

**FILED**Superior Court of California  
County of Los Angeles

SEP 10 2014

Sherri R. Carter, Executive Officer/Clerk  
By Dawn Alexander Deputy  
Dawn Alexander

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6 Attorneys for Plaintiff VENETIA MEEKS

7  
8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
9 **FOR THE COUNTY OF LOS ANGELES**

10 VENETIA MEEKS,

11 Plaintiff,

12 v.

13 KAISER PERMANENTE VENTURES,  
14 LLC; and DOES 1 through 20, inclusive,

15 Defendants.

CASE NO.: BC557236

## COMPLAINT FOR:

1. Discrimination in Violation of FEHA
2. Failure to Prevent Discrimination in Violation of FEHA
3. Failure to Engage in the Interactive Process and Provide Reasonable Accommodation in Violation of FEHA
4. Failure to Provide Medical Leave in Violation of California Family Rights Act
5. Wrongful Termination in Violation of CRLA

## DEMAND FOR JURY TRIAL

21 Plaintiff VENETIA MEEKS for her complaint against Defendant KAISER  
22 PERMANENTE VENTURES, LLC (sometimes referred to as "KAISER") hereby complains and  
23 alleges as follows:

**PARTIES, JURISDICTION AND VENUE**

24 1. Plaintiff Venetia Meeks is and was at all times relevant to the matters alleged in this  
25 complaint an individual with her residence in California.

COMPLAINT

09/10/2014

RECEIVED: 09/10/14 10:58 AM  
FILED: 09/10/14 10:58 AM  
CASE: BC557236  
FILED: 09/10/14 10:58 AM  
FEE: \$125.00  
CASH: \$0.00  
CHECK: \$0.00  
CHANGE: \$0.00  
CARD: \$125.00

1           2. Defendant Kaiser Permanente Ventures, LLC, is a Delaware Corporation. At all  
2 times material to this Complaint, said Defendant has conducted business in California. Kaiser's  
3 agent for service of process is CSC, 2711 Centerville Rd, Suite 400, Wilmington, DE 19808.

4           3. Plaintiff is informed and believes and thereon alleges that the fictitiously-named  
5 Defendants sued herein as Does 1 through 20 inclusive, and each of them, are in some manner  
6 responsible for the occurrences, acts, and omissions alleged herein and that Plaintiff's damages  
7 were proximately caused by their conduct. The true names and capacities of such fictitiously-  
8 named Doe Defendants, whether individual, corporate, partnership, associate or otherwise, are  
9 presently unknown to Plaintiff, and Plaintiff will seek leave of the Court to amend this Complaint to  
10 assert the true names and capacities of such fictitiously-named Defendants when the same have  
11 been ascertained. For convenience, each reference to the named Defendant herein shall also refer to  
12 Does 1 through 20, inclusive.

13           4. Plaintiff is informed and believes and thereon alleges that in committing certain acts  
14 herein as alleged, some or all of the Defendants herein named were acting as the agents, joint  
15 ventures, partners, representatives, subsidiaries, affiliates and/or employees of some or all of the  
16 other Defendants, and that some or all of the conduct of such Defendants, as complained of herein,  
17 was within the course and scope of such relationship.

18           5. Pursuant to Article VI, Section 10 of the California Constitution, subject matter  
19 jurisdiction is proper in the Superior Court of California, County of Los Angeles.

20           6. Pursuant to Section 395 of the California Code of Civil Procedure, venue is proper in  
21 the Superior Court of California for the County of Los Angeles, because this is where Defendant  
22 resides.

**FACTUAL BACKGROUND**

7. Defendant employed Plaintiff.

8. Plaintiff was injured and suffered a disability.

9. Defendant's employee, a physician, treated Plaintiff and effected her medical leave.

10. Defendant terminated Plaintiff's employment the next day on the basis of Plaintiff's disability and her exercising her right to medical leave before Plaintiff completed the medical leave.

11. Despite Defendant's knowledge of Plaintiff's disability, Defendant did not engage in the interactive process to determine a reasonable accommodation for Plaintiff's disability.

12. Plaintiff has received a Right to Sue letter from the California Department of Fair Housing and Employment and has thus exhausted all necessary administrative remedies.

13. As a proximate result of the wrongful acts of Defendants, Plaintiff has suffered and continues to suffer economic damages, emotional distress, humiliation, mental anguish and embarrassment.

**FIRST CAUSE OF ACTION**

**(Disability Discrimination in Violation of FEHA)  
(Against All Defendants)**

14. Plaintiff re-alleges and incorporates by reference all paragraphs of this Complaint as though fully set forth herein.

15. Under FEHA, it is unlawful for an employer to discriminate on the basis of disability.

16. Defendant terminated Plaintiff's employment on the basis of her disability.

17. As a proximate result of the wrongful conduct of Defendant, Plaintiff has suffered and continues to suffer a loss in earnings and other employment benefits according to proof at time of trial.

1 18. As a proximate result of the wrongful conduct of Defendant, Plaintiff has suffered  
2 humiliation, emotional distress and mental pain and anguish all to her damage in an amount  
3 according to proof at trial.

4 19. In doing the acts herein alleged, Defendant acted with oppression, fraud, malice,  
5 and/or conscious disregard of Plaintiff's rights and Plaintiff is therefore entitled to punitive  
6 damages.  
7

8 **SECOND CAUSE OF ACTION**  
9 **(Failure to Prevent Disability Discrimination in Violation of FEHA)**  
10 **(Against All Defendants)**

11 20. Plaintiff re-alleges and incorporates by reference all paragraphs of this Complaint as  
12 though fully set forth herein.

13 21. Under FEHA, it is unlawful for an employer to fail to take all reasonable steps to  
14 prevent discrimination on the basis of disability.

15 22. Defendant had knowledge and/or reasonable notice of the discrimination based on  
16 disability that took place against Plaintiff and failed to prevent the same.

17 23. As a proximate result of the wrongful conduct of Defendant, Plaintiff has suffered  
18 and continues to suffer a loss in earnings and other employment benefits according to proof at time  
19 of trial.  
20

21 24. As a proximate result of the wrongful conduct of Defendant, Plaintiff has suffered  
22 humiliation, emotional distress and mental pain and anguish all to her damage in an amount  
23 according to proof at trial.  
24

25 25. In doing the acts herein alleged, Defendant acted with oppression, fraud, malice,  
26 and/or conscious disregard of Plaintiff's rights and Plaintiff is therefore entitled to punitive  
27 damages.  
28

**THIRD CAUSE OF ACTION**

**(Failure to Engage in the Interactive Process and Provide a Reasonable Accommodation in Violation of FEHA)  
(Against All Defendants)**

26. Plaintiff re-alleges and incorporates all paragraphs of this Complaint as though fully set forth herein.

27. Government Code Section 12940 et seq. provides that it is unlawful for an employer to fail to engage in the interactive process and to make a reasonable accommodation for the known physical disability of an employee.

28. Defendant failed to engage in the interactive process or make a reasonable accommodation for Plaintiff's disability which it had knowledge of.

29. As a proximate result of the wrongful conduct of Defendant, Plaintiff has suffered and continues to suffer a loss in earnings and other employment benefits according to proof at time of trial.

30. As a proximate result of the wrongful conduct of Defendant, Plaintiff has suffered humiliation, emotional distress and mental pain and anguish all to her damage in an amount according to proof at trial.

31. In doing the acts herein alleged, Defendant acted with oppression, fraud, malice, and/or conscious disregard of Plaintiff's rights and Plaintiff is therefore entitled to punitive damages.

**NINTH CAUSE OF ACTION**

**(Failure to Provide Medical Leave in and Retaliation for Exercising the Right to Medical Leave in Violation of California Family Rights Act)  
(Against All Defendants)**

32. Plaintiff re-alleges and incorporates all paragraphs of this Complaint as though fully set forth herein.

1           33. The California Family Rights Act provides that it is unlawful for an employer to fail  
2 to provide medical leave to an employee.

3           34. Defendant failed to provide medical leave to Plaintiff; and terminated Plaintiff's  
4 employment in retaliation for her exercising her right to medical leave and to avoid providing her  
5 with medical leave.

6           35. In doing the acts herein alleged, Defendant acted with oppression, fraud, malice,  
7 and/or conscious disregard of Plaintiff's rights and Plaintiff is therefore entitled to punitive  
8 damages. As a proximate result of the wrongful conduct of Defendant, Plaintiff has suffered and  
9 continues to suffer a loss in earnings and other employment benefits according to proof at time of  
10 trial.

11           36. As a proximate result of the wrongful conduct of Defendant, Plaintiff has suffered  
12 humiliation, emotional distress and mental pain and anguish all to her damage in an amount  
13 according to proof at trial.

14           37. In doing the acts herein alleged, Defendant acted with oppression, fraud, malice,  
15 and/or conscious disregard of Plaintiff's rights and Plaintiff is therefore entitled to punitive  
16 damages.

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20                           **FIFTH CAUSE OF ACTION**  
21                           **(Wrongful Termination in Violation of Public Policy)**  
22                           **(Against All Defendants)**

23           38. Plaintiff re-alleges and incorporates all paragraphs of this Complaint as though fully  
24 set forth herein.

25           39. Defendant discriminated against Plaintiff by terminating her employment on the  
26 basis of her disability and due to her request for medical leave.

1 40. Accordingly, the actions of Defendants, as described herein, were wrongful and in  
2 contravention of FEHA.

3 41. As a proximate result of the aforesaid acts of Defendants, Plaintiff has suffered  
4 actual, consequential and incidental financial losses, including without limitation, loss of salary and  
5 benefits, and the intangible loss of employment related opportunities in her field and damage to her  
6 professional reputation, and emotional distress all in an amount subject to proof at the time of trial.  
7

8 **PRAYER FOR RELIEF**

9 WHEREFORE, Plaintiffs pray for judgment against Defendants as follows:

- 10 1. Compensatory damages;  
11 2. Liquidated damages;  
12 3. General damages;  
13 4. Punitive damages;  
14 5. Loss of earnings incurred and to be incurred according to proof;  
15 6. Attorney's fees;  
16 7. Costs of suit;  
17 8. Prejudgment and post-judgment interest; and  
18 9. For such other and further relief as the court deems just and proper.  
19

20  
21 Dated: September 9, 2014

By: 

22 Lawrence W. Freiman, Esq.  
23 Michael J. Freiman, Esq.  
24 Attorneys for Plaintiff Venetia Meeks  
25  
26  
27  
28

**DEMAND FOR JURY TRIAL**

Plaintiff Venetia Meeks hereby demands a jury trial.

Dated: September 9, 2014

By:

Lawrence W. Freiman, Esq.

Michael J. Freiman, Esq.

Attorneys for Plaintiff Venetia Meeks

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09/10/2014



CM-010

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Lawrence W. Freiman, Esq. SBN 288917 Freiman Law 100 Wilshire Blvd., Suite 940 Santa Monica, CA 90401 TELEPHONE NO.: 310-917-1024 FAX NO.: 888-835-8511 ATTORNEY FOR (Name): Venetia Meeks		FOR COURT USE ONLY  <b>FILED</b> Superior Court of California County of Los Angeles  SEP 10 2014  Sherri R. Carter, Executive Officer/Clerk By: <u>Dawn</u> Deputy Dawn Alexander
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles STREET ADDRESS: 111 N. Hill St. MAILING ADDRESS: CITY AND ZIP CODE: Los Angeles, CA 90012 BRANCH NAME: Stanley Mosk Courthouse		CASE NUMBER: <b>BC557236</b>  JUDGE: DEPT:
CASE NAME: Meeks v. Kaiser Permanente Ventures, LLC		
<b>CIVIL CASE COVER SHEET</b> <input checked="" type="checkbox"/> <b>Unlimited</b> (Amount demanded exceeds \$25,000)	<input type="checkbox"/> <b>Limited</b> (Amount demanded is \$25,000 or less)	<b>Complex Case Designation</b> <input type="checkbox"/> <b>Counter</b> <input type="checkbox"/> <b>Joinder</b> Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)

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:

<b>Auto Tort</b> <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46) <b>Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort</b> <input type="checkbox"/> Asbestos (04) <input type="checkbox"/> Product liability (24) <input type="checkbox"/> Medical malpractice (45) <input type="checkbox"/> Other PI/PD/WD (23) <b>Non-PI/PD/WD (Other) Tort</b> <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-PI/PD/WD tort (35) <b>Employment</b> <input checked="" type="checkbox"/> Wrongful termination (36) <input type="checkbox"/> Other employment (15)	<b>Contract</b> <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) <b>Real Property</b> <input type="checkbox"/> Eminent domain/inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (26) <b>Unlawful Detainer</b> <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38) <b>Judicial Review</b> <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)	<b>Provisionally Complex Civil Litigation</b> (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) <b>Enforcement of Judgment</b> <input type="checkbox"/> Enforcement of judgment (20) <b>Miscellaneous Civil Complaint</b> <input type="checkbox"/> RICO (27) <input type="checkbox"/> Other complaint (not specified above) (42) <b>Miscellaneous Civil Petition</b> <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> Other petition (not specified above) (43)
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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): 5
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: September 9, 2014

Lawrence Freiman

(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:

Meeks v. Kaiser Permanente Ventures, LLC

CASE NUMBER

BC557236

**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 ☐ 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.

	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 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 Deaths (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.

SHORT TITLE:

Meeks v. Kaiser Permanente Ventures, LLC

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 checked="" 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: Meeks v. Kaiser Permanente Ventures, LLC

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., 6.
	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 Petitions	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 <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:

Meeks v. Kaiser Permanente Ventures, LLC

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.

**REASON:** Check the appropriate boxes for the numbers shown under Column C for the type of action that you have selected for this case.

☐ 1. ☒ 2. ☐ 3. ☐ 4. ☐ 5. ☐ 6. ☐ 7. ☐ 8. ☐ 9. ☐ 10.

ADDRESS:

4733 Sunset Blvd.

CITY:

Los Angeles

STATE:

CA

ZIP CODE:

90027

**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: September 9, 2014

(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.