

**ELECTRONICALLY FILED**

Superior Court of California,  
County of Alameda

**01/17/2024 at 09:56:14 AM**

By: Darrell Drew,  
Deputy Clerk

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CENTER FOR ENVIRONMENTAL HEALTH

8  
9 SUPERIOR COURT OF THE STATE OF CALIFORNIA

10 COUNTY OF ALAMEDA

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

14 Plaintiff,

15 v.

16 THE KOOPLES BLOOM INC., *et al.*,

17 Defendants.

Case No. 23CV045797

ASSIGNED FOR ALL PURPOSES TO:  
The Hon. Rebekah Evenson, Dept. 24

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

Action Filed: September 27, 2023  
Trial Date: None set

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On September 27, 2023, Plaintiff Center for Environmental Health (“CEH”) filed its original Complaint (“the operative Complaint”) in this action. Pursuant to California Code of Civil Procedure § 474, CEH hereby amends the operative Complaint as follows:

1. By inserting the name FOOTWEAR UNLIMITED, INC. in place of the reference to DOE 1 in each place that it appears in the operative Complaint.
2. By inserting the name HUGO BOSS USA, INC. in place of the reference to DOE 2 in each place that it appears in the operative Complaint.
3. By inserting the name JILL ACQUISITION LLC in place of the reference to DOE 3 in each place that it appears in the operative Complaint.
4. By inserting the name REEF LIFESTYLE, LLC in place of the reference to DOE 4 in each place that it appears in the operative Complaint.

Dated: January 5, 2024

Respectfully submitted,  
LEXINGTON LAW GROUP



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Joseph Mann  
Attorney for Plaintiff  
Center for Environmental Health

1 **PROOF OF SERVICE**

2 I, Alexis Pearson, 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  
apearson@lexlawgroup.com.

6 On January 5, 2024, 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] 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 January 5, 2024 at San Francisco, California.

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25 \_\_\_\_\_  
26 Alexis Pearson  
27  
28

**SERVICE LIST**

*Center for Environmental Health v. The Kooples Bloom, Inc., et al.*  
Case No. 23CV045797

<b>ADDRESS</b>	<b>DEFENDANT</b>
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