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Superior Court of California,
County of Alameda

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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 ACUSHNET COMPANY, *et al.*,

19 Defendants.

Case No. 25CV114499

ASSIGNED FOR ALL PURPOSES TO:
The Hon. Karin Schwartz, Dept. 20

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

Action Filed: March 5, 2025
Trial Date: None set

1 On March 5, 2025, Plaintiff Center for Environmental Health (“CEH”) filed its
2 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 HARLEY-DAVIDSON, INC. in place of the
5 reference to DOE 1 in each place that it appears in the operative Complaint.

6 2. By inserting the name HARLEY-DAVIDSON MOTOR COMPANY, INC.
7 in place of the reference to DOE 2 in each place that it appears in the operative Complaint.

8 3. By inserting the name NORTHERN TOOL & EQUIPMENT COMPANY,
9 INC. in place of the reference to DOE 3 in each place that it appears in the operative Complaint.

10 4. By inserting the name NORTHERN TOOL & EQUIPMENT CATALOG
11 COMPANY, LLC in place of the reference to DOE 4 in each place that it appears in the operative
12 Complaint.

13 5. By inserting the name RAPHA RACING LTD. in place of the reference to
14 DOE 5 in each place that it appears in the operative Complaint.

15 6. By inserting the name RAPHA RACING LLC in place of the reference to
16 DOE 6 in each place that it appears in the operative Complaint.

17 7. By inserting the name SHAF INTERNATIONAL, INC. in place of the
18 reference to DOE 7 in each place that it appears in the operative Complaint.

19 8. By inserting the name SM GLOBAL GROUP, LLC in place of the
20 reference to DOE 8 in each place that it appears in the operative Complaint.

21 9. By inserting the name MAKITA U.S.A., INC. in place of the reference to
22 DOE 9 in each place that it appears in the operative Complaint.

23 10. By inserting the name MECHANIX WEAR LLC in place of the reference
24 to DOE 10 in each place that it appears in the operative Complaint.

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Dated: May 2, 2025

Respectfully submitted,
LEXINGTON LAW GROUP, LLP



Joseph Mann
Attorney for Plaintiff
Center for Environmental Health