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11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
12 **IN AND FOR THE COUNTY OF COUNTY OF SACRAMENTO**

13 CHARLES PADUANO, an individual, on
14 behalf of himself and on behalf of all persons
15 similarly situated,

16 Plaintiff,

17 v.

18 ROCKLER RETAIL GROUP, INC., a
19 Corporation; and DOES 1through 50,
20 Inclusive,

21 Defendants.

Case No:

CLASS ACTION COMPLAINT FOR:

- 1) UNFAIR COMPETITION IN VIOLATION OF CAL. BUS. & PROF. CODE §17200 *et seq*;
- 2) FAILURE TO PAY OVERTIME WAGES IN VIOLATION OF CAL. LAB. CODE §§ 510, *et seq*;
- 3) FAILURE TO PROVIDE REQUIRED MEAL PERIODS IN VIOLATION OF CAL. LAB. CODE §§1194, 1197 & 1197.1;
- 4) FAILURE TO PROVIDE REQUIRED MEAL PERIODS IN VIOLATION OF CAL. LAB. CODE §§ 226.7 & 512 AND THE APPLICABLE IWC WAGE ORDER;
- 5) FAILURE TO PROVIDE REQUIRED REST PERIODS IN VIOLATION OF CAL. LAB. CODE §§ 226.7 & 512 AND THE APPLICABLE IWC WAGE ORDER;
- 6) FAILURE TO PROVIDE ACCURATE ITEMIZED STATEMENTS IN VIOLATION OF CAL. LAB. CODE § 226;
- 7) FAILURE TO PROVIDE WAGES WHEN DUE IN VIOLATION OF CAL. LAB. CODE §§ 201, 202 AND 203;
- 8) VIOLATION OF THE PRIVATE ATTORNEY GENERAL ACT [LABOR CODE §§2698 *et seq*.]

DEMAND FOR A JURY TRIAL

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24 Plaintiff CHARLES PADUANO ("PLAINTIFF"), an individual, on behalf of
25 himself and all other similarly situated current and former employees, alleges on
26 information and belief, except for his own acts and knowledge which are based on personal
27 knowledge, the following:

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Via Fax