiff, being ignorant of the true name of this
24 defendant and having designated this defendant in the complaint by the fictitious name of DOE
25 5 and having discovered the true name of this defendant to be Simi Valley Corporate Fitness,
26 Inc. amends the complaint by substituting the true name for the fictitious name of DOE 5
27 wherever it appears in the complaint; **Culver City Corporate Fitness, Inc.**- Upon the filing of
28 the complaint, the plaintiff, being ignorant of the true name of this defendant and having

1 designated this defendant in the complaint by the fictitious name of DOE 6 and having
2 discovered the true name of this defendant to be Culver City Corporate Fitness, Inc. amends the
3 complaint by substituting the true name for the fictitious name of DOE 6 wherever it appears
4 in the complaint; **Fullerton Corporate Fitness, Inc.** - Upon the filing of the complaint, the
5 plaintiff, being ignorant of the true name of this defendant and having designated this defendant
6 in the complaint by the fictitious name of DOE 7 and having discovered the true name of this
7 defendant to be Fullerton Corporate Fitness, Inc. amends the complaint by substituting the true
8 name for the fictitious name of DOE 7 wherever it appears in the complaint; **Valencia**
9 **Corporate Fitness, Inc.** - Upon the filing of the complaint, the plaintiff, being ignorant of the
10 true name of this defendant and having designated this defendant in the complaint by the
11 fictitious name of DOE 8 and having discovered the true name of this defendant to be Valencia
12 Corporate Fitness, Inc. amends the complaint by substituting the true name for the fictitious
13 name of DOE 8 wherever it appears in the complaint; **Santa Anita Corporate Fitness, Inc.** -
14 Upon the filing of the complaint, the plaintiff, being ignorant of the true name of this defendant
15 and having designated this defendant in the complaint by the fictitious name of DOE 9 and
16 having discovered the true name of this defendant to be Santa Anita Corporate Fitness, Inc.
17 amends the complaint by substituting the true name for the fictitious name of DOE 9 wherever
18 it appears in the complaint; **Montclair Corporate Fitness, Inc.** - Upon the filing of the
19 complaint, the plaintiff, being ignorant of the true name of this defendant and having designated
20 this defendant in the complaint by the fictitious name of DOE 10 and having discovered the true
21 name of this defendant to be Montclair Corporate Fitness, Inc. amends the complaint by
22 substituting the true name for the fictitious name of DOE 10 wherever it appears in the
23 complaint; **Santa Barbara Corporate Fitness, Inc.** - Upon the filing of the complaint, the
24 plaintiff, being ignorant of the true name of this defendant and having designated this defendant
25 in the complaint by the fictitious name of DOE 11 and having discovered the true name of this
26 defendant to be Santa Barbara Corporate Fitness, Inc. amends the complaint by substituting the
27 true name for the fictitious name of DOE 11 wherever it appears in the complaint; **Anaheim**
28 **Corporate Fitness, Inc.** - Upon the filing of the complaint, the plaintiff, being ignorant of the

1 true name of this defendant and having designated this defendant in the complaint by the
2 fictitious name of DOE 12 and having discovered the true name of this defendant to be Anaheim
3 Corporate Fitness, Inc. amends the complaint by substituting the true name for the fictitious
4 name of DOE 12 wherever it appears in the complaint; **Glendale Corporate Fitness, Inc.-**
5 Upon the filing of the complaint, the plaintiff, being ignorant of the true name of this defendant
6 and having designated this defendant in the complaint by the fictitious name of DOE 13 and
7 having discovered the true name of this defendant to be Glendale Corporate Fitness, Inc.
8 amends the complaint by substituting the true name for the fictitious name of DOE 13 wherever
9 it appears in the complaint; **Santa Anita Corporate Fitness, Inc. -** Upon the filing of the
10 complaint, the plaintiff, being ignorant of the true name of this defendant and having designated
11 this defendant in the complaint by the fictitious name of DOE 14 and having discovered the true
12 name of this defendant to be Santa Anita Corporate Fitness, Inc. amends the complaint by
13 substituting the true name for the fictitious name of DOE 14 wherever it appears in the
14 complaint; and **Gym Management Services, Inc.-** Upon the filing of the complaint, the
15 plaintiff, being ignorant of the true name of this defendant and having designated this defendant
16 in the complaint by the fictitious name of DOE 15 and having discovered the true name of this
17 defendant to be Gym Management Services, Inc. amends the complaint by substituting the true
18 name for the fictitious name of DOE 15 wherever it appears in the complaint. By this errata,
19 Plaintiff now corrects these omissions.

20 Respectfully submitted,

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22 Dated: February 5, 2019 BLUMENTHAL NORDREHAUG BHOWMIK DE BLOUW LLP
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25 By:  _____

26 Norman B. Blumenthal, Esq.
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