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<b>ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):</b> Gloria Dredd Haney, SBN: 157627 LAW OFFICES OF GLORIA DREDD HANEY 333 City Boulevard West, 17th Floor Orange, California 92868 TELEPHONE NO: 714.938.3230 FAX NO. (Optional): 714.921.2856 E-MAIL ADDRESS (Optional): n/a ATTORNEY FOR (Name): Plaintiff, Lena Williams		<b>FOR COURT USE ONLY</b>  <b>FILED</b> <b>SUPERIOR COURT OF CALIFORNIA</b> <b>COUNTY OF LOS ANGELES</b>  <b>JAN 18 2013</b>  John A. Clarke, Executive Officer/Clerk BY <u>Cristina Orjave</u> Deputy Cristina Orjave
<b>SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES</b> STREET ADDRESS: 111 North Hill Street MAILING ADDRESS: 111 North Hill Street CITY AND ZIP CODE: Los Angeles, California 90012 BRANCH NAME: Central/Stanley Mosk		
PLAINTIFF: Lena Williams  DEFENDANT: Kaiser Permanente, Arlene Zepeda, Schola Ogmaka Felipe Garcia, Kaiser Permanente Baldwin Park <input checked="" type="checkbox"/> DOES 1 TO 10 Medical Center		
<b>COMPLAINT—Personal Injury, Property Damage, Wrongful Death</b> <input type="checkbox"/> AMENDED (Number): Type (check all that apply): <input type="checkbox"/> MOTOR VEHICLE <input checked="" type="checkbox"/> OTHER (specify): Employment Law <input type="checkbox"/> Property Damage <input type="checkbox"/> Wrongful Death <input type="checkbox"/> Personal Injury <input checked="" type="checkbox"/> Other Damages (specify): Civil Rights		
<b>Jurisdiction (check all that apply):</b> <input type="checkbox"/> ACTION IS A LIMITED CIVIL CASE Amount demanded <input type="checkbox"/> does not exceed \$10,000 <input type="checkbox"/> exceeds \$10,000, but does not exceed \$25,000 <input checked="" type="checkbox"/> ACTION IS AN UNLIMITED CIVIL CASE (exceeds \$25,000) <input type="checkbox"/> ACTION IS RECLASSIFIED by this amended complaint <input type="checkbox"/> from limited to unlimited <input type="checkbox"/> from unlimited to limited		CASE NUMBER:  <b>BC 499263</b>

1. Plaintiff (name or names): LENA WILLIAMS

alleges causes of action against defendant (name or names):

Kaiser Permanente, Arlene Zepeda, Schola Ogmaka, Felipe Garcia, Kaiser Permanente Baldwin Park Med. Ctr.

2. This pleading, including attachments and exhibits, consists of the following number of pages:

3. Each plaintiff named above is a competent adult

a. ☐ except plaintiff (name):

(1) ☐ a corporation qualified to do business in California

(2) ☐ an unincorporated entity (describe):

(3) ☐ a public entity (describe):

(4) ☐ a minor ☐ an adult

(a) ☐ for whom a guardian or conservator of the estate or a guardian ad litem has been appointed

(b) ☐ other (specify):

(5) ☐ other (specify):

b. ☐ except plaintiff (name):

(1) ☐ a corporation qualified to do business in California

(2) ☐ an unincorporated entity (describe):

(3) ☐ a public entity (describe):

(4) ☐ a minor ☐ an adult

(a) ☐ for whom a guardian or conservator of the estate or a guardian ad litem has been appointed

(b) ☐ other (specify):

(5) ☐ other (specify):

☐ Information about additional plaintiffs who are not competent adults is shown in Attachment 3.

SHORT TITLE:

Williams v. Kaiser Permanente, et al.

CASE NUMBER:

4. ☐ Plaintiff (name):

is doing business under the fictitious name (specify):

and has complied with the fictitious business name laws.

5. Each defendant named above is a natural person

a. ☒ except defendant (name): Kaiser Permanente(1) ☒ a business organization, form unknown(2) ☐ a corporation(3) ☐ an unincorporated entity (describe):(4) ☐ a public entity (describe):(5) ☐ other (specify):c. ☐ except defendant (name):(1) ☐ a business organization, form unknown(2) ☐ a corporation(3) ☐ an unincorporated entity (describe):(4) ☐ a public entity (describe):(5) ☐ other (specify):b. ☐ except defendant (name):(1) ☐ a business organization, form unknown(2) ☐ a corporation(3) ☐ an unincorporated entity (describe):(4) ☐ a public entity (describe):(5) ☐ other (specify):d. ☐ except defendant (name):(1) ☐ a business organization, form unknown(2) ☐ a corporation(3) ☐ an unincorporated entity (describe):(4) ☐ a public entity (describe):(5) ☐ other (specify):☐ Information about additional defendants who are not natural persons is contained in Attachment 5.

6. The true names of defendants sued as Does are unknown to plaintiff.

a. ☒ Doe defendants (specify Doe numbers): 1-10 were the agents or employees of other named defendants and acted within the scope of that agency or employment.b. ☒ Doe defendants (specify Doe numbers): 1-10 are persons whose capacities are unknown to plaintiff.7. ☐ Defendants who are joined under Code of Civil Procedure section 382 are (names):

8. This court is the proper court because

a. ☐ at least one defendant now resides in its jurisdictional area.b. ☐ the principal place of business of a defendant corporation or unincorporated association is in its jurisdictional area.c. ☐ injury to person or damage to personal property occurred in its jurisdictional area.d. ☒ other (specify):

There is no property damage, and it is a civil rights/discrimination in employment matter

9. ☐ Plaintiff is required to comply with a claims statute, anda. ☐ has complied with applicable claims statutes, orb. ☐ is excused from complying because (specify):

SHORT TITLE: Williams v. Kaiser Permanente, et al.	CASE NUMBER:
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10. The following causes of action are attached and the statements above apply to each (each complaint must have one or more causes of action attached):

- a. ☐ Motor Vehicle
- b. ☒ General Negligence
- c. ☒ Intentional Tort
- d. ☐ Products Liability
- e. ☐ Premises Liability
- f. ☒ Other (specify):

defamation, race discrimination, age discrimination, medical condition, disability discrimination, disability harassment/retaliation, harassment, failure to prevent discrimination, retaliation in violation of FEHA & section 1102.5, emotional distress, incorporation of DFEH complaint

11. Plaintiff has suffered

- a. ☒ wage loss
- b. ☐ loss of use of property
- c. ☐ hospital and medical expenses
- d. ☒ general damage
- e. ☐ property damage
- f. ☒ loss of earning capacity
- g. ☒ other damage (specify):

mental distress, pain and suffering

12. ☐ The damages claimed for wrongful death and the relationships of plaintiff to the deceased are

- a. ☐ listed in Attachment 12.
- b. ☐ as follows:

13. The relief sought in this complaint is within the jurisdiction of this court.

14. Plaintiff prays for judgment for costs of suit; for such relief as is fair, just, and equitable; and for

- a. (1) ☒ compensatory damages
- (2) ☒ punitive damages

The amount of damages is (in cases for personal injury or wrongful death, you must check (1)):

- (1) ☒ according to proof
- (2) ☐ in the amount of: \$

15. ☒ The paragraphs of this complaint alleged on information and belief are as follows (specify paragraph numbers):

1 through 10

Date: January 15, 2013

GLORIA DREDD HANEY

(TYPE OR PRINT NAME)

► Gloria Dredd Haney

(SIGNATURE OF PLAINTIFF OR ATTORNEY)

SHORT TITLE:

Williams v. Kaiser Permanente, et al.

CASE NUMBER

one--defamation  
(number)**CAUSE OF ACTION—Intentional Tort**Page 4ATTACHMENT TO ☒ Complaint ☐ Cross - Complaint

(Use a separate cause of action form for each cause of action.)

IT-1. Plaintiff (name): LENA WILLIAMS

alleges that defendant (name): All Defendants

☒ Does 1 to 10

was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant intentionally caused the damage to plaintiff  
 on (date): August 12, 2011  
 at (place): Baldwin Park

(description of reasons for liability):

ON AUGUST 12, 2011, I WAS SUSPENDED BECAUSE OF MY RACE/COLOR BLACK, BECAUSE I COMPLAINED ABOUT THE CONTINUOUS HARASSMENT I EXPERIENCED FROM THE PHILLIPINO NURSES IN PARTICULAR, AND BECAUSE I COMPLAINED ABOUT PATIENT ABUSE/SUBSTANDARD CARE. I WAS THE ONLY BLACK AMERICAN ASSIGNED TO THE STEP DOWN NURSING ASSIGNMENT FOR KAISER IN BALDWIN PARK. I WAS FIRST HIRED BY KAISER IN 1999 BUT WAS DIAGNOSED WITH CANCER IN AUGUST 2006. IN SEPTEMBER 2006 I RESIGNED BECAUSE OF MY MEDICAL CONDITION. IN DECEMBER 2007, I WAS REHIRED. MY PERFORMANCE EVALUATIONS WERE ALWAYS GOOD. HOWEVER, IN 2010, I COMPLAINED TO HUMAN RESOURCES ABOUT THE HOSTILE WORK ENVIRONMENT WHERE I WAS BEING TOLD CONSTANTLY THAT I WAS GOING TO BE FIRED AND OTHER PHILLIPINO NURSES WERE GOING TO BE HIRED TO REPLACE ME. I WAS SET UP AND TOLD I WAS ENDANGERING THE SAFETY AND WELL BEING OF PATIENTS. THE STATEMENTS WERE FALSE. FALSE STATEMENTS WERE BEING MADE ABOUT ME AND MY COMPETENCE SO THAT I COULD BE FIRED. ON AUGUST 4, 2010, I WAS SUSPENDED PURPORTEDLY FOR AN INVESTIGATION. I RETURNED TO WORK ONLY TO BE HARASSED. I ALSO COMPLAINED ABOUT THE WAY A PATIENT HAD BEEN TREATED WHICH WAS SUBSTANDARD. AGAIN, ON AUGUST 12, 2011, AFTER MY COMPLAINTS, I WAS PUT ON SUSPENSION SO THAT HUMAN RESOURCES COULD ENGAGE IN ANOTHER SO-CALLED "INVESTIGATION." I HAVE BEEN ON "SUSPENSION" EVER SINCE WITH NO END IN SIGHT. BECAUSE I AM A BLACK AMERICAN AND NOT A PART OF THE MAJORITY, PHILLIPINOS, I AM SINGLED OUT FOR PUNITIVE ACTIONS AND THREATENED WITH BEING FIRED. A PHILLIPINO HAS NOW REPLACED ME WHILE I AM ON THIS NEVER-ENDING SUSPENSION. I HAVE BEEN REPLACED BY A LESS QUALIFIED PERSON WITH LESS EXPERIENCE. I AM 53 YEARS OLD. I HAVE BEEN DISCRIMINATED & RETALIATED AGAINST AND SUBJECTED TO HARASSMENT.

SHORT TITLE:

Williams v. Kaiser Permanente, et al.

CASE NUMBER

two-race discrimination  
(number)**CAUSE OF ACTION—Intentional Tort**Page 5ATTACHMENT TO ☒ Complaint ☐ Cross - Complaint

(Use a separate cause of action form for each cause of action.)

IT-1. Plaintiff (name): LENA WILLIAMS

alleges that defendant (name): Kaiser Permanente, Kaiser Permanente Baldwin Park Medical Center

☒ Does 1 to 10

was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant intentionally caused the damage to plaintiff  
on (date): August 12, 2011  
at (place): Baldwin Park

(description of reasons for liability):

ON AUGUST 12, 2011, I WAS SUSPENDED BECAUSE OF MY RACE/COLOR BLACK, BECAUSE I COMPLAINED ABOUT THE CONTINUOUS HARASSMENT I EXPERIENCED FROM THE PHILLIPINO NURSES IN PARTICULAR, AND BECAUSE I COMPLAINED ABOUT PATIENT ABUSE/SUBSTANDARD CARE. I WAS THE ONLY BLACK AMERICAN ASSIGNED TO THE STEP DOWN NURSING ASSIGNMENT FOR KAISER IN BALDWIN PARK. I WAS FIRST HIRED BY KAISER IN 1999 BUT WAS DIAGNOSED WITH CANCER IN AUGUST 2006. IN SEPTEMBER 2006 I RESIGNED BECAUSE OF MY MEDICAL CONDITION. IN DECEMBER 2007, I WAS REHIRED. MY PERFORMANCE EVALUATIONS WERE ALWAYS GOOD. HOWEVER, IN 2010, I COMPLAINED TO HUMAN RESOURCES ABOUT THE HOSTILE WORK ENVIRONMENT WHERE I WAS BEING TOLD CONSTANTLY THAT I WAS GOING TO BE FIRED AND OTHER PHILLIPINO NURSES WERE GOING TO BE HIRED TO REPLACE ME. I WAS SET UP AND TOLD I WAS ENDANGERING THE SAFETY AND WELL BEING OF PATIENTS. THE STATEMENTS WERE FALSE. FALSE STATEMENTS WERE BEING MADE ABOUT ME AND MY COMPETENCE SO THAT I COULD BE FIRED. ON AUGUST 4, 2010, I WAS SUSPENDED PURPORTEDLY FOR AN INVESTIGATION. I RETURNED TO WORK ONLY TO BE HARASSED. I ALSO COMPLAINED ABOUT THE WAY A PATIENT HAD BEEN TREATED WHICH WAS SUBSTANDARD. AGAIN, ON AUGUST 12, 2011, AFTER MY COMPLAINTS, I WAS PUT ON SUSPENSION SO THAT HUMAN RESOURCES COULD ENGAGE IN ANOTHER SO-CALLED "INVESTIGATION." I HAVE BEEN ON "SUSPENSION" EVER SINCE WITH NO END IN SIGHT. BECAUSE I AM A BLACK AMERICAN AND NOT A PART OF THE MAJORITY, PHILLIPINOS, I AM SINGLED OUT FOR PUNITIVE ACTIONS AND THREATENED WITH BEING FIRED. A PHILLIPINO HAS NOW REPLACED ME WHILE I AM ON THIS NEVER-ENDING SUSPENSION. I HAVE BEEN REPLACED BY A LESS QUALIFIED PERSON WITH LESS EXPERIENCE. I AM 53 YEARS OLD. I HAVE BEEN DISCRIMINATED & RETALIATED AGAINST AND SUBJECTED TO HARASSMENT.

Page 1 of 1

SHORT TITLE:

Williams v. Kaiser Permanente, et al.

CASE NUMBER

3rd: disability discrimin.  
(number)**CAUSE OF ACTION—Intentional Tort**Page 6ATTACHMENT TO ☒ Complaint ☐ Cross - Complaint

(Use a separate cause of action form for each cause of action.)

IT-1. Plaintiff (name): LENA WILLIAMS

alleges that defendant (name): Kaiser Permanente, Kaiser Permanente Baldwin Park Medical Center

☒ Does 1 to 10

was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant intentionally caused the damage to plaintiff  
on (date): August 12, 2011  
at (place): Baldwin Park

(description of reasons for liability):

ON AUGUST 12, 2011, I WAS SUSPENDED BECAUSE OF MY RACE/COLOR BLACK, BECAUSE I COMPLAINED ABOUT THE CONTINUOUS HARASSMENT I EXPERIENCED FROM THE PHILLIPINO NURSES IN PARTICULAR, AND BECAUSE I COMPLAINED ABOUT PATIENT ABUSE/SUBSTANDARD CARE. I WAS THE ONLY BLACK AMERICAN ASSIGNED TO THE STEP DOWN NURSING ASSIGNMENT FOR KAISER IN BALDWIN PARK. I WAS FIRST HIRED BY KAISER IN 1999 BUT WAS DIAGNOSED WITH CANCER IN AUGUST 2006. IN SEPTEMBER 2006 I RESIGNED BECAUSE OF MY MEDICAL CONDITION. IN DECEMBER 2007, I WAS REHIRED. MY PERFORMANCE EVALUATIONS WERE ALWAYS GOOD. HOWEVER, IN 2010, I COMPLAINED TO HUMAN RESOURCES ABOUT THE HOSTILE WORK ENVIRONMENT WHERE I WAS BEING TOLD CONSTANTLY THAT I WAS GOING TO BE FIRED AND OTHER PHILLIPINO NURSES WERE GOING TO BE HIRED TO REPLACE ME. I WAS SET UP AND TOLD I WAS ENDANGERING THE SAFETY AND WELL BEING OF PATIENTS. THE STATEMENTS WERE FALSE. FALSE STATEMENTS WERE BEING MADE ABOUT ME AND MY COMPETENCE SO THAT I COULD BE FIRED. ON AUGUST 4, 2010, I WAS SUSPENDED PURPORTEDLY FOR AN INVESTIGATION. I RETURNED TO WORK ONLY TO BE HARASSED. I ALSO COMPLAINED ABOUT THE WAY A PATIENT HAD BEEN TREATED WHICH WAS SUBSTANDARD. AGAIN, ON AUGUST 12, 2011, AFTER MY COMPLAINTS, I WAS PUT ON SUSPENSION SO THAT HUMAN RESOURCES COULD ENGAGE IN ANOTHER SO-CALLED "INVESTIGATION." I HAVE BEEN ON "SUSPENSION" EVER SINCE WITH NO END IN SIGHT. BECAUSE I AM A BLACK AMERICAN AND NOT A PART OF THE MAJORITY, PHILLIPINOS, I AM SINGLED OUT FOR PUNITIVE ACTIONS AND THREATENED WITH BEING FIRED. A PHILLIPINO HAS NOW REPLACED ME WHILE I AM ON THIS NEVER-ENDING SUSPENSION. I HAVE BEEN REPLACED BY A LESS QUALIFIED PERSON WITH LESS EXPERIENCE. I AM 53 YEARS OLD. I HAVE BEEN DISCRIMINATED & RETALIATED AGAINST AND SUBJECTED TO HARASSMENT.

Page 1 of 1

SHORT TITLE:

Williams v. Kaiser Permanente, et al.

CASE NUMBER

4: disability harass/retal  
(number)**CAUSE OF ACTION—Intentional Tort**Page 7ATTACHMENT TO ☒ Complaint ☐ Cross - Complaint

(Use a separate cause of action form for each cause of action.)

IT-1. Plaintiff (name): LENA WILLIAMS

alleges that defendant (name): Kaiser Permanente, Kaiser Permanente Baldwin Park Medical Center

☒ Does 1 to 10

was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant intentionally caused the damage to plaintiff  
 on (date): August 12, 2011  
 at (place): Baldwin Park

(description of reasons for liability):

ON AUGUST 12, 2011, I WAS SUSPENDED BECAUSE OF MY RACE/COLOR BLACK, BECAUSE I COMPLAINED ABOUT THE CONTINUOUS HARASSMENT I EXPERIENCED FROM THE PHILLIPINO NURSES IN PARTICULAR, AND BECAUSE I COMPLAINED ABOUT PATIENT ABUSE/SUBSTANDARD CARE. I WAS THE ONLY BLACK AMERICAN ASSIGNED TO THE STEP DOWN NURSING ASSIGNMENT FOR KAISER IN BALDWIN PARK. I WAS FIRST HIRED BY KAISER IN 1999 BUT WAS DIAGNOSED WITH CANCER IN AUGUST 2006. IN SEPTEMBER 2006 I RESIGNED BECAUSE OF MY MEDICAL CONDITION. IN DECEMBER 2007, I WAS REHIRED. MY PERFORMANCE EVALUATIONS WERE ALWAYS GOOD. HOWEVER, IN 2010, I COMPLAINED TO HUMAN RESOURCES ABOUT THE HOSTILE WORK ENVIRONMENT WHERE I WAS BEING TOLD CONSTANTLY THAT I WAS GOING TO BE FIRED AND OTHER PHILLIPINO NURSES WERE GOING TO BE HIRED TO REPLACE ME. I WAS SET UP AND TOLD I WAS ENDANGERING THE SAFETY AND WELL BEING OF PATIENTS. THE STATEMENTS WERE FALSE. FALSE STATEMENTS WERE BEING MADE ABOUT ME AND MY COMPETENCE SO THAT I COULD BE FIRED. ON AUGUST 4, 2010, I WAS SUSPENDED PURPORTEDLY FOR AN INVESTIGATION. I RETURNED TO WORK ONLY TO BE HARASSED. I ALSO COMPLAINED ABOUT THE WAY A PATIENT HAD BEEN TREATED WHICH WAS SUBSTANDARD. AGAIN, ON AUGUST 12, 2011, AFTER MY COMPLAINTS, I WAS PUT ON SUSPENSION SO THAT HUMAN RESOURCES COULD ENGAGE IN ANOTHER SO-CALLED "INVESTIGATION." I HAVE BEEN ON "SUSPENSION" EVER SINCE WITH NO END IN SIGHT. BECAUSE I AM A BLACK AMERICAN AND NOT A PART OF THE MAJORITY, PHILLIPINOS, I AM SINGLED OUT FOR PUNITIVE ACTIONS AND THREATENED WITH BEING FIRED. A PHILLIPINO HAS NOW REPLACED ME WHILE I AM ON THIS NEVER-ENDING SUSPENSION. I HAVE BEEN REPLACED BY A LESS QUALIFIED PERSON WITH LESS EXPERIENCE. I AM 53 YEARS OLD. I HAVE BEEN DISCRIMINATED & RETALIATED AGAINST AND SUBJECTED TO HARASSMENT.

Page 1 of 1

SHORT TITLE:

Williams v. Kaiser Permanente, et al.

CASE NUMBER

5th: age discrimination  
(number)**CAUSE OF ACTION—Intentional Tort**Page 8ATTACHMENT TO ☒ Complaint ☐ Cross - Complaint

(Use a separate cause of action form for each cause of action.)

IT-1. Plaintiff (name): LENA WILLIAMS

alleges that defendant (name): Kaiser Permanente, Kaiser Permanente Baldwin Park Medical Center

☒ Does 1 to 10

was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant intentionally caused the damage to plaintiff  
 on (date): August 12, 2011  
 at (place): Baldwin Park

(description of reasons for liability):

ON AUGUST 12, 2011, I WAS SUSPENDED BECAUSE OF MY RACE/COLOR BLACK, BECAUSE I COMPLAINED ABOUT THE CONTINUOUS HARASSMENT I EXPERIENCED FROM THE PHILLIPINO NURSES IN PARTICULAR, AND BECAUSE I COMPLAINED ABOUT PATIENT ABUSE/SUBSTANDARD CARE. I WAS THE ONLY BLACK AMERICAN ASSIGNED TO THE STEP DOWN NURSING ASSIGNMENT FOR KAISER IN BALDWIN PARK. I WAS FIRST HIRED BY KAISER IN 1999 BUT WAS DIAGNOSED WITH CANCER IN AUGUST 2006. IN SEPTEMBER 2006 I RESIGNED BECAUSE OF MY MEDICAL CONDITION. IN DECEMBER 2007, I WAS REHIRED. MY PERFORMANCE EVALUATIONS WERE ALWAYS GOOD. HOWEVER, IN 2010, I COMPLAINED TO HUMAN RESOURCES ABOUT THE HOSTILE WORK ENVIRONMENT WHERE I WAS BEING TOLD CONSTANTLY THAT I WAS GOING TO BE FIRED AND OTHER PHILLIPINO NURSES WERE GOING TO BE HIRED TO REPLACE ME. I WAS SET UP AND TOLD I WAS ENDANGERING THE SAFETY AND WELL BEING OF PATIENTS. THE STATEMENTS WERE FALSE. FALSE STATEMENTS WERE BEING MADE ABOUT ME AND MY COMPETENCE SO THAT I COULD BE FIRED. ON AUGUST 4, 2010, I WAS SUSPENDED PURPORTEDLY FOR AN INVESTIGATION. I RETURNED TO WORK ONLY TO BE HARASSED. I ALSO COMPLAINED ABOUT THE WAY A PATIENT HAD BEEN TREATED WHICH WAS SUBSTANDARD. AGAIN, ON AUGUST 12, 2011, AFTER MY COMPLAINTS, I WAS PUT ON SUSPENSION SO THAT HUMAN RESOURCES COULD ENGAGE IN ANOTHER SO-CALLED "INVESTIGATION." I HAVE BEEN ON "SUSPENSION" EVER SINCE WITH NO END IN SIGHT. BECAUSE I AM A BLACK AMERICAN AND NOT A PART OF THE MAJORITY, PHILLIPINOS, I AM SINGLED OUT FOR PUNITIVE ACTIONS AND THREATENED WITH BEING FIRED. A PHILLIPINO HAS NOW REPLACED ME WHILE I AM ON THIS NEVER-ENDING SUSPENSION. I HAVE BEEN REPLACED BY A LESS QUALIFIED PERSON WITH LESS EXPERIENCE. I AM 53 YEARS OLD. I HAVE BEEN DISCRIMINATED & RETALIATED AGAINST AND SUBJECTED TO HARASSMENT.

Page 1 of 1



SHORT TITLE:

Williams v. Kaiser Permanente, et al.

CASE NUMBER

6th: harassment  
(number)**CAUSE OF ACTION—Intentional Tort**Page 9ATTACHMENT TO ☒ Complaint ☐ Cross - Complaint

(Use a separate cause of action form for each cause of action.)

IT-1. Plaintiff (name): LENA WILLIAMS

alleges that defendant (name): All Defendants

☒ Does 1 to 10

was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant intentionally caused the damage to plaintiff  
on (date): August 12, 2011  
at (place): Baldwin Park

(description of reasons for liability):

ON AUGUST 12, 2011, I WAS SUSPENDED BECAUSE OF MY RACE/COLOR BLACK, BECAUSE I COMPLAINED ABOUT THE CONTINUOUS HARASSMENT I EXPERIENCED FROM THE PHILLIPINO NURSES IN PARTICULAR, AND BECAUSE I COMPLAINED ABOUT PATIENT ABUSE/SUBSTANDARD CARE. I WAS THE ONLY BLACK AMERICAN ASSIGNED TO THE STEP DOWN NURSING ASSIGNMENT FOR KAISER IN BALDWIN PARK. I WAS FIRST HIRED BY KAISER IN 1999 BUT WAS DIAGNOSED WITH CANCER IN AUGUST 2006. IN SEPTEMBER 2006 I RESIGNED BECAUSE OF MY MEDICAL CONDITION. IN DECEMBER 2007, I WAS REHIRED. MY PERFORMANCE EVALUATIONS WERE ALWAYS GOOD. HOWEVER, IN 2010, I COMPLAINED TO HUMAN RESOURCES ABOUT THE HOSTILE WORK ENVIRONMENT WHERE I WAS BEING TOLD CONSTANTLY THAT I WAS GOING TO BE FIRED AND OTHER PHILLIPINO NURSES WERE GOING TO BE HIRED TO REPLACE ME. I WAS SET UP AND TOLD I WAS ENDANGERING THE SAFETY AND WELL BEING OF PATIENTS. THE STATEMENTS WERE FALSE. FALSE STATEMENTS WERE BEING MADE ABOUT ME AND MY COMPETENCE SO THAT I COULD BE FIRED. ON AUGUST 4, 2010, I WAS SUSPENDED PURPORTEDLY FOR AN INVESTIGATION. I RETURNED TO WORK ONLY TO BE HARASSED. I ALSO COMPLAINED ABOUT THE WAY A PATIENT HAD BEEN TREATED WHICH WAS SUBSTANDARD. AGAIN, ON AUGUST 12, 2011, AFTER MY COMPLAINTS, I WAS PUT ON SUSPENSION SO THAT HUMAN RESOURCES COULD ENGAGE IN ANOTHER SO-CALLED "INVESTIGATION." I HAVE BEEN ON "SUSPENSION" EVER SINCE WITH NO END IN SIGHT. BECAUSE I AM A BLACK AMERICAN AND NOT A PART OF THE MAJORITY, PHILLIPINOS, I AM SINGLED OUT FOR PUNITIVE ACTIONS AND THREATENED WITH BEING FIRED. A PHILLIPINO HAS NOW REPLACED ME WHILE I AM ON THIS NEVER-ENDING SUSPENSION. I HAVE BEEN REPLACED BY A LESS QUALIFIED PERSON WITH LESS EXPERIENCE. I AM 53 YEARS OLD. I HAVE BEEN DISCRIMINATED & RETALIATED AGAINST AND SUBJECTED TO HARASSMENT.

Page 1 of 1

SHORT TITLE:

Williams v. Kaiser Permanente, et al.

CASE NUMBER

7th: fail to prevent disc.  
(number)**CAUSE OF ACTION—Intentional Tort**Page 10ATTACHMENT TO ☒ Complaint ☐ Cross - Complaint

(Use a separate cause of action form for each cause of action.)

IT-1. Plaintiff (name): LENA WILLIAMS

alleges that defendant (name): Kaiser Permanente, Kaiser Permanente Baldwin Park Medical Center

☒ Does 1 to 10

was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant intentionally caused the damage to plaintiff  
on (date): August 12, 2011  
at (place): Baldwin Park

(description of reasons for liability):

ON AUGUST 12, 2011, I WAS SUSPENDED BECAUSE OF MY RACE/COLOR BLACK, BECAUSE I COMPLAINED ABOUT THE CONTINUOUS HARASSMENT I EXPERIENCED FROM THE PHILLIPINO NURSES IN PARTICULAR, AND BECAUSE I COMPLAINED ABOUT PATIENT ABUSE/SUBSTANDARD CARE. I WAS THE ONLY BLACK AMERICAN ASSIGNED TO THE STEP DOWN NURSING ASSIGNMENT FOR KAISER IN BALDWIN PARK. I WAS FIRST HIRED BY KAISER IN 1999 BUT WAS DIAGNOSED WITH CANCER IN AUGUST 2006. IN SEPTEMBER 2006 I RESIGNED BECAUSE OF MY MEDICAL CONDITION. IN DECEMBER 2007, I WAS REHIRED. MY PERFORMANCE EVALUATIONS WERE ALWAYS GOOD. HOWEVER, IN 2010, I COMPLAINED TO HUMAN RESOURCES ABOUT THE HOSTILE WORK ENVIRONMENT WHERE I WAS BEING TOLD CONSTANTLY THAT I WAS GOING TO BE FIRED AND OTHER PHILLIPINO NURSES WERE GOING TO BE HIRED TO REPLACE ME. I WAS SET UP AND TOLD I WAS ENDANGERING THE SAFETY AND WELL BEING OF PATIENTS. THE STATEMENTS WERE FALSE. FALSE STATEMENTS WERE BEING MADE ABOUT ME AND MY COMPETENCE SO THAT I COULD BE FIRED. ON AUGUST 4, 2010, I WAS SUSPENDED PURPORTEDLY FOR AN INVESTIGATION. I RETURNED TO WORK ONLY TO BE HARASSED. I ALSO COMPLAINED ABOUT THE WAY A PATIENT HAD BEEN TREATED WHICH WAS SUBSTANDARD. AGAIN, ON AUGUST 12, 2011, AFTER MY COMPLAINTS, I WAS PUT ON SUSPENSION SO THAT HUMAN RESOURCES COULD ENGAGE IN ANOTHER SO-CALLED "INVESTIGATION." I HAVE BEEN ON "SUSPENSION" EVER SINCE WITH NO END IN SIGHT. BECAUSE I AM A BLACK AMERICAN AND NOT A PART OF THE MAJORITY, PHILLIPINOS, I AM SINGLED OUT FOR PUNITIVE ACTIONS AND THREATENED WITH BEING FIRED. A PHILLIPINO HAS NOW REPLACED ME WHILE I AM ON THIS NEVER-ENDING SUSPENSION. I HAVE BEEN REPLACED BY A LESS QUALIFIED PERSON WITH LESS EXPERIENCE. I AM 53 YEARS OLD. I HAVE BEEN DISCRIMINATED & RETALIATED AGAINST AND SUBJECTED TO HARASSMENT.

Page 1 of 1

SHORT TITLE:

Williams v. Kaiser Permanente, et al.

CASE NUMBER

8th: FEHA retaliation  
(number)**CAUSE OF ACTION—Intentional Tort**Page 11ATTACHMENT TO ☒ Complaint ☐ Cross - Complaint

(Use a separate cause of action form for each cause of action.)

IT-1. Plaintiff (name): LENA WILLIAMS

alleges that defendant (name): Kaiser Permanente, Kaiser Permanente Baldwin Park Medical Center

☒ Does 1 to 10

was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant intentionally caused the damage to plaintiff  
on (date): August 12, 2011  
at (place): Baldwin Park

(description of reasons for liability):

ON AUGUST 12, 2011, I WAS SUSPENDED BECAUSE OF MY RACE/COLOR BLACK, BECAUSE I COMPLAINED ABOUT THE CONTINUOUS HARASSMENT I EXPERIENCED FROM THE PHILLIPINO NURSES IN PARTICULAR, AND BECAUSE I COMPLAINED ABOUT PATIENT ABUSE/SUBSTANDARD CARE. I WAS THE ONLY BLACK AMERICAN ASSIGNED TO THE STEP DOWN NURSING ASSIGNMENT FOR KAISER IN BALDWIN PARK. I WAS FIRST HIRED BY KAISER IN 1999 BUT WAS DIAGNOSED WITH CANCER IN AUGUST 2006. IN SEPTEMBER 2006 I RESIGNED BECAUSE OF MY MEDICAL CONDITION. IN DECEMBER 2007, I WAS REHIRED. MY PERFORMANCE EVALUATIONS WERE ALWAYS GOOD. HOWEVER, IN 2010, I COMPLAINED TO HUMAN RESOURCES ABOUT THE HOSTILE WORK ENVIRONMENT WHERE I WAS BEING TOLD CONSTANTLY THAT I WAS GOING TO BE FIRED AND OTHER PHILLIPINO NURSES WERE GOING TO BE HIRED TO REPLACE ME. I WAS SET UP AND TOLD I WAS ENDANGERING THE SAFETY AND WELL BEING OF PATIENTS. THE STATEMENTS WERE FALSE. FALSE STATEMENTS WERE BEING MADE ABOUT ME AND MY COMPETENCE SO THAT I COULD BE FIRED. ON AUGUST 4, 2010, I WAS SUSPENDED PURPORTEDLY FOR AN INVESTIGATION. I RETURNED TO WORK ONLY TO BE HARASSED. I ALSO COMPLAINED ABOUT THE WAY A PATIENT HAD BEEN TREATED WHICH WAS SUBSTANDARD. AGAIN, ON AUGUST 12, 2011, AFTER MY COMPLAINTS, I WAS PUT ON SUSPENSION SO THAT HUMAN RESOURCES COULD ENGAGE IN ANOTHER SO-CALLED "INVESTIGATION." I HAVE BEEN ON "SUSPENSION" EVER SINCE WITH NO END IN SIGHT. BECAUSE I AM A BLACK AMERICAN AND NOT A PART OF THE MAJORITY, PHILLIPINOS, I AM SINGLED OUT FOR PUNITIVE ACTIONS AND THREATENED WITH BEING FIRED. A PHILLIPINO HAS NOW REPLACED ME WHILE I AM ON THIS NEVER-ENDING SUSPENSION. I HAVE BEEN REPLACED BY A LESS QUALIFIED PERSON WITH LESS EXPERIENCE. I AM 53 YEARS OLD. I HAVE BEEN DISCRIMINATED & RETALIATED AGAINST AND SUBJECTED TO HARASSMENT.

Page 1 of 1

SHORT TITLE:

Williams v. Kaiser Permanente, et al.

CASE NUMBER

9th: emotional distress  
(number)**CAUSE OF ACTION—Intentional Tort**Page 12ATTACHMENT TO ☒ Complaint ☐ Cross - Complaint

(Use a separate cause of action form for each cause of action.)

IT-1. Plaintiff (name): LENA WILLIAMS

alleges that defendant (name): Kaiser Permanente, Kaiser Permanente Baldwin Park Medical Center

☒ Does 1 to 10

was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant intentionally caused the damage to plaintiff  
 on (date): August 12, 2011  
 at (place): Baldwin Park

(description of reasons for liability):

ON AUGUST 12, 2011, I WAS SUSPENDED BECAUSE OF MY RACE/COLOR BLACK, BECAUSE I COMPLAINED ABOUT THE CONTINUOUS HARASSMENT I EXPERIENCED FROM THE PHILLIPINO NURSES IN PARTICULAR, AND BECAUSE I COMPLAINED ABOUT PATIENT ABUSE/SUBSTANDARD CARE. I WAS THE ONLY BLACK AMERICAN ASSIGNED TO THE STEP DOWN NURSING ASSIGNMENT FOR KAISER IN BALDWIN PARK. I WAS FIRST HIRED BY KAISER IN 1999 BUT WAS DIAGNOSED WITH CANCER IN AUGUST 2006. IN SEPTEMBER 2006 I RESIGNED BECAUSE OF MY MEDICAL CONDITION. IN DECEMBER 2007, I WAS REHIRED. MY PERFORMANCE EVALUATIONS WERE ALWAYS GOOD. HOWEVER, IN 2010, I COMPLAINED TO HUMAN RESOURCES ABOUT THE HOSTILE WORK ENVIRONMENT WHERE I WAS BEING TOLD CONSTANTLY THAT I WAS GOING TO BE FIRED AND OTHER PHILLIPINO NURSES WERE GOING TO BE HIRED TO REPLACE ME. I WAS SET UP AND TOLD I WAS ENDANGERING THE SAFETY AND WELL BEING OF PATIENTS. THE STATEMENTS WERE FALSE. FALSE STATEMENTS WERE BEING MADE ABOUT ME AND MY COMPETENCE SO THAT I COULD BE FIRED. ON AUGUST 4, 2010, I WAS SUSPENDED PURPORTEDLY FOR AN INVESTIGATION. I RETURNED TO WORK ONLY TO BE HARASSED. I ALSO COMPLAINED ABOUT THE WAY A PATIENT HAD BEEN TREATED WHICH WAS SUBSTANDARD. AGAIN, ON AUGUST 12, 2011, AFTER MY COMPLAINTS, I WAS PUT ON SUSPENSION SO THAT HUMAN RESOURCES COULD ENGAGE IN ANOTHER SO-CALLED "INVESTIGATION." I HAVE BEEN ON "SUSPENSION" EVER SINCE WITH NO END IN SIGHT. BECAUSE I AM A BLACK AMERICAN AND NOT A PART OF THE MAJORITY, PHILLIPINOS, I AM SINGLED OUT FOR PUNITIVE ACTIONS AND THREATENED WITH BEING FIRED. A PHILLIPINO HAS NOW REPLACED ME WHILE I AM ON THIS NEVER-ENDING SUSPENSION. I HAVE BEEN REPLACED BY A LESS QUALIFIED PERSON WITH LESS EXPERIENCE. I AM 53 YEARS OLD. I HAVE BEEN DISCRIMINATED & RETALIATED AGAINST AND SUBJECTED TO HARASSMENT.

Page 1 of 1

SHORT TITLE:

Williams v. Kaiser Permanente, et al.

CASE NUMBER

10: medical condition  
(number)**CAUSE OF ACTION—Intentional Tort**Page 13ATTACHMENT TO ☒ Complaint ☐ Cross - Complaint

(Use a separate cause of action form for each cause of action.)

IT-1. Plaintiff (name): LENA WILLIAMS

alleges that defendant (name): Kaiser Permanente, Kaiser Permanente Baldwin Park Medical Center

☒ Does 1 to 10

was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant intentionally caused the damage to plaintiff  
on (date): August 12, 2011  
at (place): Baldwin Park

(description of reasons for liability):

ON AUGUST 12, 2011, I WAS SUSPENDED BECAUSE OF MY RACE/COLOR BLACK, BECAUSE I COMPLAINED ABOUT THE CONTINUOUS HARASSMENT I EXPERIENCED FROM THE PHILLIPINO NURSES IN PARTICULAR, AND BECAUSE I COMPLAINED ABOUT PATIENT ABUSE/SUBSTANDARD CARE. I WAS THE ONLY BLACK AMERICAN ASSIGNED TO THE STEP DOWN NURSING ASSIGNMENT FOR KAISER IN BALDWIN PARK. I WAS FIRST HIRED BY KAISER IN 1999 BUT WAS DIAGNOSED WITH CANCER IN AUGUST 2006. IN SEPTEMBER 2006 I RESIGNED BECAUSE OF MY MEDICAL CONDITION. IN DECEMBER 2007, I WAS REHIRED. MY PERFORMANCE EVALUATIONS WERE ALWAYS GOOD. HOWEVER, IN 2010, I COMPLAINED TO HUMAN RESOURCES ABOUT THE HOSTILE WORK ENVIRONMENT WHERE I WAS BEING TOLD CONSTANTLY THAT I WAS GOING TO BE FIRED AND OTHER PHILLIPINO NURSES WERE GOING TO BE HIRED TO REPLACE ME. I WAS SET UP AND TOLD I WAS ENDANGERING THE SAFETY AND WELL BEING OF PATIENTS. THE STATEMENTS WERE FALSE. FALSE STATEMENTS WERE BEING MADE ABOUT ME AND MY COMPETENCE SO THAT I COULD BE FIRED. ON AUGUST 4, 2010, I WAS SUSPENDED PURPORTEDLY FOR AN INVESTIGATION. I RETURNED TO WORK ONLY TO BE HARASSED. I ALSO COMPLAINED ABOUT THE WAY A PATIENT HAD BEEN TREATED WHICH WAS SUBSTANDARD. AGAIN, ON AUGUST 12, 2011, AFTER MY COMPLAINTS, I WAS PUT ON SUSPENSION SO THAT HUMAN RESOURCES COULD ENGAGE IN ANOTHER SO-CALLED "INVESTIGATION." I HAVE BEEN ON "SUSPENSION" EVER SINCE WITH NO END IN SIGHT. BECAUSE I AM A BLACK AMERICAN AND NOT A PART OF THE MAJORITY, PHILLIPINOS, I AM SINGLED OUT FOR PUNITIVE ACTIONS AND THREATENED WITH BEING FIRED. A PHILLIPINO HAS NOW REPLACED ME WHILE I AM ON THIS NEVER-ENDING SUSPENSION. I HAVE BEEN REPLACED BY A LESS QUALIFIED PERSON WITH LESS EXPERIENCE. I AM 53 YEARS OLD. I HAVE BEEN DISCRIMINATED & RETALIATED AGAINST AND SUBJECTED TO HARASSMENT.

Page 1 of 1

Courthouse News Service

01/16/2013

Courthouse News Service



**DEPARTMENT OF FAIR EMPLOYMENT & HOUSING**

1055 WEST 7TH STREET, SUITE 1400, LOS ANGELES, CA 90017  
(213) 439-6770  
www.dfeh.ca.gov

January 16, 2012

WILLIAMS, LENA  
208 NORTH GLENDORA AVENUE  
COVINA, CA 91724

RE: E201112R7486-00  
WILLIAMS/KAISER PERMANENTE BALDWIN PARK MEDICAL CENTER

Dear WILLIAMS, LENA:

**NOTICE OF CASE CLOSURE**

This letter informs that the above-referenced complaint that was filed with the Department of Fair Employment and Housing (DFEH) has been closed effective January 16, 2012 because an immediate right-to-sue notice was requested. DFEH will take no further action on the complaint.

This letter is also the Right-To-Sue Notice. According to Government Code section 12965, subdivision (b), a civil action may be brought under the provisions of the Fair Employment and Housing Act against the person, employer, labor organization or employment agency named in the above-referenced complaint. The civil action must be filed within one year from the date of this letter.

If a federal notice of Right-To-Sue is wanted, the U.S. Equal Employment Opportunity Commission (EEOC) must be visited to file a complaint within 30 days of receipt of this DFEH *Notice of Case Closure* or within 300 days of the alleged discriminatory act, whichever is earlier.

01/16/2013

**EXHIBIT A**



**DFEH does not retain case files beyond three years after a complaint is filed, unless the case is still open at the end of the three-year period.**

Sincerely,

Wina Walker

**Tina Walker**  
**District Administrator**

**cc: Case File**

Ma Walker  
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Administrator  
Case File

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➡ ARLENE ZEPEDA  
 ➡ HUMAN RESOURCES MANAGER  
 ➡ KAISER PERMANENTE BALDWIN PARK MEDICAL CENTER  
 ➡ 1011 BALDWIN PARK BOULEVARD  
 ➡ BALDWIN PARK, CA 91706



**DEPARTMENT OF FAIR EMPLOYMENT & HOUSING**

1055 WEST 7TH STREET, SUITE 1400, LOS ANGELES, CA 90017  
(213) 439-6770  
www.dfeh.ca.gov

January 16, 2012

WILLIAMS, LENA  
208 NORTH GLENDORA AVENUE  
COVINA, CA, 91724

RE: E201112R7486-02  
WILLIAMS/OGMAKA, SCHOLA, AS AN INDIVIDUAL

Dear WILLIAMS, LENA:

**NOTICE OF CASE CLOSURE**

This letter informs that the above-referenced complaint that was filed with the Department of Fair Employment and Housing (DFEH) has been closed effective January 16, 2012 because an immediate right-to-sue notice was requested. DFEH will take no further action on the complaint.

This letter is also the Right-To-Sue Notice. According to Government Code section 12965, subdivision (b), a civil action may be brought under the provisions of the Fair Employment and Housing Act against the person, employer, labor organization or employment agency named in the above-referenced complaint. The civil action must be filed within one year from the date of this letter.

If a federal notice of Right-To-Sue is wanted, the U.S. Equal Employment Opportunity Commission (EEOC) must be visited to file a complaint within 30 days of receipt of this DFEH *Notice of Case Closure* or within 300 days of the alleged discriminatory act, whichever is earlier.

01/16/2012

**EXHIBIT A**

DFEH does not retain case files beyond three years after a complaint is filed, unless the case is still open at the end of the three-year period.

Sincerely,

*Tina Walker*

Tina Walker  
District Administrator

cc: Case File

Courthouse News Service

ARLENE ZEPEDA  
HUMAN RESOURCES MANAGER  
KAISER PERMANENTE BALDWIN PARK MEDICAL CENTER  
1011 BALDWIN PARK BOULEVARD  
BALDWIN PARK, CA 91706



**DEPARTMENT OF FAIR EMPLOYMENT & HOUSING**

1055 WEST 7TH STREET, SUITE 1400, LOS ANGELES, CA 90017  
(213) 439-6770  
www.dfeh.ca.gov

Phyllis W. Cheng, Director

January 16, 2012

WILLIAMS, LENA  
208 NORTH GLENDORA AVENUE  
COVINA, CA, 91724

RE: E201112R7486-01  
WILLIAMS/ZEPEDA, ARLENE, AS AN INDIVIDUAL

Dear WILLIAMS, LENA:

**NOTICE OF CASE CLOSURE**

This letter informs that the above-referenced complaint that was filed with the Department of Fair Employment and Housing (DFEH) has been closed effective January 16, 2012 because an immediate right-to-sue notice was requested. DFEH will take no further action on the complaint.

This letter is also the Right-To-Sue Notice. According to Government Code section 12965, subdivision (b), a civil action may be brought under the provisions of the Fair Employment and Housing Act against the person, employer, labor organization or employment agency named in the above-referenced complaint. The civil action must be filed within one year from the date of this letter.

If a federal notice of Right-To-Sue is wanted, the U.S. Equal Employment Opportunity Commission (EEOC) must be visited to file a complaint within 30 days of receipt of this DFEH *Notice of Case Closure* or within 300 days of the alleged discriminatory act, whichever is earlier.

01/16/2012

**EXHIBIT A**

Dfeh does not retain case files beyond three years after a complaint is filed, unless the case is still open at the end of the three-year period.

Sincerely,

*Tina Walker*

Tina Walker  
District Administrator

cc: Case File

Courthouse News Service

01/11/06

ARLENE ZEPEDA  
HUMAN RESOURCES MANAGER  
KAISER PERMANENTE BALDWIN PARK MEDICAL CENTER  
101 BALDWIN PARK BOULEVARD  
BALDWIN PARK, CA 91706



**DEPARTMENT OF FAIR EMPLOYMENT & HOUSING**

1055 WEST 7TH STREET, SUITE 1400, LOS ANGELES, CA 90017  
(213) 439-6770  
www.dfeh.ca.gov

Phyllis W. Cheng, Director

January 16, 2012

WILLIAMS, LENA  
208 NORTH GLENDORA AVENUE  
COVINA, CA, 91724

RE: E201112R7486-03  
WILLIAMS/GARCIA, FELIPE, AS AN INDIVIDUAL

Dear WILLIAMS, LENA:

**NOTICE OF CASE CLOSURE**

This letter informs that the above-referenced complaint that was filed with the Department of Fair Employment and Housing (DFEH) has been closed effective January 16, 2012 because an immediate right-to-sue notice was requested. DFEH will take no further action on the complaint.

This letter is also the Right-To-Sue Notice. According to Government Code section 12965, subdivision (b), a civil action may be brought under the provisions of the Fair Employment and Housing Act against the person, employer, labor organization or employment agency named in the above-referenced complaint. The civil action must be filed within one year from the date of this letter.

If a federal notice of Right-To-Sue is wanted, the U.S. Equal Employment Opportunity Commission (EEOC) must be visited to file a complaint within 30 days of receipt of this DFEH *Notice of Case Closure* or within 300 days of the alleged discriminatory act, whichever is earlier.

01/16/2012

**EXHIBIT A**

DFEH does not retain case files beyond three years after a complaint is filed, unless the case is still open at the end of the three-year period.

Sincerely,

*Tina Walker*

Tina Walker  
District Administrator

cc: Case File

Courthouse News Service

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ARLENE ZEPEDA  
HUMAN RESOURCES MANAGER  
KAISER PERMANENTE BALDWIN PARK MEDICAL CENTER  
1011 BALDWIN PARK BOULEVARD  
BALDWIN PARK, CA 91706

Courthouse News Service

01/16/2013



\*\*\* EMPLOYMENT \*\*\*

**COMPLAINT OF DISCRIMINATION UNDER  
THE PROVISIONS OF THE CALIFORNIA  
FAIR EMPLOYMENT AND HOUSING ACT**

DFEH # **E201112R7486-00**

DFEH USE ONLY

**CALIFORNIA DEPARTMENT OF FAIR EMPLOYMENT AND HOUSING**

YOUR NAME (indicate Mr. or Ms.)

**WILLIAMS, LENA**

TELEPHONE NUMBER (INCLUDE AREA CODE)

**(626)665-2503**

ADDRESS

**208 NORTH GLENDORA AVENUE**

CITY/STATE/ZIP

**COVINA, CA 91724**

COUNTY

**LOS ANGELES**

COUNTY CODE

**037**

NAMED IS THE EMPLOYER, PERSON, LABOR ORGANIZATION, EMPLOYMENT AGENCY, APPRENTICESHIP COMMITTEE, OR STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME:

NAME

**KAISER PERMANENTE BALDWIN PARK MEDICAL CENTER**

TELEPHONE NUMBER (Include Area Code)

**(626)851-1011**

ADDRESS

**101 BALDWIN PARK BOULEVARD**

DFEH USE ONLY

CITY/STATE/ZIP

**BALDWIN PARK, CA 91706**

COUNTY

**LOS ANGELES**

COUNTY CODE

**037**

NO. OF EMPLOYEES/MEMBERS (if known)

**150+**

DATE MOST RECENT OR CONTINUING DISCRIMINATION  
TOOK PLACE (month, day, and year)

**08/12/2011**

RESPONDENT CODE

**00**

THE PARTICULARS ARE:

**I allege that on about or before  
08/12/2011, the following  
conduct occurred:**

<input type="checkbox"/> termination	<input type="checkbox"/> denial of employment	<input type="checkbox"/> denial of family or medical leave
<input checked="" type="checkbox"/> laid off	<input type="checkbox"/> denial of promotion	<input type="checkbox"/> denial of pregnancy leave
<input type="checkbox"/> demotion	<input type="checkbox"/> denial of transfer	<input type="checkbox"/> denial of equal pay
<input checked="" type="checkbox"/> harassment	<input type="checkbox"/> denial of accommodation	<input type="checkbox"/> denial of right to wear pants
<input type="checkbox"/> genetic characteristics testing	<input checked="" type="checkbox"/> failure to prevent discrimination or retaliation	<input type="checkbox"/> denial of pregnancy accommodation
<input type="checkbox"/> constructive discharge (forced to quit)	<input checked="" type="checkbox"/> retaliation	
<input type="checkbox"/> impermissible non-job-related inquiry	<input checked="" type="checkbox"/> other (specify) <b>Unlawful Discrimination</b>	

by **KAISER PERMANENTE BALDWIN PARK MEDICAL CENTER**

because of :

Name of Person

Job Title (supervisor/manager/personnel director/etc.)

<input type="checkbox"/> sex	<input type="checkbox"/> national origin/ancestry	<input type="checkbox"/> disability (physical or mental)	<input checked="" type="checkbox"/> retaliation for engaging in protected activity or requesting a protected leave or accommodation
<input checked="" type="checkbox"/> age	<input type="checkbox"/> marital status	<input type="checkbox"/> medical condition (cancer or genetic characteristic)	
<input type="checkbox"/> religion	<input type="checkbox"/> sexual orientation	<input checked="" type="checkbox"/> other (specify) <b>Medical Condition - Cancer</b>	
<input checked="" type="checkbox"/> race/color	<input type="checkbox"/> association		

**State of what you  
believe to be the  
reason(s) for  
discrimination**

ON AUGUST 12, 2011, I WAS SUSPENDED BECAUSE OF MY RACE/COLOR BLACK, BECAUSE I COMPLAINED ABOUT THE CONTINUOUS HARASSMENT I EXPERIENCED FROM THE PHILLIPINO NURSES IN PARTICULAR, AND BECAUSE I COMPLAINED ABOUT PATIENT ABUSE/SUBSTANDARD CARE. I WAS THE ONLY BLACK AMERICAN ASSIGNED TO THE STEP DOWN NURSING ASSIGNMENT FOR KAISER IN BALDWIN PARK. I WAS FIRST HIRED BY KAISER IN 1999 BUT WAS DIAGNOSED WITH CANCER IN AUGUST 2006. IN SEPTEMBER 2006 I RESIGNED BECAUSE OF MY MEDICAL CONDITION. IN DECEMBER 2007, I WAS REHIRED. MY PERFORMANCE EVALUATIONS WERE ALWAYS GOOD. HOWEVER, IN 2010, I COMPLAINED TO HUMAN RESOURCES ABOUT THE

I wish to pursue this matter in court. I hereby request that the Department of Fair Employment and Housing provide a right-to-sue. I understand that if I want a federal notice of right-to-sue, I must visit the U.S. Equal Employment Opportunity Commission (EEOC) to file a complaint within 30 days of receipt of the DFEH "Notice of Case Closure," or within 300 days of the alleged discriminatory act, whichever is earlier.

I have not been coerced into making this request, nor do I make it based on fear of retaliation if I do not do so. I understand it is the Department of Fair Employment and Housing's policy to not process or reopen a complaint once the complaint has been closed on the basis of "Complainant Elected Court Action."

By submitting this complaint I am declaring under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge except as to matters stated on my information and belief, and as to those matters I believe it to be true.

Dated **01/16/2012**

At **Orange**

DATE FILED: **01/16/2012**

DFEH-300-030 (02/08)  
DEPARTMENT OF FAIR EMPLOYMENT AND HOUSING

STATE OF CALIFORNIA

**EXHIBIT B**

\*\*\* EMPLOYMENT \*\*\*

COMPLAINT OF DISCRIMINATION UNDER  
THE PROVISIONS OF THE CALIFORNIA  
FAIR EMPLOYMENT AND HOUSING ACT

DFEH #

E201112R7486-00

DFEH USE ONLY

State of what you  
believe to be the  
reason(s) for  
discrimination

ON AUGUST 12, 2011, I WAS SUSPENDED BECAUSE OF MY RACE/COLOR BLACK, BECAUSE I COMPLAINED ABOUT THE CONTINUOUS HARASSMENT I EXPERIENCED FROM THE PHILLIPINO NURSES IN PARTICULAR, AND BECAUSE I COMPLAINED ABOUT PATIENT ABUSE/SUBSTANDARD CARE. I WAS THE ONLY BLACK AMERICAN ASSIGNED TO THE STEP DOWN NURSING ASSIGNMENT FOR KAISER IN BALDWIN PARK. I WAS FIRST HIRED BY KAISER IN 1999 BUT WAS DIAGNOSED WITH CANCER IN AUGUST 2006. IN SEPTEMBER 2006 I RESIGNED BECAUSE OF MY MEDICAL CONDITION. IN DECEMBER 2007, I WAS REHIRED. MY PERFORMANCE EVALUATIONS WERE ALWAYS GOOD. HOWEVER, IN 2010, I COMPLAINED TO HUMAN RESOURCES ABOUT THE HOSTILE WORK ENVIRONMENT WHERE I WAS BEING TOLD CONSTANTLY THAT I WAS GOING TO BE FIRED AND OTHER PHILLIPINO NURSES WERE GOING TO BE HIRED TO REPLACE ME. I WAS SET UP AND TOLD I WAS ENDANGERING THE SAFETY AND WELL BEING OF PATIENTS. THE STATEMENTS WERE UNEQUIVOCALLY FALSE. FALSE STATEMENTS WERE BEING MADE ABOUT ME AND MY COMPETENCE SO THAT I COULD BE FIRED. ON AUGUST 4, 2010, I WAS SUSPENDED PURPORTEDLY FOR AN INVESTIGATION. HUMAN RESOURCES PROMISED TO GET BACK TO ME IMMEDIATELY THEN BUT DID NOT. INSTEAD A HOUSE SUPERVISOR CONTACTED ME, AND I RETURNED TO WORK ONLY TO BE HARASSED CONTINUOUSLY AGAIN. AGAIN I WAS BEING THREATENED WITH THE LOSS OF MY JOB. IT WAS OUT OF CONTROL. FOR EXAMPLE, ON FEBRUARY 27, 2011, I AGAIN COMPLAINED TO THE MANAGER OF THE STEP DOWN UNIT WHERE I WAS ASSIGNED TO WORK ABOUT THE HOSTILE WORK ENVIRONMENT IN WHICH I WAS FORCED TO WORK. I ALSO COMPLAINED THAT THE WAY A PATIENT HAD BEEN TREATED WAS SUBSTANDARD IN THAT "THE REGISTERED NURSE DECIDED TO LEAVE THE PAINFUL IV IN" INSTEAD OF PROTECTING THE HEALTH AND RIGHTS OF THE PATIENT. ON FEBRUARY 28, 2011, AGAIN I NOTICED THAT A PATIENT WAS BEING ABUSED WITH SUBSTANDARD CARE WHEN "THERE WAS A LEAK IN THE PATIENT FEEDING TUBE TO THE TRACH." NOTHING WAS DONE TO PROTECT THESE PATIENT. AGAIN, ON AUGUST 12, 2011, AFTER MY COMPLAINTS, I WAS PUT ON SUSPENSION SO THAT HUMAN RESOURCES COULD ENGAGE IN A SO-CALLED "INVESTIGATION." I HAVE BEEN ON SUSPENSION FOR MONTHS NOW WITH NO END IN SIGHT. BECAUSE I AM A BLACK AMERICAN AND NOT A PART OF THE MAJORITY, PHILLIPINOS, I AM SINGLED OUT FOR PUNITIVE ACTIONS AND THREATENED WITH BEING FIRED. WHILE ON THIS LAST SUSPENION, WHERE I STILL REMAIN, I HAVE BEEN REPLACED BY A LESS QUALIFIED AND MUCH YOUNGER EMPLOYEE. I AM 53 YEARS OLD. I BELIEVE I HAVE BEEN DISCRIMINATED AGAINST AND SUBJECTED TO HARASSMENT BECAUSE OF MY RACE/COLOR, AGE, MEDICAL CONDITION, AND BECAUSE I ENGAGED IN THE PROTECTED ACTIVITIES OF COMPLAINING ABOUT THE UNLAWFUL DISCRIMINATION/HARASSMENT AND PATIENT ABUSE.

\*\*\* EMPLOYMENT \*\*\*

**COMPLAINT OF DISCRIMINATION UNDER  
THE PROVISIONS OF THE CALIFORNIA  
FAIR EMPLOYMENT AND HOUSING ACT**

DFEH #

**E201112R7486-02**

DFEH USE ONLY

**CALIFORNIA DEPARTMENT OF FAIR EMPLOYMENT AND HOUSING**

YOUR NAME (indicate Mr. or Ms.)

**WILLIAMS, LENA**

TELEPHONE NUMBER (INCLUDE AREA CODE)

**(626)665-2503**

ADDRESS

**208 NORTH GLENDORA AVENUE**

CITY/STATE/ZIP

**COVINA, CA, 91724**

COUNTY

**LOS ANGELES**

COUNTY CODE

**037**

NAMED IS THE EMPLOYER, PERSON, LABOR ORGANIZATION, EMPLOYMENT AGENCY, APPRENTICESHIP COMMITTEE, OR STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME:

NAME

**OGMAKA, SCHOLA**

TELEPHONE NUMBER (Include Area Code)

**(626)851-1011**

ADDRESS

**1011 BALDWIN PARK BOULEVARD**

DFEH USE ONLY

CITY/STATE/ZIP

**BALDWIN PARK, CA 91706**

COUNTY

COUNTY CODE

NO. OF EMPLOYEES/MEMBERS (if known)

**150+**

DATE MOST RECENT OR CONTINUING DISCRIMINATION  
TOOK PLACE (month, day, and year)

**08/12/2011**

RESPONDENT CODE

**02**

THE PARTICULARS ARE:

**I allege that on about or before  
08/12/2011, the following  
conduct occurred:**

<input type="checkbox"/> termination	<input type="checkbox"/> denial of employment	<input type="checkbox"/> denial of family or medical leave
<input checked="" type="checkbox"/> laid off	<input type="checkbox"/> denial of promotion	<input type="checkbox"/> denial of pregnancy leave
<input type="checkbox"/> demotion	<input type="checkbox"/> denial of transfer	<input type="checkbox"/> denial of equal pay
<input checked="" type="checkbox"/> harassment	<input type="checkbox"/> denial of accommodation	<input type="checkbox"/> denial of right to wear pants
<input type="checkbox"/> genetic characteristics testing	<input checked="" type="checkbox"/> failure to prevent discrimination or retaliation	<input type="checkbox"/> denial of pregnancy accommodation
<input type="checkbox"/> constructive discharge (forced to quit)	<input checked="" type="checkbox"/> retaliation	
<input type="checkbox"/> impermissible non-job-related inquiry	<input checked="" type="checkbox"/> other (specify) <u>Unlawful Discrimination</u>	

by **OGMAKA, SCHOLA**

**DIRECTOR**

because of :

Name of Person

Job Title (supervisor/manager/personnel director/etc.)

<input type="checkbox"/> sex	<input type="checkbox"/> national origin/ancestry	<input type="checkbox"/> disability (physical or mental)	<input checked="" type="checkbox"/> retaliation for engaging in protected
<input checked="" type="checkbox"/> age	<input type="checkbox"/> marital status	<input type="checkbox"/> medical condition (cancer or	activity or requesting a protected
<input type="checkbox"/> religion	<input type="checkbox"/> sexual orientation	generic characteristic	leave or accommodation
<input checked="" type="checkbox"/> race/color	<input type="checkbox"/> association	<input checked="" type="checkbox"/> other (specify) <u>Medical Condition - Cancer</u>	

**State of what you  
believe to be the  
reason(s) for  
discrimination**

ON AUGUST 12, 2011, I WAS SUSPENDED BECAUSE OF MY RACE/COLOR BLACK, BECAUSE I COMPLAINED ABOUT THE CONTINUOUS HARASSMENT I EXPERIENCED FROM THE PHILIPPINO NURSES IN PARTICULAR, AND BECAUSE I COMPLAINED ABOUT PATIENT ABUSE/SUBSTANDARD CARE. I WAS THE ONLY BLACK AMERICAN ASSIGNED TO THE STEP DOWN NURSING ASSIGNMENT FOR KAISER IN BALDWIN PARK. I WAS FIRST HIRED BY KAISER IN 1999 BUT WAS DIAGNOSED WITH CANCER IN AUGUST 2006. IN SEPTEMBER 2006 I RESIGNED BECAUSE OF MY MEDICAL CONDITION. IN DECEMBER 2007, I WAS REHIRED. MY PERFORMANCE EVALUATIONS WERE ALWAYS GOOD. HOWEVER, IN 2010, I COMPLAINED TO HUMAN RESOURCES ABOUT THE

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By submitting this complaint I am declaring under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge except as to matters stated on my information and belief, and as to those matters I believe it to be true.

Dated **01/16/2012**

At **Orange**

DATE FILED: **01/16/2012**

DFEH-300-030 (02/08)  
DEPARTMENT OF FAIR EMPLOYMENT AND HOUSING

STATE OF CALIFORNIA

**EXHIBIT B**

\*\*\* EMPLOYMENT \*\*\*

COMPLAINT OF DISCRIMINATION UNDER  
THE PROVISIONS OF THE CALIFORNIA  
FAIR EMPLOYMENT AND HOUSING ACT

DFEH #

E201112R7486-02

DFEH USE ONLY

State of what you  
believe to be the  
reason(s) for  
discrimination

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\*\*\* EMPLOYMENT \*\*\*

**COMPLAINT OF DISCRIMINATION UNDER  
THE PROVISIONS OF THE CALIFORNIA  
FAIR EMPLOYMENT AND HOUSING ACT**

DFEH #

E201112R7486-01

DFEH USE ONLY

**CALIFORNIA DEPARTMENT OF FAIR EMPLOYMENT AND HOUSING**

YOUR NAME (indicate Mr. or Ms.)

TELEPHONE NUMBER (INCLUDE AREA CODE)

**WILLIAMS, LENA**

**(626)665-2503**

ADDRESS

**208 NORTH GLENDORA AVENUE**

CITY/STATE/ZIP

**COVINA, CA, 91724**

COUNTY

**LOS ANGELES**

COUNTY CODE

**037**

NAMED IS THE EMPLOYER, PERSON, LABOR ORGANIZATION, EMPLOYMENT AGENCY, APPRENTICESHIP COMMITTEE, OR STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME:

NAME

**ZEPEDA, ARLENE**

TELEPHONE NUMBER (Include Area Code)

**(626)851-1011**

ADDRESS

**1011 BALDWIN PARK BOULEVARD**

DFEH USE ONLY

CITY/STATE/ZIP

**BALDWIN PARK, CA 91706**

COUNTY

COUNTY CODE

NO. OF EMPLOYEES/MEMBERS (if known)

**150+**

DATE MOST RECENT OR CONTINUING DISCRIMINATION  
TOOK PLACE (month, day, and year)

**08/12/2011**

RESPONDENT CODE

**01**

THE PARTICULARS ARE:

**I allege that on about or before  
08/12/2011, the following  
conduct occurred:**

<input type="checkbox"/> termination	<input type="checkbox"/> denial of employment	<input type="checkbox"/> denial of family or medical leave
<input checked="" type="checkbox"/> laid off	<input type="checkbox"/> denial of promotion	<input type="checkbox"/> denial of pregnancy leave
<input type="checkbox"/> demotion	<input type="checkbox"/> denial of transfer	<input type="checkbox"/> denial of equal pay
<input checked="" type="checkbox"/> harassment	<input type="checkbox"/> denial of accommodation	<input type="checkbox"/> denial of right to wear pants
<input type="checkbox"/> genetic characteristics testing	<input checked="" type="checkbox"/> failure to prevent discrimination or retaliation	<input type="checkbox"/> denial of pregnancy accommodation
<input type="checkbox"/> constructive discharge (forced to quit)	<input checked="" type="checkbox"/> retaliation	
<input type="checkbox"/> impermissible non-job-related inquiry	<input checked="" type="checkbox"/> other (specify) <u>Unlawful Discrimination</u>	

by **ZEPEDA, ARLENE**

**HUMAN RESOURCES MANAGER**

because of:

Name of Person

Job Title (supervisor/manager/personnel director/etc.)

<input type="checkbox"/> sex	<input type="checkbox"/> national origin/ancestry
<input checked="" type="checkbox"/> age	<input type="checkbox"/> marital status
<input type="checkbox"/> religion	<input type="checkbox"/> sexual orientation
<input checked="" type="checkbox"/> race/color	<input type="checkbox"/> association

<input type="checkbox"/> disability (physical or mental)	<input checked="" type="checkbox"/> retaliation for engaging in protected activity or requesting a protected leave or accommodation
<input type="checkbox"/> medical condition (cancer or genetic characteristic)	
<input checked="" type="checkbox"/> other (specify) <u>Medical Condition - Cancer</u>	

**State of what you  
believe to be the  
reason(s) for  
discrimination**

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Dated, **01/16/2012**

At **Orange**

DATE FILED: **01/16/2012**

DFEH-300-030 (02/08)  
DEPARTMENT OF FAIR EMPLOYMENT AND HOUSING

STATE OF CALIFORNIA

**EXHIBIT B**

\*\*\* EMPLOYMENT \*\*\*

COMPLAINT OF DISCRIMINATION UNDER  
THE PROVISIONS OF THE CALIFORNIA  
FAIR EMPLOYMENT AND HOUSING ACT

DFEH #

E201112R7486-03

DFEH USE ONLY

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DFEH #

E201112R7486-03

DFEH USE ONLY

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YOUR NAME (indicate Mr. or Ms.)

TELEPHONE NUMBER (INCLUDE AREA CODE)

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NAME

**GARCIA, FELIPE**

TELEPHONE NUMBER (Include Area Code)

**(626)851-1011**

ADDRESS

**1011 BALDWIN PARK BOULEVARD**

DFEH USE ONLY

CITY/STATE/ZIP

**BALDWIN PARK, CA 91706**

COUNTY

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RESPONDENT CODE

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<input type="checkbox"/> impermissible non-job-related inquiry	<input checked="" type="checkbox"/> other (specify) <u>Unlawful Discrimination</u>	

by **GARCIA, FELIPE**

**DIRECTOR**

because of:

Name of Person

Job Title (supervisor/manager/personnel director/etc.)

<input type="checkbox"/> sex	<input type="checkbox"/> national origin/ancestry	<input type="checkbox"/> disability (physical or mental)	<input checked="" type="checkbox"/> retaliation for engaging in protected
<input checked="" type="checkbox"/> age	<input type="checkbox"/> marital status	<input type="checkbox"/> medical condition (cancer or	activity or requesting a protected
<input type="checkbox"/> religion	<input type="checkbox"/> sexual orientation	genetic characteristic	leave or accommodation
<input checked="" type="checkbox"/> race/color	<input type="checkbox"/> association	<input checked="" type="checkbox"/> other (specify) <u>Medical Condition - Cancer</u>	

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DEPARTMENT OF FAIR EMPLOYMENT AND HOUSING

STATE OF CALIFORNIA

**EXHIBIT B**

\*\*\* EMPLOYMENT \*\*\*

COMPLAINT OF DISCRIMINATION UNDER  
THE PROVISIONS OF THE CALIFORNIA  
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DFEH #

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ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):

Gloria Dredd Haney, SBN 157627  
 LAW OFFICES OF GLORIA DREDD HANEY  
 333 City Boulevard West, 17th Floor  
 Orange, California 92868

TELEPHONE NO.: 714.938.3230

FAX NO.: 714.921.2856

ATTORNEY FOR (Name): Plaintiff, LENA WILLIAMS

FOR COURT USE ONLY

**FILED**  
 SUPERIOR COURT OF CALIFORNIA  
 COUNTY OF LOS ANGELES

JAN 16 2013

John A. Clarke, Executive Officer/Clerk  
 BY *Cristina Grialva* Deputy  
 Cristina Grialva

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

STREET ADDRESS: 111 North Hill Street

MAILING ADDRESS: 111 North Hill Street

CITY AND ZIP CODE: Los Angeles, California 90012

BRANCH NAME: Central/Stanley Mosk

CASE NAME:

Lena Williams v. Kaiser Permanente, et al.

## CIVIL CASE COVER SHEET

☒ **Unlimited** (Amount demanded exceeds \$25,000) ☐ **Limited** (Amount demanded is \$25,000 or less)

## Complex Case Designation

☐ Counter ☐ Joinder

Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)

CASE NUMBER:

JUDGE:

DEPT: BC 499 263

Items 1-6 below must be completed (see instructions on page 2).

1. Check one box below for the case type that best describes this case:

## Auto Tort

☐ Auto (22)  
☐ Uninsured motorist (46)

## Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort

☐ Asbestos (04)  
☐ Product liability (24)  
☐ Medical malpractice (45)  
☐ Other PI/PD/WD (23)

## Non-PI/PD/WD (Other) Tort

☐ Business tort/unfair business practice (07)  
☒ Civil rights (08)  
☐ Defamation (13)  
☐ Fraud (16)  
☐ Intellectual property (19)  
☐ Professional negligence (25)  
☐ Other non-PI/PD/WD-tort (35)

## Employment

☐ Wrongful termination (36)  
☐ Other employment (15)

## Contract

☐ Breach of contract/warranty (06)  
☐ Rule 3.740 collections (09)  
☐ Other collections (09)  
☐ Insurance coverage (18)  
☐ Other contract (37)

## Real Property

☐ Eminent domain/inverse condemnation (14)  
☐ Wrongful eviction (33)  
☐ Other real property (26)

## Unlawful Detainer

☐ Commercial (31)  
☐ Residential (32)  
☐ Drugs (35)

## Judicial Review

☐ Asset forfeiture (05)  
☐ Petition re: arbitration award (11)  
☐ Writ of mandate (02)  
☐ Other judicial review (39)

## Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403)

☐ Antitrust/Trade regulation (03)  
☐ Construction defect (10)  
☐ Mass tort (40)  
☐ Securities litigation (28)  
☐ Environmental/Toxic tort (30)  
☐ Insurance coverage claims arising from the above listed provisionally complex case types (41)

## Enforcement of Judgment

☐ Enforcement of judgment (20)

## Miscellaneous Civil Complaint

☐ RICO (27)  
☐ Other complaint (not specified above) (42)

## Miscellaneous Civil Petition

☐ Partnership and corporate governance (21)  
☐ Other petition (not specified above) (43)

2. This case ☐ is ☒ is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:

- a. ☐ Large number of separately represented parties d. ☐ Large number of witnesses  
 b. ☐ Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve e. ☐ Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court  
 c. ☐ Substantial amount of documentary evidence f. ☐ Substantial postjudgment judicial supervision

3. Remedies sought (check all that apply): a. ☒ monetary b. ☒ nonmonetary; declaratory or injunctive relief c. ☒ punitive

4. Number of causes of action (specify): 10

5. This case ☐ is ☒ is not a class action suit.

6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)

Date: January 15, 2013

GLORIA DREDD HANEY

(TYPE OR PRINT NAME)

(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

## NOTICE

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
- Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

Page 1 of 2

SHORT TITLE:

Williams v. Kaiser Permanente, et al.

CASE NUMBER

EC 499263

**CIVIL CASE COVER SHEET ADDENDUM AND  
STATEMENT OF LOCATION  
(CERTIFICATE OF GROUNDS FOR ASSIGNMENT TO COURTHOUSE LOCATION)**

**This form is required pursuant to Local Rule 2.0 in all new civil case filings in the Los Angeles Superior Court.**

**Item I.** Check the types of hearing and fill in the estimated length of hearing expected for this case:

JURY TRIAL? ☒ YES CLASS ACTION? ☐ YES LIMITED CASE? ☐ YES TIME ESTIMATED FOR TRIAL 4 ☐ HOURS/ ☒ DAYS

**Item II.** Indicate the correct district and courthouse location (4 steps – If you checked "Limited Case", skip to Item III, Pg. 4):

**Step 1:** After first completing the Civil Case Cover Sheet form, find the main Civil Case Cover Sheet heading for your case in the left margin below, and, to the right in Column **A**, the Civil Case Cover Sheet case type you selected.

**Step 2:** Check one Superior Court type of action in Column **B** below which best describes the nature of this case.

**Step 3:** In Column **C**, circle the reason for the court location choice that applies to the type of action you have checked. For any exception to the court location, see Local Rule 2.0.

**Applicable Reasons for Choosing Courthouse Location (see Column C below)**

1. Class actions must be filed in the Stanley Mosk Courthouse, central district.
2. May be filed in central (other county, or no bodily injury/property damage).
3. Location where cause of action arose.
4. Location where bodily injury, death or damage occurred.
5. Location where performance required or defendant resides.
6. Location of property or permanently garaged vehicle.
7. Location where petitioner resides.
8. Location wherein defendant/respondent functions wholly.
9. Location where one or more of the parties reside.
10. Location of Labor Commissioner Office

**Step 4:** Fill in the information requested on page 4 in Item III; complete Item IV. Sign the declaration.

Auto  
TortOther Personal Injury/Property  
Damage/Wrongful Death Tort

<b>A</b> Civil Case Cover Sheet Category No.	<b>B</b> Type of Action (Check only one)	<b>C</b> Applicable Reasons - See Step 3 Above
Auto (22)	<input type="checkbox"/> A7100 Motor Vehicle - Personal Injury/Property Damage/Wrongful Death	1., 2., 4.
Uninsured Motorist (46)	<input type="checkbox"/> A7110 Personal Injury/Property Damage/Wrongful Death - Uninsured Motorist	1., 2., 4.
Asbestos (04)	<input type="checkbox"/> A6070 Asbestos Property Damage <input type="checkbox"/> A7221 Asbestos - Personal Injury/Wrongful Death	2. 2.
Product Liability (24)	<input type="checkbox"/> A7260 Product Liability (not asbestos or toxic/environmental)	1., 2., 3., 4., 8.
Medical Malpractice (45)	<input type="checkbox"/> A7210 Medical Malpractice - Physicians & Surgeons <input type="checkbox"/> A7240 Other Professional Health Care Malpractice	1., 4. 1., 4.
Other Personal Injury Property Damage Wrongful Death (23)	<input type="checkbox"/> A7250 Premises Liability (e.g., slip and fall) <input type="checkbox"/> A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.) <input type="checkbox"/> A7270 Intentional Infliction of Emotional Distress <input type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death	1., 4. 1., 4. 1., 3. 1., 4.

SHORT TITLE:

Williams v. Kaiser Permanente, et al.

CASE NUMBER

Non-Personal Injury/ Property  
Damage/ Wrongful Death Tort

Employment

Contract

Real Property

Unlawful Detainer

A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Business Tort (07)	<input type="checkbox"/> A6029 Other Commercial/Business Tort (not fraud/breach of contract)	1., 3.
Civil Rights (08)	<input checked="" type="checkbox"/> A6005 Civil Rights/Discrimination	1., 2., 3.
Defamation (13)	<input type="checkbox"/> A6010 Defamation (slander/libel)	1., 2., 3.
Fraud (16)	<input type="checkbox"/> A6013 Fraud (no contract)	1., 2., 3.
Professional Negligence (25)	<input type="checkbox"/> A6017 Legal Malpractice <input type="checkbox"/> A6050 Other Professional Malpractice (not medical or legal)	1., 2., 3. 1., 2., 3.
Other (35)	<input type="checkbox"/> A6025 Other Non-Personal Injury/Property Damage tort	2., 3.
Wrongful Termination (36)	<input type="checkbox"/> A6037 Wrongful Termination	1., 2., 3.
Other Employment (15)	<input checked="" type="checkbox"/> A6024 Other Employment Complaint Case <input type="checkbox"/> A6109 Labor Commissioner Appeals	1., 2., 3. 10.
Breach of Contract/ Warranty (06) (not insurance)	<input type="checkbox"/> A6004 Breach of Rental/Lease Contract (not unlawful detainer or wrongful eviction) <input type="checkbox"/> A6008 Contract/Warranty Breach - Seller Plaintiff (no fraud/negligence) <input type="checkbox"/> A6019 Negligent Breach of Contract/Warranty (no fraud) <input type="checkbox"/> A6028 Other Breach of Contract/Warranty (not fraud or negligence)	2., 5. 2., 5. 1., 2., 5. 1., 2., 5.
Collections (09)	<input type="checkbox"/> A6002 Collections Case-Seller Plaintiff <input type="checkbox"/> A6012 Other Promissory Note/Collections Case	2., 5., 6. 2., 5.
Insurance Coverage (18)	<input type="checkbox"/> A6015 Insurance Coverage (not complex)	1., 2., 5., 8.
Other Contract (37)	<input type="checkbox"/> A6009 Contractual Fraud <input type="checkbox"/> A6031 Tortious Interference <input type="checkbox"/> A6027 Other Contract Dispute(not breach/insurance/fraud/negligence)	1., 2., 3., 5. 1., 2., 3., 5. 1., 2., 3., 8.
Eminent Domain/Inverse Condemnation (14)	<input type="checkbox"/> A7300 Eminent Domain/Condemnation      Number of parcels _____	2.
Wrongful Eviction (33)	<input type="checkbox"/> A6023 Wrongful Eviction Case	2., 6.
Other Real Property (26)	<input type="checkbox"/> A6018 Mortgage Foreclosure <input type="checkbox"/> A6032 Quiet Title <input type="checkbox"/> A6060 Other Real Property (not eminent domain, landlord/tenant, foreclosure)	2., 6. 2., 6. 2., 6.
Unlawful Detainer-Commercial (31)	<input type="checkbox"/> A6021 Unlawful Detainer-Commercial (not drugs or wrongful eviction)	2., 6.
Unlawful Detainer-Residential (32)	<input type="checkbox"/> A6020 Unlawful Detainer-Residential (not drugs or wrongful eviction)	2., 6.
Unlawful Detainer- Post-Foreclosure (34)	<input type="checkbox"/> A6020F Unlawful Detainer-Post-Foreclosure	2., 6.
Unlawful Detainer-Drugs (38)	<input type="checkbox"/> A6022 Unlawful Detainer-Drugs	2., 6.

SHORT TITLE:

Williams v. Kaiser Permanente, et al.

CASE NUMBER

	<b>A</b> Civil Case Cover Sheet Category No.	<b>B</b> Type of Action (Check only one)	<b>C</b> Applicable Reasons - See Step 3 Above
Judicial Review	Asset Forfeiture (05)	<input type="checkbox"/> A6108 Asset Forfeiture Case	2., 6.
	Petition re Arbitration (11)	<input type="checkbox"/> A6115 Petition to Compel/Confirm/Vacate Arbitration	2., 5.
	Writ of Mandate (02)	<input type="checkbox"/> A6151 Writ - Administrative Mandamus <input type="checkbox"/> A6152 Writ - Mandamus on Limited Court Case Matter <input type="checkbox"/> A6153 Writ - Other Limited Court Case Review	2., 8. 2. 2.
	Other Judicial Review (39)	<input type="checkbox"/> A6150 Other Writ /Judicial Review	2., 8.
Provisionally Complex Litigation	Antitrust/Trade Regulation (03)	<input type="checkbox"/> A6003 Antitrust/Trade Regulation	1., 2., 8.
	Construction Defect (10)	<input type="checkbox"/> A6007 Construction Defect	1., 2., 3.
	Claims Involving Mass Tort (40)	<input type="checkbox"/> A6006 Claims Involving Mass Tort	1., 2., 8.
	Securities Litigation (28)	<input type="checkbox"/> A6035 Securities Litigation Case	1., 2., 8.
	Toxic Tort Environmental (30)	<input type="checkbox"/> A6036 Toxic Tort/Environmental	1., 2., 3., 8.
	Insurance Coverage Claims from Complex Case (41)	<input type="checkbox"/> A6014 Insurance Coverage/Subrogation (complex case only)	1., 2., 5., 8.
Enforcement of Judgment	Enforcement of Judgment (20)	<input type="checkbox"/> A6141 Sister State Judgment <input type="checkbox"/> A6160 Abstract of Judgment <input type="checkbox"/> A6107 Confession of Judgment (non-domestic relations) <input type="checkbox"/> A6140 Administrative Agency Award (not unpaid taxes) <input type="checkbox"/> A6114 Petition/Certificate for Entry of Judgment on Unpaid Tax <input type="checkbox"/> A6112 Other Enforcement of Judgment Case	2., 9. 2., 6. 2., 9. 2., 8. 2., 8. 2., 8., 9.
	RICO (27)	<input type="checkbox"/> A6033 Racketeering (RICO) Case	1., 2., 8.
	Other Complaints (Not Specified Above) (42)	<input type="checkbox"/> A6030 Declaratory Relief Only	1., 2., 8.
		<input type="checkbox"/> A6040 Injunctive Relief Only (not domestic/harassment)	2., 8.
		<input type="checkbox"/> A6011 Other Commercial Complaint Case (non-tort/non-complex)	1., 2., 8.
		<input type="checkbox"/> A6000 Other Civil Complaint (non-tort/non-complex)	1., 2., 8.
Miscellaneous Civil Complaints	Partnership Corporation Governance (21)	<input type="checkbox"/> A6113 Partnership and Corporate Governance Case	2., 8.
	Other Petitions (Not Specified Above) (43)	<input type="checkbox"/> A6121 Civil Harassment	2., 3., 9.
<input type="checkbox"/> A6123 Workplace Harassment		2., 3., 9.	
<input type="checkbox"/> A6124 Elder/Dependent Adult Abuse Case		2., 3., 9.	
<input type="checkbox"/> A6190 Election Contest		2.	
<input type="checkbox"/> A6110 Petition for Change of Name		2., 7.	
<input type="checkbox"/> A6170 Petition for Relief from Late Claim Law		2., 3., 4., 8.	
<input type="checkbox"/> A6100 Other Civil Petition		2., 9.	

SHORT TITLE:

Williams v. Kaiser Permanente, et al.

CASE NUMBER

**Item III. Statement of Location:** Enter the address of the accident, party's residence or place of business, performance, or other circumstance indicated in Item II., Step 3 on Page 1, as the proper reason for filing in the court location you selected.

<b>REASON:</b> Check the appropriate boxes for the numbers shown under Column C for the type of action that you have selected for this case.  <input type="checkbox"/> 1. <input checked="" type="checkbox"/> 2. <input type="checkbox"/> 3. <input type="checkbox"/> 4. <input type="checkbox"/> 5. <input type="checkbox"/> 6. <input type="checkbox"/> 7. <input type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10.		<b>ADDRESS:</b> Kaiser Permanente 1011 Baldwin Park Boulevard
<b>CITY:</b> Baldwin Park	<b>STATE:</b> CA	<b>ZIP CODE:</b> 91706

**Item IV. Declaration of Assignment:** I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that the above-entitled matter is properly filed for assignment to the Los Angeles courthouse in the Central District of the Superior Court of California, County of Los Angeles [Code Civ. Proc., § 392 et seq., and Local Rule 2.0, subds. (b), (c) and (d)].

Dated: January 15, 2013
  
 (SIGNATURE OF ATTORNEY/FILING PARTY)

**PLEASE HAVE THE FOLLOWING ITEMS COMPLETED AND READY TO BE FILED IN ORDER TO PROPERLY COMMENCE YOUR NEW COURT CASE:**

1. Original Complaint or Petition.
2. If filing a Complaint, a completed Summons form for issuance by the Clerk.
3. Civil Case Cover Sheet, Judicial Council form CM-010.
4. Civil Case Cover Sheet Addendum and Statement of Location form, LACIV 109, LASC Approved 03-04 (Rev. 03/11).
5. Payment in full of the filing fee, unless fees have been waived.
6. A signed order appointing the Guardian ad Litem, Judicial Council form CIV-010, if the plaintiff or petitioner is a minor under 18 years of age will be required by Court in order to issue a summons.
7. Additional copies of documents to be conformed by the Clerk. Copies of the cover sheet and this addendum must be served along with the summons and complaint, or other initiating pleading in the case.