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7

8 SUPERIOR COURT OF CALIFORNIA

9 IN AND FOR THE COUNTY OF SAN FRANCISCO

10 IAN D'SA, MARIO DIAZ, JORGE  
11 VALDIVIA, and FRANCISCO ROMERO on  
behalf of themselves, all others similarly  
12 situated, and the State of California,

13 Plaintiffs,

14 vs.

15 AMBER INDIA CORPORATION, AMBER  
INDIA COMMERCIAL, INC., AMBER INDIA  
16 ENTERPRISE, INC., VIJAY BIST, VIJAY  
KUMAR, and DOES 1–25,  
17

18 Defendants,

Case No. CGC-15-544578

**AMENDMENT TO FIRST AMENDED  
COMPLAINT**

19 Pursuant to the Court's July 31, 2017 Order Allowing Amendment to Complaint to  
20 Correct Typographical Error in the Captioned Name of Plaintiff Mario Ibarra Diaz, Plaintiffs  
21 Diaz, Valdivia, and Romero submit this amendment to the operative complaint.

22 Plaintiffs MARIO DIAZ, JORGE VALDIVIA, and FRANCISCO ROMERO amend the  
23 First Amended Complaint in this action as follows:

24 1. In the caption replace "Maria Diaz" with "Mario Ibarra Diaz;"

- 1 2. At page 1, line 21, replace “Maria Diaz” with “Mario Ibarra Diaz;”  
2 3. At page 3, line 10, replace “Maria Diaz” with “Mario Ibarra Diaz;” and  
3 4. At page 15, line 18, replace “Maria Diaz” with “Mario Ibarra Diaz.”

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5 Respectfully submitted,

6 Date: July 31, 2017

HOYER & HICKS



Richard A. Hoyer  
Ryan L. Hicks  
*Attorneys for Plaintiffs Diaz, Romero, and  
Valdivia*

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1 **PROOF OF SERVICE BY FILE & SERVEXPRESS E-SERVICE**

2 RE: *D’sa, et al. v. Amber India Corp., et al.*, San Francisco County Case No. CGC-  
3 15-544578

4 I declare that I am employed in the City and County of San Francisco, State of  
5 California. I am over eighteen years of age and not a party to the within entitled cause. My  
6 business address is 4 Embarcadero Center, Suite 1400, San Francisco, California 94111.

7 On July 31, 2017, I served the within:

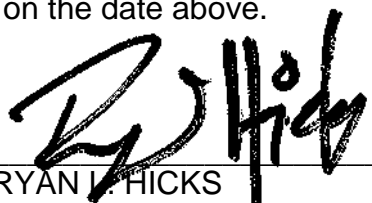
8 **AMENDMENT TO FIRST AMENDED COMPLAINT**

9 To:

10 JEFFREY V. TA (State Bar No. 225188)  
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13 San Francisco, California 94108-2805

14 I electronically served true and correct copies of the above documents in accordance with  
15 the Court’s Local Rule 2.10 requiring all documents to be served upon interested parties via  
16 File & ServeXpress System.

17 I declare under penalty of perjury that the foregoing is true and correct, and that this  
18 declaration was executed at San Francisco, California, on the date above.

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20   
21 RYAN J. HICKS