STAN S. MALLISON (Bar No. 184191)
stan@themmlawfirm.com
HECTOR R. MARTINEZ (Bar No. 206336)
hectorm@themmlawfirm.com
CODY A. BOLCE (Bar No. 322725)
cbolce@themmlawfirm.com
MALLISON & MARTINEZ
1939 Harrison Street, Suite 730
Oakland, California 94612-3547
Telephone: (510) 832-9999
Facsimile: (510) 832-1101

Attorneys for Plaintiff

FILED
SUPERIOR COURT SAN JOAQUIN
2026 JUL 28 P 12:42
STEPHANIE BOHRER, CLERK
BY MONICA D. JONES
DEPUTY

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN JOAQUIN

JOSE LUIS HERRERA,

Plaintiff,

vs.

SAI DÉCOR dba THE VERANDA, a California corporation, and DOES 1 through 50, inclusive,

Defendant.

Case No. STK-CV-UOE-2025-0015081

THIRD AMENDED CLASS AND PRIVATE ATTORNEYS GENERAL ACT COMPLAINT

1. Failure to Pay Contractual Wages (Labor Code §§ 201, 202, 221, 226.2);
2. Failure to Pay Minimum Wages;
3. Failure to Provide Rest Periods or Pay Additional Wages in Lieu Thereof;
4. Failure to Provide Meal Periods or Pay Additional Wages in Lieu Thereof;
5. Knowing and Intentional Failure to Comply with Itemized Employee Wage Statement Provisions;
6. Failure to Pay All Wages Owed Upon Termination or Resignation;
7. Failure to Timely Pay Wages During Employment (Labor Code § 204);
8. Violation of Unfair Competition Law, Cal. Bus. & Prof. Code §§ 17200 *et seq.*; and
9. Penalties Pursuant to the Labor Code Private Attorneys General Act, Labor Code §§ 2698 *et seq.*

DEMAND FOR JURY TRIAL

FILED BY FAX