

ELECTRONICALLY FILED

Superior Court of California,
County of Alameda

08/15/2025 at 01:02:34 PM

By: Darrell Drew,
Deputy Clerk

1 LEXINGTON LAW GROUP, LLP
2 Lucas Williams, State Bar No. 264518
3 Joseph J. Mann, State Bar No. 207968
4 Meredyth L. Merrow, State Bar No. 328337
5 503 Divisadero Street
6 San Francisco, CA 94117
7 Telephone: (415) 913-7800
8 Facsimile: (415) 759-4112
9 lwilliams@lexlawgroup.com
10 jmann@lexlawgroup.com
11 mmerrow@lexlawgroup.com

12 Attorneys for Plaintiff
13 CENTER FOR ENVIRONMENTAL HEALTH

14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

15 **COUNTY OF ALAMEDA**

16 CENTER FOR ENVIRONMENTAL HEALTH,
17 a non-profit corporation,

18 Plaintiff,

19 v.

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

21 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 ABASIC S.A.in place of the reference to DOE 19 in
6 each place that it appears in the operative Complaint.

7 2. By inserting the name ARA SHOES INC.in place of the reference to DOE
8 20 in each place that it appears in the operative Complaint.

9 3. By inserting the name ARA SHOES GMBH in place of the reference to
10 DOE 21 in each place that it appears in the operative Complaint.

11 4. By inserting the name BANANA REPUBLIC, LLC in place of the
12 reference to DOE 22 in each place that it appears in the operative Complaint.

13 5. By inserting the name THE GAP, INC. in place of the reference to DOE 23
14 in each place that it appears in the operative Complaint.

15 6. By inserting the name CAMPER ATLANTIC CORP. in place of the
16 reference to DOE 24 in each place that it appears in the operative Complaint.

17 7. By inserting the name CAMPER S.L. in place of the reference to DOE 25
18 in each place that it appears in the operative Complaint.

19 8. By inserting the name DIESEL U.S.A., INC. in place of the reference to
20 DOE 26 in each place that it appears in the operative Complaint.

21 9. By inserting the name DIESEL S.P.A. in place of the reference to DOE 27
22 in each place that it appears in the operative Complaint.

23 10. By inserting the name DVN (DRIES VAN NOTEN) USA CORP. in place
24 of the reference to DOE 28 in each place that it appears in the operative Complaint.

25 11. By inserting the name DRIES VAN NOTEN GROUP in place of the
26 reference to DOE 29 in each place that it appears in the operative Complaint.

27 12. By inserting the name VAN NOTEN ANDRIES NV in place of the
28 reference to DOE 30 in each place that it appears in the operative Complaint.

1 13. By inserting the name HERMES OF PARIS, INC. in place of the reference
2 to DOE 31 in each place that it appears in the operative Complaint.

3 14. By inserting the name KENZO PARIS USA LLC in place of the reference
4 to DOE 32 in each place that it appears in the operative Complaint.

5 15. By inserting the name KENZO, S.A. in place of the reference to DOE 33 in
6 each place that it appears in the operative Complaint.

7 16. By inserting the name FERRAGAMO USA INC. in place of the reference
8 to DOE 34 in each place that it appears in the operative Complaint.

9 17. By inserting the name SALVATORE FERRAGAMO S.P.A. in place of
10 the reference to DOE 35 in each place that it appears in the operative Complaint.

11 18. By inserting the name TOMMY HILFIGER U.S.A., INC. in place of the
12 reference to DOE 36 in each place that it appears in the operative Complaint.

13 19. By inserting the name PVH CORP. in place of the reference to DOE 37 in
14 each place that it appears in the operative Complaint.

15 20. By inserting the name VINEYARD VINES, LLC in place of the reference
16 to DOE 38 in each place that it appears in the operative Complaint.

17 21. By inserting the name VINEYARD VINES RETAIL, LLC in place of the
18 reference to DOE 39 in each place that it appears in the operative Complaint.

19 22. By inserting the name YVES SAINT LAURENT AMERICA, INC. in
20 place of the reference to DOE 40 in each place that it appears in the operative Complaint.

21 23. By inserting the name YVES SAINT LAURENT SAS in place of the
22 reference to DOE 41 in each place that it appears in the operative Complaint.

23

24

25

26

27

28

1 Dated: August 15, 2025

Respectfully submitted,

2 LEXINGTON LAW GROUP, LLP

3 

4
5

Joseph Mann
6 *Attorneys for Plaintiff*
7 *Center for Environmental Health*

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 August 15, 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 August 15, 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

ADDRESS	DEFENDANT
Milord A. Keshishian MILORD LAW GROUP, P.C. 333 South Hope Street, Suite 4025 Los Angeles, CA 90071 milord@milordlaw.com	MATISSE FOOTWEAR, INC.
Matthew S. Kenefick Sebastian Nguyen JEFFER MANGELS BUTLER & MITCHELL LLP Two Embarcadero Center, 5th Floor San Francisco, CA 94111-3813 mkenefick@jmbm.com snguyen@jmbm.com	RAG & BONE INDUSTRIES LLC RAG & BONE HOLDINGS LLC RAG & BONE FOOTWEAR LLC GUESS?, INC.
Jeffrey Margulies Lauren Shoor NORTON ROSE FULBRIGHT 555 South Flower Street Forty-First Floor Los Angeles, CA 90071 jeff.margulies@nortonrosefulbright.com lauren.shoor@nortonrosefulbright.com	UNITED LEGWEAR COMPANY, LLC PRADA USA CORP.
Aaron Belzer SEYFARTH SHAW LLP 2029 Century Park East, Suite 3500 Los Angeles, CA 90067-3021 abelzer@seyfarth.com	YALEET INC. MANGO NY, INC. PUNTO FA, S.L

ADDRESS	DEFENDANT
<p>Aaron P. Allan GLASER WEIL FINK HOWARD AVCHEN & SHAPIRO LLP 10250 Constellation Boulevard, 19th Floor Los Angeles, CA 90067 aallan@glaserweil.com</p>	<p>PHOENIX FOOTWEAR GROUP, INC.</p>
<p>Sedina L. Banks Sherry E. Jackman Bryce B. Lourié GREENBERG GLUSKER FIELDS CLAMAN & MACHTINGER LLP 2049 Century Park East, Suite 2600 Los Angeles, CA 90067 SBanks@ggfirm.com SJackman@ggfirm.com BLourie@ggfirm.com</p>	<p>FRAME LA BRANDS, LLC</p>
<p>Willis M. Wagner Alexandra L. Lizano GREENBERG TRAUERIG LLP 400 Capitol Mall, Suite 2400 Sacramento, CA 95814 will.wagner@gtlaw.com alexandra.lizano@gtlaw.com</p>	<p>BALENCIAGA AMERICA, INC. BALENCIAGA SAS THOM BROWNE, INC. BURBERRY LIMITED BURBERRY (WHOLESALE) LIMITED JACQUEMUS SAS JACQUEMUS L'AMERIQUE LLC</p>
<p>Gregory G. Sperla DLA PIPER LLP (US) 555 Mission Street, Suite 2400 San Francisco, CA 94105-2933 Greg.Sperla@us.dlapiper.com</p>	<p>RIVER ISLAND CLOTHING CO. LIMITED</p>

ADDRESS	DEFENDANT
James Robert Maxwell ROGERS JOSEPH O'DONNELL 311 California Street San Francisco, CA 94104 jmaxwell@rjo.com	LANDS' END, INC.
Gregory S. Berlin Samantha K. Burdick ALSTON & BIRD LLP 350 South Grand Avenue, 51st Floor Los Angeles, CA 90071 greg.berlin@alston.com sam.burdick@alston.com	SERGIO ROSSI S.P.A SERGIO ROSSI USA INC.
Michael J. Gleason HAHN LOESER & PARKS LLP One America Plaza 600 W. Broadway, Suite 1500 San Diego, CA 92101 mgleason@hahnlaw.com	CAMUTO LLC
Peter W. McGaw BUCHALTER 425 Market Street, Suite 2900 San Francisco, CA 94105 pmcgaw@buchalter.com	3.1 PHILLIP LIM, LLC

ADDRESS	DEFENDANT
<p>James H. Moon Marcy Blattner DAVIS WRIGHT TREMAINE LLP 350 South Grand Avenue, 27th Floor Los Angeles, CA 90071 jamesmoon@dwt.com marcymicale@dwt.com</p> <p>John M. Magliery DAVIS WRIGHT TREMAINE LLP 1251 Avenue of the Americas, 21st Floor New York, NY 10020 johnmagliery@dwt.com</p>	<p>LAST BRAND, INC.</p>