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8 Attorneys for Plaintiff
9 LAURA SCHWAB

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 ORANGE COUNTY

12 LAURA SCHWAB,
13 Plaintiff,

14 vs.

15 RIVIAN AUTOMOTIVE, LLC., and DOES 1
16 through 20, inclusive,
17 Defendants.

Case No. 30-2021-01229809-CU-OE-CJC

COMPLAINT FOR DAMAGES

Assigned for All Purposes

Judge Stephanie George

19 _____ /

1 Plaintiff LAURA SCHWAB complains and alleges as follows:

2 **INTRODUCTION**

3 1. Although Rivian’s Chief Executive Officer boasts that the company’s “culture is
4 our most valuable product,”¹ a toxic “bro culture” at the company’s highest levels derailed a
5 high-performing female senior executive and allowed male executives to dodge responsibility for
6 major problems within the company. After Rivian’s highly-regarded head of sales and
7 marketing, Laura Schwab, spoke up about the boys’ club culture and gender discrimination she
8 was experiencing from a C-level executive, Rivian abruptly fired her.

9 2. Rivian subjected Ms. Schwab to a textbook pattern of gender bias that,
10 unfortunately, women who attain senior executive levels too often continue to experience. This
11 pattern almost always involves male executives dismissing a woman’s professional advice;
12 trivializing her legitimate business concerns; excluding a woman from important strategy
13 meetings and decisions in which her male peers are included; failing to share information that is
14 needed for a female subordinate to run her part of the business; and generally fostering a “bro”
15 culture that denigrates and marginalizes women executives.

16 3. Ms. Schwab experienced precisely this treatment from senior executives at Rivian,
17 most notably Jiten Behl, Chief Commercial/Growth Officer. Mr. Behl routinely excluded her
18 from meetings attended by Ms. Schwab’s male peers, made decisions about Ms. Schwab’s team
19 without *her* input but *with* input from men on different teams, and dismissed the legitimate
20 concerns she had regarding Rivian’s misleading public statements and flawed business practices.
21 Mr. Behl told Ms. Schwab not to communicate her concerns to the CEO Robert “RJ” Scaringe,
22 who himself relied on a small group of men to make decisions.

23 4. Rivian’s exclusionary, “bro” culture was an open secret, but Ms. Schwab’s
24 decision to report the discriminatory, hostile environment to Human Resources resulted in her
25 termination just two days later. During the meeting where she was terminated, Mr. Behl
26 acknowledged that she was not being terminated for cause or performance reasons; indeed, he
27

28 ¹ Form S-1, filed with the Securities and Exchange Commission on October 1, 2021
(Letter to Prospective Investors and Rivian Owners from Robert J. Scaringe, Founder and Chief
Executive Officer).

1 recognized that Ms. Schwab was “well-respected” and a “high performer”. The stated reason for
2 her termination was Rivian’s move into an “operational” phase, and a corresponding
3 reorganization. This rationale is false for many reasons. *First*, Ms. Schwab had the most
4 automotive operations experience of anyone reporting to Mr. Behl, and she had a track record of
5 executing and delivering on operations. *Second*, she was the *only* person let go as part of the
6 “reorganization.” *Third*, this was precisely the role that Ms. Schwab was recruited to fill.
7 *Fourth*, it is not credible that Rivian would simply lay off of a “well-respected” “high performer”
8 in a leadership role as part of a routine reorganization, particularly when the company is on the
9 eve of an IPO and is rapidly growing.

10 5. Ms. Schwab enjoyed a stellar career before enduring discrimination and retaliation
11 at Rivian, including executive roles at Jaguar Land Rover and five years as President of Aston
12 Martin Lagonda (The Americas)—the first female president in Aston-Martin’s 105 year history.
13 Her termination has damaged her previously unblemished track record and reputation in the
14 automotive industry, and the emotional impact is severe. Rivian’s unlawful conduct also cost
15 Ms. Schwab millions of dollars in unvested equity on the eve of the company’s IPO.

16 **PARTIES**

17 6. Plaintiff Laura Schwab (“Plaintiff” or “Ms. Schwab”) is an individual residing in
18 San Clemente in Orange County, California.

19 7. Upon information and belief, Defendant Rivian Automotive, LLC (“Defendant” or
20 “Rivian”) is a company organized and existing pursuant to the laws of the State of Delaware,
21 having its principal place of business in Irvine, California, and doing business throughout the
22 State of California.

23 8. The true names and capacities of Defendants named herein as Does 1 through 20,
24 inclusive, whether individual, corporate, associate or otherwise are unknown to Plaintiff, who
25 therefore sues said Defendants by fictitious names pursuant to California Code of Civil Procedure
26 section 474. Plaintiff will amend this Complaint to show such true names and capacities of Does
27 1 through 20, inclusive, when they have been determined.

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1 in management and executive roles at Jaguar Land Rover, including as Director of Marketing for
2 the UK, and five years as President of Aston Martin Lagonda for the Americas. Ms. Schwab was
3 the first female president in Aston Martin’s 105-year history. In that role, she grew the Americas
4 region from the worst performing in the company to the number one performer in sales globally.
5 She did this while overseeing the launch of six new vehicles, recruiting key brand ambassadors,
6 and running the distribution network in Canada, the U.S., Mexico, and South America.

7 15. Ms. Schwab is known throughout the automotive industry because of both her
8 professional accomplishments and the relationships she has cultivated over her career. She is a
9 frequent speaker at automotive events and has received numerous honors for her leadership and
10 work as a woman executive in a male-dominated industry.

11 16. Throughout Rivian’s recruitment process, Ms. Schwab had regular interviews with
12 Jiten Behl, Chief Commercial/Growth Officer. During these interviews and in discussions with
13 other Rivian employees, she gleaned that the company had a dearth of operational automotive
14 experience. Ms. Schwab also had reservations about leaving Aston Martin, one of the most well-
15 established and reputable automakers in the world, for an automotive company that had debuted a
16 prototype but had yet to manufacture a single vehicle. To that end, she conducted extensive due
17 diligence to ensure that she would be a good fit with the company culture, that Rivian would
18 utilize her expertise, and that she could succeed in the proposed role.

19 17. After approximately four months of interviews, Ms. Schwab moved into contract
20 negotiations. The remuneration, bonus, and benefits Rivian offered were well below
21 Ms. Schwab’s expectations and market rates, given the scope of role and significant work that
22 would be required to prepare Rivian in advance of its IPO, which was already behind schedule.
23 Ms. Schwab would also be giving up generous benefits provided by Aston Martin, such that her
24 compensation package would be less generous. Rivian’s final offer was \$360,000 base salary, 40
25 percent bonus, a \$4,000 per month stipend, a \$100,000 sign-on bonus, and \$1.5 million in equity
26 in the form of RSUs.

27 18. Ms. Nicola reassured Ms. Schwab that because of Rivian’s impending IPO, its
28 equity plan would more than compensate for the shortfall. With the reassurance that Rivian

1 trucks would soon be rolling off the production line and that the company would go public in the
2 next year, Ms. Schwab accepted the offer and began working as Vice President of Sales and
3 Marketing on November 30, 2020.

4 19. As head of Sales and Marketing, Ms. Schwab was responsible for the following
5 initiatives, programs, and products: marketing, business-to-business sales, remarketing (i.e., the
6 ability to price and sell trade ins, as well as sell Rivian used vehicles), sales planning and
7 operations, accessory sales, merchandise sales, retail experience, test drives, customer
8 engagement centers, Rivian insurance, and a dotted line to Rivian financial services.

9 20. Ms. Schwab reported to Mr. Behl, who had seven other direct reports, six of
10 whom were men: Larry Parker (Executive Creative Director), Patrick Hunt (then-Senior Director,
11 Consumer Digital), Noe Mejia (Senior Director, Service Operations), Dagan Mishoulam (VP,
12 Strategy), Rob Francis (Senior Director, Fleet Digital Products), and Marco Batra (Senior
13 Director, Global Delivery Operations). The only other woman reporting to Mr. Behl was Anshu
14 Narula, VP of Digital Technology. Many of the men had worked together in other capacities and
15 thus had similar backgrounds. For example, Mr. Behl had worked with Mr. Mishoulam at a
16 consulting firm, while Mr. Mejia and Mr. Batra were together at Tesla.

17 21. Unfortunately, none of them had anything approaching Ms. Schwab’s breadth and
18 depth of knowledge about automotive launch and operations. This was evidenced in part by
19 Rivian’s wholly deficient preparations for the vehicle’s scheduled launch later that fall.
20 Ms. Schwab’s work was cut out for her.

21 22. In Ms. Schwab’s first few months at Rivian, she had regular conversations with
22 CEO Robert “RJ” Scaringe, but her check-ins grew less frequent over time. She learned that he
23 only met with the newest hires and the “OG,” a small group of men he hired when he founded
24 the company. Ms. Schwab’s exclusion from these meetings impacted her in different ways. The
25 meetings were used as a forum to disseminate key information on Rivian’s accomplishments and
26 goals. Because she was not invited to attend, she was not getting this important core information
27 and was in the dark about initiatives, including expectations for things to be shared with her team.

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1 23. Most Rivian employees received feedback during quarterly performance reviews,
2 a.k.a. “recharges.” Ms. Schwab’s first recharge took place six months after she joined, in June
3 2021. She told Mr. Behl that things were going well, and they agreed that the area to focus on
4 next quarter was the marketing team. Specifically, she wanted to get more production and
5 content from the team and improve its relationship with the brand team, led by Mr. Parker.
6 Mr. Behl told her that her performance was “very good” and that he thought everything was
7 going well. He praised her specifically for working with and leading employees who others at
8 Rivian had perceived to be difficult or too challenging to work with.

9 24. Despite being marginalized by male executives, there is no question that
10 Ms. Schwab excelled in her role leading Rivian’s Sales and Marketing team. In less than a year,
11 she launched the company’s test drive tour, led the successful opening of the company’s first
12 “brand experience hub” in Venice, California, and developed a new merchandise collection,
13 complete with in-house fulfillment through Rivian Parts Development Centers, slated for launch
14 November 9.

15 25. She also grew the marketing team, created new content, and built up the Customer
16 Relationship Management (CRM) team. The CRM team ultimately increased email subscriptions
17 by nearly a third year over year. She hired new talent for business-to-business sales, developed
18 strategy for the same, and led discussions with potential new business partners. And she oversaw
19 the sale of the company’s first insurance policy and scoped the launch of an in-house insurance
20 agency.

21 26. Along with her team, Ms. Schwab renegotiated a remarketing team contract,
22 saving the company well over one million dollars. She led the development of an algorithm to
23 take vehicles in on trade and created a residual value strategy to ensure the vehicles retained their
24 maximum value throughout their lifecycle. She also created business and pricing strategy for
25 accessories and expanded operations for the customer engagement centers.

26 27. Beginning in spring of 2021, Ms. Schwab started to raise the alarm about
27 concerns she had relating to Rivian’s ability to deliver on its promises to investors. Shockingly,
28

1 Mr. Behl dismissed her concerns and explicitly asked Ms. Schwab not to raise these issues in
2 front of Mr. Scaringe.

3 28. *First*, it was clear that the vehicles were underpriced, and each sale would result in
4 a loss the company. Ms. Schwab ultimately contacted Dennis Lucey, Rivian's Finance Director,
5 and worked with him to develop projections showing how much of a loss the company would
6 incur if Rivian did not raise prices. Ms. Schwab raised this issue with several executives,
7 including Mr. Behl, Stuart Dixon (Director of Product Management), and Andy Zicheck
8 (Principal Product Manager). Mr. Behl brushed her off. Eventually, Mr. Hunt raised the issue
9 with Mr. Behl, at which point Mr. Behl agreed that they would need to raise the vehicle prices
10 after the IPO.

11 29. *Second*, the manufacturing process had yet to be refined to a point that the
12 company could confidently assure a consumer of the vehicle's quality, integrity, and safety. For
13 these reasons, Ms. Schwab told Mr. Behl that the first deliveries should go to Rivian employees.
14 Mr. Behl dismissed her advice and questioned her conclusion, but this was ultimately the
15 approach the company adopted.

16 30. *Third*, the publicly announced dates for manufacturing and delivery were not
17 achievable. Rivian delivered a small handful of vehicles in September, despite having a much
18 larger goal. Mr. Scaringe then announced an internal goal of delivering a specific number of
19 vehicles by the end of 2021. In subsequent Sales and Operations planning meetings in
20 September, Ms. Schwab said that this number was not achievable and that the company should
21 set a realistic objective. This was a major issue since the S-1 filing stated that the company
22 would deliver 1,000 vehicles in 2021.

23 31. Ms. Schwab also raised concerns surrounding Rivian's use of an expensive third-
24 party vendor to execute its test drive events. Her input was again ignored, with the result that
25 these events were over budget, leading to the last-minute cancellation of subsequent events.

26 32. Ms. Schwab's work was often impeded by the gender discrimination that she
27 experienced from Mr. Behl and other male colleagues at Rivian. For example, Mr. Behl had
28 initially asked her to help lead Project Apollo, the name given to the work and activities leading

1 up to the IPO. But when Mr. Parker challenged this decision, she was cut out of the decision-
2 making process. Likewise, in summer of 2021, Ms. Schwab asked to lead the pricing
3 discussions, as would be expected of someone in her role and with her extensive experience with
4 vehicle pricing. Instead, Mr. Behl asked Mr. Hunt, who worked on consumer digital, to lead the
5 discussion on both pricing and other integral projects.

6 33. Between September and October 2021, Mr. Behl cancelled every recurring weekly
7 meeting scheduled with Ms. Schwab. The only communication she received from him in earnest
8 was his request for a sample of the new merchandise for himself, his wife, and Mr. Scaringe. In
9 contrast, Mr. Behl continued to meet regularly with his male direct reports.

10 34. On October 4, Ms. Schwab met with Claire McDonough, Rivian's CFO.
11 Ms. Schwab asked Ms. McDonough if she could join the sales projections meetings with
12 Mr. Scaringe and Mr. Behl, to make sure the company was setting reasonable target goals and
13 accurately tracking production. Surprisingly, Ms. McDonough responded that she was also
14 excluded from those meetings, which was bizarre since sales volume drives revenue: a key focus
15 of the CFO. The only people in the room discussing volume and pricing were three guys:
16 Mr. Scaringe, Mr. Behl, and Jake Kohn, the Vehicle Line Director.

17 35. This pattern of excluding female executives from the most important strategy and
18 business operations meetings is one of the most revealing and also impactful types of gender
19 discrimination experienced by senior executive women. This exclusion from key meetings is
20 impactful not only to the woman executive's success, but to the business as well.

21 36. In addition, the persistent and visible exclusion of Ms. Schwab from key meetings
22 undermined her standing with key senior leaders and other senior functional peers in the
23 company. It diminished her influence and the perception that she was someone who should be
24 consulted on key business decisions or whose opinion mattered. The exclusion also drove a
25 wedge between her and peers on Mr. Behl's team and reinforced the "bro" culture in which
26 Ms. Schwab was very much an "other." The message was clear: Ms. Schwab was not someone
27 who mattered or toward whom it was in anyone's interest to be inclusive.

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1 37. Towards the end of September 2021, Mr. Behl messaged Ms. Schwab on Slack
2 and asked her not to hire any more marketing heads. She complied but asked what precipitated
3 this decision. He said that she should just talk to Mr. Parker and ensure that he had enough
4 support. She immediately reached out to Mr. Parker, who explained that he and Mr. Behl had
5 met and unilaterally decided that *her* team was overstaffed but *his* needed more people.
6 Ms. Schwab was surprised at their conclusion since the marketing team was operating within a
7 preapproved budget that all members of Mr. Behl’s team had agreed to. Shortly thereafter,
8 Ms. Schwab learned that Mr. Behl had directed the talent acquisition team to pause recruitment
9 for the Director of Hospitality Programming role, without discussing the decision with
10 Ms. Schwab. This was even more perplexing, as the company had just opened its first retail
11 space in Venice, and it was struggling to manage events and production.

12 38. On Saturday, October 9, Mr. Batra sent an email to Mr. Behl and Ms. Schwab
13 regarding the upcoming test drives planned in New York. At a July meeting, the Commercial
14 leadership team had decided that Mr. Batra’s team would manage delivery and drives of the
15 vehicles brought to customer’s homes and Ms. Schwab’s team would own the strategy and
16 manage the actual test drive program. Mr. Batra’s email asked how they would handle test drives
17 after the New York mobile drive event. Ms. Schwab responded that she believed her team should
18 continue to manage strategy and execution of the test drives going forward. Mr. Behl replied,
19 dismissively, “Laura, just hand test drive to Marco!” She said that she would work on a
20 transition with Mr. Batra in New York, where they would be seeing one another in person.

21 39. The constant marginalization of Ms. Schwab’s voice and exclusion from
22 important decisions made clear that Rivian had “bro” culture that excluded women and caused
23 her male colleagues to hide mistakes and cover for one another rather than admit a wrong and
24 course correct. This dynamic was even more apparent among Mr. Behl’s direct reports. Even
25 two of Ms. Schwab’s male colleagues, Mr. Zicheck and Mr. Batra, acknowledged this problem
26 and the issues it was creating within the organization.

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1 40. Mr. Batra recognized that Mr. Behl’s discriminatory behavior was inappropriate
2 and forwarded Mr. Behl’s response to Farinaz Raissi in Human Resources, noting that Mr. Behl’s
3 email could have been World War III.

4 41. On Sunday, October 10, Ms. Schwab texted Mr. Behl and asked if they could
5 schedule a long overdue check-in. He did not respond. She messaged him again on Slack the
6 next day, stating that she wanted to discuss organization, test drives, and communication. Later,
7 she called him. They eventually spoke late that evening, after she landed in New York. She said
8 that she was hearing feedback from Mr. Parker, Mr. Hunt, and people on the recruiting team
9 about her headcount and organization, but was not hearing directly from Mr. Behl, her
10 supervisor. She said that it would be helpful if she could hear from him directly.

11 42. Mr. Behl first grilled Ms. Schwab about the size of and structure of her ten-person
12 marketing team. He was aggressive, condescending, and hostile. Ms. Schwab politely offered to
13 walk him through the work her team had completed and planned, but he had no interest in the
14 substance of her answers. She told him that she was very pleased with the work Lindsay Pearl
15 was doing as Head of Marketing. He insisted that for each employee in marketing, Mr. Parker’s
16 brand team had to hire at least three more people to deliver on that work. Of course, this was
17 nonsensical, and Ms. Schwab could have pushed back on Mr. Parker’s claim if she had been part
18 of the meeting where the two men discussed *her* team. Notably, Mr. Behl could not explain why
19 he also excluded her from the discussion around whether to hire a head of hospitality
20 programming.

21 43. They also discussed the test drive program, which Mr. Behl insisted on giving to
22 Mr. Batra. Ms. Schwab said that Mr. Scaringe had called the test drive program “critical,” and
23 that it would be risky to assign it to a team that had not thought through a rollout strategy.
24 Mr. Behl again ignored her comment and began complaining about the earlier test drive events
25 going over budget. Ms. Schwab immediately cut in and reminded him that she had opposed the
26 third-party contractor they had used and that he had ignored her recommendations for a different,
27 option. She noted that these issues were rooted in his decision to exclude her from important
28 meetings, ignore her suggestions, and cancel their check-ins.

1 44. Mr. Behl responded that he would respond to Slack messages sent in the evening,
2 which was both inaccurate and insulting—he did not respond to messages she sent in the evening,
3 and he had never asked other direct reports to only contact him after work. It was also not a
4 workable strategy for any professional relationship. The call ended with Ms. Schwab stating that
5 it was imperative for the two of them to communicate, that she would set up a meeting with the
6 marketing team to go through their projects, and that she would work on a transition of mobile
7 test drives to Marco Batra.

8 45. The next day, Ms. Schwab called Ms. Raissi in HR and told her about the call with
9 Mr. Behl. She told Ms. Raissi that she was concerned about Mr. Behl’s behavior, specifically
10 that he was cancelling their check-ins and that he and Mr. Parker were making important
11 decisions about her team without her in the room. She also raised the test drive program, which
12 Mr. Behl had decided to remove from Ms. Schwab’s organization and give to Mr. Batra.

13 46. Notably, Ms. Schwab complained to Ms. Raissi that there was a larger, more toxic
14 issue at play—the “bro” culture that made Rivian more like an “old boys’ club” rather than a
15 serious business. Ms. Schwab explained this was evidenced by the default assignment of
16 important projects to men, Mr. Behl’s unwillingness to meet with her (or, as she had just learned,
17 Ms. Raissi), her exclusion from meetings, the favoritism shown towards men, and Mr. Behl
18 relying on other men to make decisions about Ms. Schwab’s team. She noted that the only way
19 to be heard at Rivian was to be in the boys’ club or consistently be the loudest person in the
20 room.

21 47. Ms. Raissi suggested that Ms. Schwab write down her thoughts and share them
22 with Mr. Behl. Ms. Schwab later sent Ms. Raissi an email thanking her for her time, though
23 Ms. Raissi made no promise to investigate Ms. Schwab’s report of discrimination.

24 48. Later that day, Mr. Batra picked Ms. Schwab up from her hotel in New York and
25 the two drove to the nearby Rivian Service Center. She told him about the conversations with
26 both Mr. Behl and Ms. Raissi. She also mentioned the “bro” culture that was making it
27 impossible for her to do her job. He agreed with her characterization of Rivian’s culture and said
28 that this was also impacting a member of his team, Jessie Yoste, and that he had raised the

1 problem with others at Rivian.³ Ms. Schwab also told Ms. Pearl about the conversation with
2 Mr. Behl.

3 49. On Wednesday, October 13, Ms. Schwab sent an email to Mr. Behl outlining next
4 steps and do-outs based on their discussions. On Thursday, he asked her to meet him at the
5 Irvine office on Friday morning to discuss organizational structure. She texted Ms. Raissi and
6 asked if she had talked to Mr. Behl about their conversation, since she had talked to her in
7 confidence. Ms. Raissi did not answer her question.

8 50. On Friday, October 15, Ms. Schwab drove to the Irvine office to meet with
9 Mr. Behl. When she arrived, Mr. Behl and Ms. Raissi were both present. Mr. Behl told her that
10 Rivian was moving into a new “operational” phase, and that they had decided to eliminate her
11 position as part of a reorganization. Ms. Schwab reminded them that her team was doing
12 operations, that she was one of the few automotive operations experts in leadership at the
13 company, and that Rivian had recruited her to do operations. When Ms. Schwab asked if the
14 termination had anything to do with her recent report of gender discrimination, Ms. Raissi
15 acknowledged that she knew Ms. Schwab had talked to other employees about her concerns and
16 recent conversations. Mr. Behl and Ms. Raissi acknowledged that Ms. Schwab was a “high
17 performer” who was “very well respected” across the organization.

18 51. Rivian’s stated reasons for terminating Ms. Schwab are patently pretextual for at
19 least four reasons.

20 52. *First*, Ms. Schwab was the only person laid off as part of this “reorganization,”
21 and it makes no sense that the company would eliminate the head of sales and marketing just as
22 its vehicles are beginning production and at the most critical juncture for the company to be
23 marketing and selling its products on the eve of its IPO.

24 53. *Second*, “high performers” are seldom let go in a reorganization, especially when a
25 company is actively recruiting and hiring hundreds of people each month. Even if there was a
26 reorganization, any reasonable executive would, absent discrimination or retaliatory motive, find
27 a new position for Ms. Schwab within Rivian, retain her talent, and put her skills to good use.

28 _____
³ Ms. Schwab believes that Mr. Batra had reported the discrimination to HR.

1 employees, may recover penalties under any provision of the Labor Code that provides for civil
2 penalties. These penalties are in addition to any other relief available under the Labor Code.

3 60. As set forth above, Defendant has committed violations for which the Labor Code
4 provides for penalties, including violating Sections 1102.5.

5 61. As a direct result of Defendant’s conduct as described above, Plaintiff is entitled
6 to recover the maximum civil penalties permitted by the Private Attorneys General Act from
7 Defendant for all violations of Labor Code sections 1102.5, as well as reasonable attorney’s fees
8 and costs.

9 **PRAYER FOR RELIEF**

10 WHEREFORE, Plaintiff Laura Schwab prays for judgment and the following specific
11 relief against Rivian Automotive, LLC, as follows:

12 1. A declaratory judgment that the practices complained of herein are unlawful under
13 the California Labor Code and a declaration that: Defendant is found to have violated Cal. Labor
14 Code § 1102.5;

15 2. For penalties as provided under the Private Attorneys General Act, codified as
16 Labor Code section 2698, *et seq.*, and distributed in accordance with the Act; and

17 3. Costs of action incurred herein, including expert fees;

18 4. Attorney’s fees, including fees pursuant to California Code of Civil Procedure
19 section 1021.5 and California Labor Code section 2699; and

20 5. For such other and further relief that the Court may deem just and proper.

21
22 DATED: November 4, 2021

Respectfully submitted,

RUDY, EXELROD, ZIEFF & LOWE, LLP

23
24
25 By: 

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28 JANE G. FARRELL
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