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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 TOMMY BAHAMA GROUP, INC., *et al.*,

19 Defendants.

ELECTRONICALLY FILED
Superior Court of California,
County of Alameda
10/21/2024 at 12:53:23 PM
By: Curtiyah Ganter,
Deputy Clerk

Case No. RG 19-034870

[Consolidated with Lead Case No. RG
19-029736]

ASSIGNED FOR ALL PURPOSES TO:
The Hon. Noël Wise, Dept. 21

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

Action Filed: September 12, 2019
Trial Date: None set

1 On September 12, 2019, Plaintiff Center for Environmental Health (“CEH”) filed its
2 original Complaint in this action. On November 26, 2019, CEH filed its First Amended
3 Complaint. On June 18, 2021, CEH filed its Second Amended Complaint. On May 19, 2022,
4 CEH filed its Third Amended Complaint (“the operative Complaint”). Pursuant to California
5 Code of Civil Procedure § 474, CEH hereby amends the operative Complaint as follows:

6 1. By inserting the name AEFPE GROUP, INC. in place of the reference to DOE 48
7 in each place that it appears in the operative Complaint.

8 2. By inserting the name ARZZ INTERNATIONAL INC. in place of the reference to
9 DOE 49 in each place that it appears in the operative Complaint.

10 3. By inserting the name BILL BLASS GROUP, LLC in place of the reference to
11 DOE 50 in each place that it appears in the operative Complaint.

12 4. By inserting the name CELINE, INC. in place of the reference to DOE 51 in each
13 place that it appears in the operative Complaint.

14 5. By inserting the name CELS ENTERPRISES, INC. in place of the reference to
15 DOE 52 in each place that it appears in the operative Complaint.

16 6. By inserting the name EVERLANE, INC. in place of the reference to DOE 53 in
17 each place that it appears in the operative Complaint.

18 7. By inserting the name FOOTWEAR UNLIMITED, INC. in place of the reference
19 to DOE 54 in each place that it appears in the operative Complaint.

20 8. By inserting the name HIGHLINE UNITED, LLC in place of the reference to
21 DOE 55 in each place that it appears in the operative Complaint.

22 9. By inserting the name JILL ACQUISITION LLC in place of the reference to DOE
23 56 in each place that it appears in the operative Complaint.

24 10. By inserting the name LAFAYETTE 148, INC. in place of the reference to DOE
25 57 in each place that it appears in the operative Complaint.

26 11. By inserting the name MANOLO BLAHNIK AMERICAS LLC in place of the
27 reference to DOE 58 in each place that it appears in the operative Complaint.

28 12. By inserting the name MARC FISHER LLC in place of the reference to DOE 59

1 in each place that it appears in the operative Complaint.

2 13. By inserting the name OFF-WHITE, LLC in place of the reference to DOE 60 in
3 each place that it appears in the operative Complaint.

4 14. By inserting the name OFF-WHITE OPERATING HOLDING CORP. in place of
5 the reference to DOE 61 in each place that it appears in the operative Complaint.

6 15. By inserting the name OFF-WHITE OPERATING S.R.L. in place of the reference
7 to DOE 62 in each place that it appears in the operative Complaint.

8 16. By inserting the name PAUL GREEN GMBH in place of the reference to DOE 63
9 in each place that it appears in the operative Complaint.

10 17. By inserting the name REEF LIFESTYLE, LLC in place of the reference to DOE
11 64 in each place that it appears in the operative Complaint.

12 18. By inserting the name ROGER VIVIER S.P.A in place of the reference to DOE 65
13 in each place that it appears in the operative Complaint.

14 19. By inserting the name THE KOOPLES BLOOM, INC. in place of the reference to
15 DOE 66 in each place that it appears in the operative Complaint.

16 20. By inserting the name THE KOOPLES USA, INC. in place of the reference to
17 DOE 67 in each place that it appears in the operative Complaint.

18 21. By inserting the name TOD'S S.P.A. in place of the reference to DOE 68 in each
19 place that it appears in the operative Complaint.

20 22. By inserting the name COLUMBIA BRANDS USA, LLC in place of the reference
21 to DOE 69 in each place that it appears in the operative Complaint.

22 23. By inserting the name COLUMBIA SPORTSWEAR COMPANY in place of the
23 reference to DOE 70 in each place that it appears in the operative Complaint.

24 24. By inserting the name DOLCE & GABBANA USA INC. in place of the reference
25 to DOE 71 in each place that it appears in the operative Complaint.

26 25. By inserting the name HUGO BOSS USA, INC. in place of the reference to DOE
27 72 in each place that it appears in the operative Complaint.

28 26. By inserting the name MOUNTAIN HARDWARE, INC. in place of the reference

1 to DOE 73 in each place that it appears in the operative Complaint.

2 27. By inserting the name PRANA LIVING, LLC in place of the reference to DOE 74
3 in each place that it appears in the operative Complaint.

4 28. By inserting the name SOREL CORPORATION in place of the reference to DOE
5 75 in each place that it appears in the operative Complaint.

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7 Dated: October 21, 2024

Respectfully submitted,

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LEXINGTON LAW GROUP, LLP

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Joseph Mann
Attorney for Plaintiff
Center for Environmental Health

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1 **PROOF OF SERVICE**

2 I, Star Beltman, 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
sbeltman@lexlawgroup.com.

6 On October 21, 2024, I served the following document(s) on all interested parties in this action
7 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 October 21, 2024 at San Francisco, California.

24 

25 _____
26 Star Beltman
27
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SERVICE LIST

Center for Environmental Health v. Tommy Bahama Group, Inc., et al.
Case No. RG 19-034870

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SERVICE LIST

Center for Environmental Health v. Bali Leathers, Inc., et al.
Case No. RG 19-029736

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