

MAY 11 2026

By 
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Attorneys for Plaintiff, GARY WALKER SR and
on behalf of all others similarly situated

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO**

GARY WALKER SR, an individual and on
behalf of all others similarly situated,

Plaintiff,

v.

BOYS REPUBLIC, a California nonprofit
corporation; and DOES 1 through 100,
inclusive,

Defendants.

CASE NO.: CIVRS2506102

CLASS ACTION

[Assigned for all purposes to the
Hon. Gilbert Ochoa in Dept. R17]

FIRST AMENDED COMPLAINT FOR:

1. FAILURE TO PAY OVERTIME WAGES;
2. FAILURE TO PAY MINIMUM WAGES;
3. FAILURE TO PROVIDE MEAL PERIODS;
4. FAILURE TO PROVIDE REST PERIODS;
5. WAITING TIME PENALTIES;
6. WAGE STATEMENT VIOLATIONS;
7. FAILURE TO TIMELY PAY WAGES;
8. FAILURE TO INDEMNIFY;
9. UNFAIR COMPETITION; and,
10. CIVIL PENALTIES UNDER THE
LABOR CODE PRIVATE ATTORNEYS'
GENERAL ACT (2004) FOR
VIOLATIONS OF LABOR CODE §§ 210,
226.3, 558, 1174.5, 1197.1, AND 2699, *et*
seq.

DEMAND FOR JURY TRIAL

[Amount in Controversy Exceeds \$35,000.00]

Complaint Filed: June 18, 2025

Plaintiff, GARY WALKER SR ("Plaintiff"), on behalf of Plaintiff and all others similarly situated, alleges as follows:

GENERAL ALLEGATIONS

INTRODUCTION

1. This is a Class Action, pursuant to Code of Civil Procedure section 382, against BOYS REPUBLIC, and any of its respective subsidiaries or affiliated companies within the State of California ("BOYS REPUBLIC" and collectively, with DOES 1 through 100, as further defined below, "Defendants") on behalf of Plaintiff and all other current and former non-exempt California employees employed by or formerly employed by Defendants ("Class Members").

2. This is also a representative action, pursuant to the Labor Code Private Attorneys General Act of 2004, codified at Labor Code section 2698, *et seq.* ("PAGA"), against Defendants, and any of its respective subsidiaries or affiliated companies within the State of California as a proxy of the Labor and Workforce Development Agency of the State of California ("LWDA"), on behalf of Plaintiff and all other current and former non-exempt employees of Defendants working within the Civil Penalty Period, as further defined herein, and, as it pertains to the alleged claims for failure to comply with the Labor Code. Specifically, in connection with the alleged claims for failure to comply with Labor Code sections 201, 202, 203, 204, 210, 221, 223, 226, 226.2, 226.3, 226.7, 233, 234, 245, 246, 432, 432.7, 432.8, 510, 512, 551, 552, 558, 1174, 1174.5, 1182.12, 1194, 1194.2, 1197, 1197.1, 1198, 1198.5, 2800, 2802, 2699, among others, Business and Professions Code section 17200, as well as applicable Wage Orders, Plaintiff seeks to represent all employees of BOYS REPUBLIC, and each of them, DOES 1 through 100, as well as their parents, subsidiaries and affiliates (hereinafter, collectively, "Defendants") working within one years preceding the date of this letter and continuing past the date of this Letter into perpetuity ("PAGA Period"). On all other claims mentioned herein, Plaintiff seeks to represent only non-exempt employees of Defendants working within the Civil Penalty Period. Collectively, those employees shall be known as "Aggrieved Employees" herein.