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21 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
22 **FOR THE COUNTY OF LOS ANGELES**

23 SARAH TITHER-KAPLAN and TONI GAAL, on
24 behalf of themselves and all those similarly
25 situated,

26 Plaintiffs,

27 v.

28 JAMES FRANCO, VINCE JOLIVETTE, JAY
DAVIS, RABBITBANDINI PRODUCTIONS;
RABBITBANDINI PRODUCTIONS, LLC;
RABBITBANDINI FILMS, LLC; DARK
RABBIT PRODUCTIONS, LLC ;
RABBITBANDINI PRODUCTIONS STUDIO 4,
LLC, and DOES 1-10

Defendants.

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Superior Court of California
County of Los Angeles

MAR 30 2020

Sherri R. Carter, Executive Officer/Clerk of Court

By: Isaac Lovo, Deputy

Case No: 19STCV35156

[Assigned to the Hon. Ann I. Jones]

**FIRST AMENDED CLASS ACTION
COMPLAINT**

1. Sex Discrimination in Violation of Cal. Civ. Code §§ 51, 51.5, 52
2. Sexual Harassment in Violation of Cal. Civ. Code § 51.9 and 52
3. Interference with the Exercise of Civil Rights in Violation of the Bane Act, California Civil Code § 52.1
4. Violations of California Business and Professions Code §17200
5. Violations of the Consumer Legal Remedies Act, California Civil Code §1750, et seq.
6. Untrue and Misleading Advertising in Violation of Cal. Bus. & Prof. Code §17500 et seq.
7. Breach of Contract
8. Breach of the Implied Covenant of Good Faith and Fair Dealing
9. Negligent Misrepresentation
10. Fraud
11. False Promise
12. Unjust Enrichment

DEMAND FOR JURY TRIAL