

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

7 Attorneys for Plaintiff

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SUPERIOR COURT OF THE STATE OF CALIFORNIA

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IN AND FOR THE COUNTY OF SAN JOAQUIN

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12 JOSE LUIS HERRERA,

13 Plaintiff,

14 vs.

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

17 Defendant.

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FILED
SUPERIOR COURT SAN JOAQUIN

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

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SUPERIOR COURT SAN JOAQUIN

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**SECOND 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

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