

ELECTRONICALLY FILED

Superior Court of California,
County of Alameda

12/11/2025 at 03:54:40 PM

By: Chan Huang,
Deputy Clerk

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

10 Attorneys for Plaintiff
11 CENTER FOR ENVIRONMENTAL HEALTH

12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF ALAMEDA

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

13 Plaintiff,

14 v.

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

16 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**

19
20
21
22
23
24
25
26
27
28

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

21 Plaintiff,

22 v.

23 ACUSHNET COMPANY, *et al.*,

24 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 SOCIEDAD TEXTIL LONIA, CORP. in place of the
7 reference to DOE 53 in each place that it appears in the operative Complaint.

8
9 Dated: December 11, 2025

Respectfully submitted,

10 LEXINGTON LAW GROUP, LLP

11 

12 _____
13 Joseph Mann
14 Attorney for Plaintiff
15 Center for Environmental Health
16
17
18
19
20
21
22
23
24
25
26
27
28

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 December 11, 2025, 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 December 11, 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.
Lead 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. THE GAP, INC.
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.
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. Lourie 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 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>

ADDRESS	DEFENDANT
<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>
<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 FERRAGAMO USA, INC. SALVATORE FERRAGAMO S.P.A.</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>	<p>LAST BRAND, INC.</p>
<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>	<p>BALLY AMERICAS INC. BALLY SCHUHFABRIKEN AG</p>
<p>Andrew M. Hutchison LOEB & LOEB LLP Two Embarcadero Center, Suite 2510 San Francisco, CA 94111 ahutchison@loeb.com</p>	<p>MONCLER USA, INC. INDUSTRIES S.P.A.</p>
<p>Whitney Jones Roy SHEPPARD, MULLIN, RICHTER & HAMPTON LLP 350 South Grand Avenue, 40th Floor Los Angeles, CA 90071 wroy@sheppardmullin.com</p>	<p>RALPH LAUREN CORPORATION</p>

ADDRESS	DEFENDANT
Andrew W. Homer KELLEY DRYE & WARREN LLP 888 Prospect Street, Suite 200 La Jolla, CA 92037 AHomer@kelleydrye.com	KENZO, S.A. KENZO PARIS USA LLC
Lynn R. Fiorentino Susanne Boniadi ARENTFOX SCHIFF LLP 44 Montgomery Street, 38th Floor San Francisco, CA 94104 lynn.fiorentino@afslaw.com susanne.boniadi@afslaw.com	DIESEL U.S.A., INC. DIESEL S.P.A.
Tyler R. Dowdall Renata A. Guidry TARTER KRINSKY & DROGIN LLP 1880 Century Park East, Suite 1104 Los Angeles, California 90067 tdowdall@tarterkrinsky.com rguidry@tarterkrinsky.com	ARA SHOES, INC. ARA SHOES GMBH
Edward D. Totino Nancy Nguyen Sims Michael T. Boardman BAKER & MCKENZIE LLP 10250 Constellation Blvd., Suite 1850 Los Angeles, California 90067 edward.totino@bakermckenzie.com nancy.sims@bakermckenzie.com michael.boardman@bakermckenzie.com	DVN (DRIES VAN NOTEN) USA CORP.

SERVICE LIST

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

ADDRESS	PARTY
Joseph Mann Meredyth Merrow LEXINGTON LAW GROUP, LLP 503 Divisadero Street San Francisco, CA 94117 jmann@lexlawgroup.com mmerrow@lexlawgroup.com kcarpenter@lexlawgroup.com	<i>Plaintiff</i> CENTER FOR ENVIRONMENTAL HEALTH
Caitlin C. Blanche Kaidyn McClure VENABLE LLP 2049 Century Park East, Suite 2300 Los Angeles, CA 90067 CBlanche@Venable.com KPMcClure@Venable.com	<i>Defendant</i> DULUTH HOLDINGS INC., MAKITA USA, INC., MECHANIX WEAR, LLC
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.
Gregory G. Sperla DLA PIPER LLP (US) 555 Mission Street, Suite 2400 San Francisco, CA 94105-2933 Greg.Sperla@us.dlapiper.com	<i>Defendant</i> ALPINESTARS USA

ADDRESS	PARTY
Stephanie Sheridan Whitney Miner BENESCH, FRIEDLANDER, COPLAN & ARONOFF LLP 100 Pine Street, Suite 3100 San Francisco, California 94111 ssheridan@beneschlaw.com wminer@beneschlaw.com	<i>Defendant</i> C.C. FILSON CO.
Mark E. Elliott Stephanie Angkadjaja PILLSBURY WINTHROP SHAW PITTMAN LLP 725 South Figueroa Street, 36 th Floor Los Angeles, CA 90017-5524 mark.elliott@pillsburylaw.com stephanie.angkadjaja@pillsburylaw.com	<i>Defendant</i> ACUSHNET COMPANY
Terence H. Hawley Phillip H. Babich REED SMITH LLP 101 Second Street, Suite 1800 San Francisco, CA 94105 thawley@reedsmith.com pbabich@reedsmith.com	<i>Defendants</i> REVELYST, INC. REVELYST SALES LLC
Alecia E. Cotton Emily A. Murphy Crystal J. Yu ROGERS JOSEPH O'DONNELL 311 California Street, 10th Floor San Francisco, California 94104 acotton@rjo.com emurphy@rjo.com cyu@rjo.com	<i>Defendant</i> COSTCO WHOLESALE CORPORATION
Jeffrey J. Parker SHEPPARD, MULLIN, RICHTER & HAMPTON LLP 350 South Grand Avenue, 40 th Floor Los Angeles, California 90071-3460 jparker@sheppardmullin.com	<i>Defendant</i> SM GLOBAL GROUP, LLC

ADDRESS	PARTY
Lauren M. Michals NIXON PEABODY LLP One Embarcadero Center, 32nd Floor San Francisco, CA 94111 lmichals@nixonpeabody.com	<i>Defendant</i> RAPHA RACING LLC
Sarah A. Slack Alexandra R. Jernigan FOLEY & LARDNER LLP 555 South Flower Street, Suite 3300 Los Angeles, CA 90071-2418 sslack@foley.com alexandra.jernigan@foley.com	<i>Defendants</i> HARLEY-DAVIDSON, INC. HARLEY-DAVIDSON MOTOR COMPANY, INC.