

FILED

SEP 05 2023

SHASTA COUNTY SUPERIOR COURT
BY: E. WIECHMAN, DEPUTY CLERK

HUNTER PYLE, SBN 191125
JOHN J. DARIN, SBN 323730
HUNTER PYLE LAW
505 14th Street, Suite 600
Oakland, California 94612
Telephone: (510) 444-4400
Facsimile: (510) 444-4410
Email: hunter@hunterpylelaw.com
jdarin@hunterpylelaw.com

*Attorneys for Plaintiffs, the Putative Class,
and all other similarly situated Aggrieved Employees*

**IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SHASTA**

JOHN COFFEE; RON FREEMAN; DANIEL
JURGENSEN; JASON MCBROOME;
JOSHAWA WARNECKE; ANDRE
BIENCOURT; KENNETH LAFOUNTAIN;
LEON STAMPS; BRIAN WARNECKE;
JAMES YERIES; and JOHN YERIES, on behalf
of themselves and all others similarly situated,

Plaintiffs,

v.

CONTECH ENGINEERED SOLUTIONS
LLC, and DOES 1 through 10, inclusive,

Defendant.

Case No.: 22CV-0201161

CLASS AND REPRESENTATIVE ACTION

SECOND AMENDED COMPLAINT

1. **FAILURE TO PAY MINIMUM WAGES**
(Labor Code §§ 1182.11-1182.13, 1194,
1194.2, 1197 & 1198; IWC Wage Order No.
1);
2. **FAILURE TO PAY OVERTIME WAGES**
(Labor Code §§ 510, 1194; IWC Wage
Order No. 1);
3. **FAILURE TO PROVIDE MEAL PERIODS**
(Labor Code §§ 226.7 & 512; IWC Wage
Order No. 1);
4. **FAILURE TO AUTHORIZE AND
PERMIT REST PERIODS** (Labor Code
§ 226.7; IWC Wage Order No. 1);
5. **FAILURE TO PROVIDE ADEQUATE
WAGE STATEMENTS** (Labor Code
§ 226);
6. **UNLAWFUL BUSINESS PRACTICES**
(Business & Professions Code §§ 17200, *et
seq.*); and
7. **VIOLATIONS OF THE LABOR CODE
PRIVATE ATTORNEYS GENERAL ACT
OF 2004** (Labor Code § 2698, *et seq.*).

DEMAND FOR JURY TRIAL