

ELECTRONICALLY FILED

Superior Court of California,
County of Alameda

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By: Damaree Franklin,
Deputy Clerk

1 LEXINGTON LAW GROUP, LLP
2 Joseph Mann, State Bar No. 207968
3 503 Divisadero Street
4 San Francisco, CA 94117
5 Telephone: (415) 913-7800
6 Facsimile: (415) 759-4112
7 jmann@lexlawgroup.com

8 Attorneys for Plaintiff
9 CENTER FOR ENVIRONMENTAL HEALTH

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA

11 COUNTY OF ALAMEDA

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

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 CELS ENTERPRISES, INC. in place of the
5 reference to DOE 5 in each place that it appears in the operative Complaint.

6 2. By inserting the name BILL BLASS GROUP, LLC in place of the
7 reference to DOE 6 in each place that it appears in the operative Complaint.

8 3. By inserting the name MARC FISHER LLC in place of the reference to
9 DOE 7 in each place that it appears in the operative Complaint.

10 4. By inserting the name MB FISHER LLC in place of the reference to DOE
11 8 in each place that it appears in the operative Complaint.

12 5. By inserting the name EVERLANE, INC. in place of the reference to DOE
13 9 in each place that it appears in the operative Complaint.

14 6. By inserting the name GEOX S.P.A. in place of the reference to DOE 10 in
15 each place that it appears in the operative Complaint.

16 7. By inserting the name S & A RETAIL, INC. in place of the reference to
17 DOE 11 in each place that it appears in the operative Complaint.

18 8. By inserting the name S & A DISTRIBUTION, INC. in place of the
19 reference to DOE 12 in each place that it appears in the operative Complaint.

20
21 Dated: March 15, 2024

Respectfully submitted,

LEXINGTON LAW GROUP



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
6 apearson@lexlawgroup.com.

7 On March 15, 2024, I served the following document(s) on all interested parties in this
8 action by placing a true copy thereof in the manner and at the addresses indicated below:

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

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

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

18 *Please see attached service list.*

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 March 15, 2024 at San Francisco, California.

22 

23 _____
24 Lilian Macancela
25
26
27
28

SERVICE LIST

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

ADDRESS	DEFENDANT
Willis M. Wagner Rica Santos ARNOLD & PORTER KAYE SCHOLER LLP Three Embarcadero Center, 10th Floor San Francisco, CA 94111 will.wagner@arnoldporter.com rica.santos@arnoldporter.com	CELINE, INC.
Lynn Fiorentino Susanne Boniadi ARENTFOX SCHIFF LLP 44 Montgomery Street, 38th Floor San Francisco, CA 94104 lynn.fiorentino@afslaw.com susanne.boniadi@afslaw.com	THE KOOPLES BLOOM, INC. THE KOOPLES USA, INC.
Kathleen C. Bricken FOSTER GARVEY P.C. 121 SW Morrison Street, Eleventh Floor Portland, Oregon 97204-3141 kathleen.bricken@foster.com	ARZZ INTERNATIONAL INC.
Stephen T. Holzer LEWITT, HACKMAN, SHAPIRO, MARSHALL & HARLAN 16633 Ventura Boulevard, 11th Floor Encino, California 91436-1865 sholzer@lewitthackman.com	FRENCH CONNECTION GROUP, INC.

ADDRESS	DEFENDANT
Jeffrey B. Margulies Lauren A. Shoor Eva Yang NORTON ROSE FULBRIGHT US LLP 555 South Flower Street Forty-First Floor Los Angeles, California 90071 jeff.margulies@nortonrosefulbright.com lauren.shoor@nortonrosefulbright.com eva.yang@nortonrosefulbright.com	JILL ACQUISITION LLC