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9 CENTER FOR ENVIRONMENTAL HEALTH

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **COUNTY OF ALAMEDA**

12 CENTER FOR ENVIRONMENTAL HEALTH,
13 a non-profit corporation,

14 Plaintiff,

15 v.

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

17 Defendants.

Lead Case No. 25CV112558

[Consolidated with Case No. 25CV114499]

ASSIGNED FOR ALL PURPOSES TO:
The Hon. Ruben Sundeen, Dept. 23

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

18 CENTER FOR ENVIRONMENTAL HEALTH,
19 a non-profit corporation,

20 Plaintiff,

21 v.

22 ACUSHNET COMPANY, *et al.*,

23 Defendants.

1 On February 20,2025, Plaintiff Center for Environmental Health (“CEH”) filed its original
2 Complaint in the action captioned as *CEH v. Mango NY, Inc., et al.* (Case No. 25CV112558). On
3 March 6, 2025, CEH filed the operative First Amended Complaint (“the operative Complaint”) in
4 this action. Pursuant to California Code of Civil Procedure § 474, CEH hereby amends the
5 operative Complaint as follows:

- 6 1. By inserting the name RICHEMONT NORTH AMERICA, INC. DBA CHLOÉ
7 in place of the reference to DOE 54 in each place that it appears in the operative
8 Complaint.
- 9 2. By inserting the name GALAXY UNIVERSAL, LLC in place of the reference to
10 DOE 55 in each place that it appears in the operative Complaint.

11
12
13 Dated: January 26, 2026

Respectfully submitted,

14 LEXINGTON LAW GROUP, LLP

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17 Joseph Mann
18 Attorney for Plaintiff
19 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 January 26, 2026, I served the following document(s) on all interested parties in this
7 action 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 January 26, 2026 at San Francisco, California.

24 

25 _____
Kaitlyn M. Carpenter

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

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Center for Environmental Health v. Acushnet Company., et al.
Case No. 25CV114499

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