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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. Rebekah Evenson, Dept. 24

**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 (“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 BALDININI S.R.L. in place of the reference to DOE
5 1 in each place that it appears in the operative Complaint.

6 2. By inserting the name BURBERRY LIMITED in place of the reference to
7 DOE 2 in each place that it appears in the operative Complaint.

8 3. By inserting the name BURBERRY (WHOLESALE) LIMITED in place of
9 the reference to DOE 3 in each place that it appears in the operative Complaint.

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

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

14 6. By inserting the name JACQUEMUS SAS in place of the reference to
15 DOE 6 in each place that it appears in the operative Complaint.

16 7. By inserting the name JACQUEMUS L’AMERIQUE LLC in place of the
17 reference to DOE 7 in each place that it appears in the operative Complaint.

18 8. By inserting the name LAST BRAND, INC. in place of the reference to
19 DOE 8 in each place that it appears in the operative Complaint.

20 9. By inserting the name MONCLER USA, INC. in place of the reference to
21 DOE 9 in each place that it appears in the operative Complaint.

22 10. By inserting the name PRADA USA CORP. in place of the reference to
23 DOE 10 in each place that it appears in the operative Complaint.

24 11. By inserting the name SERGIO ROSSI S.P.A. in place of the reference to
25 DOE 11 in each place that it appears in the operative Complaint.

26 12. By inserting the name SERGIO ROSSI USA INC. in place of the reference
27 to DOE 12 in each place that it appears in the operative Complaint.

28

1 13. By inserting the name THOM BROWNE, INC. in place of the reference to
2 DOE 13 in each place that it appears in the operative Complaint.

3
4 Dated: May 30, 2025

Respectfully submitted,

5 LEXINGTON LAW GROUP, LLP

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8 _____
9 Joseph Mann
10 Attorney for Plaintiff
11 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 May 30, 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
21 FedEx, with delivery fees paid or provided for, and addressed to the person(s) being served
below.

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

24 Executed on May 30, 2025 at San Francisco, California.

25
26 

27 Kaitlyn M. Carpenter
28

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

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