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TONY IMBRENDA

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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF LOS ANGELES**

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11 TONY IMBRENDA, an individual,
12 Plaintiff,
13 v.
14 COUNTY OF LOS ANGELES; and DOES 1
through 25, inclusive
15 Defendants.

Case No. 20STCV44299

COMPLAINT FOR:

- (1) VIOLATION OF RIGHTS UNDER THE FIREFIGHTER BILL OF RIGHTS (CAL. GOV. CODE §3260);**
- (2) RETALIATION UNDER FIREFIGHTER BILL OF RIGHTS (“FIBOR”), Cal. Gov. Code §3254**
- (3) RETALIATION IN VIOLATION OF CAL. LAB CODE §1102.5;**

[DEMAND FOR JURY TRIAL]

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20 Plaintiff TONY IMBRENDA, an individual, alleges as follows:

21 **PARTIES AND JURISDICTION**

22 1. Plaintiff TONY IMBRENDA (“Plaintiff” or “Imbrenda”) is, and at all relevant times
23 was an employee of the County of Los Angeles, and was employed as a Captain with the Los
24 Angeles County Fire Department (“LACOFD” or the “Department”) located within the County of
25 Los Angeles, and operating under the authority of the County of Los Angeles, and a resident in the
26 State of California.

27 2. Defendant County of Los Angeles (the “County”) is a governmental entity organized
28 and existing under the laws of the state of California, and located within the State of California,

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