

LEXINGTON LAW GROUP, LLP
Joseph J. Mann, State Bar No. 207968
Meredyth L. Merrow, State Bar No. 328337
503 Divisadero Street
San Francisco, CA 94117
Telephone: (415) 913-7800
Facsimile: (415) 759-4112
jmann@lexlawgroup.com
mmerrow@lexlawgroup.com

Attorneys for Plaintiff
CENTER FOR ENVIRONMENTAL HEALTH

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF ALAMEDA

CENTER FOR ENVIRONMENTAL
HEALTH, a non-profit corporation,

Plaintiff,

v.

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

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**

Action Filed: February 20, 2025
Trial Date: None set

CENTER FOR ENVIRONMENTAL
HEALTH, a non-profit corporation,

Plaintiff,

v.

ACUSHNET COMPANY, *et al.*,

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 ANINE BING CORPORATION in place of the reference to
7 DOE 63 in each place that it appears in the operative Complaint.
- 8 2. By inserting the name FERRARI S.P.A. in place of the reference to DOE 64 in each
9 place that it appears in the operative Complaint.
- 10 3. By inserting the name KHAITE LLC in place of the reference to DOE 65 in each
11 place that it appears in the operative Complaint.
- 12 4. By inserting the name PINKO SHOES S.R.L. in place of the reference to DOE 66 in
13 each place that it appears in the operative Complaint.
- 14 5. By inserting the name CRIS CONF S.P.A. in place of the reference to DOE 67 in each
15 place that it appears in the operative Complaint.
- 16 6. By inserting the name ELI S.R.L. in place of the reference to DOE 68 in each place
17 that it appears in the operative Complaint.
- 18 7. By inserting the name SCALPERS FASHION S.L. in place of the reference to DOE
19 69 in each place that it appears in the operative Complaint.
- 20 8. By inserting the name BALDININI USA CORP. in place of the reference to DOE 70
21 in each place that it appears in the operative Complaint.

1 Dated: August 3, 2026

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, Kian Blewett, 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
kblewett@lexlawgroup.com.

6 On August 3, 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 ☐ **BY PERSONAL DELIVERY:** I placed all pages of the document(s) listed above in a sealed
17 envelope addressed to the party(ies) listed above, and caused such envelope to be delivered by
hand to the addressee(s) as indicated.

18 ☐ **BY OVERNIGHT DELIVERY:** I deposited such document(s) in a box or other facility
19 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.

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

22 Executed on August 3, 2026 at San Francisco, California.

23 

24 _____
25 Kian Blewett
26
27
28

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

ADDRESS	DEFENDANT
Matthew S. Kenefick Sebastian Nguyen JEFFER MANGELS & MITCHELL LLP 333 Bush Street, 11th Floor San Francisco, CA 94104 mkenefick@jeffer.com snguyen@jeffer.com	GUESS?, LLC
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	BANANA REPUBLIC, LLC HERMES OF PARIS, INC. THE GAP, INC. SUGARTOWN WORLDWIDE LLC
Peter W. McGaw BUCHALTER 425 Market Street, Suite 2900 San Francisco, CA 94105 pmcgaw@buchalter.com	3.1 PHILLIP LIM, LLC
Presently unrepresented by counsel.	BALLY AMERICAS INC. BALLY SCHUHFABRIKEN AG

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
Staci J. Trager DLA PIPER LLP (US) 2000 Avenue of the Stars Suite 400, North Tower Los Angeles, CA 90067 Staci.Trager@us.dlapiper.com	GIORGIO ARMANI CORPORATION
Samuel Y. Edgerton, III Alexis A. Arteaga O'HAGAN MEYER LLP 2615 Pacific Coast Highway, Suite 300 Hermosa Beach, CA 90254 sedgerton@ohaganmeyer.com aarteaga@ohaganmeyer.com	IM USA CORP. I.M. PRODUCTION SAS

SERVICE LIST

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

ADDRESS	PARTY
None	No active parties. Plaintiff's claims against all Defendants have been resolved by settlement and/or dismissal.