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12 individually and on behalf of all others similarly situated

13
14 **IN THE SUPERIOR COURT OF CALIFORNIA**
15
16 **COUNTY OF SAN DIEGO**

17 CHRISTIAN LEMUEL JIMENEZ, individually
18 and on behalf of all others similarly situated,

19 Plaintiff(s),

20 v.

21 CRAFT AND TECHNICAL SOLUTIONS, LLC;
22 and DOES 1 through 100,

23 Defendant(s).

ELECTRONICALLY FILED
Superior Court of California,
County of San Diego

9/10/2025 3:01:52 PM

Clerk of the Superior Court
By R. Stille ,Deputy Clerk

Case No. 25CU047876C

COMPLAINT

1. Failure to Pay for All Hours Worked
2. Failure to Pay for All Overtime Owed
3. Wage Statement Penalties
4. Waiting Time Penalties
5. Violation of Unfair Competition Law
6. Private Attorneys General Act
7. Disability Discrimination
8. Failure to Accommodate Disability
9. Failure to Engage in the Interactive Process
10. Retaliation
11. Wrongful Termination in Violation of Public Policy
12. Failure to Prevent Discrimination, Harassment and/or Retaliation in Violation of FEHA

DEMAND FOR JURY TRIAL

1 **RELEVANT PARTIES**

2 1. Plaintiff Christian Lemuel Jimenez (“Plaintiff”) is an adult resident of San Diego County,
3 California, and was at all times relevant residing in San Diego County, California.

4 2. Defendant Craft and Technical Solutions, LLC (“Defendant”) is a Florida corporation with
5 its principal place of business located in Spanish Fort, Alabama. Defendant is registered to and does
6 conduct business in the State of California and is subject to the laws of the State of California. All
7 acts and omissions of Defendant employees as alleged herein occurred while they were acting
8 within the course and scope of their employment.

9 3. Plaintiff is unaware of the true names or capacities of the Defendants sued herein as DOES 1
10 through 100, inclusive (“Doe Defendants”), and therefore sues said Doe Defendants by such
11 fictitious names. Plaintiff will seek leave of this Court to amend this Complaint to insert the true
12 names and capacities of such Doe Defendants when such information has been obtained. Plaintiff is
13 informed and believes, and based on such information and belief alleges, that each of the fictitiously
14 named Doe Defendants has participated in some way in the wrongful acts and omissions alleged
15 below, and is liable to Plaintiff for damages and other relief to which Plaintiff is entitled. Defendant
16 and Doe Defendants are collectively referred to as “Defendants”.

17 **JURISDICTION AND VENUE**

18 4. This action is properly filed in San Diego County because the acts and omissions that give
19 rise to Plaintiff’s claims took place in San Diego County, and Defendants transact substantial
20 business in this County.

21 5. This Court has jurisdiction over Defendants because Defendants’ unlawful conduct as
22 alleged herein occurred in San Diego County, California and Plaintiff suffered damages from such
23 conduct within San Diego County, California.

24 **FACTUAL ALLEGATIONS**

25 6. At all times relevant, Plaintiff was Defendants’ employee.

26 7. Plaintiff was employed by Defendants from about May 2023 until his termination in
27 November 2024.

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1 8. Plaintiff was paid \$35.00 per hour and worked 6-7 days per week with shifts ranging from 8-
2 12 hours.

3 9. In or about November 2024, Plaintiff sustained injuries from a non-work-related car
4 accident.

5 10. Plaintiff properly documented his medical condition and provided all required
6 documentation to Defendant.

7 11. Plaintiff had a clear intention and made attempts to return to work with accommodation
8 starting in or about December 2024.

9 12. Defendant failed to engage in any interactive process or provide reasonable accommodations
10 despite Plaintiff's documented medical condition.

11 13. Defendant unilaterally placed Plaintiff on "inactive" status after 30 days of medical leave.

12 14. Defendant denied Plaintiff access to his accrued sick pay.

13 15. Plaintiff discovered his termination not from Defendant directly, but through the third-party
14 job site where he had been assigned.

15 16. Defendants failed to pay Plaintiff for all hours worked because throughout his employment,
16 Plaintiff was required to go through mandatory security screenings before clocking in and after
17 clocking out, which took approximately 5-15 minutes each time.

18 17. Plaintiff was not compensated for the time spent in mandatory security screenings.

19 18. Defendants failed to pay Plaintiff all overtime owed because Plaintiff received work-related
20 communications from supervisors during his off-hours regarding scheduling and job assignments,
21 occurring 1-3 times weekly for approximately 5-10 minutes each.

22 19. Plaintiff was not compensated for time spent on off-the-clock work communications.

23 20. Defendants failed to provide Plaintiff with accurate wage statements because the wage
24 statements issued to Plaintiff did not accurately list total wages owed and hours worked, among
25 other things.

26 21. Due to Defendants' failure to pay all wages due to Plaintiff during their employment, it
27 follows that Defendant failed to pay all wages due at the conclusion of Plaintiff's employment as
28 well. Therefore, Defendants are liable to Plaintiff for waiting time penalties.

PAGA ALLEGATIONS

22. Pursuant to Labor Code section 2699(a), any provision of the Labor Code which provides for a civil penalty to be assessed and collected by the Labor and Workforce Development Agency (“LWDA”) for violations of the Labor Code may, as an alternative, be recovered through a civil action brought by an aggrieved employee on behalf of himself or herself and other current or former employees pursuant to the procedures outlined in Labor Code section 2699.3.

23. Pursuant to Labor Code section 2699.3, an aggrieved employee may pursue a civil action under PAGA after the following requirement have been met:

24. The aggrieved employee has provided written notice by online filing to the LWDA and by certified mail to the employer (hereinafter “Employee’s Notice”) of the specific provisions of the Labor Code alleged to have been violated, including the facts and theories to support the alleged violations; and

25. The LWDA has provided notice (hereinafter “LWDA’s Notice”) to the employer and the aggrieved employee by certified mail that it does not intend to investigate the aggrieved employee’s claims. Upon receipt of the LWDA’s Notice, or if the LWDA does not provide such Notice within 65 calendar days of the postmark date of the Employee’s Notice, the aggrieved employee may commence a civil action pursuant to Labor Code section 2699 to recover civil penalties in addition to any other penalties to which the employee may be entitled.

26. On May 20, 2025, Plaintiff provided written notice by online filing to the LWDA and by certified mail to Defendants of specific provisions of the Labor Code alleged to have been violated by Defendants, including the facts and theories to support the alleged violations.

27. The 65-day notice period has elapsed, and the LWDA did not provide Plaintiff with written notice that it intends to investigate the alleged violations of the Labor Code. Thus, Plaintiff seeks PAGA Penalties on behalf of all Aggrieved Employees.

28. The Aggrieved Employees are defined as “All other nonexempt, hourly employees, current and former, who were employed by Defendants within one year prior to May 20, 2025, through final disposition of this action.”

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37. Defendants failed to pay Plaintiff all overtime wages owed as alleged herein. Plaintiff is therefore entitled to recover all unpaid overtime wages, liquidated damages, interest, penalties, attorney fees, and costs.

THIRD CAUSE OF ACTION

Wage Statement Penalties

By Plaintiff Against All Defendants

38. Plaintiff incorporates by reference the paragraphs above.

39. Labor Code section 226(a) requires employers to provide itemized wage statements to its employees that identify accurate information regarding their compensation. Defendants, as a matter of policy and practice, failed in its affirmative obligation to provide accurate itemized wage statements to Plaintiff in violation of Labor Code section 226(a).

40. As alleged herein, the wage statements that Defendants issued to Plaintiff were inaccurate and incomplete.

41. Defendants knowingly and intentionally issued wage statements that were inaccurate and incomplete, and the issuance of inaccurate and incomplete wage statements caused injury to Plaintiff in that Plaintiff was unable to accurately verify and/or calculate their wages.

42. Plaintiff is therefore entitled to the recovery of wage statement penalties, attorney fees, and costs.

FOURTH CAUSE OF ACTION

Waiting Time Penalties

By Plaintiff Against All Defendants

43. Plaintiff incorporates by reference the paragraphs above.

44. Labor Code sections 201 and 202 require that an employer provide an employee with all wages due and payable either: (a) immediately upon termination, or (b) within 3 days of the employee's resignation.

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1 45. Labor Code section 203 provides that if an employer willfully fails to pay wages owed in
2 accordance with Labor Code sections 201 or 202, then the wages of the employee continue as a
3 penalty from the due date at the same rate until paid or until an action is commenced, not to exceed
4 thirty days.

5 46. As alleged herein, Defendants willfully did not pay Plaintiff all wages owed at the
6 conclusion of employment.

7 47. Plaintiff is therefore entitled to the recovery of waiting time penalties, interest, attorney fees,
8 and costs.

9 **FIFTH CAUSE OF ACTION**

10 **Violation of Unfair Competition Law**

11 **By Plaintiff Against All Defendants**

12 48. Plaintiff incorporates by reference the paragraphs above.

13 49. Defendants' conduct described herein constitutes unfair competition.

14 50. Specifically, Defendants have gained an unfair advantage over other similarly situated
15 businesses by unlawfully reducing their overhead costs by not paying their employees what they are
16 owed.

17 51. Pursuant to Business and Professions Code 17203, Plaintiff is entitled to restitution of all
18 wrongfully withheld wages.

19 52. Plaintiff may recover attorney fees pursuant to Code of Civil Procedure section 1021.5.

20 **SIXTH CAUSE OF ACTION**

21 **Private Attorneys General Act**

22 **By Plaintiff and the Aggrieved Employees Against All Defendants**

23 53. Plaintiff incorporates by reference the paragraphs above.

24 54. PAGA permits Plaintiff and the Aggrieved Employees to recover civil penalties for the
25 violation(s) of the Labor Code.

26 55. As alleged herein, Defendants' conduct violates numerous sections of the Labor Code.

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1 56. With respect to violations of Labor Code section 1197 for Defendants' failure to compensate
2 Plaintiff and the Aggrieved Employees for all minimum wages earned, the penalties in Labor Code
3 sections 1197.1 and 2699 apply.

4 57. With respect to violations of Labor Code section 510 for Defendants' failure to compensate
5 Plaintiff and the Aggrieved Employees for all overtime wages earned, the penalties in Labor Code
6 sections 558, 1197.1, and 2699 apply.

7 58. With respect to violations of Labor Code section 226(a) for failure to provide accurate wage
8 statements to Plaintiff and the Aggrieved Employees, the penalties in Labor Code sections 226.3
9 and 2699 apply.

10 59. With respect to violations of Labor Code section 203 for failure to pay all wages due to
11 Plaintiff and the Aggrieved Employees and the conclusion of their employment, the penalties in
12 Labor Code section 2699 apply.

13 60. Pursuant to Labor Code section 2699(k)(1), Plaintiff further seeks public injunctive relief
14 in the form of an Order enjoining Defendants from continuing to violate the California Labor Code
15 in the manner alleged herein.

16 61. Additionally, Plaintiff and the Aggrieved Employees are entitled to attorney's fees pursuant
17 to Labor Code section 2699(g).

18 **SEVENTH CAUSE OF ACTION**

19 **Violation of California Government Code § 12940 et seq. – Disability Discrimination**

20 **By Plaintiff Against All Defendants**

21 62. Plaintiff incorporates by reference the paragraphs above.

22 63. Government Code § 12940(a) prohibits an employer from discriminating against an
23 employee in compensation or in terms, conditions, or privileges of employment because of the
24 employee's "race," "national origin, ancestry, physical disability, mental disability, medical
25 condition" or "sex."

26 64. During their employment with Defendants, Plaintiff was subjected to discrimination based
27 on their disability (described supra).

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1 65. The discriminatory actions of Defendants against Plaintiff constitute unlawful discrimination
2 in violation of FEHA.

3 66. As a direct and proximate result of the aforementioned misconduct, Plaintiff has suffered
4 and continues to sustain substantial losses in earnings and other employment benefits in an amount
5 according to proof at trial.

6 67. As a further direct and legal result of the acts and conduct of Defendants, as aforesaid,
7 Plaintiff has been caused to and did suffer, and continues to suffer, severe emotional and mental
8 distress, anguish, humiliation, embarrassment, fright, shock, discomfort, anxiety, and related
9 symptoms, all to Plaintiff's damage in an amount according to proof at trial.

10 68. Defendants, by engaging in the aforementioned acts and/or in authorizing and/or ratifying
11 such acts, engaged in willful, malicious, intentional, oppressive, and despicable conduct, and acted
12 with willful and conscious disregard of the rights, welfare, and safety of Plaintiff, thereby justifying
13 the award of punitive and exemplary damages in an amount to be determined at trial.

14 69. As a direct and proximate result of Defendants' unlawful conduct, as set forth herein,
15 Plaintiff is entitled to recover damages in amounts to be established at trial, as set forth below,
16 including recovery of attorney's fees and costs of suit, pursuant to Government Code section
17 12965(c)(6).

18 **EIGHTH CAUSE OF ACTION**

19 **Violation of Government Code § 12940(m) - Failure to Accommodate Disability**

20 **By Plaintiff Against All Defendants**

21 70. Plaintiff incorporates by reference the paragraphs above.

22 71. At all relevant times herein, Plaintiff was an individual with a disability as defined by
23 FEHA.

24 72. FEHA requires an employer to make reasonable accommodations for the known disabilities
25 of employees to enable them to perform a position's essential functions, unless doing so would
26 produce undue hardship to the employer's operations. Govt. Code §12940(m).

27 73. As a result of Plaintiff's disability, Plaintiff was in need of certain reasonable
28 accommodations, as set forth herein.

1 74. Defendants were on notice of Plaintiff's need for reasonable accommodations in connection
2 with their disability.

3 75. Defendants, and each of them, failed and refused to grant reasonable accommodations, as
4 required by law, to Plaintiff (described supra).

5 76. The actions of Defendants against Plaintiff constitutes unlawful failure to accommodate a
6 disability, in violation of FEHA.

7 77. As a direct and proximate result of the aforementioned misconduct, Plaintiff has suffered
8 and continues to sustain substantial losses in earnings and other employment benefits in an amount
9 according to proof at trial.

10 78. As a further direct and legal result of the acts and conduct of Defendants, as aforesaid,
11 Plaintiff has been caused to and did suffer, and continues to suffer, severe emotional and mental
12 distress, anguish, humiliation, embarrassment, fright, shock, discomfort, anxiety, and related
13 symptoms, all to Plaintiff's damage in an amount according to proof at trial.

14 79. Defendants, by engaging in the aforementioned acts and/or in authorizing and/or ratifying
15 such acts, engaged in willful, malicious, intentional, oppressive, and despicable conduct, and acted
16 with willful and conscious disregard of the rights, welfare, and safety of Plaintiff, thereby justifying
17 the award of punitive and exemplary damages in an amount to be determined at trial.

18 80. As a direct and proximate result of Defendants' unlawful conduct, as set forth herein,
19 Plaintiff is entitled to recover damages in amounts to be established at trial, as set forth below,
20 including recovery of attorney's fees and costs of suit, pursuant to Government Code section
21 12965(c)(6).

22 **NINTH CAUSE OF ACTION**

23 **Violation of California Government Code § 12940(n) – Failure to Engage in the Interactive**
24 **Process**

25 **By Plaintiff Against All Defendants**

26 81. Plaintiff incorporates by reference the paragraphs above.

27 82. At all relevant times herein, Plaintiff was individuals with a disability as defined by FEHA.

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1 83. Govt. Code §12940(n) requires employers to engage in a timely, good faith, interactive
2 process with an employee to determine effective reasonable accommodations if an employee with a
3 disability so requests. The interactive process is the key mechanism for facilitating the integration of
4 disabled employees in the workplace and liability may be imposed on the employer for failing to
5 engage in the process.

6 84. As a result of Plaintiff's disability, Plaintiff was in need of certain reasonable
7 accommodations, as set forth herein.

8 85. Defendants were on notice of Plaintiff's need for reasonable accommodations in connection
9 with their disability.

10 86. Despite having notice of Plaintiff's disability and need for accommodations, Defendants
11 engaged in unlawful employment practices when they failed and refused to engage in the interactive
12 process (described supra).

13 87. The actions of Defendants against Plaintiff constitutes unlawful failure to engage in the
14 interactive process, in violation of FEHA.

15 88. As a direct and proximate result of the aforementioned misconduct, Plaintiff has suffered
16 and continues to sustain substantial losses in earnings and other employment benefits in an amount
17 according to proof at trial.

18 89. As a further direct and legal result of the acts and conduct of Defendants, as aforesaid,
19 Plaintiff has been caused to and did suffer, and continues to suffer, severe emotional and mental
20 distress, anguish, humiliation, embarrassment, fright, shock, discomfort, anxiety, and related
21 symptoms, all to Plaintiff's damage in an amount according to proof at trial.

22 90. Defendants, by engaging in the aforementioned acts and/or in authorizing and/or ratifying
23 such acts, engaged in willful, malicious, intentional, oppressive, and despicable conduct, and acted
24 with willful and conscious disregard of the rights, welfare, and safety of Plaintiff, thereby justifying
25 the award of punitive and exemplary damages in an amount to be determined at trial.

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1 91. As a direct and proximate result of Defendants' unlawful conduct, as set forth herein,
2 Plaintiff is entitled to recover damages in amounts to be established at trial, as set forth below,
3 including recovery of attorney's fees and costs of suit, pursuant to Government Code section
4 12965(c)(6).

5 **TENTH CAUSE OF ACTION**

6 **Violation of California Government Code § 12940(m)(2) - Retaliation**

7 **By Plaintiff Against All Defendants**

8 92. Plaintiff incorporates by reference the paragraphs above.

9 93. Government Code Section 12940(m)(2) prohibits an employer from retaliating or otherwise
10 discriminating against a person for requesting accommodations, regardless of whether the request
11 was granted.

12 94. As detailed above, Plaintiff engaged in protected activity by requesting accommodations.

13 95. Defendants retaliated against Plaintiff in violation of FEHA in connection with his request
14 for accommodations.

15 96. As a direct and proximate result of the aforementioned misconduct, Plaintiff has suffered
16 and continues to sustain substantial losses in earnings and other employment benefits in an amount
17 according to proof at trial.

18 97. As a further direct and legal result of the acts and conduct of Defendants, as aforesaid,
19 Plaintiff has been caused to and did suffer, and continues to suffer, severe emotional and mental
20 distress, anguish, humiliation, embarrassment, fright, shock, discomfort, anxiety, and related
21 symptoms, all to Plaintiff's damage in an amount according to proof at trial.

22 98. Defendants, by engaging in the aforementioned acts and/or in authorizing and/or ratifying
23 such acts, engaged in willful, malicious, intentional, oppressive, and despicable conduct, and acted
24 with willful and conscious disregard of the rights, welfare, and safety of Plaintiff, thereby justifying
25 the award of punitive and exemplary damages in an amount to be determined at trial.

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1 99. As a direct and proximate result of Defendants' unlawful conduct, as set forth herein,
2 Plaintiff is entitled to recover damages in amounts to be established at trial, as set forth below,
3 including recovery of attorney's fees and costs of suit, pursuant to Government Code section
4 12965(c)(6).

5 **ELEVENTH CAUSE OF ACTION**

6 **Wrongful Termination in Violation of Public Policy**

7 **By Plaintiff Against All Defendants**

8 100. Plaintiff incorporates by reference the paragraphs above.

9 101. At all times mentioned in this complaint, it was a fundamental policy of the State of
10 California that Defendants cannot discriminate and/or retaliate against any employee on the basis of
11 race, national origin, ancestry, physical disability, mental disability, medical condition, sex, and/or
12 engagement in protected activity.

13 102. Based on the actions described above, Defendants terminated Plaintiff on account of
14 discrimination and retaliation.

15 103. Defendants actions were in violation of California Public Policy.

16 104. As a direct and proximate result of Defendant's adverse actions against Plaintiff, Plaintiff
17 has suffered and continues to sustain substantial losses in earnings and other employment benefits
18 in an amount according to proof at trial.

19 105. As a direct and proximate result of Defendant's adverse actions against Plaintiff, Plaintiff
20 has suffered humiliation, emotional distress, and mental pain and anguish, all to Plaintiff's damage
21 in an amount according to proof at trial.

22 106. The conduct of Defendants and each of them as described above was malicious, fraudulent,
23 or oppressive and done with a willful and conscious disregard for Plaintiff's rights. Defendants and
24 each of them and their agents/employees, managing agents, and/or supervisors, authorized,
25 condoned, and ratified the unlawful conduct of each other. Consequently, Plaintiff is entitled to
26 punitive damages against each of said Defendants.

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1 **TWELFTH CAUSE OF ACTION**

2 **Failure to Prevent Discrimination, Harassment, and/or Retaliation in Violation of FEHA**

3 **By Plaintiff Against All Defendants**

4 107. Plaintiff incorporates by reference the paragraphs above.

5 108. Government Code section 12940(k) provides in relevant part:

6 It is an unlawful employment practice . . .[f]or an employer . . . to fail
7 to take all reasonable steps necessary to prevent discrimination[,]
8 harassment [and/or retaliation] from occurring.

9 109. Further, under applicable law, in addition to discrimination and harassment, retaliation is
10 conduct forbidden by the FEHA and actionable under Government Code section 12940(k). *See,*
11 *Taylor v. City of Los Angeles Dept. of Water & Power* (2006)144 Cal.App.4th 1216, 1240,
12 disapproved on other grounds in *Jones v. The Lodge at Torrey Pines Partnership* (2008) 42 Cal.4th
13 1158.

14 110. Defendants failed to take all reasonable steps necessary to prevent discrimination,
15 retaliation, and harassment.

16 111. Plaintiff suffered and continues to suffer harm as a result of Defendant's' failure to prevent
17 discrimination, retaliation, and harassment.

18 112. Defendants' conduct was a substantial factor in causing Plaintiff's harm.

19 113. As a direct and proximate result of Defendants' failure to prevent discrimination,
20 harassment, and retaliation, Plaintiff has suffered and continues to sustain substantial losses in
21 earnings and other employment benefits in an amount according to proof.

22 114. As a direct and proximate result of Defendants' failure to prevent discrimination,
23 harassment, retaliation, Plaintiff has suffered humiliation, emotional distress, and pain and anguish,
24 all to Plaintiff's damage in an amount according to proof at trial.

25 115. The conduct of Defendants and each of them as described above was malicious, fraudulent,
26 or oppressive and done with a willful and conscious disregard for Plaintiff's rights. Defendants and
27 each of them, and their agents/employees, managing agents and/or supervisors, authorized,
28 condoned, and ratified the unlawful conduct of each other. Consequently, Plaintiff is entitled to

1 punitive damages against each of said Defendants.

2 116. Government Code section 12965(c)(6) permits the court to award reasonable attorneys' fees
3 and costs, including expert witness fees, to a Plaintiff successfully pursues a FEHA claim. Plaintiff
4 has and will continue to incur attorneys' fees in the pursuit of this action. As such, Plaintiff is
5 entitled to an award of reasonable attorneys' fees and costs.

6 **PRAYER FOR RELIEF**

7 WHEREFORE, Plaintiff prays for judgment against Defendants as follows:

8 **First Cause of Action**

- 9 1. Damages and/or penalties pursuant to Labor Code sections 558, 1194, 1197, and 1197.1
- 10 2. Liquidated damages
- 11 3. Interest
- 12 4. Attorneys' fees
- 13 5. Costs
- 14 6. Other relief the court deems proper

15 **Second Cause of Action**

- 16 1. Damages and/or penalties pursuant to Labor Code sections 510, 558, and 1194
- 17 2. Interest
- 18 3. Attorneys' fees
- 19 4. Costs
- 20 5. Other relief the court deems proper

21 **Third Cause of Action**

- 22 1. Penalties pursuant to Labor Code section 226
- 23 2. Attorneys' fees
- 24 3. Costs
- 25 4. Other relief the court deems proper

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1 Fourth Cause of Action

- 2 1. Penalties pursuant to Labor Code section 203
3 2. Attorneys' fees
4 3. Costs
5 4. Other relief the court deems proper

6 Fifth Cause of Action

- 7 1. Restitution of all wrongfully withheld wages
8 2. Attorneys' fees
9 3. Costs
10 4. Other relief the court deems proper

11 Sixth Cause of Action

- 12 1. All applicable civil penalties available pursuant to Labor Code section 2698, et seq.
13 2. Public injunctive relief in the form of an Order enjoining Defendants from continuing to
14 violate the California Labor Code in the manner alleged herein
15 3. Attorneys' fees
16 4. Costs
17 5. Other relief the court deems proper

18 Seventh – Tenth, and Twelfth Causes of Action

- 19 1. Compensatory damages
20 2. Punitive damages
21 3. Attorneys' fees
22 4. Costs
23 5. Interest
24 6. Other relief the court deems proper

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1 Eleventh Cause of Action

- 2 1. Compensatory damages
3 2. Punitive damages
4 3. Costs
5 4. Interest
6 5. Other relief the court deems proper

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8 DATED: September 10, 2025

FRONTIER LAW CENTER

Daniel Ginzburg

DANIEL GINZBURG

Attorney for Plaintiff

CHRISTIAN LEMUEL JIMENEZ,
individually and on behalf of all
others similarly situated

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