

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
Facsimile: (415) 759-4112
lwilliams@lexlawgroup.com
jmann@lexlawgroup.com
mmerrow@lexlawgroup.com

8 Attorneys for Plaintiff
CENTER FOR ENVIRONMENTAL HEALTH

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF ALAMEDA

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

15 Plaintiff,

16 || V.

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

18 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

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

1. By inserting the name SANTONI S.P.A. in place of the reference to DOE 42 in each place that it appears in the operative Complaint.

Dated: September 11, 2025

Respectfully submitted,

LEXINGTON LAW GROUP, LLP

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Joseph Mann
Attorneys for Plaintiff
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 September 11, 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
12 mentioned documents for collection and mailing following my firm's ordinary business practices.

13 **BY FACSIMILE:** I caused all pages of the document(s) listed above to be transmitted via
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
21 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 September 11, 2025 at San Francisco, California.

25
26 
27

28 Kaitlyn M. Carpenter

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 333 Bush Street, 11th Floor San Francisco, CA 94104 mkenefick@jmbm.com snguyen@jmbm.com	RAG & BONE INDUSTRIES LLC RAG & BONE HOLDINGS LLC RAG & BONE FOOTWEAR LLC GUESS?, INC.
Jeffrey Margulies NORTON ROSE FULBRIGHT 555 South Flower Street Forty-First Floor Los Angeles, CA 90071 jeff.margulies@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>	PHOENIX FOOTWEAR GROUP, INC.
<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>	FRAME LA BRANDS, LLC
<p>Willis M. Wagner Alexandra L. Lizano GREENBERG TRAURIG LLP 400 Capitol Mall, Suite 2400 Sacramento, CA 95814 will.wagner@gtlaw.com alexandra.lizano@gtlaw.com</p>	BALENCIAGA AMERICA, INC. BALENCIAGA SAS THOM BROWNE, INC. BURBERRY LIMITED BURBERRY (WHOLESALE) LIMITED JACQUEMUS SAS JACQUEMUS L'AMERIQUE LLC
<p>Gregory G. Sperla DLA PIPER LLP (US) 555 Mission Street, Suite 2400 San Francisco, CA 94105-2933 Greg.Sperla@us.dlapiper.com</p>	RIVER ISLAND CLOTHING CO. LIMITED

ADDRESS	DEFENDANT
<p>James Robert Maxwell ROGERS JOSEPH O'DONNELL 311 California Street San Francisco, CA 94104 jmaxwell@rjo.com</p>	<p>LANDS' END, INC.</p>
<p>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</p>	<p>SERGIO ROSSI S.P.A SERGIO ROSSI USA INC.</p>
<p>Michael J. Gleason HAHN LOESER & PARKS LLP One America Plaza 600 W. Broadway, Suite 1500 San Diego, CA 92101 mgleason@hahnlaw.com</p>	<p>CAMUTO LLC VINCE CAMUTO LLC VCJS LLC CAMUTO IPCO LLC</p>
<p>Peter W. McGaw BUCHALTER 425 Market Street, Suite 2900 San Francisco, CA 94105 pmcgaw@buchalter.com</p>	<p>3.1 PHILLIP LIM, LLC</p>

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>	LAST BRAND, INC.
<p>Bao M. Vu STOEL RIVES LLP 1 Montgomery Street, Suite 3230 San Francisco, CA 94104 bao.vu@stoel.com</p> <p>Kelly V. Beskin STOEL RIVES LLP 500 Capitol Mall, Suite 1600 Sacramento, CA 95814 kelly.beskin@stoel.com</p>	BALLY AMERICAS INC.
<p>Andrew M. Hutchison LOEB & LOEB LLP Two Embarcadero Center, Suite 2510 San Francisco, CA 94111 ahutchison@loeb.com</p>	MONCLER USA, INC.

ADDRESS	DEFENDANT
<p>Whitney Jones Roy SHEPPARD, MULLIN, RICHTER & HAMPTON LLP 350 South Grand Avenue, 40th Floor Los Angeles, CA 90071 wroy@sheppardmullin.com</p>	RALPH LAUREN CORPORATION