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6 CASE #: 25-2-37599-4 SEA

7 IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
8 COUNTY OF KING

9 CULLEN DUKE, individually and on behalf of all  
10 others similarly situated,

11 Plaintiff,

12 vs.

13 AMAZON.COM SERVICES LLC, a foreign limited  
14 liability company,

15 Defendant.

No.

CLASS ACTION COMPLAINT

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17 Plaintiff Cullen Duke ("Plaintiff"), on personal knowledge and/or on information and  
18 belief and/or on the investigation of his counsel, for his class action complaint against  
19 Defendant Amazon.com Services LLC ("Amazon" or "Defendant"), alleges as follows:

20 **INTRODUCTION**

21 1. This class action arises from Amazon's practice of calculating and collecting  
22 excessive sales tax on purchases made by customers from third-party sellers through Amazon's  
23 online marketplace. Plaintiff is a Tennessee resident who, during 2024 and 2025, made multiple  
24 purchases through Amazon's marketplace, and Amazon calculated and collected sales tax on  
25 those purchases at a rate higher than the rate applicable to his shipping address under  
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1 a venue selection clause mandating that all disputes and claims be adjudicated in King County,  
2 Washington.<sup>1</sup>

3 8. The claims asserted on behalf of Plaintiff and the Class members in this action  
4 are brought under and governed by Washington state law because the acts and omissions  
5 alleged originated in Washington, and Washington has a paramount interest in regulating the  
6 business practices of companies headquartered and operating within its borders.

7 9. In addition, Amazon’s Conditions of Use expressly provide that the laws of the  
8 state of Washington, without regard to principles of conflict of laws, govern any dispute of any  
9 sort that might arise between Amazon and Plaintiff and the Class members.<sup>2</sup>

10 **FACTUAL ALLEGATIONS**

11 **A. Third party sellers sell products through Amazon’s marketplace.**

12 10. Amazon owns and operates Amazon.com, the world’s largest online  
13 marketplace.

14 11. Amazon states on its website that when contracting with third-party sellers who  
15 sell goods and services through its marketplace, Amazon is acting as a marketplace facilitator  
16 under Tennessee law and, as such, is “responsible to calculate, collect, remit, and refund state  
17 sales tax on sales sold by third party sellers.”<sup>3</sup> Naturally, Amazon’s responsibility is to calculate  
18 and collect the *correct* amount of sales tax on sales by third-party sellers.<sup>4</sup>

19 12. Amazon’s statement is consistent with Tennessee law, which provides: “When a  
20 marketplace seller uses a marketplace facilitator to facilitate sales of tangible personal property  
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22 <sup>1</sup> See *Conditions of Use* (May 30, 2025), <https://www.amazon.com/gp/help/customer/display.html?nodeId=508088> (last visited Dec. 3, 2025).

23 <sup>2</sup> *Id.*

24 <sup>3</sup> See *Marketplace Tax Collection*, <https://www.amazon.com/gp/help/customer/display.html?nodeId=202211260> (last visited Dec. 3, 2025); see also TN Code § 67-6-102(56) (defining “marketplace facilitator”).

25 <sup>4</sup> TN Code § 67-6-501(f) (“the marketplace facilitator is liable *for the taxes imposed by this chapter* on the sales price of the tangible personal property or the things or services taxable”) (emphasis added).

1 . . . the marketplace facilitator is liable for the taxes imposed by this chapter on the sales price  
2 of the tangible personal property.”<sup>5</sup>

3 13. Tennessee law further provides that the applicable tax rate for sales made  
4 through a marketplace facilitator’s marketplace is determined by the location where the  
5 purchaser receives the product.<sup>6</sup> In other words, Amazon’s responsibility is to collect sales tax  
6 “based on the shipped to or delivered to address of the customer.”<sup>7</sup>

7 **B. Amazon ignores the marketplace facilitator sales tax collection rules.**

8 14. During 2024 and 2025, Plaintiff made several purchases from third-party sellers  
9 through Amazon’s marketplace. The products were shipped to and received by Plaintiff at his  
10 residence, which is located in an unincorporated area of Sullivan County, Tennessee.

11 15. Plaintiff’s residence is classified under local tax jurisdiction SITUS Code 8200. The  
12 applicable state sales tax rate for non-food items is 7.00%, and the applicable local sales tax  
13 rate is 2.25%, resulting in a total sales tax rate of 9.25%, as shown below:<sup>8</sup>

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<sup>5</sup> *Id.*

24 <sup>6</sup> See TN Code §§ 67-6-901(d) and 67-6-902(a)(2).

25 <sup>7</sup> *MF-11 – Sourcing Marketplace Facilitated Sales*, Tenn. Dep’t of Rev., <https://revenue.support.tn.gov/hc/en-us/articles/360058084251-MF-11-Sourcing-Marketplace-Facilitated-Sales> (last  
26 visited Dec. 3, 2025).

27 <sup>8</sup> See *Tennessee Sales Tax Jurisdictional and Tax Rate Database*, Tenn. Dep’t of Rev.,  
<https://tnmap.tn.gov/sst/sst.html> (last visited, Dec. 3, 2025).

State		Local	
State Tax (non-food items)	7.00%	County	SULLIVAN
State Tax (food items) as of 7/1/2017	4.00%	City	KINGSPORT
State Tax (food items) before 7/1/2017	5.00%	General Tax Rate	2.25%
State FIPS	47	Food and Drug Tax Rate	2.25%
		County FIPS	163
		City FIPS	
		Special Tax Jurisdiction FIPS	
		SITUS Code	8200

16. However, for marketplace transactions fulfilled by Amazon, Amazon calculated and collected sales tax at a rate of 9.50% rather than the correct 9.25% based on Plaintiff's shipping address.

17. For example, on October 19, 2024, Plaintiff purchased a *Proster Wood Moisture Meter* from outside Tennessee from Proster US for \$13.45 (Order No. 111-9409912-6368215). The sale was made through Amazon's marketplace, and the product was shipped to and received by Plaintiff at his residence. Amazon calculated and collected \$1.28 in sales tax from Plaintiff, reflecting a rate of 9.50% rather than the correct rate of 9.25% for Plaintiff's tax jurisdiction, as shown below:

Items Ordered	Price
1 of: Proster Wood Moisture Meter - Digital Moisture Detector Moisture Tester, Pin-Type Moisture Detector Damp Tester for Wood Firewood Paper Floor	\$13.45
Sold by: PROSTER US (seller profile)	
Supplied by: PROSTER US (seller profile)	
<b>Business Price</b>	
Condition: New	
<b>Shipping Address:</b>	
Cullen A. Duke	
[REDACTED]	
KINGSPORT, TN 37663-2242	
United States	

<b>Payment Method:</b> Visa ending in [REDACTED]	Item(s) Subtotal: \$13.45
	Shipping & Handling: \$6.99
	Free Shipping: -\$6.99
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<b>Billing address</b> Cullen A. Duke [REDACTED] KINGSPORT, TN 37663-2242 United States	Total before tax: \$13.45
	Estimated tax to be collected: \$1.28
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<b>Credit Card transactions</b>	<b>Grand Total: \$14.73</b>
	Visa ending in [REDACTED]: October 12, 2024: \$14.73

18. Likewise, on February 4, 2025, Plaintiff purchased a ten-piece box of *Blue Waterfall 4-in Ceramic Tile* from outside Tennessee from RGRetro for \$31.79 (Order No. 111-7163532-6109060). The sale was made through Amazon’s marketplace, and the product was shipped to and received by Plaintiff at his residence. Amazon calculated and collected \$3.02 in sales tax from Plaintiff, reflecting a rate of 9.50% rather than the correct rate of 9.25% for Plaintiff’s tax jurisdiction, as shown below:

Shipped on February 16, 2025	
<b>Items Ordered</b>	<b>Price</b>
1 of: <i>Blue Waterfall 4 in Ceramic Tile 4.25 inch Shower Bathroom Kitchen Backsplash Daltile Color 0169 4x4 Subway Square 10 Pi</i>	\$31.79
ece Box Sold by: RGRetro ( <a href="#">seller profile</a> ) Business Price Condition: New	
<b>Shipping Address:</b> Cullen A. Duke [REDACTED] KINGSPORT, TN 37663-2242 United States	Item(s) Subtotal: \$31.79 Shipping & Handling: \$3.57 Free Shipping: -\$3.57 ----- Total before tax: \$31.79 Sales Tax: \$3.02 -----
<b>Shipping Speed:</b> FREE Shipping	<b>Total for This Shipment: \$34.81</b>
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19. On February 18, 2025, Plaintiff purchased a *Hopkins 39524 Brake Buddy Select Iii* from outside Tennessee from Parts Via for \$1,335.70 (Order No. 111-8581370-7857060). The sale was made through Amazon’s marketplace, and the product was shipped to and received by Plaintiff at his residence. Amazon calculated and collected \$126.89 in sales tax from Plaintiff,

1 reflecting a rate of 9.50% rather than the correct rate of 9.25% for Plaintiff's tax jurisdiction, as  
2 shown below:

Shipped on February 18, 2025	
<b>Items Ordered</b>	<b>Price</b>
1 of: Hopkins 39524 Brake Buddy Select III Sold by: Parts Via ( <a href="#">seller profile</a> ) Condition: New	\$1,335.70
<b>Shipping Address:</b> Cullen A. Duke [REDACTED] KINGSPORT, TN 37663-2242 United States	Item(s) Subtotal: \$1,335.70 Shipping & Handling: \$0.00 ----- Total before tax: \$1,335.70 Sales Tax: \$126.89 -----
<b>Shipping Speed:</b> Standard Shipping	<b>Total for This Shipment: \$1,462.59</b> -----

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11 20. On February 20, 2025, Plaintiff purchased a *Blazer International C6304 LED*  
12 *Wireless Magnetic Trailer Towing Light Kit* from outside Tennessee from Crimp Supply Inc. for  
13 \$101.34 (Order No. 111-5641127-0661009). The sale was made through Amazon's marketplace,  
14 and the product was shipped to and received by Plaintiff at his residence. Amazon calculated  
15 and collected \$9.63 in sales tax from Plaintiff, reflecting a rate of 9.50% rather than the correct  
16 rate of 9.25% for Plaintiff's tax jurisdiction, as shown below:

Shipped on February 20, 2025	
<b>Items Ordered</b>	<b>Price</b>
1 of: Blazer International C6304 LED Wireless Magnetic Trailer Towing Light Kit Sold by: Crimp Supply Inc ( <a href="#">seller profile</a> ) Business Price Condition: New	\$101.34
<b>Shipping Address:</b> Cullen A. Duke [REDACTED] KINGSPORT, TN 37663-2242 United States	Item(s) Subtotal: \$101.34 Shipping & Handling: \$0.00 ----- Total before tax: \$101.34 Sales Tax: \$9.63 -----
<b>Shipping Speed:</b> Standard Shipping	<b>Total for This Shipment: \$110.97</b> -----

1 **C. Amazon knowingly and intentionally refuses to charge the correct tax rate.**

2 21. On March 1, 2025, Plaintiff notified Amazon that it was incorrectly charging him  
3 excess sales tax and requested a refund. Despite this notice, Amazon continued to calculate and  
4 collect sales tax from Plaintiff at the incorrect rate of 9.50% for sales made by third-party sellers  
5 through its marketplace.

6 22. For example, on March 10, 2025, Plaintiff purchased a pack of four *Snuggell*  
7 *Universal CPAP Nasal Mask Liners* from outside Tennessee from Snuggell and a pack of four  
8 *resplabs CPAP Mask Liners* from outside Tennessee from resplabs for a subtotal of \$35.73  
9 (Order No. 111-2646642-1569861). The sale was made through Amazon’s marketplace, and the  
10 products were shipped to and received by Plaintiff at his residence. Amazon calculated and  
11 collected \$3.39 in sales tax from Plaintiff, reflecting a rate of 9.50% rather than the correct rate  
12 of 9.25% for Plaintiff’s tax jurisdiction, as shown below:

Items Ordered	Price
1 of: <i>Snuggell Universal CPAP Nasal Mask Liners (4-Pack) – Gray - Ultra-Soft Fabric for Major CPAP Nasal Mask Compatibility – Reusable &amp; Washable Cushion Covers for 6-Month Supply – Reduces Skin Irritation</i>	\$16.74
Sold by: Snuggell (seller profile) Supplied by: Snuggell (seller profile)	
<b>Business Price</b>	
Condition: New	
1 of: <i>resplabs CPAP Mask Liners Compatible with ResMed AirFit N20 Nasal Masks - Reusable Cushion Covers, Reduces Noisy Air Leaks &amp; Provides Comfort (Large - Pack of 4)</i>	\$18.99
Sold by: resplabs® (seller profile) Supplied by: resplabs® (seller profile)	
<b>Business Price</b>	
Condition: New	
<b>Shipping Address:</b> Cullen A. Duke [REDACTED] KINGSPORT, TN 37663-2242 United States	

<b>Payment Method:</b> Visa ending in [REDACTED]	Item(s) Subtotal:	\$35.73
	Shipping & Handling:	\$6.99
	Free Shipping:	-\$6.99
		-----
<b>Billing address</b> Cullen A. Duke [REDACTED] KINGSPORT, TN 37663-2242 United States	Total before tax:	\$35.73
	Estimated tax to be collected:	\$3.39
		-----
<b>Credit Card transactions</b>	<b>Grand Total:</b>	<b>\$39.12</b>
	Visa ending in [REDACTED] March 13, 2025:	\$39.12

1           23.     Although Amazon acknowledges Tennessee’s marketplace facilitator tax  
2 collection rules apply to third-party sales made through its marketplace, Amazon knowingly and  
3 intentionally calculates and collects sales tax on these sales at rates that exceed those allowed  
4 under the law.

5           24.     On May 8, 2025, Amazon attempted to justify its practice of overcharging sales  
6 tax to Plaintiff by stating: “when an item originates from within the state of Tennessee, the rate  
7 that will be charged is associated with the origin of the shipment.” But the goods and services  
8 sold to Plaintiff did not originate from within the state of Tennessee. And regardless of where a  
9 good or service that is sold through Amazon’s marketplace originates, the applicable tax rate  
10 for that sale is determined by the location where the purchaser receives the good or service.

11           25.     Amazon’s practice of calculating and collecting excessive sales tax from Plaintiff  
12 and Class members is unfair and deceptive.

13 **D.     Amazon is the only entity from which Plaintiff can seek relief.**

14           26.     Under Tennessee law, Amazon is responsible for calculating and collecting the  
15 correct state and local sales tax rate for sales made by marketplace sellers through Amazon’s  
16 marketplace.<sup>9</sup>

17           27.     Plaintiff and Class members are unable to seek relief from any entity other than  
18 Amazon for its collection of excessive sales tax. This is because a consumer may file a claim for  
19 unauthorized sales tax amounts directly with the Tennessee Department of Revenue only in  
20 very limited circumstances, and the amount sought must be greater than \$2,500.<sup>10</sup>

21           28.     Because the aggregate amount of excessive sales tax that Amazon collected from  
22 Plaintiff is less than \$2,500, Plaintiff attempted to seek relief from Amazon directly.

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26 <sup>9</sup> TN Code § 67-6-501(f).

27 <sup>10</sup> See TN Code § 67-1-1802(e)(2) (permitting direct refund claims to the Department of Revenue only if the claim amount exceeds \$2,500).

1 29. Amazon, however, refused to pay the funds at issue back to Plaintiff, and  
2 Amazon continues to calculate and collect excessive sales tax from him and the Class members.  
3 Plaintiff thus has no recourse other than to bring this action against Amazon.

4 **CLASS ALLEGATIONS**

5 30. Class Definition. Pursuant to Washington Civil Rule 23, Plaintiff brings this action  
6 on behalf of a Class defined as follows:

7 All Amazon customers who, on or after December 12, 2021,  
8 purchased goods or services from marketplace sellers through  
9 Amazon's marketplace for which Amazon collected sales tax at a  
10 rate higher than the rate applicable to the customer's shipping  
11 address as set forth in Tennessee's Sales Tax Jurisdictional and Tax  
Rate Database, and whose aggregate excess sales tax paid to  
Amazon does not exceed \$2,500.<sup>11</sup>

12 Excluded from the Classes are Amazon, its parents, subsidiaries, affiliates, officers, directors,  
13 legal representatives, predecessors, successors, assigns, and employees, and all judges  
14 assigned to hear any aspect of this litigation, as well as their staff and immediate family  
15 members.

16 31. Numerosity: Amazon routinely collects sales tax from customers in connection  
17 with sales made by marketplace sellers to Tennessee residents through Amazon's marketplace.  
18 Although the exact number of Class members can only be ascertained through discovery,  
19 Plaintiff believes that Amazon has collected excessive sales tax from more than 40 purchasers  
20 in Tennessee during the relevant period.

21 32. Commonality: There are numerous questions of law and fact common to  
22 Plaintiff and Class members, including, but not limited to, the following:

23 a. Whether Plaintiff and Class members purchased goods and services from  
24 marketplace sellers on Amazon's marketplace;

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27 <sup>11</sup> See Sales Tax Jurisdictional and Tax Rate Database, Tenn. Dep't of Rev., <https://tnmap.tn.gov/sst/sst.html> (last visited Dec. 3, 2025).

1           b.       Whether Amazon failed to implement proper tax-sourcing procedures  
2 for sales made by marketplace sellers to Tennessee residents through Amazon’s marketplace;

3           c.       Whether Amazon engaged in a common course of calculating and  
4 collecting sales tax at rates higher than those legally applicable to Plaintiff and Class members  
5 for sales made by marketplace sellers through Amazon’s marketplace;

6           d.       Whether Amazon’s common course of calculating and collecting sales tax  
7 at rates higher than those legally applicable to Plaintiff and Class members is unfair;

8           e.       Whether Amazon’s common course of calculating and collecting sales tax  
9 at rates higher than those legally applicable to Plaintiff and Class members is deceptive;

10          f.       Whether Amazon’s common course of calculating and collecting sales tax  
11 at rates higher than those legally applicable to Plaintiff and Class members impacts the public  
12 interest;

13          g.       Whether Amazon’s common course of calculating and collecting sales tax  
14 at rates higher than those legally applicable to Plaintiff and Class members occurs in the course  
15 of Amazon’s trade or commerce;

16          h.       Whether Amazon’s common course of calculating and collecting sales tax  
17 at rates higher than those legally applicable to Plaintiff and Class members has injured Plaintiff  
18 and Class members;

19          i.       Whether Amazon willfully interfered with property belonging to Plaintiff  
20 and Class members ;

21          j.       Whether Amazon took or unlawfully retained property belonging to  
22 Plaintiff and Class members;

23          k.       Whether Amazon deprived Plaintiff and Class members of possession of  
24 their property;

25          l.       Whether Amazon received a benefit when it collected excessive sales tax  
26 from Plaintiff and Class members;

27

1 m. Whether the benefit Amazon received was at the expense of Plaintiff  
2 and Class members;

3 n. Whether the circumstances make it unjust for Amazon to retain the  
4 benefit without payment to Plaintiff and Class members;

5 o. Whether a declaratory judgment and injunctive relief are warranted to  
6 end Amazon's unlawful assessment of sales tax for sales made by marketplace sellers through  
7 Amazon's marketplace;

8 p. Whether Plaintiff and Class members are entitled to actual damages,  
9 exemplary damages, restitution, or other monetary relief; and

10 q. The nature and extent of classwide injury and the proper measure of  
11 damages or other monetary relief owed to Plaintiff and Class members.

12 33. Typicality: Plaintiff's claims are typical of the claims of the Class members  
13 because Plaintiff, like all Class members, purchased goods or services from marketplace sellers  
14 through Amazon's marketplace and Amazon improperly calculated and collected excessive  
15 sales tax from Plaintiff. Furthermore, the factual bases of Amazon's common course of  
16 calculating and collecting excessive sales tax resulting in injury are common to Plaintiff and the  
17 Class members.

18 34. Adequacy: Plaintiff will fairly and adequately protect the interests of the Class.  
19 Plaintiff has retained competent and capable attorneys with significant experience in complex  
20 and class action litigation. Plaintiff and his counsel are committed to prosecuting this action  
21 vigorously on behalf of the Class and have the financial resources to do so. Neither Plaintiff nor  
22 his counsel have interests that are contrary to or conflict with those of the Class.

23 35. Superiority: A class action is the superior method for fairly and efficiently  
24 adjudicating this controversy. The Class members' damages or other financial detriments are  
25 relatively small compared to the burden and expense required to individually litigate their  
26 claims; absent a class action, the Class members likely would find the cost of litigating their  
27 claims prohibitive. Furthermore, even if Class members could afford individual litigation, Class

1 treatment is superior because it conserves judicial resources, promotes consistency and  
2 efficiency of adjudication. By contrast, the class action device provides the benefits of  
3 adjudication of these issues in a single proceeding, economies of scale, and comprehensive  
4 supervision by a single court. There will be no significant difficulty in the management of this  
5 case as a class action. The Class members and the tax rates they were charged are readily  
6 identifiable from Amazon's records.

7  
8 **FIRST CLAIM FOR RELIEF**  
**(Unfair Acts or Practices in Violation of Chapter 19.86 RCW)**

9 36. Plaintiff and the Class members reallege and incorporate by reference each and  
10 every allegation set forth in the preceding paragraphs.

11 37. Plaintiff, the Class members, and Amazon are "persons" within the meaning of  
12 the Washington Consumer Protection Act. RCW 19.86.010(1).

13 38. Amazon's common course of calculating and collecting excessive sales tax from  
14 Plaintiff and Class members constitutes unfair acts or practices within the meaning of the  
15 Washington Consumer Protection Act. A "tax to be collected" is a mandatory charge required  
16 by the government, and it is unfair of Amazon to calculate and collect from consumers,  
17 including Plaintiff and Class members, amounts that exceed those allowed by law.

18 39. Amazon's common course of calculating and collecting excessive sales tax from  
19 Plaintiff and Class members occurred in trade or commerce within the meaning of the  
20 Washington Consumer Protection Act.

21 40. Amazon's common course of calculating and collecting excessive sales tax from  
22 Plaintiff and Class members impacts the public interest because it has injured Plaintiff and Class  
23 members, had the capacity to injure other persons, and continues to have the capacity to injure  
24 other persons.

25 41. As a direct and proximate result of Amazon's unfair acts or practices, Plaintiff  
26 and Class members have suffered an injury in fact and lost money.



1 members, had the capacity to injure other persons, and continues to have the capacity to injure  
2 other persons.

3 49. As a direct and proximate result of Amazon's deceptive acts or practices, Plaintiff  
4 and Class members have suffered an injury in fact and lost money.

5 50. Plaintiff and Class members are entitled to legal relief against Amazon, including  
6 recovery of actual damages, treble damages, attorneys' fees, costs of suit, and such further  
7 relief as the Court may deem appropriate.

8 51. Plaintiff and Class members are also entitled to injunctive relief in the form of an  
9 order prohibiting Amazon from collecting excessive sales tax from consumers in Tennessee.

10 **THIRD CLAIM FOR RELIEF**  
11 **Common Law Conversion**

12 52. Plaintiff and the Class members reallege and incorporate by reference each and  
13 every allegation set forth in the preceding paragraphs.

14 53. Plaintiff and the Class members had ownership of, and an immediate right to  
15 possession of, the specific, identifiable monetary amounts constituting the excess sales tax that  
16 Amazon collected on sales made by marketplace sellers through Amazon's marketplace. Those  
17 funds belonged to Plaintiff and the Class members and were not owed under Tennessee's sales  
18 tax laws.

19 54. Amazon intentionally interfered with those funds.

20 55. Amazon took and unlawfully retained those funds.

21 56. Amazon deprived Plaintiff and Class members of possession of those funds.

22 57. Amazon's subsequent remittance of the excess tax to the Tennessee  
23 Department of Revenue, if any, does not negate the wrongful taking because the tort of  
24 conversion is complete at the moment Amazon unlawfully exercised control over the specific  
25 funds.





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