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Superior Court of California,
County of Alameda

07/01/2024 at 10:51:57 AM

By: Lynetta Irvin,
Deputy Clerk

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11 CENTER FOR ENVIRONMENTAL HEALTH

12 SUPERIOR COURT OF THE STATE OF CALIFORNIA

13 COUNTY OF ALAMEDA

14 CENTER FOR ENVIRONMENTAL HEALTH,
15 a non-profit corporation,

16 Plaintiff,

17 v.

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

19 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: July 14, 2025

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

4 1. By inserting the name DOLCE & GABBANA USA INC. in place of the
5 reference to DOE 13 in each place that it appears in the operative Complaint.

6 2. By inserting the name ROGER VIVIER S.P.A. in place of the reference to
7 DOE 14 in each place that it appears in the operative Complaint.

8 3. By inserting the name CAL. DEL. U.S.A. INC. in place of the reference to
9 DOE 15 in each place that it appears in the operative Complaint.

10 4. By inserting the name BRUNELLO CUCINELLI, USA, INC. in place of
11 the reference to DOE 16 in each place that it appears in the operative Complaint.

12 5. By inserting the name PAUL GREEN GMBH in place of the reference to
13 DOE 17 in each place that it appears in the operative Complaint.

14 6. By inserting the name OFF-WHITE OPERATING S.R.L. in place of the
15 reference to DOE 18 in each place that it appears in the operative Complaint.

16 7. By inserting the name OFF-WHITE, LLC in place of the reference to DOE
17 19 in each place that it appears in the operative Complaint.

18 8. By inserting the name OFF-WHITE OPERATING HOLDING CORP. in
19 place of the reference to DOE 20 in each place that it appears in the operative Complaint.

20 9. By inserting the name HIGHLINE UNITED, LLC in place of the reference
21 to DOE 21 in each place that it appears in the operative Complaint.

22
23 Dated: June 27, 2024

Respectfully submitted,

LEXINGTON LAW GROUP, LLP



Joseph Mann
Attorney for Plaintiff
Center for Environmental Health

1 **PROOF OF SERVICE**

2 I, Lilian Macancela, 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
Lmacancela@lexlawgroup.com.

6 On June 27, 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 **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 ELECTRONIC MAIL:** I transmitted a PDF version of the document(s) listed above via
13 email to the email address(es) indicated on the attached service list [or noted above] on the date
executed.

14 *Please see attached service list*

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

17 **BY OVERNIGHT DELIVERY:** I deposited such document(s) in a box or other facility
18 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.

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

21 Executed on June 27, 2024, at San Francisco, California.

22 

23 _____
Lilian Macancela

SERVICE LIST

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

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