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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 MANGO NY, INC., *et al.*,

19 Defendants.

Case No. 25CV112558

ASSIGNED FOR ALL PURPOSES TO:  
The Hon. Jenna Whitman, Dept. 25

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

Action Filed: February 20, 2025  
Trial Date: None set

1 On February 20, 2025, Plaintiff Center for Environmental Health (“CEH”) filed its  
2 original Complaint in this action. On March 6, 2025, CEH filed the operative First Amended  
3 Complaint (“the operative Complaint”) in this action. Pursuant to California Code of Civil  
4 Procedure § 474, CEH hereby amends the operative Complaint as follows:

5 1. By inserting the name CAMUTO IPCO, LLC in place of the reference to  
6 DOE 14 in each place that it appears in the operative Complaint.

7 2. By inserting the name VINCENT CAMUTO LLC in place of the reference  
8 to DOE 15 in each place that it appears in the operative Complaint.

9 3. By inserting the name VCJS LLC in place of the reference to DOE 16 in  
10 each place that it appears in the operative Complaint.

11 4. By inserting the name ECCO USA, INC. in place of the reference to DOE  
12 17 in each place that it appears in the operative Complaint.

13 5. By inserting the name INDUSTRIES S.P.A. in place of the reference to  
14 DOE 18 in each place that it appears in the operative Complaint.

15  
16 Dated: July 23, 2025

Respectfully submitted,

17 LEXINGTON LAW GROUP, LLP

18 

19  
20 Joseph Mann  
21 *Attorneys for Plaintiff*  
22 *Center for Environmental Health*  
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1 **PROOF OF SERVICE**

2 I, Kaitlyn M. Carpenter, 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  
kcarpenter@lexlawgroup.com.

6 On July 23, 2025, 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 July 23, 2025 at San Francisco, California.

24 

25 \_\_\_\_\_  
26 Kaitlyn M. Carpenter  
27  
28

**SERVICE LIST**  
***Center for Environmental Health v. Mango NY, Inc., et al.***  
**Case No. 25CV112558**

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