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Attorneys for Defendants, DANIEL KUNZ,
dba D.K. PROJECT MANAGEMENT, and TANYA KUNZ

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO, NORTH COUNTY DIVISION

LILIA GARCIA-BROWER, California State
Labor Commissioner, Division of Labor
Standards Enforcement, Department of
Industrial Relations, State of California, on
behalf of the People of the State of California,

Plaintiff,

v.

DANIEL KUNZ, an individual, dba D.K.
PROJECT MANAGEMENT; TANYA KUNZ,
an individual, and DOES 1-10, inclusive,

Defendants.

Case No.: 37-2023-00022018-CU-WT-NC

**DEFENDANTS' VERIFIED AMENDED
ANSWER TO PLAINTIFF'S
COMPLAINT FOR DAMAGES**

[CAL.CIV.PROC § 446(a)]

DEMAND FOR JURY TRIAL

COMES NOW the defendants, DANIEL KUNZ, dba PROJECT MANAGEMENT, and
TANYA KUNZ (hereinafter referred to as "Defendants"), for themselves alone answer the Complaint
on file herein with a verified answer pursuant Cal.Civ.Proc §446(a) as follows:

1. Defendants admit the allegations in paragraph 1 of Plaintiff's complaint.
2. Defendants admit the allegations in paragraph 2 of Plaintiff's complaint.
3. Defendants admit the allegations in paragraph 3 of Plaintiff's complaint in that they are
married and had business operations in the City of Vista, in the County of San Diego, in the State of
California. All other allegations in paragraph 3 of the complaint are denied.

1 4. Defendants have no information or belief as to plaintiff's allegations in paragraph 4 of
2 the verified complaint and deny all allegations in paragraph 4 pursuant to Cal.Civ.Proc. § 431.30(e).

3 5. Defendants have no information or belief as to plaintiff's allegations in paragraph 5 of
4 the verified complaint and deny all allegations in paragraph 5 pursuant to Cal.Civ.Proc. § 431.30(e).

5 6. Defendants have no information or belief as to plaintiff's allegations in paragraph 6 of
6 the verified complaint and deny all allegations in paragraph 6 pursuant to Cal.Civ.Proc. § 431.30(e).

7 7. Defendants admit or deny as previously provided in paragraphs 1 through 6 of this
8 verified answer.

9 8. Defendants deny all allegations in paragraph 8 of plaintiff's complaint.

10 9. Defendants admit the allegations in paragraph 9 of Plaintiff's complaint in that
11 Defendants requested Complainant sign a W-9 and to receive a check, versus cash, going forward. All
12 other allegations in paragraph 9 of the complaint are denied.

13 10. Defendants deny all allegations in paragraph 10 of plaintiff's complaint.

14 11. Defendants have no information or belief as to plaintiff's allegations in paragraph 11
15 of the verified complaint and deny all allegations in paragraph 11 pursuant to Cal.Civ.Proc. §
16 431.30(e).

17 12. Defendants admit the allegations in paragraph 12 of Plaintiff's complaint in that
18 Defendants made a check payable as the complainant instructed. All other allegations in paragraph 12
19 of the complaint are denied.

20 13. Defendants deny all allegations in paragraph 13 of plaintiff's complaint.

21 14. Defendants deny all allegations in paragraph 14 of plaintiff's complaint.

22 15. Defendants deny all allegations in paragraph 15 of plaintiff's complaint.

23 16. Defendants deny all allegations in paragraph 16 of plaintiff's complaint.

24 17. Defendants admit the allegations in paragraph 17 of Plaintiff's complaint.

25 18. Defendants admit the allegations in paragraph 18 of Plaintiff's complaint in that
26 Defendants attended a wage conference at the Labor Commissioner's Office on February 8, 2017. All
27 other allegations in paragraph 18 of the complaint are denied on the basis that defendants lack sufficient
28 information or belief to admit or deny.

1 19. Defendants have no information or belief as to plaintiff's allegations in paragraph 19
2 of the verified complaint and deny all allegations in paragraph 19 pursuant to Cal.Civ.Proc. §
3 431.30(e).

4 20. Defendants deny all allegations in paragraph 20 of plaintiff's complaint.

5 21. Defendants deny all allegations in paragraph 21 of plaintiff's complaint.

6 22. Defendants deny all allegations in paragraph 22 of plaintiff's complaint.

7 23. Defendants have no information or belief as to plaintiff's allegations in paragraph 23
8 of the verified complaint and deny all allegations in paragraph 23 pursuant to Cal.Civ.Proc. §
9 431.30(e).

10 24. Defendants have no information or belief as to plaintiff's allegations in paragraph 24
11 of the verified complaint and deny all allegations in paragraph 24 pursuant to Cal.Civ.Proc. §
12 431.30(e).

13 25. Defendants deny all allegations in paragraph 25 of plaintiff's complaint.

14 26. Defendants admit they were served with the DLSE letter attached as *Exhibit A* to the
15 complaint as alleged in paragraph 26 of the complaint, but denies all other allegations contained in
16 paragraph 26.

17 27. Defendants admit or deny as previously provided in paragraphs 1 through 26 of this
18 verified answer.

19 28. Defendants deny all allegations in paragraph 28 of plaintiff's complaint.

20 29. Defendants deny all allegations in paragraph 29 of plaintiff's complaint.

21 30. Defendants deny all allegations in paragraph 30 of plaintiff's complaint.

22 31. Defendants have no information or belief as to plaintiff's allegations in paragraph 31
23 of the verified complaint and deny all allegations in paragraph 31 pursuant to Cal.Civ.Proc. §
24 431.30(e).

25 32. Defendants have no information or belief as to plaintiff's allegations in paragraph 32
26 of the verified complaint and deny all allegations in paragraph 32 pursuant to Cal.Civ.Proc. §
27 431.30(e).

28 33. Defendants deny all allegations in paragraph 33 of plaintiff's complaint.

1 34. Defendants admit they were served with the DLSE letter attached as *Exhibit A* to the
2 complaint as alleged in paragraph 34 of the complaint, but denies all other allegations contained in
3 paragraph 34.

4 35. Defendants admit or deny as previously provided in paragraphs 1 through 34 of this
5 verified answer.

6 36. Defendants deny all allegations in paragraph 36 of plaintiff's complaint.

7 37. Defendants deny all allegations in paragraph 37 of plaintiff's complaint.

8 38. Defendants deny all allegations in paragraph 38 of plaintiff's complaint.

9 39. Defendants have no information or belief as to plaintiff's allegations in paragraph 39
10 of the verified complaint and deny all allegations in paragraph 39 pursuant to Cal.Civ.Proc. §
11 431.30(e).

12 40. Defendants admit they were served with the DLSE letter attached as *Exhibit A* to the
13 complaint as alleged in paragraph 40 of the complaint, but denies all other allegations contained in
14 paragraph 40.

15 41. Defendants deny all allegations in paragraph 41 of plaintiff's complaint.

16 42. Defendants admit they were served with the DLSE letter attached as *Exhibit A* to the
17 complaint as alleged in paragraph 42 of the complaint, but denies all other allegations contained in
18 paragraph 42.

19 43. Defendants admit or deny as previously provided in paragraphs 1 through 42 of this
20 verified answer.

21 44. Defendants deny all allegations in paragraph 44 of plaintiff's complaint.

22 45. Defendants deny all allegations in paragraph 45 of plaintiff's complaint.

23 46. Defendants deny all allegations in paragraph 46 of plaintiff's complaint.

24 47. Defendants deny all allegations in paragraph 47 of plaintiff's complaint.

25 48. Defendants have no information or belief as to plaintiff's allegations in paragraph 48
26 of the verified complaint and deny all allegations in paragraph 48 pursuant to Cal.Civ.Proc. §
27 431.30(e).

1 49. Defendants admit they were served with the DLSE letter attached as *Exhibit A* to the
2 complaint as alleged in paragraph 49 of the complaint, but denies all other allegations contained in
3 paragraph 49.

4 50. Defendants deny all allegations in paragraph 50 of plaintiff's complaint.

5 51. Defendants admit they were served with the DLSE letter attached as *Exhibit A* to the
6 complaint as alleged in paragraph 51 of the complaint, but denies all other allegations contained in
7 paragraph 51.

8
9 Defendant believes that after a reasonable opportunity for discovery and further investigation,
10 it is likely that there will be evidentiary support for the following affirmative defenses:

11 **FIRST AFFIRMATIVE DEFENSE**

12 **(Failure to State Facts Sufficient to Constitute a Cause of Action)**

13 52. As and for a first separate and affirmative defense to each and every purported cause of
14 action contained within Plaintiff's unverified Complaint on file herein, these answering Defendants
15 allege that the Complaint and each and every cause of action contained therein fails to state facts
16 sufficient to constitute a cause of action.

17 **SECOND AFFIRMATIVE DEFENSE**

18 **(Contributory and Comparative Negligence – Plaintiff)**

19 53. As and for a second separate and affirmative defense to each and every purported cause
20 of action contained within Plaintiff's unverified Complaint on file herein, these answering Defendants
21 allege that at the time and place of the incident referred to in Plaintiff's Complaint, Plaintiff was
22 negligent, careless and unlawfully conducted herself so as to cause Plaintiffs alleged injuries and
23 damages; which negligence bars, either in whole or in part, the damages sought herein.

24 **THIRD AFFIRMATIVE DEFENSE**

25 **(Contributory and Comparative Negligence – 3rd Parties)**

26 54. As and for a third separate and affirmative defense to each and every purported cause
27 of action contained within Plaintiff's unverified Complaint on file herein, these answering Defendants
28 allege that if said incident and/or injuries alleged were caused by negligence, defendant requests that

1 the negligence of all persons or parties and the degree to which such negligence contributed to the
2 happening of the incident and/or the nature and extent of the injuries actually sustained, if any, be
3 determined by the trier of fact.

4 **FOURTH AFFIRMATIVE DEFENSE**

5 **(Failure to Mitigate)**

6 55. As and for a fourth separate and affirmative defense to each and every purported cause
7 of action contained within Plaintiff's unverified Complaint on file herein, these answering Defendants
8 allege that if plaintiffs sustained any injury or damage as alleged in the Complaint, defendant is
9 informed and believes the same could have been mitigated or prevented, in whole or in part, by the
10 taking of reasonable steps to do so, but plaintiff failed to do so and should therefore be barred from any
11 recovery herein.

12 **FIFTH AFFIRMATIVE DEFENSE**

13 **(Cal.Civ.Proc. §§ 1431, *et seq.*)**

14 56. As and for a fifth separate and distinct affirmative defense to each and every purported
15 cause of action contained within Plaintiff's unverified Complaint on file herein, these answering
16 Defendants allege that any recovery by Plaintiff for non-economic damages shall be several only and
17 shall not be joint pursuant to *California Code of Civil Procedure* Section 1431, *et. seq.*, specifically
18 Section 1431.2, and these answering Defendants shall be liable only for the amount of damages, if any,
19 proportionate to its own degree of responsibility, which responsibility these answering Defendants
20 specifically and generally denies exists.

21 **SIXTH AFFIRMATIVE DEFENSE**

22 **(Ratification)**

23 57. As and for a sixth separate and affirmative defense to the Complaint on file herein, and
24 to each purported cause of action set forth therein, Defendant alleges that the facts alleged in the
25 Complaint, if true, were consented to, accepted, ratified and confirmed by complainant.

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28 / / /

(Unanticipated and Unforeseeable Events)

EIGHTH AFFIRMATIVE DEFENSE

NINTH AFFIRMATIVE DEFENSE

TENTH AFFIRMATIVE DEFENSE

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1 answering Defendants allege that Plaintiff has failed to state sufficient facts to entitle her to the recovery
2 of prejudgment interest.

3 **SIXTEENTH AFFIRMATIVE DEFENSE**

4 **(Laches)**

5 67. As and for a sixteenth separate and distinct affirmative defense to each and every
6 purported cause of action contained within Plaintiff's unverified Complaint on file herein, these
7 answering Defendants allege that Plaintiff is barred from recovering the relief sought within her
8 unverified Complaint on file herein by reason of the Doctrine of Laches.

9 **SEVENTEENTH AFFIRMATIVE DEFENSE**

10 **(No Special Damages)**

11 68. As and for a seventeenth separate and distinct affirmative defense to each and every
12 purported cause of action contained within Plaintiff's unverified Complaint on file herein, these
13 answering Defendants allege that Plaintiff failed to state sufficient facts to entitle her to the recovery
14 of any special damages incurred.

15 **EIGHTEENTH AFFIRMATIVE DEFENSE**

16 **(Privilege)**

17 69. As and for an eighteenth separate and distinct affirmative defense to each and every
18 purported cause of action contained within Plaintiff's unverified Complaint on file herein, these
19 answering Defendants allege that Plaintiff is barred from recovering the relief sought within her
20 unverified Complaint on file herein by reason of the common law and codified Doctrines of Privilege.

21 **NINETEENTH AFFIRMATIVE DEFENSE**

22 **(Statute of Limitations)**

23 70. As and for a nineteenth separate and distinct affirmative defense to each and every
24 purported cause of action contained within Plaintiff's unverified Complaint on file herein, these
25 answering Defendants allege that Plaintiff's Complaint and each cause of action contained therein are
26 barred by all applicable statutes of limitation.

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1 **TWENTIETH AFFIRMATIVE DEFENSE**

2 **(Apportionment)**

3 71. As and for a twentieth separate and affirmative defense to the Complaint, and to each
4 purported cause of action therein, these answering Defendants are informed and believe and thereon
5 allege that the matters complained of in the Complaint were proximately caused, in whole or in part,
6 by the acts or omissions of a third party or parties or plaintiff. Accordingly, the liability of the plaintiff
7 and responsible parties, named or unnamed, should be apportioned according to their respective
8 degrees of fault or other legal responsibility, and the liability, if any, of these answering Defendants
9 should be reduced accordingly.

10 **TWENTY-FIRST AFFIRMATIVE DEFENSE**

11 **(Excuse)**

12 72. As and for a twenty-first separate and distinct affirmative defense to each and every
13 purported cause of action contained within Plaintiff's unverified Complaint on file herein, these
14 answering Defendants allege that Plaintiff is barred from recovering the relief sought within her
15 unverified Complaint on file herein by reason of the Doctrine of Excuse.

16 **TWENTY-SECOND AFFIRMATIVE DEFENSE**

17 **(Necessity)**

18 73. As and for a twenty-second separate and distinct affirmative defense to each and every
19 purported cause of action contained within Plaintiff's unverified Complaint on file herein, these
20 answering Defendants allege that Plaintiff is barred from recovering the relief sought within her
21 unverified Complaint on file herein by reason of the Doctrine of Necessity.

22 **TWENTY-THIRD AFFIRMATIVE DEFENSE**

23 **(Bar of Express Contract Terms)**

24 74. As and for a twenty-third separate and affirmative defense to the Complaint on file
25 herein, and to each purported cause of action set forth therein, Defendants allege that complainant is
26 barred from recovery by express and implied terms of the agreements made with Defendants.

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1 **TWENTY-FOURTH AFFIRMATIVE DEFENSE**

2 **(Uncertainty)**

3 75. As and for a twenty-fourth separate and affirmative defense to the Complaint on file
4 herein, and to each purported cause of action set forth therein, Defendant alleges that the Complaint,
5 and each cause of action thereof, and every allegation thereof, is so vague, ambiguous, incomplete,
6 uncertain and unintelligible as to be subject to dismissal on the grounds of uncertainty.

7 **TWENTY-FIFTH AFFIRMATIVE DEFENSE**

8 **(In Pari Delicto)**

9 76. As and for a twenty-fifth separate and affirmative defense to the Complaint, and to each
10 purported cause of action therein, these answering Defendants allege that the plaintiff herein and each
11 and every purported cause of action in the Complaint are barred because plaintiff has engaged in acts
12 and courses of conduct which rendered them in *pari delicto*.

13 **TWENTY-SIXTH AFFIRMATIVE DEFENSE**

14 **(Unclean Hands)**

15 77. As and for a twenty-sixth separate and affirmative defense to the Complaint, and to each
16 purported cause of action therein, these answering Defendants allege that Plaintiff's conduct constitutes
17 unclean hands and Plaintiff is therefore barred from obtaining relief against this answering Defendant.

18 **TWENTY-SEVENTH AFFIRMATIVE DEFENSE**

19 **(Offset and Indemnity and Contribution)**

20 78. As and for a twenty-seventh separate and affirmative defense to the Complaint, and to
21 each purported cause of action therein, these answering Defendants have a right to offset and/or
22 indemnity and/or contribution from the Plaintiff and/or other third parties for any damages or costs
23 these answering Defendants may have to pay Plaintiff or to any other parties.

24 **TWENTY-EIGHTH AFFIRMATIVE DEFENSE**

25 **(Conspiracy)**

26 79. As and for a twenty-eighth separate and affirmative defense to the Complaint, and to
27 each purported cause of action therein, these answering Defendants affirmatively allege that Plaintiff
28

1 and other third parties acted jointly, in concert, conspired and agreed to cause damage to this answering
2 Defendant.

3 **TWENTY-NINTH AFFIRMATIVE DEFENSE**

4 **(Violation of Constitutional Protections – Due Process)**

5 80. As and for a twenty-ninth separate and affirmative defense to the Complaint, and to each
6 purported cause of action therein, these answering Defendants affirmatively allege that Plaintiff's
7 claims are barred, in whole or in part, because they violate the Due Process provisions of the United
8 States and California Constitutions by, among other things, depriving Defendant of procedural and
9 substantive due process rights.

10 **THIRTIETH AFFIRMATIVE DEFENSE**

11 **(Intervening or Superseding Events)**

12 81. As and for a thirtieth separate and affirmative defense to the Complaint, and to each
13 purported cause of action therein, these answering Defendants affirmatively allege that if Plaintiff has
14 sustained any injuries or incurred any expenses, or otherwise suffered any damage, such injuries,
15 expenses or damage, if any, were the result of intervening or superseding events, factors, occurrences
16 or conditions, which were in no way caused by Defendant, and for which these answering Defendants
17 is not responsible and/or liable.

18 **THIRTY-FIRST AFFIRMATIVE DEFENSE**

19 **(Unjust Enrichment)**

20 82. As and for a thirty-first separate and affirmative defense to the Complaint, and to each
21 purported cause of action therein, these answering Defendants affirmatively allege that any recovery
22 by Plaintiff would constitute unjust enrichment.

23 **THIRTY-SECOND AFFIRMATIVE DEFENSE**

24 **(Excessive Fines and Penalties)**

25 83. As and for a thirty-second separate and affirmative defense to the Complaint, and to
26 each purported cause of action therein, these answering Defendants affirmatively allege that Plaintiff's
27 claims for relief, on her Complaint and as applied, are barred because they violate the Excessive Fines
28 and Penalties Clauses of the United States and California Constitutions.

(Settlement, Accord, Satisfaction)

THIRTY-FOURTH AFFIRMATIVE DEFENSE

THIRTY-FIFTH AFFIRMATIVE DEFENSE

THIRTY-SIXTH AFFIRMATIVE DEFENSE

/ / /

1 **THIRTY-SEVENTH AFFIRMATIVE DEFENSE**

2 **(Federal Preemption)**

3 88. As and for a thirty-seventh separate and affirmative defense to the Complaint, and to
4 each purported cause of action therein, these answering Defendants affirmatively allege that the actions
5 and/or omissions of Defendants, as alleged in the Complaint, are not illegal or unlawful as any state
6 law purported to proscribe them is(are) preempted by Federal Law and/or to proscribe Defendants'
7 actions and/or omissions as illegal or unlawful conduct would require Defendants to violate Federal
8 Law.

9 **THIRTY-EIGHTH AFFIRMATIVE DEFENSE**

10 **(No Employer-Employee Relationship)**

11 89. As and for a thirty-eighth separate and affirmative defense to the Complaint, and to each
12 purported cause of action therein, these answering Defendants affirmatively allege that they are not
13 liable to Plaintiff due to the lack of an employer-employee relationship between the parties.

14 **THIRTY-NINTH AFFIRMATIVE DEFENSE**

15 **(No Adverse Action)**

16 90. As and for a thirty-ninth separate and affirmative defense to the Complaint, and to each
17 purported cause of action therein, these answering Defendants affirmatively allege that any actions
18 and/or omissions as alleged in Plaintiff's Complaint do not constitute actionable adverse actions,
19 including, but not limited to, retaliation, and Plaintiff is therefore barred from obtaining relief against
20 these answering Defendants.

21 **FORTIETH AFFIRMATIVE DEFENSE**

22 **(Other Affirmative Defenses)**

23 91. As and for a fortieth separate and affirmative defense to the Complaint, and to each
24 purported cause of action therein, these answering Defendants state that they do not presently know all
25 facts concerning the conduct of Plaintiff and her claims sufficient to state all affirmative defenses at
26 this time Defendant will seek leave to amend this Answer should Defendant later discover facts
27 demonstrating the existence of additional affirmative defenses. This affirmative defense is for the
28 purpose of avoiding any waiver of the affirmative defense and is based on information and belief. The

1 affirmative defense is likely to have evidentiary support after a reasonable opportunity for further
2 investigation or discovery.

3 **FORTY-FIRST AFFIRMATIVE DEFENSE**

4 **(Additional Affirmative Defenses)**

5 92. As and for a forty-first separate and affirmative defense to the Complaint, Defendants
6 hereby give notice that they intend to rely on any additional affirmative defenses that become available
7 or apparent during discovery or otherwise and thus reserve the right to amend their Answers to assert
8 such additional defenses. Defendants also hereby give notice that they intend to rely on and reserve
9 their right to assert such other or related defenses as may become available in the event of a
10 determination that this action, or some part thereof, is governed by the substantive law of a state other
11 than California or of a foreign country, or in the event the facts on which this action is premised lack
12 any necessary nexus to California.


13 **WHEREFORE**, answering defendant prays for an order of this court as follows:

- 14 1. That Complainant take nothing by way of her Complaint;
- 15 2. For an award of attorney's fees and costs incurred by defendants herein;
- 16 3. For such other and further relief as the court deems just and proper.
- 17

18

19 Dated: JANUARY 24, 2024

LAW OFFICES OF DONALD A. GREEN, PC

20 By: 
21 DONALD A. GREEN
22 Attorneys for Defendants,
23 DANIEL KUNZ and TANYA KUNZ
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VERIFICATION

We, DANIEL KUNZ and TANYA KUNZ, are Defendants in this action. We have read the foregoing *Verified Amended Answer to Plaintiff's Complaint* and know the contents thereof. The same is true to our own knowledge, except as to those matters which are therein stated on information and belief, and as to those matters, we believe them to be true.

We declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated: 01 / 25 / 2024

By: *Daniel Kunz*
DANIEL KUNZ

Dated: 01 / 25 / 2024

By: *Tanya Kunz*
TANYA KUNZ

DONALD A. GREEN (SBN 225171)
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440 N. BARRANCA AVE. # 1794
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Attorneys for Defendants, DANIEL KUNZ,
dba D.K. PROJECT MANAGEMENT, and TANYA KUNZ

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO, NORTH COUNTY DIVISION

LILIA GARCIA-BROWER, California State
Labor Commissioner, Division of Labor
Standards Enforcement, Department of
Industrial Relations, State of California, on
behalf of the People of the State of California,

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DANIEL KUNZ, an individual, dba D.K.
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an individual, and DOES 1-10, inclusive,

Defendants.

Case No.: 37-2023-00022018-CU-WT-NC

PROOF OF SERVICE

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3 **PROOF OF SERVICE**

4 I, Donald A. Green, declare as follows:

5 I am over 18 years of age and not a party to this action; I am an attorney with Law Offices of
6 Donald A. Green, PC, located in the County of Los Angeles, State of California. My business
7 address is located in the County of Los Angeles, State of California, at 440 N. Barranca Ave, Suite #
1794, Covina, CA 91723, telephone number (760) 431-5290; facsimile number (760) 268-9889.

8 On January 25, 2024, I served the document(s) described as:

9 **1. DEFENDANTS' VERIFIED AMENDED ANSWER TO PLAINTIFF'S COMPLAINT**
10 **FOR DAMAGES**

11 on the interested parties in this action as listed below:

12 **BY MAIL:**


13 ☒ As follows: I am "readily familiar" with the firm's practice for collection and processing of
14 correspondence for mailing with the United States Postal Service; and that the correspondence
15 shall be deposited with the United States Postal Service this same day in the ordinary course
16 of business. I am aware that on motion of the party served, service is presumed invalid if
postal cancellation date or postage meter date is more than one day after date of deposit for
mailing in affidavit.

17 ☒ **BY FACSIMILE TRANSMISSION:** From Fax No. (760) 268-9889 to the *facsimiles of*
18 *the below-listed facsimile numbers*. The facsimile machine I used complied with Rule
2003(3), and no error was reported by the machine.

19 ☐ **BY PERSONAL SERVICE:** I delivered the above documents by hand to the offices of the
20 addressee(s).

21 ☒ **BY EMAIL OR ELECTRONIC TRANSMISSION:** Sent by email to the email address
22 listed below. I did not receive any undeliverable email message and the email was not
returned to me as undeliverable.

23 ☒ (State) I declare under penalty of perjury under the laws of the State of California that the
24 foregoing is true and correct. Executed on January 25, 2024 at Bluffton, South Carolina.

25 
26 Donald A. Green

1 LILIA GARCIA-BROWER v. DANIEL KUNZ, et al
2 Case No. 37-2023-00022018-CU-WT-NC

3 **SERVICE LIST**

4 *Attorney for Plaintiff,*
5 LILIA GARCIA-BROWER,
6 California State
7 Labor Commissioner,
8 Division of Labor
9 Standards Enforcement,
10 Department of
11 Industrial Relations, State of
12 California, on
13 behalf of the People of the
14 State of California

Ms. Felicia Espinosa, Esq.
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Division of Labor Standards Enforcement
Department of Industrial Relations
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File name	Verified Amended Answer to Complaint.pdf
Document ID	e76c353d39ed02947aa8e6258e25623933e732ce
Audit trail date format	MM / DD / YYYY
Status	● Signed

Document History



SENT

01 / 25 / 2024

01:42:44 UTC

Sent for signature to Daniel Kunz (dkunzsd@gmail.com) and Tanya Kunz (dksolta@gmail.com) from donald@dgreenlaw.com
IP: 64.20.146.226



VIEWED

01 / 25 / 2024

02:02:35 UTC

Viewed by Tanya Kunz (dksolta@gmail.com)
IP: 76.88.25.199



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16:33:31 UTC

Signed by Daniel Kunz (dkunzsd@gmail.com)
IP: 76.88.25.199



SIGNED

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Signed by Tanya Kunz (dksolta@gmail.com)
IP: 76.88.25.199



COMPLETED

01 / 25 / 2024

16:37:02 UTC

The document has been completed.