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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF KING

LOU LEHMAN, individually and on behalf
of all those similarly situated,

Plaintiff,

v.

EXTRA CAR AIRPORT PARKING, INC.
a domestic corporation,

Defendant.

No. 14-2-08531-1 KNT

CLASS ACTION COMPLAINT
FOR DAMAGES

Plaintiff claims against defendant as follows:

I. NATURE OF ACTION

1. Plaintiff brings this class action for money damages and statutory penalties for wage law violations on behalf of current and former employees of defendant Extra Car Airport Parking, Inc. (“Extra Car,” “company,” or “employer”) for violating the SeaTac Municipal Code 7.45, the Washington Minimum Wage Act (“MWA”), RCW 49.46, and the Wage Rebate Act (“WRA”), RCW 49.52.

II. JURISDICTION AND VENUE

2. The Superior Court of Washington has jurisdiction of plaintiff’s claims pursuant to RCW 2.08.010.

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IX. PRAYER FOR RELIEF

WHEREFORE, plaintiff requests this Court enter an order granting her and class members the following relief:

- A. Damages for lost wages in amounts to be proven at trial;
- B. Exemplary damages in amounts equal to double the wages due to class members, pursuant to RCW 49.52.070;
- C. Attorneys' fees and costs pursuant to RCW 49.46.090, RCW 49.48.030, RCW 49.52, and SeaTac Municipal Code 7.45.100.
- D. Prejudgment interest; and
- E. Such other and further relief as the Court deems just and proper.

DATED this 26th day of March, 2014.

SCHROETER GOLDMARK & BENDER



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Attorneys for Plaintiff