

Ryan A. Quadrel (State Bar No. 308311
rquadrel@blackstonepc.com
Shelby L. Miner (State Bar No. 318338)
sminer@bl@blackstonepc.com
Alexandra Rose (State Bar No. 329407)
arose@blackstonepc.com
BLACKSTONE LAW, APC
8383 Wilshire Boulevard, Suite 745
Beverly Hills, California 90211
Telephone: (310) 622-4278
Fax: (855) 786-6356

*Attorneys for Plaintiff YINAN ZHANG,
individually, and on behalf of other similarly
situated employees and aggrieved employees
pursuant to the California Private Attorneys
General Act*

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA**

YINAN ZHANG, individually, and on behalf
of other similarly situated employees and
aggrieved employees pursuant to the
California Private Attorneys General Act,

Plaintiff,

vs.

HALREC, INC. dba STEVENS CREEK
TOYOTA; and DOES 1 through 25, inclusive,

Defendants.

Case No. 25CV463865

*Honorable Beth McGowan
Department 22*

PROOF OF SERVICE

Complaint Filed:	April 17, 2025
FAC Filed:	June 2, 2026
Trial Date:	Not Set

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8

- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6

3

5

- 7
8
9
0
1
2

3

4
5
6
7
8
9

20

- 21
-
- 22
-
- 23

5

25

26

- 27

1 for the submission of notices and documents, in conformity with California Labor Code
2 section 2699(I). I did not receive, within a reasonable time after the transmission, any
electronic message or other indication that the transmission was unsuccessful.

3 ☒ **STATE:** I declare under penalty of perjury under the laws of the State of California that the
4 above is true and correct.

5 Executed on August 14, 2026 at Beverly Hills, California.

6
7 /s/ Lorena Bautista

Lorena Bautista