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SUPERIOR COURT

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individually and on behalf of others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN JOAQUIN – STOCKTON COURTHOUSE

ISRAEL HERNANDEZ ARAIZA,
individually and on behalf of all others
similarly situated,

PLAINTIFF,

v.

LIONUDAKIS FIREWOOD, a California
corporation; and DOES 1 through 50,
inclusive,

DEFENDANTS.

CASE NO.: STK-CV-UOE-2024-0001540
*Assigned For All Purposes to the Honorable
Judge George J. Abdallah; Dept. 10A*

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

- 1) FAILURE TO PAY OVERTIME (LABOR CODE §§ 510, 1198)
- 2) FAILURE TO PROVIDE MEAL PERIODS AND/OR PAY MEAL PERIOD PREMIUMS (LABOR CODE § 226.7, 512)
- 3) FAILURE TO AUTHORIZE AND PERMIT REST BREAKS AND/OR PAY REST BREAK PREMIUMS (LABOR CODE § 226.7)
- 4) FAILURE TO PAY MINIMUM WAGES (LABOR CODE §§ 1194, 1197, 1197.1)
- 5) FAILURE TO TIMELY PAY FINAL WAGES (LABOR CODE §§ 201-203)
- 6) FAILURE TO PROVIDE COMPLETE AND ACCURATE ITEMIZED WAGE STATEMENTS (LABOR CODE § 226)
- 7) FAILURE TO REIMBURSE NECESSARY BUSINESS EXPENSES (LABOR CODE § 2800-2802)
- 8) UCL VIOLATIONS (BUS. & PROF. CODE §§ 17200-17204)
- 9) PENALTIES PURSUANT TO THE PRIVATE ATTORNEYS GENERAL ACT (LABOR CODE §§ 2698 – 2699.5)

DEMAND FOR JURY TRIAL