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ALAMEDA COUNTY

JUL 08 2015

CLERK OF THE SUPERIOR COURT

By Glenn Baker Deputy

1 Stan S. Mallison (SBN 184191)
Hector R. Martinez (SBN 206336)
2 Marco A. Palau (SBN 242340)
Joseph D. Sutton (SBN 269951)
3 Eric S. Trabucco (SBN 295473)
MALLISON & MARTINEZ
4 1939 Harrison Street, Suite 730
Oakland, California 94549
5 Telephone: 510.832.9999
Facsimile: 510.832.1101

6 Attorneys for Plaintiffs and the State of California,
7 Pursuant to the Private Attorneys General Act

8 SUPERIOR COURT OF CALIFORNIA

9 IN AND FOR THE COUNTY OF ALAMEDA

10 GABRIEL F. AYALA, on behalf of all others
similarly situated, and on behalf of the State of
11 California and the workforce in the interest of
the general public,

12 Plaintiffs,

13 vs.

14 COLD STORAGE MANUFACTURING,
15 INC., a California Corporation, COLD
STORAGE DESIGN & BUILD, INC., a
16 California Corporation; and DOES 1 through
20,

17 Defendants.
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Case No. RG14725346

CLASS ACTION

FIRST AMENDED COMPLAINT FOR:

1. FAILURE TO PAY MINIMUM WAGE (LABOR CODE §1194)
2. FAILURE TO PAY OVERTIME (LABOR CODE §510);
3. UNLAWFUL KICKBACK PAYMENTS (LABOR CODE §§221, 224)
4. FAILURE TO REIMBURSE WORK EXPENSES (LABOR CODE §2802);
5. REST PERIOD VIOLATIONS (LABOR CODE § 226.7);
6. MEAL PERIOD VIOLATIONS (LABOR CODE § 226.7);
7. WAITING TIME PENALTIES OR WAGES (LABOR CODE § 203);
8. WAGE STATEMENT PENALTIES, (LABOR CODE § 226);
9. VIOLATION OF UCL (BUS. & PROF. CODE §§ 17200 *et seq.*); and
10. FAILURE TO PAY VESTED VACATION PAY (LABOR CODE § 227.3)
11. PAGA PENALTIES FOR VIOLATIONS OF LABOR CODE (LABOR CODE §§2699 *et seq.*)