

ORIGINAL

FILED
Los Angeles Superior Court

APR 05 2013

John A. Clarke, Executive Officer/Clerk
By SHAUNYA WESLEY Deputy

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10 Attorneys for Plaintiffs,
11 RAJINDER SACHDEVA, D.V.M., an
12 individual, and ASMA SACHDEVA, an
13 individual

14 SUPERIOR COURT OF THE STATE OF CALIFORNIA
15 FOR THE COUNTY OF LOS ANGELES

16 RAJINDER SACHDEVA, D.V.M., an individual,
17 and ASMA SACHDEVA, an individual,

Case No.: BC504978

Plaintiffs,

vs.

**COMPLAINT FOR DAMAGES AND
DEMAND FOR JURY TRIAL**

18 KAISER FOUNDATION HOSPITALS, a
19 California Corporation, KAISER FOUNDATION
20 HEALTH PLAN, INC., SOUTHERN
21 CALIFORNIA PERMANENTE MEDICAL
22 GROUP AND DOES 1 through 300,
23 INCLUSIVE,

Defendants.

I.

GENERAL ALLEGATIONS

1. The true names, identities or capacities, whether individual, associate, or otherwise of Defendants DOES 1 through 300, inclusive, are unknown to Plaintiffs who, therefore, sue said Defendants by such fictitious names. When the true names, identities or capacities of fictitiously-designated Defendants are ascertained, Plaintiffs will ask leave of Court to amend the Complaint to insert said true names, identities and capacities, together with the proper charging allegations.

BY FAX

CIT/CASE: BC504978
LEA/DEF#:

RECEIVED
DATE FILED: 04/05/13
PAYMENT: \$435.00
RECEIVED: 11:16 AM
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\$435.00
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91 Rafael Inglebo

DONAHUE & HORROW LLP

04/05/2013

1 2. Plaintiffs are informed and believe and thereon allege that each of the Defendants
2 sued herein as a DOE is responsible in some manner for the events and happenings herein referred
3 to, thereby legally causing the injuries and damages to the Plaintiffs as herein alleged.

4 3. All of the facts, acts, events and circumstances herein mentioned and described
5 occurred in the County of Los Angeles, State of California, and all Defendants are residents of the
6 County of Los Angeles, State of California, and/or doing business in said County, State of
7 California.

8 4. At all times herein mentioned, Defendants DOES 1 through 100 inclusive, were, and
9 now are, physicians and/or surgeons, holding themselves out as duly licensed to practice their
10 profession under and by virtue of the laws of the State of California and were, and now are, engaged
11 in the practice of their profession in the State of California. At all times herein mentioned
12 Defendants DOES 1 through 100 inclusive, acted as agents, ostensible agents, employees and/or
13 servants of some or all of the other Defendants, acting within the course and scope of their agency
14 and/or employment.

15 5. At all times herein mentioned, Defendants DOES 101 through 150, inclusive, were,
16 and now are, registered nurses, licensed vocational nurses, practical nurses, aids, technicians,
17 attendants, students or other paramedical personnel, holding themselves out as duly able to practice
18 their profession under and by virtue of the laws of the State of California and were, and now are,
19 engaged in the practice of their profession in the State of California and acting as agents, ostensible
20 agents, employees and servants of some or all of the other Defendants within the course and scope of
21 said agency or employment. At all times herein mentioned Defendant DOES 101 through 150
22 inclusive, acted as agents, ostensible agents, employees and/or servants of some or all of the other
23 Defendants, acting within the course and scope of their agency and/or employment.

24 6. At all times herein mentioned, Defendants KAISER FOUNDATION HOSPITALS,
25 KAISER FOUNDATION HEALTH PLAN, INC., SOUTHERN CALIFORNIA PERMANENTE
26 MEDICAL GROUP, DOES 151 through 200, inclusive, were corporations, partnerships, joint
27 ventures, or other entities organized and existing under the laws of the State of California, with their
28 principal place of business situated in the State of California. All of the acts complained of herein

1 by Plaintiffs against said Defendants were done and performed by said Defendants by and through
2 their duly authorized agents, ostensible agents, servants and employees, each of whom and all of
3 whom were at all times mentioned herein acting within the course, purpose, and scope of their said
4 agency, service and employment, and whose conduct was ratified by all Defendants, and each of
5 them. Further, each Defendant ratified and affirmed the conduct of each other Defendant. Each of
6 the Defendants was the agent, ostensible agent, servant, and/or employee of the other Defendants.

7 7. At all times herein mentioned Defendants KAISER FOUNDATION HOSPITALS, KAISER
8 FOUNDATION HEALTH PLAN, INC., SOUTHERN CALIFORNIA PERMANENTE MEDICAL
9 GROUP, and DOES 201 through 250, inclusive, were at all times herein mentioned duly organized
10 California corporations, medical groups, clinics, hospitals or other medical facility existing under
11 and by virtue of the laws of the State of California; that said Defendant corporations, medical
12 groups, clinics, hospitals or other medical facility and the remaining Defendants, and each of them,
13 owned, operated, managed and controlled a general hospital facility, medical group, clinic or other
14 medical facility within the County of Los Angeles, State of California, held out to the public at large
15 and to the Plaintiffs herein, as properly equipped, fully accredited, competently staffed by qualified
16 and prudent personnel and operating in compliance with the standard of due care maintained in other
17 properly equipped, efficiently operated and administered, accredited hospital facility, medical group,
18 clinic or other medical facility in said community. All of the acts complained of herein by Plaintiffs
19 against said Defendants were done and performed by said Defendants by and through their duly
20 authorized agents, ostensible agents, servants and employees, each of whom and all of whom were at
21 all times mentioned herein acting within the course, purpose, and scope of their said agency, service
22 and employment, and whose conduct was ratified by all Defendants, and each of them. Further, each
23 Defendant ratified and affirmed the conduct of each other Defendant. Each of the Defendants was
24 the agent, ostensible agent, servant, and/or employee of the other Defendants.

25 8. Defendants KAISER FOUNDATION HOSPITALS, KAISER FOUNDATION
26 HEALTH PLAN, INC., SOUTHERN CALIFORNIA PERMANENTE MEDICAL GROUP DOES
27 201 through 300, inclusive, at all times herein mentioned were institutions or controlled institutions,
28 duly accredited by the Joint Commission on Hospital Accreditation, and assumed and held

1 themselves out to the public as in compliance with the minimum standards required by said Joint
2 Commission for such accreditation.

3 9. Plaintiffs are informed and believe, and upon such information and belief allege that
4 at all times herein mentioned, Defendants and other Defendants named fictitiously, were the agents,
5 ostensible agents, servants, employees, joint-venture, and co-partners of their said co-Defendants
6 and, as such, were acting within the course and scope of such agency, service, partnership, venture,
7 and employment at all times herein mentioned; that each and every Defendant, as aforesaid, when
8 acting as a principal, was negligent in the selection and hiring of each and every other Defendant, as
9 its agent, ostensible agent, servant, employee, joint-venture and partner. Further, each and every
10 Defendant ratified the conduct of the other Defendants.

11 10. Plaintiffs are informed and believe that at the time of judgment they will be entitled to
12 prejudgment interest because the Defendants will have rejected an offer pursuant to the terms of
13 Code of Civil Procedure section 998 and will have failed to obtain a more favorable judgment.

14 11. Plaintiffs are informed and believe, and upon such information and belief allege that
15 at all times herein mentioned, that due to the negligent care and treatment rendered by Defendants
16 KAISER FOUNDATION HOSPITALS, KAISER FOUNDATION HEALTH PLAN, INC.,
17 SOUTHERN CALIFORNIA PERMANENTE MEDICAL GROUP and DOES 1 THROUGH 300,
18 Plaintiffs, RAJINDER SACHDEVA, D.V.M. and ASMA SACHDEVA, sustained damages caused
19 by said Defendants, and each of them, by their negligence in performing endoscopic maxillary
20 sinusotomy surgery, causing Plaintiff RAJINDER SACHDEVA, D.V.M. to undergo unnecessary
21 medical procedures, further unnecessary testing and sustain significant damage to both Plaintiffs.
22 Plaintiffs first learned of Defendants' and each of their negligence, on or about May 23, 2012.

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II.

PLAINTIFF RAJINDER SACHDEVA, D.V.M. ALLEGES A CAUSE OF
ACTION FOR MEDICAL NEGLIGENCE AGAINST DEFENDANTS KAISER
FOUNDATION HOSPITALS, KAISER FOUNDATION
HEALTH PLAN, INC., SOUTHERN CALIFORNIA PERMANENTE MEDICAL
GROUP and DOES 1 THROUGH 300, INCLUSIVE

13. Plaintiffs repeat and replead each and every allegation contained in all prior paragraphs and incorporate the same herein by reference as to Defendants KAISER FOUNDATION HOSPITALS, KAISER FOUNDATION HEALTH PLAN, INC., SOUTHERN CALIFORNIA PERMANENTE MEDICAL GROUP and DOES 1 THROUGH 300 and each of them as follows.

14. Prior to May 23, 2013, RAJINDER SACHDEVA, D.V.M., employed Defendants, and each of them, to diagnose and treat his conditions including, but not limited to endoscopic maxillary sinusotomy surgery, and to do all things necessary for his care.

15. Prior to May 23, 2013, and at all times mentioned herein, RAJINDER SACHDEVA, D.V.M. was placed in and remained under the sole and exclusive care and control of Defendants, and each of them, for the purpose of receiving medical, surgical, hospital, diagnostic, nursing and other care.

16. While Plaintiff RAJINDER SACHDEVA, D.V.M. was under the sole and exclusive care and control of the Defendants, and each of them, Defendants, and each of them, negligently failed to possess and exercise that degree of skill and knowledge ordinarily possessed and exercised by other physicians and surgeons, hospitals, nurses, technicians, attendants and the like engaged in said professions in the same locality as Defendants, and each of them, and Defendants, and each of them, negligently, carelessly and unskillfully delivered, examined, treated, cared for, diagnosed, operated upon, attended and otherwise handled and controlled the Plaintiff, RAJINDER SACHDEVA, D.V.M. herein, thereby proximately causing injuries and damages to Plaintiff by their negligence in performing endoscopic maxillary sinusotomy surgery. Plaintiffs did not discover this negligence until on or about May 23, 2013.

17. Defendants neglected to adequately select a competent medical staff and to

1 periodically review the competency of its medical staff and failed to adequately monitor its staff
2 such that the Plaintiff was caused to, and did suffer damages.

3 18. At all times herein mentioned when the Plaintiff was in the exclusive control of the
4 Defendants, and each of them, at not time prior to the events, conduct, activities, care and treatment
5 herein complained of did the Defendants herein, any of them, obtain knowledge, informed consent
6 for said care, treatment or conduct. Prior to the initiation of or performance of said care, treatment,
7 procedure or conduct no opportunity was afforded the Plaintiff or any authorized agent of the
8 Plaintiff to exercise voluntary, knowledgeable and informed consent to said care, treatment,
9 procedure or conduct.

10 19. As a legal result of the negligence of the Defendants, and each of them, Plaintiff was
11 injured in health, strength and activity, sustaining severe shock, disfigurement and injury to the
12 body, all of which said injuries have caused and continue to cause Plaintiff great physical, emotional,
13 and nervous pain and suffering, and which said injuries Plaintiff is informed and believe, and
14 thereon alleges, will result in loss of earnings, permanent disability, loss of enjoyment of life, and
15 impairment of earning capacity all to Plaintiff's damage in a sum in excess of the jurisdiction of the
16 Municipal Court.

17 20. As a further legal result of the negligence of the Defendants, and each of them, and
18 the resulting injuries to the Plaintiff, said Plaintiff was compelled to, and did, incur expenses for
19 medical and surgical attention, hospitalization, nursing, medication and incidentals for said Plaintiff
20 in an amount unknown to Plaintiffs at present.

21 21. As a further legal result of the negligence of the Defendants, and each of them, and of
22 the resulting injuries, Plaintiff RAJINDER SACHDEVA, D.V.M. will be obliged to incur expenses
23 for medical care and hospitalization for an indefinite period in the future and to pay for these
24 expenses in the treatment and relief of injuries for medical and surgical attention, hospitalization,
25 nursing, medication, and incidentals for said Plaintiff in an amount unknown to Plaintiffs at present.

26 22. As a further legal result of the negligence of the Defendants, and each of them,
27 Plaintiffs will suffer a decreased earning capacity in the future and future earnings to Plaintiffs'
28 further damage in a sum unknown at present.

III.

**PLAINTIFF ASMA SACHDEVA ALLEGES A CAUSE OF ACTION FOR LOSS OF
CONSORTIUM AGAINST DEFENDANTS KAISER FOUNDATION HOSPITALS, KAISER
FOUNDATION HEALTH PLAN, INC., SOUTHERN CALIFORNIA PERMANENTE
MEDICAL GROUP AND DOES 1 THROUGH 300, INCLUSIVE**

23. Plaintiffs plead each and every allegation contained in all prior paragraphs and incorporate the same herein by reference as to Defendants and each of them as follows.

24. At all times herein mentioned, RAJINDER SACHDEVA, D.V.M. and ASMA SACHDEVA are married and are husband and wife.

25. As a direct and proximate result of the aforesaid conduct of Defendants, and each of them, and the resultant injuries to Plaintiff, RAJINDER SACHDEVA, D.V.M., Plaintiff ASMA SACHDEVA suffered and is reasonably certain to suffer in the future the loss of love, companionship, comfort, affection, society, solace, moral support, enjoyment of sexual relations, enjoyment of life, and physical assistance in the operation and maintenance of the home, loss of financial support all to their damage in a sum in excess of the jurisdiction of the Municipal Court.

WHEREFORE, Plaintiffs pray for damages against the Defendants, and each of them, as follows:

FOR THE FIRST CAUSE OF ACTION FOR MEDICAL NEGLIGENCE FOR RAJINDER SACHDEVA, D.V.M.:

1. General damages, according to proof;
2. Past and future medical expenses, according to proof;
3. For loss of past and future earning and future earning capacity, according to proof;
4. Prejudgment interest;
5. Costs of suit incurred herein, and
6. For such other and further relief as to the Court appears just and proper.

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1 FOR THE SECOND CAUSE OF ACTION FOR LOSS OF CONSORTIUM FOR
2 PLAINTIFF ASMA SACHDEVA:

- 3 1. General damages, according to proof;
4 2. Past and future medical expenses, according to proof;
5 3. For loss of financial support and home services, according to proof;
6 4. Prejudgment interest;
7 5. Costs of suit incurred herein, and
8 6. For such other and further relief as to the Court appears just and proper.

9 DATED: April 4, 2013

DONAHUE & HORROW, LLP

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13 THOMAS E. DONAHUE
REID A. WINTHROP

14 JURY DEMAND

15 Plaintiffs RAJINDER SACHDEVA, D.V.M. and ASMA SACHDEVA hereby demand a
16 jury trial in this action.

17
18 DATED: April 4, 2013

DONAHUE & HORROW, LLP

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21
22 THOMAS E. DONAHUE
REID A. WINTHROP

ORIGINAL

CM-010

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Thomas E. Donahue/Reid A Winthrop SBN: 156279/223527 DONAHUE & HORROW LLP 1960 E Grand Ave, Ste 1215, El Segundo, CA 90245 TELEPHONE NO.: (310) 322-0300 FAX NO.: (310) 322-0302 ATTORNEY FOR (Name): Rajinder Sachdeva and Asma Sachdeva		FOR COURT USE ONLY FILED Los Angeles Superior Court APR 05 2013 John A. Clarke, Executive Officer/Clerk By SHAUNYA WESLEY , Deputy
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, 90012 BRANCH NAME: Stanley Mosk Courthouse		
CASE NAME: Rajinder Sachdeva, D.V.M., and Asma Sachdeva v. Kaiser Foundation Hospitals, et al.		
CIVIL CASE COVER SHEET <input checked="" type="checkbox"/> Unlimited (Amount demanded exceeds \$25,000) <input type="checkbox"/> Limited (Amount demanded is \$25,000 or less) Complex Case Designation <input type="checkbox"/> Counter <input type="checkbox"/> Joinder Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)		
CASE NUMBER: BC504978		JUDGE: DEPT:

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 <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46) Other P/DPD/WD (Personal Injury/Property Damage/Wrongful Death) Tort <input type="checkbox"/> Asbestos (04) <input type="checkbox"/> Product liability (24) <input checked="" type="checkbox"/> Medical malpractice (45) <input type="checkbox"/> Other P/DPD/WD (23) Non-P/DPD/WD (Other) Tort <input type="checkbox"/> Business tort/unfair business practice (07) <input type="checkbox"/> Civil rights (08) <input type="checkbox"/> Defamation (13) <input type="checkbox"/> Fraud (16) <input type="checkbox"/> Intellectual property (19) <input type="checkbox"/> Professional negligence (25) <input type="checkbox"/> Other non-P/DPD/WD tort (35) Employment <input type="checkbox"/> Wrongful termination (36) <input type="checkbox"/> Other employment (15)	Contract <input type="checkbox"/> Breach of contract/warranty (06) <input type="checkbox"/> Rule 3.740 collections (09) <input type="checkbox"/> Other collections (09) <input type="checkbox"/> Insurance coverage (18) <input type="checkbox"/> Other contract (37) Real Property <input type="checkbox"/> Eminent domain/inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (26) Unlawful Detainer <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38) Judicial Review <input type="checkbox"/> Asset forfeiture (05) <input type="checkbox"/> Petition re: arbitration award (11) <input type="checkbox"/> Writ of mandate (02) <input type="checkbox"/> Other judicial review (39)	Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403) <input type="checkbox"/> Antitrust/Trade regulation (03) <input type="checkbox"/> Construction defect (10) <input type="checkbox"/> Mass tort (40) <input type="checkbox"/> Securities litigation (28) <input type="checkbox"/> Environmental/Toxic tort (30) <input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41) Enforcement of Judgment <input type="checkbox"/> Enforcement of judgment (20) Miscellaneous Civil Complaint <input type="checkbox"/> RICO (27) <input type="checkbox"/> Other complaint (not specified above) (42) Miscellaneous Civil Petition <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> 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. <input type="checkbox"/> Large number of separately represented parties | d. <input type="checkbox"/> Large number of witnesses |
| b. <input type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve | e. <input type="checkbox"/> Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court |
| c. <input type="checkbox"/> Substantial amount of documentary evidence | f. <input type="checkbox"/> 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): 2
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: April 5, 2013

Thomas E. Donahue/Reid A Winthrop
(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

Form Adopted for Mandatory Use
Judicial Council of California
CM-010 (Rev. July 1, 2007)**CIVIL CASE COVER SHEET**Cal. Rules of Court, rules 2.30, 3.220, 3.400-3.403, 3.740;
Cal. Standards of Judicial Administration, std. 3.10
www.courtinfo.ca.gov
Westlaw Doc & Form Builder

INSTRUCTIONS ON HOW TO COMPLETE THE COVER SHEET

To Plaintiffs and Others Filing First Papers. If you are filing a first paper (for example, a complaint) in a civil case, you must complete and file, along with your first paper, the *Civil Case Cover Sheet* contained on page 1. This information will be used to compile statistics about the types and numbers of cases filed. You must complete items 1 through 6 on the sheet. In item 1, you must check one box for the case type that best describes the case. If the case fits both a general and a more specific type of case listed in item 1, check the more specific one. If the case has multiple causes of action, check the box that best indicates the primary cause of action. To assist you in completing the sheet, examples of the cases that belong under each case type in item 1 are provided below. A cover sheet must be filed only with your initial paper. Failure to file a cover sheet with the first paper filed in a civil case may subject a party, its counsel, or both to sanctions under rules 2.30 and 3.220 of the California Rules of Court.

To Parties in Rule 3.740 Collections Cases. A "collections case" under rule 3.740 is defined as an action for recovery of money owed in a sum stated to be certain that is not more than \$25,000, exclusive of interest and attorney's fees, arising from a transaction in which property, services, or money was acquired on credit. A collections case does not include an action seeking the following: (1) tort damages, (2) punitive damages, (3) recovery of real property, (4) recovery of personal property, or (5) a prejudgment writ of attachment. The identification of a case as a rule 3.740 collections case on this form means that it will be exempt from the general time-for-service requirements and case management rules, unless a defendant files a responsive pleading. A rule 3.740 collections case will be subject to the requirements for service and obtaining a judgment in rule 3.740.

To Parties in Complex Cases. In complex cases only, parties must also use the *Civil Case Cover Sheet* to designate whether the case is complex. If a plaintiff believes the case is complex under rule 3.400 of the California Rules of Court, this must be indicated by completing the appropriate boxes in items 1 and 2. If a plaintiff designates a case as complex, the cover sheet must be served with the complaint on all parties to the action. A defendant may file and serve no later than the time of its first appearance a joinder in the plaintiff's designation, a counter-designation that the case is not complex, or, if the plaintiff has made no designation, a designation that the case is complex.

CASE TYPES AND EXAMPLES

Auto Tort	Contract	Provisionally Complex Civil Litigation (Cal. Rules of Court Rules 3.400-3.403)
Auto (22)—Personal Injury/Property Damage/Wrongful Death	Breach of Contract/Warranty (06)	Antitrust/Trade Regulation (03)
Uninsured Motorist (46) (if the case involves an uninsured motorist claim subject to arbitration, check this item instead of Auto)	Breach of Rental/Lease Contract (not unlawful detainer or wrongful eviction)	Construction Defect (10)
	Contract/Warranty Breach—Seller Plaintiff (not fraud or negligence)	Claims Involving Mass Tort (40)
	Negligent Breach of Contract/Warranty	Securities Litigation (28)
Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort	Other Breach of Contract/Warranty	Environmental/Toxic Tort (30)
Asbestos (04)	Collections (e.g., money owed, open book accounts) (09)	Insurance Coverage Claims (arising from provisionally complex case type listed above) (41)
Asbestos Property Damage	Collection Case—Seller Plaintiff	Enforcement of Judgment
Asbestos Personal Injury/Wrongful Death	Other Promissory Note/Collections Case	Enforcement of Judgment (20)
Product Liability (not asbestos or toxic/environmental) (24)	Insurance Coverage (not provisionally complex) (18)	Abstract of Judgment (Out of County)
Medical Malpractice (45)	Auto Subrogation	Confession of Judgment (non-domestic relations)
Medical Malpractice—Physicians & Surgeons	Other Coverage	Sister State Judgment
Other Professional Health Care Malpractice	Other Contract (37)	Administrative Agency Award (not unpaid taxes)
Other PIPD/WD (23)	Contractual Fraud	Petition/Certification of Entry of Judgment on Unpaid Taxes
Premises Liability (e.g., slip and fall)	Other Contract Dispute	Other Enforcement of Judgment Case
Intentional Bodily Injury/PD/WD (e.g., assault, vandalism)	Real Property	Miscellaneous Civil Complaint
Intentional Infliction of Emotional Distress	Eminent Domain/Inverse Condemnation (14)	RICO (27)
Negligent Infliction of Emotional Distress	Wrongful Eviction (33)	Other Complaint (not specified above) (42)
Other PI/PD/WD	Other Real Property (e.g., quiet title) (26)	Declaratory Relief Only
Non-PI/PD/WD (Other) Tort	Writ of Possession of Real Property	Injunctive Relief Only (non-harassment)
Business Tort/Unfair Business Practice (07)	Mortgage Foreclosure	Mechanics Lien
Civil Rights (e.g., discrimination, false arrest) (not civil harassment) (08)	Quiet Title	Other Commercial Complaint Case (non-tort/non-complex)
Defamation (e.g., slander, libel) (13)	Other Real Property (not eminent domain, landlord/tenant, or foreclosure)	Other Civil Complaint (non-tort/non-complex)
Fraud (16)	Unlawful Detainer	Miscellaneous Civil Petition
Intellectual Property (19)	Commercial (31)	Partnership and Corporate Governance (21)
Professional Negligence (25)	Residential (32)	Other Petition (not specified above) (43)
Legal Malpractice	Drugs (38) (if the case involves illegal drugs, check this item; otherwise, report as Commercial or Residential)	Civil Harassment
Other Professional Malpractice (not medical or legal)	Judicial Review	Workplace Violence
Other Non-PI/PD/WD Tort (35)	Asset Forfeiture (05)	Elder/Dependent Adult Abuse
Employment	Petition Re: Arbitration Award (11)	Election Contest
Wrongful Termination (36)	Writ of Mandate (02)	Petition for Name Change
Other Employment (15)	Writ—Administrative Mandamus	Petition for Relief From Late Claim
	Writ—Mandamus on Limited Court Case Matter	Other Civil Petition
	Writ—Other Limited Court Case Review	
	Other Judicial Review (39)	
	Review of Health Officer Order	
	Notice of Appeal—Labor Commissioner Appeals	

ORIGINAL

SHORT TITLE: Sachdeva, et al. v. Kaiser Foundation Hospitals, et al.

CASE NUMBER

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 10 ☐ 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 where in 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.

	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons (See Step 3 Above)
Auto Tort	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.
Other Personal Injury/Property Damage/Wrongful Death Tort	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 checked="" 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)	1, 4.
		<input type="checkbox"/> A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.)	1, 4.
		<input type="checkbox"/> A7270 Intentional Infliction of Emotional Distress <input type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death	1, 3. 1, 4.

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SHORT TITLE: Sachdeva, et al. v. Kaiser Foundation Hospitals, 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 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 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: Sachdeva, et al. v. Kaiser Foundation Hospitals, et al.

CASE NUMBER

A Civil Case Cover Sheet Category No.		B Type of Action (Check only one)	C 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.
Miscellaneous Civil Complaints	Other Complaints (Not Specified Above) (42)	<input type="checkbox"/> A6030 Declaratory Relief Only <input type="checkbox"/> A6040 Injunctive Relief Only (not domestic/harassment) <input type="checkbox"/> A6011 Other Commercial Complaint Case (non-tort/non-complex) <input type="checkbox"/> A6000 Other Civil Complaint (non-tort/non-complex)	1., 2., 8. 2., 8. 1., 2., 8. 1., 2., 8.
	Partnership/Corporation Governance (21)	<input type="checkbox"/> A6113 Partnership and Corporate Governance Case	2., 8.
Miscellaneous Civil Petitions	Other Petitions (Not Specified Above) (43)	<input type="checkbox"/> A6121 Civil Harassment <input type="checkbox"/> A6123 Workplace Harassment <input type="checkbox"/> A6124 Elder/Dependent Adult Abuse Case <input type="checkbox"/> A6190 Election Contest <input type="checkbox"/> A6110 Petition for Change of Name <input type="checkbox"/> A6170 Petition for Relief from Late Claim Law <input type="checkbox"/> A6100 Other Civil Petition	2., 3., 9. 2., 3., 9. 2., 3., 9. 2. 2., 7. 2., 3., 4., 8. 2., 9.

SHORT TITLE: Sachdeva, et al. v. Kaiser Foundation Hospitals, et al.	CASE NUMBER
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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.

REASON: 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 type="checkbox"/> 2. <input type="checkbox"/> 3. <input checked="" 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.			ADDRESS: 9333 E. Imperial Highway
CITY: Downey	STATE: CA	ZIP CODE: 90242	

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 Stanley Mosk 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: April 5, 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.

04/05/2013