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13 CENTER FOR ENVIRONMENTAL HEALTH

14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
15 **COUNTY OF ALAMEDA**

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

18 Plaintiff,

19 v.

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

21 Defendants.

Lead Case No. 25CV112558

[Consolidated with Case No. 25CV114499]

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

22 CENTER FOR ENVIRONMENTAL
23 HEALTH, a non-profit corporation,

24 Plaintiff,

25 v.

26 ACUSHNET COMPANY, *et al.*,

27 Defendants.

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

6 1. By inserting the name ALEXANDER WANG LLC in place of the
7 reference to DOE 43 in each place that it appears in the operative Complaint.

8 2. By inserting the name ALEXANDER WANG INCORPORATED in place
9 of the reference to DOE 44 in each place that it appears in the operative Complaint.

10 3. By inserting the name CHLOÉ SAS in place of the reference to DOE 45 in
11 each place that it appears in the operative Complaint.

12 4. By inserting the name GIORGIO ARMANI CORPORATION in place of
13 the reference to DOE 46 in each place that it appears in the operative Complaint.

14 5. By inserting the name GIORGIO ARMANI S.P.A. in place of the
15 reference to DOE 47 in each place that it appears in the operative Complaint.

16 6. By inserting the name GROUP JS INTERNATIONAL LTD. in place of
17 the reference to DOE 48 in each place that it appears in the operative Complaint.

18 7. By inserting the name MAX MARA USA, INC. in place of the reference to
19 DOE 49 in each place that it appears in the operative Complaint.

20 8. By inserting the name MAX MARA S.R.L. in place of the reference to
21 DOE 50 in each place that it appears in the operative Complaint.

22 9. By inserting the name SMCP USA, INC. in place of the reference to DOE
23 51 in each place that it appears in the operative Complaint.

24 10. By inserting the name SMCP USA RETAIL WEST INC. in place of the
25 reference to DOE 52 in each place that it appears in the operative Complaint.

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Dated: November 10, 2025

Respectfully submitted,
LEXINGTON LAW GROUP, LLP



Joseph Mann
Attorneys for Plaintiff
Center for Environmental Health

1 **PROOF OF SERVICE**

2 I, Sophia Filipe 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
6 sfilipe@lexlawgroup.com.

7 On November 10, 2025, I served the following document(s) on all interested parties in this
8 action by placing a true copy thereof in the manner and at the addresses indicated below:

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

10 **BY MAIL:** I am readily familiar with the firm’s practice for collecting and processing mail
11 with the United States Postal Service (“USPS”). Under that practice, mail would be deposited
12 with USPS that same day with postage thereon fully prepaid at San Francisco, California in the
13 ordinary course of business. On this date, I placed sealed envelopes containing the above
14 mentioned documents for collection and mailing following my firm’s ordinary business practices.

15 **BY FACSIMILE:** I caused all pages of the document(s) listed above to be transmitted via
16 facsimile to the fax number(s) as indicated and said transmission was reported as complete and
17 without error.

18 **BY ELECTRONIC MAIL:** I transmitted a PDF version of the document(s) listed above via
19 email to the email address(es) indicated on the attached service list [or noted above] on the date
20 executed.

21 *Please see attached service list*

22 **BY PERSONAL DELIVERY:** I placed all pages of the document(s) listed above in a sealed
23 envelope addressed to the party(ies) listed above, and caused such envelope to be delivered by
24 hand to the addressee(s) as indicated.

25 **BY OVERNIGHT DELIVERY:** I deposited such document(s) in a box or other facility
26 regularly maintained by FedEx, or delivered such document(s) to a courier or driver authorized by
27 FedEx, with delivery fees paid or provided for, and addressed to the person(s) being served
28 below.

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

Executed on November 10, 2025, at San Francisco, California.



Sophia Filipe

SERVICE LIST

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

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Robert S. Nicksin LAW OFFICE OF ROBERT S. NICKSIN 1629 Idlewood Road Glendale, CA 91202 bob@nicksinlaw.com	<i>Defendant</i> TAYLOR MADE GOLF COMPANY, INC.
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Center for Environmental Health v. Mango NY, Inc., et al.
Lead Case No. 25CV112558

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Jeffrey Margulies Nicole Zelada NORTON ROSE FULBRIGHT 555 South Flower Street Forty-First Floor Los Angeles, CA 90071 jeff.margulies@nortonrosefulbright.com nicole.zelada@nortonrosefulbright.com	UNITED LEGWEAR COMPANY, LLC PRADA USA CORP. BANANA REPUBLIC, LLC HERMES OF PARIS, INC.
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<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 PVH CORP. TOMMY HILFIGER U.S.A., INC. YVES SAINT LAURENT AMERICA, INC. YVES SAINT LAURENT SAS VINEYARD VINES, LLC VINEYARD VINES RETAIL, LLC</p>

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<p>Andrew M. Hutchison LOEB & LOEB LLP Two Embarcadero Center, Suite 2510 San Francisco, CA 94111 ahutchison@loeb.com</p>	MONCLER USA, INC. INDUSTRIES S.p.A.

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Lynn R. Fiorentino Susanne Boniadi ARENTFOX SCHIFF LLP 44 Montgomery Street, 38 th Floor San Francisco, CA 94104 lynn.fiorentino@afslaw.com susanne.boniadi@afslaw.com	DIESEL U.S.A., INC. DIESEL S.P.A.