

1 LEXINGTON LAW GROUP  
Mark N. Todzo, State Bar No. 168389  
2 Meredyth Merrow, State Bar No. 328337  
503 Divisadero Street  
3 San Francisco, CA 94117  
Telephone: (415) 913-7800  
4 Facsimile: (415) 759-4112  
5 mtodzo@lexlawgroup.com  
mmerrow@lexlawgroup.com

6 Attorneys for Plaintiff  
7 CENTER FOR ENVIRONMENTAL HEALTH

8  
9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

10 **COUNTY OF SAN FRANCISCO**

11  
12 CENTER FOR ENVIRONMENTAL HEALTH,  
a non-profit corporation,

13 Plaintiff,

14 v.

15 DOLLS KILL, INC., *et al.*,

16 Defendants.

Case No. CGC-22-602383

ASSIGNED FOR ALL PURPOSES TO:  
Judge Ethan P. Schulman, Dept. 304

**C.C.P. § 474 AMENDMENT TO  
COMPLAINT**

Action Filed: October 13, 2022  
Trial Date: None Set

1                   On October 13, 2022, Plaintiff Center for Environmental Health (“CEH”) filed its  
2 original Complaint in this action. Pursuant to California Code of Civil Procedure § 474, CEH  
3 hereby amends the operative First Amended Complaint (the “operative Complaint”) as follows:

4                   1.       By inserting the name FRANCESCA’S COLLECTIONS, INC. in place of  
5 the reference to DOE 1 in each place that it appears in the operative Complaint.

6                   2.       By inserting the name DICK’S SPORTING GOODS, INC. in place of the  
7 reference to DOE 2 in each place that it appears in the operative Complaint.

8                   3.       By inserting the name AMERICAN SPORTS LICENSING, LLC in place  
9 of the reference to DOE 3 in each place that it appears in the operative Complaint.

10                  4.       By inserting the name TORRID MERCHANDISING, INC. in place of the  
11 reference to DOE 4 in each place that it appears in the operative Complaint.

12                  5.       By inserting the name TORRID LLC in place of the reference to DOE 5 in  
13 each place that it appears in the operative Complaint.

14  
15  
16 Dated: February 9, 2023

Respectfully submitted,

LEXINGTON LAW GROUP



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Meredyth Merrow  
Attorney for Plaintiff  
Center for Environmental Health

1 **PROOF OF SERVICE**

2 I, Valerie Hammer, declare:

3 I am a citizen of the United States and employed in the County of San Francisco, State of  
4 California. I am over the age of eighteen (18) years and not a party to this action. My business  
5 address is 503 Divisadero Street, San Francisco, CA 94117 and my email address is  
vhammer@lexlawgroup.com.

6 On February 10, 2023, I served the following document(s) on all interested parties in this  
7 action by placing a true copy thereof in the manner and at the addresses indicated below:

8 **C.C.P. § 474 AMENDMENT TO COMPLAINT**

9  **BY MAIL:** I am readily familiar with the firm’s practice for collecting and processing mail  
10 with the United States Postal Service (“USPS”). Under that practice, mail would be deposited  
11 with USPS that same day with postage thereon fully prepaid at San Francisco, California in the  
ordinary course of business. On this date, I placed sealed envelopes containing the above  
mentioned documents for collection and mailing following my firm’s ordinary business practices.

12  **BY FACSIMILE:** I caused all pages of the document(s) listed above to be transmitted via  
13 facsimile to the fax number(s) as indicated and said transmission was reported as complete and  
without error.

14  **BY ELECTRONIC MAIL:** I transmitted a PDF version of the document(s) listed above via  
15 email to the email address(es) indicated on the attached service list [or noted above] before 5 p.m.  
on the date executed.

16 *Please see attached service list*

17  **BY PERSONAL DELIVERY:** I placed all pages of the document(s) listed above in a sealed  
18 envelope addressed to the party(ies) listed above, and caused such envelope to be delivered by  
hand to the addressee(s) as indicated.

19  **BY OVERNIGHT DELIVERY:** I deposited such document(s) in a box or other facility  
20 regularly maintained by FedEx, or delivered such document(s) to a courier or driver authorized by  
FedEx, with delivery fees paid or provided for, and addressed to the person(s) being served  
below.

21 I declare under penalty of perjury under the laws of the State of California that the  
22 foregoing is true and correct.

23 Executed on February 10, 2023 at San Francisco, California.

24 

25 \_\_\_\_\_  
26 Valerie Hammer  
27  
28

**SERVICE LIST**  
**CEH v. Dolls Kill, LLC, et al.**  
**Case No. CGC-22-602383**

<b>ADDRESS</b>	<b>PARTY</b>
Mark N. Todzo Meredyth Merrow Lucas Williams Jacob Janzen LEXINGTON LAW GROUP 503 Divisadero Street San Francisco, CA 94117 mtodzo@lexlawgroup.com mmerrow@lexlawgroup.com lwilliams@lexlawgroup.com jjanzen@lexlawgroup.com vhammer@lexlawgroup.com	<i>Plaintiff</i> Center for Environmental Health
Ryan S. Landis Gordon Rees Scully Mansukhani, LLP 5 Park Plaza, Suite 1100 Irvine, CA 92614 rlandis@grsm.com	<i>Defendants</i> Dolls Kill, LLC
Maureen F. Gorsen Amy P. Lally SIDLEY AUSTIN LLP 1999 Avenue of the Stars, 17th Floor Los Angeles, CA 90067 maureen.gorsen@sidley.com  J. Simone Jones SIDLEY AUSTIN LLP One South Dearborn Chicago, IL 60616 jsimone.jones@sidley.com	<i>Defendants</i> Sam's West, Inc.

<p>Richard J. McNeil CROWELL &amp; MORING LLP 3 Park Plaza, 20th Floor Irvine, CA 92614 RMcNeil@crowell.com</p>	<p><i>Defendants</i> Stance, Inc.</p>
<p>Hazel Ocampo GREENBERG TRAUIG, LLP 18565 Jamboree Road, Suite 500 Irvine, CA 92612 ocampoh@gtlaw.com</p> <p>Madeline Orlando GREENBERG TRAUIG, LLP 1201 K Street, Suite 1100 Sacramento, CA 95814-3938 orlandom@gtlaw.com</p>	<p><i>Defendants</i> Victoria's Secret &amp; Co.</p>
<p>Gary M. Roberts DENTONS US LLP 601 South Figueroa Street, Suite 2500 Los Angeles, California 90017-5704 <a href="mailto:gary.roberts@dentons.com">gary.roberts@dentons.com</a></p>	<p><i>Defendants</i> Preger &amp; Wertenteil, Inc.</p>
<p>Todd O. Maiden REED SMITH LLP 101 Second Street, Suite 1800 San Francisco, CA 94105 tmaiden@reedsmith.com</p>	<p><i>Defendants</i> DSW Shoe Warehouse, Inc.</p>