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[EXEMPT FROM FILING FEES  
UNDER GOVT. CODE, § 6103]

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David H. Yarnesky, Clerk of the Superior Court  
County of Santa Clara, California  
By: \_\_\_\_\_  
Deputy Clerk

*Attorneys for Plaintiff*  
THE PEOPLE OF THE STATE OF CALIFORNIA

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SANTA CLARA

THE PEOPLE OF THE STATE OF CALIFORNIA,  
  
Plaintiff,  
  
vs.  
  
HOZZ INC.,  
  
Defendant.

Case No. **115C V286406**  
**COMPLAINT FOR INJUNCTIVE AND  
OTHER RELIEF**  
(BUS. & PROF. CODE, § 17200 et seq.)

Plaintiff, the People of the State of California, by and through Kamala D. Harris, Attorney General of the State of California, alleges the following on information and belief:

**DEFENDANT AND VENUE**

1. Defendant Houzz Inc. ("Houzz") is a Delaware corporation with its headquarters and principal place of business at 310 University Avenue, Second Floor, Palo Alto, CA 94301.
2. Houzz also maintains an office in Irvine, California ("Orange County office."). Houzz's sales staff is located in its Orange County office.







1 PRAYER FOR RELIEF

2 WHEREFORE, Plaintiff prays for judgment as follows:

3 1. That under California Business and Professions Code section 17203, Houzz, its  
4 successors, agents, representatives, employees, and all persons who act in concert with Houzz be  
5 permanently enjoined from committing any acts of unfair competition, including the violations  
6 alleged in the First Cause of Action.

7 2. That under California Business and Professions Code section 17206, Houzz be  
8 ordered to pay Two Thousand Five Hundred Dollars (\$2,500) for each violation of California  
9 Business and Professions Code section 17200 by Houzz, as proved at trial.

10 3. That Plaintiff recovers its cost of suit herein, including costs of investigation.

11 4. For such other and further relief as the Court may deem just and proper.

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13 Dated: October 2, 2015

Respectfully Submitted,

14 KAMALA D. HARRIS  
15 Attorney General of California  
16 MARK J. BRECKLER  
17 Chief Assistant Attorney General  
18 NICKLAS A. AKERS  
19 Senior Assistant Attorney General  
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25 THE PEOPLE OF THE STATE OF CALIFORNIA  
26  
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