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Attorneys for Plaintiff
SYMPHONY POLK

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF ALAMEDA**

SYMPHONY POLK, on behalf of herself
and the State of California as a private
attorney general,

Plaintiff,

vs.

SAN JOAQUIN VALLEY COLLEGE,
INC., a California Corporation; and DOES
1 through 100, inclusive,

Defendants.

Case No. **25CV133066**

**INDIVIDUAL AND
REPRESENTATIVE ACTION
COMPLAINT**

- 1. SEXUAL HARASSMENT** (Cal. Gov't Code § 12940(j));
- 2. FAILURE TO INVESTIGATE AND PREVENT HARASSMENT** (Cal. Gov't Code § 12940, *et seq.*); &
- 3. PRIVATE ATTORNEYS GENERAL ACT** (Lab. Code § 2698, *et seq.*)

JURY TRIAL DEMANDED

1 Plaintiff SYMPHONY POLK (“Plaintiff”), on behalf of herself and the State of California
2 as a private attorney general and all other employees who have suffered one or more of the alleged
3 violations (“Aggrieved Employees”), brings this Complaint against her former employers,
4 Defendants SAN JOAQUIN VALLEY COLLEGE, INC. and DOES 1-100, inclusive (“Doe
5 Defendants”) (collectively “Defendants”) and hereby demands a jury trial on all causes of action.
6 Plaintiff’s allegations are as follows:

7 **PLAINTIFF**

8 1. At all times material herein, Plaintiff was and is a competent adult and resident of
9 the State of California. During all times relevant to this Complaint, Plaintiff was employed by
10 Defendants as a non-exempt hourly employee.

11 **DEFENDANTS**

12 2. At all times material herein, Defendant SAN JOAQUIN VALLEY COLLEGE,
13 INC. was and is a California corporation doing business in the State of California.

14 3. The Defendants identified as DOES 1 through 100, inclusive, were, at all times
15 herein-mentioned, agents, business affiliates, successors- and/or predecessors-in-interest,
16 officers, directors, partners, and/or managing agents of some or each of the remaining Defendants.
17 Plaintiff is informed and believes and, on that basis, alleges that, at all times herein-mentioned,
18 each of the Defendants identified as DOES 1 through 100, inclusive, employed, and/or exercised
19 control over the wages, hours, and/or working conditions of Plaintiff and Aggrieved Employees
20 throughout California. In doing the acts herein alleged, each Defendant is liable and responsible
21 to Plaintiff and Aggrieved Employees for the acts of every other Defendant. The true names and
22 capacities of the Doe Defendants, whether individual, corporate, associate or otherwise, are
23 unknown to Plaintiff who therefore sues such Doe Defendants by fictitious names pursuant to
24 California Code of Civil Procedure § 474. Plaintiff is informed and believes that the Doe
25 Defendants are residents of the State of California. Plaintiff will amend this complaint to show
26 such Doe Defendants’ true names and capacities when they are known.

27 4. Plaintiff is informed and believes and thereon alleges that, unless otherwise
28 indicated, each Defendant was the agent and/or employee of every other Defendant within the

1 course and scope of said agency and/or employment, with the knowledge and/or consent of said
2 Defendant.

3 **JURISDICTION AND VENUE**

4 5. This Court is the proper Court, and this action is properly filed in the Superior
5 Court for the State of California, County of Alameda, because Defendants employ and/or
6 employed Aggrieved Employees in this County during the relevant time frame.

7 6. This Court has jurisdiction over the Plaintiff's and Aggrieved Employees' claims
8 for civil penalties, injunctive and other equitable relief, and attorneys' fees and costs pursuant to,
9 *inter alia*, California Labor Code §§ 2698, *et seq.*

10 **EXHAUSTION OF ADMINISTRATIVE REMEDIES**

11 7. Plaintiff has satisfied all administrative requirements prior to adding a claim
12 pursuant to the Private Attorneys General Act, California Labor Code § 2698 *et seq.* On May 6,
13 2025, Plaintiff gave written notice by online filing to the Labor and Workforce Development
14 Agency ("LWDA") of Defendants' violations of various provisions of the California Labor Code
15 as alleged in this Complaint. On May 6, 2025, Plaintiff gave written notice by certified mail to
16 Defendants of Defendants' violations of various provisions of the California Labor Code as
17 alleged in this Complaint. Cal. Lab. Code § 2699.3(a)(1). Plaintiff has also paid the \$75.00 filing
18 fee to the LWDA. By July 10, 2025 – 65 days after Plaintiff gave written notice to the LWDA -
19 the LWDA did not respond. Cal. Lab. Code § 2699.3(a)(2)(A). Plaintiff is therefore entitled to
20 pursue her penalty claims pursuant to California Labor Code section 2699 *et seq.*, the Private
21 Attorneys General Act. Cal. Lab. Code § 2699.3(a)(2)(C).

22 8. Defendant regularly and systematically does business in the State of California and
23 is subject to suit under the Fair Employment and Housing Act ("FEHA") in that Defendant
24 regularly employs five or more persons. Plaintiff timely received a right to sue from the California
25 Civil Rights Department pursuant to California Government Code § 12965(b). Plaintiff filed this
26 action within one year of the date of her CCRD right to sue letter; therefore, administrative
27 remedies have been properly exhausted.

FACTS COMMON TO PLAINTIFF’S INDIVIDUAL CAUSES OF ACTION

9. Plaintiff is a black woman

10. Plaintiff has been working as a financial aid advisor and veteran affairs financial advisor since early 2023.

11. Plaintiff was, at all times herein, an employee covered by Government Code section 12940 prohibiting sexual harassment.

12. Defendant SAN JOAQUIN VALLEY COLLEGE, INC. was and is, at all times herein mentioned, an employer within the meaning of California Government Code section 12926(d), as such, was and is statutorily prohibited from allowing Plaintiff to be sexually harassed on the bases set forth in California Government Code sections 12940 et seq.

13. At all times relevant herein, Matthew Blackburn, a white man, was Plaintiff’s direct supervisor.

14. Beginning on or around June 2024, Mr. Blackburn started constantly sexually harassing and demeaning Plaintiff by making sexually charged comments about Plaintiff’s weight and the size of her buttocks. Mr. Blackburn harassed Plaintiff because she was a woman.

15. For example, Mr. Blackburn, on multiple occasions, remarked about how large Plaintiff’s buttocks was, saying things such as the following: that Plaintiff should not lean against the wall because her “ass” or “butt” would break it or push the wall over; that Plaintiff needs two seats for her “ass” or “butt,” that Plaintiff’s “ass was so big” Plaintiff could not fit through the door. In addition to these comments, Mr. Blackburn would also constantly mention how large Plaintiff’s “ass” or “butt” was. These comments were regularly repeated and made in front of Plaintiff’s coworkers.

16. Mr. Blackburn would even go so far as to sexually harass Plaintiff while she was trying to take her meal periods (and clocked out from work) by saying she couldn’t leave to take her lunch because her “ass” was so big.

17. When Plaintiff asked Mr. Blackburn to stop his harassment of her, especially in front of co-workers, Mr. Blackburn responded by screaming at Plaintiff, referring to her as “trash,” and threatening to take away Plaintiff’s responsibilities as a veteran’s affairs financial aid

1 advisor – a position that Mr. Blackburn knew Plaintiff loved. Mr. Blackburn then proceeded to
2 take away Plaintiff’s veteran’s affairs position in retaliation for her complaints.

3 18. On or around February 6, 2025, Mr. Blackburn’s sexual harassment and
4 mistreatment of Plaintiff became too much for Plaintiff to bear and Plaintiff reported Mr.
5 Blackburn’s conduct to Defendants’ human resources department. Despite meeting with Plaintiff
6 and Plaintiff explaining what Mr. Blackburn was doing, Defendants did nothing to address or stop
7 the harassment from happening.

8 19. Because Mr. Blackburn’s harassment of Plaintiff was so severe and pervasive and
9 Defendants refused to address it, Plaintiff was forced to take a medical leave of absence on or
10 around March 2025.

11 20. As a proximate result of Defendants’ acts, Plaintiff has suffered and continues to
12 suffer both physical and non-physical injuries, including severe emotional distress, humiliation,
13 embarrassment, and mental anguish all to her damage in an amount to be proven at trial.

14 21. In doing the acts and/or failing to do the acts alleged herein above, Defendants
15 engaged in discriminatory acts and conduct with malice towards Plaintiff and/or a reckless
16 indifference to her statutorily protected rights and in conscious disregard of the rights, both
17 statutory and common law, guaranteed Plaintiff by the State of California. As such, Defendants
18 are guilty of oppression and malice for which Plaintiff is entitled to punitive damages, in an
19 amount to be proven at trial.

20 **FACTS COMMON TO PLAINTIFF’S PAGA CAUSE OF ACTION**

21 22. At all times relevant to the Complaint, Plaintiff was employed by Defendants as a
22 non-exempt hourly employee.

23 23. At all times relevant, Plaintiff and Aggrieved Employees were non-exempt hourly
24 employees. As such, Plaintiff and Aggrieved Employees were and are eligible for minimum
25 wages and overtime compensation.

26 24. Plaintiff and Aggrieved Employees were not properly paid for all hours that they
27 spent working, including overtime hours worked despite routinely and consistently working more
28 than 8 hours per day and 40 hours per week in violation of the California Labor Code. However,

Defendants failed to pay all overtime wages owing to Plaintiff and Aggrieved Employees, and Plaintiff and Aggrieved Employees were underpaid for overtime. In this regard, Plaintiff and other employees regularly worked off the clock before and after their shifts in order to complete their work duties.

25. At all times relevant, Plaintiff and Aggrieved Employees were frequently not provided with an opportunity to take a legally compliant meal period prior to the end of their fifth hour of work. Plaintiff and Aggrieved Employees routinely were required to miss their meal periods entirely, work through their meal periods, or were required to take a truncated meal period. Plaintiff and Aggrieved Employees also regularly were not provided second meal periods when they worked shifts of 10 hours or more.

26. At all times relevant, Defendants failed to relieve Plaintiff and Aggrieved Employees of employer control during rest periods.

27. Pursuant to California law, an employee is entitled to one ten-minute rest period if required to work at least three and one-half hours, two ten-minute rest periods if required to work more than six hours, and three ten-minute rest periods if required to work more than ten hours. Pursuant to California law, an employee is entitled to one thirty-minute meal period if required to work at least five hours and two thirty-minute meal periods if required to work at least ten hours.

28. Defendants did not consistently provide meal and rest periods because business needs took precedence, routinely interfering with what should be break periods. If Plaintiff or Aggrieved Employees failed to address business needs at any time, including during breaks, they were subject to discipline. Moreover, Plaintiff and Aggrieved Employees meal periods were routinely interrupted. Despite these policies and practices, Defendants have failed to pay missed meal or rest period premiums to Plaintiff or Aggrieved Employees for these violations.

29. By requiring Plaintiff and Aggrieved Employees to work off-the-clock during meal periods, Defendants failed to pay Plaintiff and Aggrieved Employees for all hours worked.

30. Defendants also failed to provide Plaintiff and Aggrieved Employees with accurate semimonthly itemized statements of the total number of hours worked by each, and all applicable hourly rates in effect during each pay period, in violation of California Labor Code § 226 and/or

1 1174(d). In doing so, Defendants have not only failed to pay their workers the full amount of
2 compensation due, they have, until now, effectively shielded themselves from their employees'
3 scrutiny for their unlawful conduct by concealing the magnitude (e.g., the full number of hours
4 worked) and financial impact of their wrongdoing.

5 31. Defendants also failed to reimburse Plaintiff and Aggrieved Employees for
6 business expenses that they incurred related to, among other things, the required use of their
7 personal cellular telephones for work-related purposes in violation of California Labor Code §
8 2802.

9 32. All policies and practices described herein were in place at all of Defendants'
10 business locations in California. As such, all Aggrieved Employees were subject to these same
11 policies in violation of California law. Plaintiff is informed and believes that Defendants
12 knowingly failed to pay all wages owed (including overtime, minimum, and meal and rest period
13 premium payments), failed to provide meal and rest periods, failed to maintain and provide
14 accurate time and payroll records, failure to reimburse business expenses, and failed to pay final
15 wages to Aggrieved Employees whose employment has ended, thereby enjoying a significant
16 competitive edge over other companies within its industry. Even after Plaintiff and Aggrieved
17 Employees were terminated or voluntarily resigned, Defendants still failed to pay all wages owed
18 upon separation, despite the penalty provisions of California Labor Code §§ 201-204. More than
19 30 days have passed since certain Aggrieved Employees have left Defendants' employ, entitling
20 those Aggrieved Employees to the maximum penalties.

21 33. In sum, Defendants failed to maintain time records accurately setting forth the
22 amount of hours that Plaintiff and Aggrieved Employees worked. Defendants failed to pay for
23 all hours worked, including overtime hours worked. Defendants failed to provide meal and rest
24 periods and failed to make premium payments for missed meal and rest breaks. Defendants failed
25 to issue wage statements accounting for the number of hours actually worked by Plaintiff and
26 Aggrieved Employees. Defendants failed to reimburse Plaintiff and Aggrieved Employees for
27 business expenses that they incurred. Defendants also failed to timely pay all wages owing upon
28 separation of employment.

34. As a direct and proximate result of Defendants' unlawful conduct, as set forth herein, Plaintiff and Aggrieved Employees are entitled to recover civil penalties, attorneys' fees, and litigation costs, pursuant to statute.

FIRST CAUSE OF ACTION
SEXUAL HARASSMENT

(California Gov't Code § 12940 *et seq.*)

(*On behalf of Plaintiff against Defendants SAN JOAQUIN VALLEY COLLEGE, INC. and Does 1 through 50*)

35. Plaintiff incorporates in this cause of action each and every allegation of the preceding paragraphs, with the same force and effect as though fully set forth herein.

36. Under the California Fair Employment and Housing Act ("FEHA"), it is unlawful for an employer to harass an employee due to, *inter alia*, the employee's sex.

37. Plaintiff is a black woman.

38. At all times material hereto, Plaintiff was employed by Defendant SAN JOAQUIN VALLEY COLLEGE, INC. as a financial aid advisor and veteran's affairs financial aid advisor.

39. At all times herein mentioned, Cal. Government Code section 12940(j)(1) (provision of the FEHA) was in full force and effect and were binding on Defendants. The FEHA requires Defendants to refrain from harassing any employee on the basis of the employee's sex. Within the time provided by law, Plaintiff received a "Right-to-Sue" letter from the California Civil Rights Department.

40. On numerous occasions during Plaintiff's employment with Defendants, Plaintiff was harassed by having to endure derogatory comments and conduct from Plaintiff's supervisor Matthew Blackburn. These comments included, *inter alia*, constantly remarking about the size of Plaintiff's buttocks and making crude jokes about Plaintiff's buttocks. The comments were made by Mr. Blackburn in front of several of Plaintiff's coworkers. No investigation was conducted and no disciplinary action was taken against Mr. Blackburn.

41. The harassment was based on Plaintiff's sex.

42. Defendants' conduct was so severe and pervasive that it altered Plaintiff's conditions of employment.

43. Defendants' treatment of Plaintiff caused her to consider the work environment to be hostile and/or abusive, and a reasonable person in her circumstances would have similarly considered the work environment to be hostile and/or abusive. Indeed, Plaintiff was forced to take a medical leave of absence because of the severity of the harassment.

44. Defendants were on notice that the derogatory sexual comments were being made to Plaintiff, and Defendants failed to take any immediate and appropriate corrective action.

45. Defendants' conduct was substantial factor in causing Plaintiff's harm.

46. As a direct and proximate result of the conduct of Defendants, Plaintiff has suffered and will continue to suffer emotional and physical distress and injury, humiliation, and anxiety in an amount to be determined at trial.

47. Defendants' actions were cold, callous, and reckless as to be malicious. Plaintiff is therefore entitled to an award of punitive damages in an amount to be determined at trial.

SECOND CAUSE OF ACTION

FAILURE TO INVESTIGATE AND PREVENT HARASSMENT

(California Gov't Code § 12940 *et seq.*)

(On behalf of Plaintiff against Defendants SAN JOAQUIN VALLEY COLLEGE, INC. and Does 1 through 50)

48. Plaintiff incorporates in this cause of action each and every allegation of the preceding paragraphs, with the same force and effect as though fully set forth herein.

49. Under the FEHA, an employer is required to promptly investigate harassment, taking "all reasonable steps necessary to prevent harassment from occurring," and taking "immediate and appropriate corrective action," as set forth in California Government Code sections 12940(j-k).

50. Plaintiff is a black woman.

51. At all times material hereto, Plaintiff was employed by Defendant SAN JOAQUIN VALLEY COLLEGE, INC. as a financial aid advisor and veteran's affairs financial aid advisor.

1 52. At all times herein mentioned, Cal. Government Code section 12940(k) (provision
2 of the FEHA) was in full force and effect and were binding on Defendants. The FEHA required
3 Defendants to take all reasonable steps to prevent, investigate, and stop Mr. Blackburn from
4 sexually harassing Plaintiff. Within the time provided by law, Plaintiff received a “Right-to-Sue”
5 letter from the California Civil Rights Department.

6 53. On numerous occasions during Plaintiff’s employment with Defendants, Plaintiff
7 was sexually harassed by having to endure derogatory comments and conduct from Plaintiff’s
8 supervisor Matthew Blackburn. The comments were made by Mr. Blackburn in front of several
9 of Plaintiff’s coworkers.

10 54. The harassment was based on Plaintiff’s sex.

11 55. Defendants’ conduct was so severe and pervasive that it altered Plaintiff’s
12 conditions of employment.

13 56. Defendants’ treatment of Plaintiff caused her to consider the work environment to
14 be hostile and/or abusive, and a reasonable person in her circumstances would have similarly
15 considered the work environment to be hostile and/or abusive.

16 57. Defendants were on notice that the derogatory sexual comments were being made
17 to Plaintiff and the pervasiveness of such actions, and Defendants failed to take any immediate
18 and appropriate corrective action. Moreover, Defendants failed to properly investigate or
19 discipline Mr. Blackburn for his unlawful conduct.

20 58. Defendants’ conduct was substantial factor in causing Plaintiff’s harm.

21 59. As a direct and proximate result of the conduct of Defendants, Plaintiff has
22 suffered and will continue to suffer emotional and physical distress and injury, humiliation, and
23 anxiety in an amount to be determined at trial.

24 60. Defendants’ actions were cold, callous, and reckless as to be malicious. Plaintiff
25 is therefore entitled to an award of punitive damages in an amount to be determined at trial.

THIRD CAUSE OF ACTION
VIOLATIONS OF THE PRIVATE ATTORNEYS GENERAL ACT (“PAGA”)
(Lab. Code § 2698 *et seq.*)
(*On behalf of Plaintiff and all Aggrieved Employees against Defendants SAN JOAQUIN VALLEY COLLEGE, INC. and DOES 51 through 100*)

61. Plaintiff and Aggrieved Employees incorporate in this cause of action each and every allegation of the preceding paragraphs, with the same force and effect as though fully set forth herein.

62. Plaintiff is an “aggrieved employee” under the California Labor Code Private Attorneys General Act (“PAGA”) as she was employed by Defendants during the applicable statutory period and suffered one or more of the Labor Code violations alleged herein. As such, she seeks to recover, on behalf of herself and all other current and former aggrieved employees of Defendants, the civil penalties provided by PAGA, plus reasonable attorney’s fees and costs.

63. Plaintiff seeks to recover the PAGA civil penalties through a representative action as permitted by PAGA and the California Supreme Court in *Arias v. Superior Court*, 46 Cal. 4th 969 (2009).

64. Plaintiff alleges that Defendants violated the provisions detailed herein, and thus seeks to enforce civil penalties against Defendants for these violations. The PAGA allows a private individual to recover civil penalties previously only recoverable by the State. Although some of the labor provisions referenced herein do not themselves provide the amount of any penalty, the PAGA states that for all provisions of the Labor Code for which no civil penalty is established, including but not limited to the provisions referenced herein, the penalty shall be one hundred dollars (\$100) for each aggrieved employee per pay period for the initial violation, and two hundred dollars (\$200) for each aggrieved employee per pay period for each subsequent violation. Accordingly, these are the penalties that Plaintiff seeks to enforce to the extent civil penalties are not already provided for in the Labor Code. If the Labor Code already provides penalties for particular violations, Plaintiff seeks those penalties.

65. Plaintiff is also entitled to recover for herself, other aggrieved employees, and the State of California, civil penalties pursuant to California Labor Code § 210 in the amount of \$100 per employee per initial violation of the timely payment requirements of California Labor Code

§ 204 and \$200 per employee for each subsequent violation, plus 25% of the amount unlawfully withheld. Plaintiff seeks to pursue remedies pursuant to PAGA for these violations.

66. California Labor Code § 226.3 imposes a civil penalty in addition to any other penalty provided by law of two hundred fifty dollars (\$250) per aggrieved employee for the first violation, and one thousand dollars (\$1,000) per aggrieved employee for each subsequent violation under California Labor Code § 226(a).

67. Pursuant to California Labor Code § 203, for an employer who willfully fails to pay any wages of an employee who is discharged or quits, that employee's wages shall continue as a penalty from the due date at the same rate until paid, but shall not continue for more than thirty (30) days. California Labor Code § 256 imposes a civil penalty in an amount not exceeding thirty (30) days pay as waiting time under the terms of California Labor Code § 203.

68. California Labor Code § 558 Provides: "Any employer or other person acting on behalf of an employer who violates, or causes to be violated, a section of this chapter or any provision regulating hours and days of work in any order of the Industrial Welfare Commission shall be subject to a civil penalty as follows: (1) For any initial violation, fifty dollars (\$50) for each underpaid employee for each pay period for which the employee was underpaid in addition to an amount sufficient to recover underpaid wages. (2) For each subsequent violation, one hundred dollars (\$100) for each underpaid employee for each pay period for which the employee was underpaid in addition to an amount sufficient to recover underpaid wages. (3) Wages recovered pursuant to this section shall be paid to the affected employee."

69. Under California Labor Code § 1174.5, Defendants are subject to a civil penalty of five hundred dollars (\$500) for failing to keep records as required by section 1174(d).

70. California Labor Code § 2698 *et seq.* imposes a civil penalty of one hundred dollars (\$100) per pay period, per aggrieved employee for the initial violation of California Labor Code §§ 204, 510, 512, 1174, 1194, 1198 and two hundred dollars (\$200) for each aggrieved employee per pay period for each subsequent violation.

71. Plaintiff has fully complied with the procedural requirements specified in California Labor Code § 2699.3 as to each of the alleged violations. Plaintiff is therefore entitled

1 to pursue her penalty claims pursuant to California Labor Code section 2699 *et seq.*, the Private
2 Attorneys General Act. Cal. Lab. Code § 2699.3(a)(2)(C).

3 72. Enforcement of statutory provisions to protect workers and to ensure proper and
4 prompt payment of wages is a fundamental public interest. Plaintiff's successful enforcement of
5 important rights affecting the public interest will confer a significant benefit upon the general
6 public. Private enforcement of these rights is necessary, as no public agency has pursued
7 enforcement.

8 73. As a result of the violations alleged, Plaintiff, as an aggrieved employee on behalf
9 of herself and other similarly situated employees employed by Defendants, seeks all civil penalties
10 available pursuant to California Labor Code § 2699, including all civil penalties, attorneys' fees,
11 expenses, and costs of suit.

12 **PRAYER FOR RELIEF**

13 WHEREFORE, Plaintiff prays for judgment for herself and all others on whose behalf
14 this suit is brought against Defendants, jointly and severally, as follows:

15 1. That this Court award Plaintiff actual damages, compensatory damages,
16 compensation for special damages according to proof, and general damages in amounts according
17 to proof and in no event in an amount less than the jurisdictional limit of this court, as well as
18 punitive damages to Plaintiff according to proof;

19 2. For statutory penalties pursuant to, among others, the Private Attorney General
20 Act;

21 3. That this Court award statutory attorneys' fees and costs, including reasonable
22 attorneys' fees and expert fees, including those available under the California Government Code
23 and Labor Code §§ 2698 *et seq.*, and other provisions of the Labor Code and "private attorney
24 general" statutes contained in Code of Civil Procedure section 1021.5;

25 4. That this Court award prejudgment and post-judgment interest according to any
26 applicable provision of law or as otherwise permitted by law; and

27 5. That this Court award such other and further relief as the Court deems just and
28 proper.

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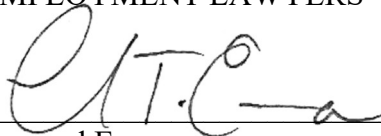
JURY DEMAND

Plaintiff hereby demands a jury trial on all issues and causes of action.

Dated: July 22, 2025

Respectfully submitted,

EMPLOYMENT LAWYERS



Leonard Emma

Cody Stroman

Attorneys for Plaintiff