
EXHIBIT I

Allegation¹	Responses²
<p>25. Pursuant to California Labor Code § 2699.3 and other provisions of California law, Plaintiffs have exhausted all administrative remedies and satisfied all private, administrative, and judicial prerequisites to the institution of this action. Specifically, on February 28, 2011 Plaintiffs sent written notice by certified mail to the California Labor and Workforce Development Agency (LWDA) and the employer including specific provisions of the Labor Code that have been violated and facts and theories to support such violations. To-date, more than 33 calendar days after the postmark date of Plaintiffs written notice, Plaintiffs have not received a response from the LWDA.</p>	<p>25. The allegations in this paragraph amount to legal conclusions to which no answer is required. To the extent that this paragraph contains factual allegations DEFENDANT denies.</p>
<p>52. By effecting the above alleged unlawful deductions, Defendants have violated California Labor Code § 221 which provides that: “It shall be unlawful for any employer to collect or receive from an employee any part of wages theretofore paid by said employer to said employee.” This statute and other provisions of the California Labor and Civil Codes impose strict limitations on an employer’s right to withhold or deduct unauthorized amounts from employees’ wages.</p>	<p>52. The allegations in this paragraph amount to legal conclusions to which no answer is required. To the extent that this paragraph contains factual allegations DEFENDANT denies.</p>

¹ Ex. D.

² Ex. E.