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Case #25CV482915
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Tuvia Korobkin (SBN 268066)
tuvia@marqueelaw.com
Neil M. Larsen (SBN 276490)
neil@marqueelaw.com
Nancy Goodes (SBN 346529)
nancy@marqueelaw.com
MARQUEE LAW GROUP, A Professional Corporation
9100 Wilshire Boulevard, Suite 445 East Tower
Beverly Hills, California 90212
(310) 275-1844 telephone
(310) 275-1801 fax

Attorneys for Plaintiff
VICTORIA BOUTROS

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SANTA CLARA

VICTORIA BOUTROS, on behalf of herself and
all others similarly situated,

Plaintiff,

vs.

GLOBAL LOGIC, INC., a corporation; and
DOES 1 through 100, inclusive,

Defendants.

Case No. 25CV482915

**FIRST AMENDED CLASS AND
REPRESENTATIVE ACTION
COMPLAINT FOR:**

- 1. FAILURE TO REIMBURSE
BUSINESS EXPENSES (LABOR
CODE §§ 2802, 2804);**
- 2. UNFAIR COMPETITION (BUS. &
PROF. CODE § 17200, *et seq.*) ; and**
- 3. CIVIL PENALTIES UNDER THE
LABOR CODE PRIVATE
ATTORNEYS' GENERAL ACT
(LABOR CODE § 2698, *et seq.*)**

**DEMAND FOR JURY TRIAL
UNLIMITED CIVIL CASE**

1 Plaintiff Victoria Boutros (“Plaintiff”), on behalf of herself and all others similarly
2 situated, as well as the State of California and other aggrieved employees, hereby brings this First
3 Amended Class and Representative Action Complaint against Global Logic, Inc. and Does 1
4 through 100, inclusive (collectively, “Defendants”), and on information and belief alleges as
5 follows:

6 **JURISDICTION**

7 1. Plaintiff, on behalf of herself and all others similarly situated, as well as the State
8 of California and other aggrieved employees, hereby brings this class and representative action
9 for recovery of damages and penalties under California Business and Professions Code section
10 17200, *et seq.*; Labor Code §§ 1174, 2802, 2804, and 2698, *et seq.*; and Industrial Welfare
11 Commission Wage Order No. 4 (“Wage Order 4”), in addition to seeking declaratory relief and
12 restitution. This class action is brought pursuant to Code of Civil Procedure § 382. This Court
13 has jurisdiction over Defendants’ Labor Code violations as the amount in controversy exceeds
14 this Court’s jurisdictional minimum.

15 **VENUE**

16 2. Venue is proper in this judicial district pursuant to California Code of Civil
17 Procedure §§ 395(a) and 395.5, as at least some of the acts and omissions complained of herein
18 occurred in Santa Clara County. Defendants own, maintain offices, transact business, have an
19 agent or agents within Santa Clara County, and/or otherwise are found within Santa Clara County,
20 and Defendants are within the jurisdiction of this Court for purposes of service of process.

21 **PARTIES**

22 3. Plaintiff is an individual over the age of eighteen (18). At all relevant times,
23 Plaintiff was, and currently is, a California resident. During the four years immediately preceding
24 the filing of this action and within the statute of limitations periods applicable to each cause of
25 action pled herein, Plaintiff was employed by Defendants as a non-exempt employee. Plaintiff
26 was, and is, a victim of Defendants’ policies and/or practices complained of herein, lost money
27 and/or property, and has been deprived of the rights guaranteed by California Labor Code §§
28 1174, 2802, 2804, and 2698, *et seq.*; California Business & Professions Code § 17200, *et seq.*

(Unfair Competition), and Wage Order 4, which sets employment standards for employees in professional, technical, clerical, mechanical and similar occupations.

4. Plaintiff is informed and believes, and based thereon alleges, that during the four years preceding the filing of this lawsuit and continuing to the present, Defendants did (and do) business as a digital product engineering company, and that they employed Plaintiff and/or other similarly situated non-exempt employees within Santa Clara County and the State of California.

5. Plaintiff does not know the true names or capacities, whether individual, partner, or corporate, of the defendants sued herein as DOES 1 through 100, and for that reason, said defendants are sued under such fictitious names, and Plaintiff will seek leave from this Court to amend this Complaint when such true names and capacities are discovered. Plaintiff is informed and believes, and thereon alleges, that each of said fictitious defendants, whether individual, partners, or corporate, were responsible in some manner for the acts and omissions alleged herein, and proximately caused Plaintiff and the Classes (as defined in Paragraph 14) to be subject to the unlawful employment practices, wrongs, injuries, and damages complained of herein.

6. Plaintiff is informed and believes, and based thereon alleges, that at all times mentioned herein, Defendants were and are the employers of Plaintiff and all Class members.

7. At all times herein mentioned, each of said Defendants participated in the acts herein alleged to have been done by the named Defendants; and furthermore, the Defendants, and each of them, were the agents, servants, and employees of each of the other Defendants, as well as the agents of all Defendants, and at all times herein mentioned were acting within the course and scope of said agency and employment. Defendants, and each of them, approved of, condoned, and/or otherwise ratified each of the acts or omissions alleged herein.

8. At all times mentioned herein, Defendants, and each of them, were members of and engaged in a joint venture, partnership, and common enterprise, and acting within the course and scope of and in pursuance of said joint venture, partnership, and common enterprise. Further, Plaintiff alleges that all Defendants were joint employers for all purposes of Plaintiff and all members of the Classes (as defined in Paragraph 14).

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10. During her employment with Defendants, Defendants required Plaintiff and other employees to incur business expenses without reimbursement. Specifically, Plaintiff and other employees who worked from home were required to use their own internet service to perform their work for Defendants, as well as provide their own computer mice and other work-related items. On information and belief, many of Defendants' other employees have also been required to provide their internet service, mice, and other work-related items without reimbursement.

12. Beginning in or about January 2025, Defendants also failed to maintain accurate records of the hours worked by Plaintiff and other employees. Specifically, Plaintiff regularly worked in excess of eight hours a day and/or 40 hours a week. However, beginning in or about January 2025, Defendants announced to their employees that it was Defendants' new policy that employees were not permitted to report any overtime hours worked. Plaintiff's workload did not change at all, so she continued working overtime hours. However, Plaintiff and other employees were forced to begin working those hours unpaid and un-reported due to Defendants' aforementioned policy. This policy resulted in Defendants failing to maintain accurate records of Plaintiff's and other employees' hours worked, in violation of Labor Code § 1174 and Section 7 of Wage Order 4.

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1 **CLASS ACTION ALLEGATIONS**

2 14. **Class Definition:** Plaintiff brings this action on behalf of herself and the following
3 Class pursuant to California Code of Civil Procedure § 382:

4 a. The Expense Reimbursement Class consists of all of Defendants' employees in
5 California who were required to use their personal internet for work-related purposes,
6 and/or provide computer mice or other items for work-related purposes, at any time from
7 four years prior to the filing of this action through the present.

8 15. **Numerosity/Ascertainability:** The members of the Class are so numerous that
9 joinder of all members would be unfeasible and impracticable. The membership of the Class is
10 unknown to Plaintiff at this time; however, it is estimated that the Class numbers greater than one
11 hundred (100) individuals. The identity of such membership is readily ascertainable via
12 Defendants' employment records.

13 16. **Common Questions of Law and Fact Predominate/Well Defined Community**
14 **of Interest:** There are common questions of law and fact as to Plaintiff and all other similarly
15 situated employees, which predominate over questions affecting only individual members
16 including, without limitation to:

- 17 i. Whether Plaintiff and other employees were required to incur work-related
18 expenses;
19 ii. Whether Defendants properly reimbursed such expenses.

20 17. **Predominance of Common Questions:** Common questions of law and fact
21 predominate over questions that affect only individual members of the Classes. The common
22 questions of law set forth above are numerous and substantial and stem from Defendants' policies
23 and/or practices applicable to each individual class member, such as Defendants' expense
24 reimbursement policies/practices. As such, the common questions predominate over individual
25 questions concerning each individual class member's showing as to his or her eligibility for
26 recovery or as to the amount of his or her damages.

27 18. **Typicality:** Plaintiff's claims are typical of the claims of the Classes because
28 Plaintiff was employed by Defendants as a non-exempt employee in California during the

statute(s) of limitation applicable to each cause of action pled in the Complaint in this action. As alleged herein, Plaintiff, like the members of the Classes, was not reimbursed for all expenses she incurred in carrying out her job duties for Defendants.

19. **Adequacy of Representation:** Plaintiff is fully prepared to take all necessary steps to represent fairly and adequately the interests of the members of the Classes. Moreover, Plaintiff's attorneys are ready, willing, and able to fully and adequately represent the members of the Classes and Plaintiff. Plaintiff's attorneys have prosecuted numerous wage-and-hour class actions in state and federal courts in the past and are committed to vigorously prosecuting this action on behalf of the members of the Classes.

20. **Superiority:** The California Labor Code is broadly remedial in nature and serves an important public interest in establishing minimum working conditions and standards in California. These laws and labor standards protect the average working employee from exploitation by employers who have the responsibility to follow the laws and who may seek to take advantage of superior economic and bargaining power in setting onerous terms and conditions of employment. The nature of this action and the format of laws available to Plaintiff and members of the Classes make the class action format a particularly efficient and appropriate procedure to redress the violations alleged herein. If each employee were required to file an individual lawsuit, Defendants would necessarily gain an unfair advantage, as they would be able to exploit and overwhelm the limited resources of each individual plaintiff with their vastly superior financial and legal resources. Moreover, requiring each member of the Classes to pursue an individual remedy would discourage the assertion of lawful claims by employees who would be disinclined to file an action against their former and/or current employer for real and justifiable fear of retaliation and permanent damages to their careers at subsequent employment. Further, the prosecution of separate actions by individual class members would create a substantial risk of inconsistent or varying verdicts or adjudications with respect to the individual class members against Defendants herein; and which would establish potentially incompatible standards of conduct for Defendants. Further, the claims of the individual members of the Classes are not sufficiently large to warrant vigorous individual prosecution considering all of the concomitant

costs and expenses attending thereto. As such, the Class identified in Paragraph 14 is maintainable under California Code of Civil Procedure § 382.

FIRST CAUSE OF ACTION

FAILURE TO REIMBURSE BUSINESS EXPENSES

(AGAINST ALL DEFENDANTS)

21. Plaintiff re-alleges and incorporates by reference all previous paragraphs.

22. At all relevant times, Defendants were subject to Labor Code § 2802, which states that “an employer shall indemnify his or her employees for all necessary expenditures or losses incurred by the employee in direct consequence of the discharge of his or her duties, or of his or her obedience to the directions of the employer.”

23. At all relevant times, Defendants were subject to Labor Code § 2804, which states, “any contract or agreement, express or implied, made by any employee to waive the benefits of this article or any part thereof, is null and void, and this article shall not deprive any employee or his personal representative of any right or remedy to which he is entitled under the laws of this State.”

24. Due to Defendants’ unlawful policy and practice of requiring employees to provide and/or use their personal property, including but not limited to personal internet and computer mice, for work purposes and their failure to reimburse Plaintiff and members of the Expense Reimbursement Class, Defendants have violated Labor Code § 2802.

25. As a proximate result of Defendants’ policies and/or practices in violation of Labor Code §§ 2802 and 2804, Plaintiff and members of the Expense Reimbursement Class have suffered damages in sums, which will be shown according to proof.

26. Plaintiff and members of the Expense Reimbursement Class are entitled to attorneys’ fees and costs of suit pursuant to Labor Code § 2802(c) for bringing this action.

27. Pursuant to Labor Code § 2802(b), any action brought for the reimbursement of necessary expenditures carries interest at the same rate as judgments in civil actions. Thus, Plaintiff and members of the Expense Reimbursement Class are entitled to interest, which shall accrue from the date on which they incurred the initial necessary expenditure.

1 **SECOND CAUSE OF ACTION**

2 **UNFAIR COMPETITION**

3 **(AGAINST ALL DEFENDANTS)**

4 28. Plaintiff re-alleges and incorporates by reference all previous paragraphs.

5 29. Defendants have engaged, and continue to engage, in unfair and/or unlawful
6 business practices in violation of Business & Professions Code § 17200, *et seq.*, by failing to
7 reimburse business expenses incurred by Plaintiff and Class members.

8 30. Defendants' utilization of these unfair and/or unlawful business practices has
9 deprived Plaintiff and members of the Class of compensation to which they are legally entitled,
10 constitutes unfair and/or unlawful competition, and provides an unfair advantage over
11 Defendants' competitors who have been and/or are currently employing workers and attempting
12 to do so in honest compliance with applicable wage and hour laws.

13 31. Because Plaintiff is a victim of Defendants' unfair and/or unlawful conduct alleged
14 herein, Plaintiff, for herself and on behalf of the members of the Classes, seeks full restitution of
15 monies as necessary and according to proof, to restore all monies withheld, acquired, and/or
16 converted by Defendants pursuant to Business & Professions Code §§ 17203 and 17208.

17 32. The acts complained of herein occurred within the four years immediately
18 preceding the filing of this action.

19 33. Plaintiff was compelled to retain the services of counsel to file this court action to
20 protect her interests and those of the Class, to obtain restitution and injunctive relief on behalf of
21 Defendants' current employees, and to enforce important rights affecting the public interest.
22 Plaintiff has thereby incurred the financial burden of attorneys' fees and costs, which she is
23 entitled to recover under Code of Civil Procedure § 1021.5.

24 **THIRD CAUSE OF ACTION**

25 **CIVIL PENALTIES UNDER THE PRIVATE ATTORNEYS GENERAL ACT**

26 **(AGAINST ALL DEFENDANTS)**

27 34. Plaintiff re-alleges and incorporates by reference all previous paragraphs.

28 35. Defendants have committed several Labor Code violations against Plaintiff and

1 other aggrieved employees. Plaintiff is an “aggrieved employee” within the meaning of Labor
2 Code § 2698 *et seq.* Plaintiff, acting on behalf of herself, the State of California, and other
3 aggrieved employees, brings this representative action against Defendants to recover the civil
4 penalties due to Plaintiff, other aggrieved employees, and the State of California according to
5 proof, as well as for injunctive relief, as provided under the Private Attorneys General Act, based
6 on the following violations:

- 7 a. Failing to reimburse Plaintiff and other aggrieved employees for expenses
8 incurred in the course of employment, in violation of Labor Code §§ 2802 and
9 2804; and
- 10 b. Failing to maintain accurate records on behalf of Plaintiff and other aggrieved
11 employees, in violation of Labor Code §§ 1174, 1198, and 1199.

12 36. On or about December 22, 2025, Plaintiff notified Defendant Global Logic, Inc.,
13 via certified mail, and the California Labor and Workforce Development Agency (“LWDA”) via
14 its website, of Defendants’ violations of the California Labor Code and Plaintiff’s intent to bring
15 a claim for civil penalties under California Labor Code § 2698 *et seq.* with respect to the violations
16 of the California Labor Code identified in paragraph 35 (a)-(b) above. Now that sixty-five days
17 have passed from Plaintiff’s notifying Defendants and the LWDA of these violations, Plaintiff
18 has exhausted her administrative requirements for bringing a claim under the Private Attorneys
19 General Act (“PAGA”) with respect to these violations.

20 37. As indicated in Plaintiff’s PAGA notice letter, the “aggrieved employees” whom
21 Plaintiff seeks to represent in this PAGA action include all of Defendants’ current and former
22 non-exempt employees who have worked for Defendants in California at any time from one year
23 prior to the date of Plaintiff’s PAGA notice letter through the date that judgment is entered in
24 Plaintiff’s PAGA action or any alternative date agreed upon by the parties and/or approved by the
25 court.

26 38. Plaintiff was compelled to retain the services of counsel to file this court action to
27 protect her interests and the interests of other aggrieved employees, and to assess and collect the
28 civil penalties owed by Defendants and to seek injunctive relief under the PAGA. Plaintiff has

thereby incurred attorneys' fees and costs, which he is entitled to recover under Labor Code § 2699(k).

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment for herself and for all others on whose behalf this suit is brought against Defendants, as follows:

1. For an order certifying the proposed Class;
2. For an order appointing Plaintiff as representative of the Class;
3. For an order appointing counsel for Plaintiff as counsel for the Class;
4. Upon the First Cause of Action, for compensatory, consequential, general, and special damages according to proof pursuant to Labor Code §§ 2802 and 2804;
5. Upon the Second Cause of Action, for restitution to Plaintiff and members of the Classes of all money and/or property unlawfully acquired by Defendants by means of any acts or practices declared by this Court to be in violation of Bus. & Prof Code § 17200, *et seq.*;
6. Upon the Third Cause of Action, for any and all civil penalties available to Plaintiff, the State of California, and other aggrieved employees under the Private Attorneys General Act, as well as injunctive relief under the Private Attorneys General Act prohibiting Defendants from engaging in the unlawful conduct alleged herein;
7. Prejudgment interest on all due and unpaid damages pursuant to Cal. Labor Code § 2802(b) and Civil Code § 3287; and Art. XV, § 1 of the California Constitution;
8. On all causes of action, for attorneys' fees and costs as provided by Labor Code § 2802(c), 2699(k), Code of Civil Procedure § 1021.5, and all other applicable statutes; and
9. For such other and further relief the Court may deem just and proper.

Date: February 26, 2026

MARQUEE LAW GROUP, APC



Neil M. Larsen
Attorneys for Plaintiff

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Date: February 26, 2026

Neil Larsen
Neil M. Larsen
Attorneys for Plaintiff