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Clerk of the Napa Superior Court
By: Kelly Rose, Deputy

7 Attorneys for Plaintiff, JORDAN VENEMA

8
9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 IN AND FOR THE COUNTY OF NAPA
11

12 JORDAN VENEMA, an individual,

CASE NO.: 20CV001329

13 Plaintiff,

14 vs.

**COMPLAINT FOR PENALTIES FOR THE
LATE PAYMENT OF WAGES (Labor Code
§ 203); DEMAND FOR JURY TRIAL**

15 L'OREAL USA, INC., a Delaware
corporation; DAN KLORES
16 COMMUNICATIONS, LLC, a Delaware
limited liability company; DAN KLORES
17 COMMUNICATIONS HOLDINGS, INC.,
a New York corporation; and DOES 1-25,
18 inclusive.

19 Defendants.

20
21 **PARTIES**

22 1. Plaintiff, JORDAN VENEMA, ("Plaintiff") is an individual residing in the County of
23 Sacramento, California.

24 2. Defendant, L'OREAL USA, INC., ("L'OREAL"), is, and at all times relevant herein was, a
25 Delaware corporation, maintaining its principal place of business in the City of New York, New
26 York.

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1 3. Defendant, DAN KLORES COMMUNICATIONS, LLC, (“DKCLLC”), is, and at all times
2 relevant herein was, a Delaware limited liability company, maintaining its principal place of
3 business in the City of New York, New York.

4 4. Defendant, DAN KLORES COMMUNICATIONS HOLDINGS, INC., (“DKCHINC”), is,
5 and at all times relevant herein was, a New York corporation, maintaining its principal place of
6 business in the City of New York, New York.

7 5. Plaintiff is ignorant of the true names and capacities of the defendants sued herein as
8 DOES 1 through 25 inclusive, and therefore sues these defendants by such fictitious names.
9 Plaintiff will amend this complaint to allege their true names and capacities when ascertained.
10 Plaintiff is informed and believe and on that basis alleges that each of these fictitiously named
11 defendants is responsible in some manner for the acts and/or omissions herein alleged, and that as
12 such, said fictitiously named defendants are subject to, and liable for, the penalties sought in this
13 action. L’OREAL, DKCLLC, DKCHINC and Does 1 thru 25 are hereinafter collectively referred
14 to as “Defendants.”

15 6. Plaintiff is informed and believe and thereon allege at all times mentioned herein, the
16 Defendants, and each of them, both those specifically named and fictitiously named, were the
17 agents, servants, and/or employees of their co-defendants and in doing the things hereinafter
18 mentioned, were acting within the course and scope of their authority as such agents, servants,
19 employees with the permission of their co-defendants.

20 **FIRST COUNT**

21 **(For Late-Wage-Payment Penalties for June, 2017, Employment -**
22 **Against All Defendants)**

23 7. Plaintiff re-alleges and incorporates herein Paragraphs 1-6 hereof as though fully set forth
24 herein.

25 8. In June of 2017, in the County of Napa, California, Defendant employed Plaintiff as a host
26 for an live event. That employment began on June 25, 2017, and concluded on June 27, 2017. In
27 the course of that employment, Plaintiff performed his hosting services pursuant to, and under the
28 direction and complete control of Defendants and their personnel and agents.

