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8 SUDARSHNA PRASAD

FILED  
Superior Court of California  
County of Los Angeles

MAY 20 2015

Sherri R. Carter, Executive Officer/Clerk  
By Cristina Grijalva Deputy  
Cristina Grijalva

DSS Malcolm Mackey  
SUPERIOR COURT OF THE STATE OF CALIFORNIA,  
FOR THE COUNTY OF LOS ANGELES, CENTRAL DISTRICT

11 SUDARSHNA PRASAD, an individual,

12 Plaintiffs,

13 vs.

14 KAISER FOUNDATION HOSPITALS, a  
15 California corporation; and DOES I through  
16 20, inclusive,

17 Defendants.

Case No.: **BC582504**

**COMPLAINT FOR DAMAGES**

1. DISCRIMINATION IN VIOLATION OF GOV'T CODE §§12940 ET SEQ.;
2. FAILURE TO PREVENT; DISCRIMINATION IN VIOLATION OF GOV'T CODE §§12940(K);
3. RELIATION IN VIOLATION OF GOV'T CODE §§12940 ET SEQ.;
4. FAILURE TO PROVIDE REASONABLE ACCOMMODATIONS IN VIOLATION OF GOV'T CODE §§12940 ET SEQ.;
5. FAILURE TO ENGAGE IN A GOOD FAITH INTERACTIVE PROCESS IN VIOLATION OF GOV'T CODE §§12940 ET SEQ.;
6. WRONGFUL TERMINATION IN VIOLATION OF PUBLIC POLICY
7. DECLARATORY JUDGMENT

Demand over \$25,000.00

**DEMAND FOR JURY TRIAL**

CIT/CASE: BC582504  
LST/DEF#: 310  
RECEIVED: 05/20/15 02:26 PM  
STAMPED: 05/20/15 02:26 PM  
PAID: \$435.00  
CHECK: \$435.00  
CASH: \$0.00  
CHARGE: \$0.00  
CDO: \$0.00

05/20/2015

1 COMES NOW PLAINTIFF, SUDARSHNA PRASAD, and for causes action against the  
2 Defendants and each of them, alleges as follows:

3  
4 **JURISDICTION**

5 1. This Court is the proper court, and this action is properly filed in Los Angeles County,  
6 because Defendants' obligations and liability arise therein, because Defendants maintain offices and  
7 transact business within Los Angeles County, and because the incident that is the subject of this suit  
8 took place in Los Angeles County.

9  
10 **THE PARTIES**

11 2. Plaintiff SUDARSHNA PRASAD (hereinafter referred to as "Plaintiff"), at all times relevant  
12 to this action, resided in Glendale, California.

13 3. The acts pleaded herein were committed against Plaintiff in the City of Los Angeles,  
14 California.

15 4. Defendant KAISER FOUNDATION HOSPITALS (hereinafter referred to as "KAISER") is  
16 a California corporation with its principal place of business in Los Angeles, California.

17 5. Defendant KAISER operates medical centers in southern California.

18 6. KAISER was Plaintiff's employer within the meaning of Government Code §§ 12926,  
19 subdivision (d), 12940, subdivisions (a),(h),(1), (h)(3)(A), and (i), and 12950, and regularly employs  
20 five (5) or more persons and is therefore subject to the jurisdiction of this Court.

21 7. The true names and capacities, whether individual, corporate, associate, or otherwise, of the  
22 Defendants named herein as DOES 1 through 20, inclusive, are unknown to Plaintiff at this time and  
23 therefore said Defendants are sued by such fictitious names. Plaintiff will seek leave to amend this  
24 Complaint to insert the true names and capacities of said Defendants when the same become known to  
25 Plaintiff. Plaintiff is informed and believes, and based thereupon alleges, that each of the fictitiously  
26 named Defendants is responsible for the wrongful acts alleged herein, and is therefore liable to Plaintiff  
27 as alleged hereinafter.  
28

1 8. Plaintiff is informed and believes, and based thereupon alleges, that at all times relevant  
2 hereto, Defendants, and each of them, were the agents, employees, managing agents, supervisors,  
3 coconspirators, parent corporation, joint employers, alter ego, and/or joint ventures of the other  
4 Defendants, and each of them, and in doing the things alleged herein, were acting at least in part within  
5 the course and scope of said agency, employment, conspiracy, joint employer, alter ego status, and/or  
6 joint venture and with the permission and consent of each of the other Defendants.

7 9. Plaintiff is informed and believes, and based thereupon alleges, that Defendants, and each of  
8 them, including those Defendants named as DOES 1 through 20, acted in concert with one another to  
9 commit the wrongful acts alleged herein, and aided, abetted, incited, compelled, and/or coerced one  
10 another in the wrongful acts alleged herein, and/or attempted to do so, including pursuant to  
11 Government Code §12940(i). Plaintiff is further informed and believes, and based thereupon alleges,  
12 that Defendants, and each of them, formed and executed a conspiracy or common plan pursuant to  
13 which they would commit the unlawful acts alleged herein, with all such acts alleged herein done as part  
14 of and pursuant to said conspiracy, intended to cause and actually causing Plaintiff harm.

15 10. Whenever and wherever reference is made in this Complaint to any act or failure to act by a  
16 Defendant or co-Defendant, such allegations and references shall also be deemed to mean the acts and/or  
17 failures to act by each Defendant acting individually, jointly and severally.

18 11. Plaintiff has filed complaints of discrimination, retaliation, failure to prevent discrimination,  
19 and retaliation, failure to accommodate, failure to engage in the interactive process, denial of  
20 employment and wrongful termination and/or constructive termination under Government Code  
21 §§12940, et seq., the California Fair Employment and Housing Act (the "FEHA"), with the California  
22 Department of Fair Employment and Housing (the "DFEH"), and have satisfied their administrative  
23 prerequisites with respect to these and all related filings. On September 16, 2014, Plaintiff received a  
24 Notice of Case Closure and Right to Sue Letter from the DFEH.

1                                    **ALTER EGO, AGENCY AND JOINT EMPLOYER**

2            12. Plaintiff is informed and believes, and based thereon alleges, that there exists such a unity of  
3 interest and ownership between KAISER and DOES 1 through 20 that the individuality and separateness  
4 of Defendants have ceased to exist.

5            13. Plaintiff is informed and believes, and based thereon alleges, that despite the formation of  
6 purported corporate existence, KAISER and DOES 1 through 20 are, in reality, one and the same,  
7 including, but not limited to because:

8                    a.        KAISER is completely dominated and controlled by DOES 1 through 20, who  
9 personally committed the frauds and violated the laws as set forth in this complaint, and who have  
10 hidden and currently hide behind KAISER to perpetrate frauds, circumvent statutes, or accomplish  
11 some other wrongful or inequitable purpose.

12                   b.        DOES 1 through 20 derive actual and significant monetary benefits by and  
13 through PSM'S unlawful conduct, and by using KAISER as the funding source for their own personal  
14 expenditures.

15                   c.        Plaintiff is informed and believes that KAISER and DOES 1 through 20, while  
16 really one and the same, were segregated to appear as though separate and distinct for purposes of  
17 perpetrating a fraud, circumventing a statute, or accomplishing some other wrongful or inequitable  
18 purpose.

19                   d.        Plaintiff is informed and believes that KAISER and DOES 1 through 20 do not  
20 comply with all requisite corporate formalities to maintain a legal and separate corporate existence.

21                   e.        Plaintiff is informed and believes, and based thereon alleges, that the business  
22 affairs of KAISER and DOES 1 through 20 are, and at all times relevant were, so mixed and  
23 intermingled that the same cannot reasonably be segregated, and the same are in inextricable  
24 confusion. KAISER is, and at all times relevant hereto was, used by DOES 1 through 20 as a mere  
25 shell and conduit for the conduct of certain of Defendants' affairs, and is, and was, the alter ego of  
26 DOES 1 through 20. The recognition of the separate existence of KAISER and DOES 1 through 20  
27 from one another would not promote justice, in that it would permit Defendants to insulate themselves  
28 from liability to Plaintiff for violations of the Government Code, Labor Code, and other statutory

1 violations. The corporate existence of KAISER and DOES 1 through 20 should be disregarded in  
2 equity and for the ends of justice because such disregard is necessary to avoid fraud and injustice to  
3 Plaintiff herein.

4 14. Accordingly, KAISER and DOES 1 through 20 constitute the alter egos of one another, and  
5 the fiction of their separate corporate existence must be disregarded.

6 15. As a result of the aforementioned facts, Plaintiff is informed and believes, and based thereon  
7 alleges that KAISER and DOES 1 through 20 are Plaintiff's joint employers by virtue of a joint  
8 enterprise, and that Plaintiff was an employee of KAISER and DOES 1 through 20. Plaintiff performed  
9 services for each and every one of Defendants, and to the mutual benefit of all Defendants, and all  
10 Defendants shared control of Plaintiff as an employee, either directly or indirectly, and the manner in  
11 which Defendants' business was and is conducted.

12  
13 **FACTUAL ALLEGATIONS**

14 16. On July 23, 2013, Plaintiff was extended a conditional offer of employment with KAISER to  
15 work as a storeroom worker at KAISER'S Sunset Medical Center in the city of Los Angeles.

16 17. She was scheduled to begin work on August 20, 2013.

17 18. Her hourly wage was set at \$14.50.

18 19. Prior to her scheduled start date, Plaintiff informed KAISER that she suffered from a health  
19 condition called atopic dermatitis, which causes her to break out into rashes when she is exposed to  
20 certain open chemicals and solvents.

21 20. On August 13, 2013, Plaintiff provided KAISER with a note from Dr. Frank Kwong, which  
22 stated that Plaintiff could safely perform the essential job demands of the storeroom worker position, but  
23 that she should not be exposed to open chemicals and solvents.

24 21. On September 20, 2013, KAISER informed Plaintiff that it was revoking her conditional  
25 offer of employment because it allegedly could not accommodate her disability.

26 22. As a result of Defendant's action, Plaintiff has suffered and will continue to suffer general  
27 and special damages, including emotion distress and other physical ailments, as well as medical  
28

1 expenses, expenses for psychological counseling and treatment, and past and future lose wages and  
2 benefits.

3 23. As a result of the above, Plaintiff is entitled to past and future lost wages, bonuses,  
4 commissions, and benefits.

5 24. Plaintiff claims general damages for emotional and mental distress and aggravation in a sum  
6 of excess of the jurisdictional minimum of this Court.

7 25. Because the acts taken toward Plaintiff were carried out by managerial employees acting in a  
8 deliberate, cold, callous, cruel and international manner, in conscious disregard of Plaintiff's rights and  
9 in order to injure and damage her, Plaintiff requests that punitive damages be levied against Defendants  
10 and each of them, in sums in excess of the jurisdictional minimum of this Court.

11  
12 **FIRST CAUSE OF ACTION**

13 **DISCRIMINATION IN VIOLATION OF GOV'T CODE §§12940 ET SEQ.**

14 **(AGAINST KAISER AND DOES 1 THROUGH 20, INCLUSIVE)**

15 26. Plaintiff incorporates, by reference, all the foregoing paragraphs of this Complaint, as though  
16 fully set forth herein.

17 27. At all times hereto, the FEHA was in full force and effect and was binding upon Defendants  
18 and each of them.

19 28. As such term is used under FEHA, "on the bases enumerated in this part means or refers to  
20 discrimination on the bases of one or more of the protected characteristics under FEHA.

21 29. FEHA requires Defendants to refrain from discriminating against an employee on the basis  
22 of race, color, national origin, sex, perceived sexual orientation, and disability; and to prevent  
23 discrimination and harassment on the basis of race, color, national origin, sex, perceived sexual  
24 orientation, disability, use of medical leave, and engagement in protected activities from occurring.

25 30. Plaintiff was a member of multiple protected classes as a woman with a disability and/or  
26 medical condition.  
27  
28

1 31. Plaintiff suffered the adverse employment actions of discrimination and retaliation, denial of  
2 a good faith interactive process, failure to prevent discrimination, termination, failure to hire and was  
3 harmed thereby.

4 32. Plaintiff is informed and believes that her disability and/or medical condition and/or some  
5 combination of these protected characteristics under Government Code §12926(j) were motivating  
6 reasons and/or factors in the decisions to subject Plaintiff to the aforementioned adverse employment  
7 actions.

8 33. Said conduct violates the FEHA, and such violations were a proximate cause in Plaintiff's  
9 damage as stated below.

10 34. The foregoing conduct of Defendants individually, or by through their managing agents, was  
11 intended by the Defendants to cause injury to the Plaintiff or was despicable conduct carried on by the  
12 Defendants with a willful and conscious disregard of the rights of Plaintiff or subjected Plaintiff to cruel  
13 and unjust hardship in conscious disregard of Plaintiff's right such as to constitute malice, oppression, or  
14 fraud under Civil Code §3294, thereby entitling Plaintiff to punitive damages in an amount appropriate  
15 to punish or make an example of Defendants.

16 35. Pursuant to Government Code §12965(b), Plaintiff requests a reasonable award of attorneys'  
17 fees and costs, including expert fees pursuant to the FEHA.

18  
19 **SECOND CAUSE OF ACTION**

20 **FAILURE TO PREVENT DISCRIMINATION AND RETALIATION IN VIOLATION OF**

21 **GOV'T CODE §12940(K)**

22 **(AGAINST KAISER AND DOES 1 THROUGH 20, INCLUSIVE)**

23 36. Plaintiff incorporates, by reference, all the foregoing paragraphs of this Complaint, as though  
24 fully set forth herein.

25 37. At all times hereto, the FEHA, including in particular Government Code §12940(k), was in  
26 full force and effect and was binding upon Defendants. This subsection imposes a duty on Defendants to  
27 take all reasonable steps necessary to prevent discrimination and retaliation from occurring. As alleged  
28

1 above, Defendants violated this subsection and breached their duty by failing to take all reasonable steps  
2 necessary to prevent discrimination and retaliation from occurring.

3 38. The above said acts of Defendants constitute violations of the FEHA, and were a proximate  
4 cause in Plaintiff's damage as stated below.

5 39. The foregoing conduct of Defendants individually, or by and through their managing agents,  
6 was intended by the Defendant to cause injury to the Plaintiff or was despicable conduct carried on by  
7 the Defendants with a willful and conscious disregard of the rights of Plaintiff or subjected Plaintiff to  
8 cruel and unjust hardship in conscious disregard of Plaintiff's right such as to constitute malice,  
9 oppression, or fraud under Civil Code §3294, thereby entitling Plaintiff to punitive damages in an  
10 amount appropriate to punish or make an example of Defendants.

11 40. Pursuant to Government Code §12965(b), Plaintiff request a reasonable award of attorneys'  
12 fees and costs, including expert fees pursuant to the FEHA.

13  
14 **THIRD CAUSE OF ACTION**

15 **RETALIATION IN VIOLATION OF GOV'T CODE §§12940 ET SEQ.**

16 **(AGAINST KAISER AND DOES 1 THROUGH 20, INCLUSIVE)**

17 41. Plaintiff incorporates, by reference, all the foregoing paragraphs of this Complaint, as though  
18 fully set forth herein.

19 42. At all times hereto, the FEHA was in full force and effect and was binding upon Defendants  
20 and each of them.

21 43. These laws set forth in the preceding paragraph require Defendants to refrain from retaliating  
22 against an employee for engaging in protected activity.

23 44. Plaintiff engaged in the protected activities of reporting her disability and/or medical  
24 condition.

25 45. Plaintiff suffered the adverse employment actions of unlawful discrimination, refusal to  
26 properly investigate discrimination, failure to prevent discrimination, and termination, and was harmed  
27 thereby.  
28



1 46. Plaintiff is informed and believes that reporting her disability and/or medical condition was a  
2 motivating reason and/or factor in the decisions to subject her to the aforementioned adverse  
3 employment actions.

4 47. Defendants violated the FEHA by retaliating against Plaintiff and terminating her for  
5 exercising or attempting to exercise her protected rights, as set forth hereinabove.

6 48. Plaintiff is informed and believes, and based thereon alleges, that the above acts of retaliation  
7 committed by Defendants were done with the knowledge, consent, and/or ratification of, or at the  
8 direction of, each other defendant and the other Managers.

9 49. The above said acts of Defendants constitute violations of the FEHA, and were a proximate  
10 cause in Plaintiff's damage as stated below.

11 50. The foregoing conduct of Defendants individually, or by and through their managing agents,  
12 was intended by the Defendants to cause injury to the Plaintiff or was despicable conduct carried on by  
13 the Defendants with a willful and conscious disregard of the rights of Plaintiff or subjected Plaintiff to  
14 cruel and unjust hardship in conscious disregard of Plaintiff's right such as to constitute malice,  
15 oppression, or fraud under Civil Code §3294, thereby entitling Plaintiff to punitive damages in an  
16 amount appropriate to punish or make an example of Defendants.

17 51. Pursuant to Government Code §12965(b), Plaintiff requests a reasonable award of attorneys'  
18 fees and costs, including expert fees pursuant to the FEHA.

19  
20 **FOURTH CAUSE OF ACTION**

21 **FAILURE TO PROVIDE REASONABLE ACCOMMODATIONS**

22 **IN VIOLATION OF GOV'T CODE §§12940 ET SEQ.**

23 **(AGAINST KAISER AND DOES 1 THROUGH 20, INCLUSIVE)**

24 52. Plaintiff incorporates, by reference, all the foregoing paragraphs of this Complaint, as though  
25 fully set forth herein.

26 53. At all times hereto, the FEHA, including in particular Government Code §12940(m), was in  
27 full force and effect and was binding upon Defendants. This subsection imposes a duty on Defendants to  
28 make reasonable accommodation for the known physical disability of an employee.

1 54. At all relevant times, Plaintiff was a member of a protected class within the meaning of  
2 particular Government Code §§12940(a) & 12986(1) et seq. because she had disabilities that affected  
3 her major life activities, of which Defendants had both actual and constructive knowledge.

4 55. At all times herein, Plaintiff was willing and able to perform the duties and functions of the  
5 position in which she was hired, or could have performed the duties and functions of those positions  
6 with reasonable accommodations. At no time would the performance of the functions of the employment  
7 positions, with reasonable accommodations for Plaintiff's disabilities or her disabilities as they were  
8 perceived by Defendants, have been a danger to Plaintiff or any other person's health or safety.  
9 Accommodation of Plaintiff's disabilities or disabilities as they were perceived by Defendants would not  
10 have imposed an undue hardship on Defendants. Defendants failed and refused to accommodate  
11 Plaintiff and failed to engage in the interactive process with Plaintiff.

12 56. The above said acts of Defendants constitute violations of the FEHA, and were a proximate  
13 cause in Plaintiff's damages as stated below.

14 57. The foregoing conduct of Defendants individually, or by and through their managing agents,  
15 was intended by Defendants to cause injury to Plaintiff or was despicable conduct carried on by  
16 Defendants with a willful and conscious disregard of the rights of Plaintiff or subjected Plaintiff to cruel  
17 and unjust hardship in conscious disregard of Plaintiff's right such as to constitute malice, oppression, or  
18 fraud under Civil Code §3294, thereby entitling Plaintiff to punitive damages in an amount appropriate  
19 to punish or make an example of Defendants.

20 58. Pursuant to Government Code §12965(b), Plaintiff requests a reasonable award of attorneys'  
21 fees and costs, including expert fees pursuant to the FEHA.

22  
23 **FIFTH CAUSE OF ACTION**

24 **FOR FAILURE TO ENGAGE IN A GOOD FAITH INTERACTIVE PROCESS**

25 **IN VIOLATION OF GOV'T CODE §§12940 ET SEQ.**

26 **(AGAINST KAISER AND DOES 1 THROUGH 20, INCLUSIVE)**

27 59. Plaintiff incorporates, by reference, all the foregoing paragraphs of this Complaint, as though  
28 fully set forth herein.

1 60. At all times hereto, the FEHA, including in particular Government Code §12940(n), was in  
2 full force and effect and was binding upon Defendants. This subsection imposes a duty on Defendants to  
3 engage in a timely, good faith, interactive process with the employee to determine effective reasonable  
4 accommodations, if any, in response to a request for reasonable accommodation by an employee with a  
5 known physical disability or known medical condition.

6 61. At all relevant times, Plaintiff was a member of a protected class within the meaning of  
7 particular Government Code §§12940(a) & 12986(1) et seq. because she had disabilities of which  
8 Defendants had both actual and constructive knowledge.

9 62. Plaintiff reported her disabilities to Defendants, triggering Defendants' obligation to engage  
10 in the interactive process with Plaintiff, but at all times herein, Defendants failed and refused to do so.

11 63. The above said acts of Defendants constitute violations of the FEHA, and were a proximate  
12 cause in Plaintiff's damages as stated below.

13 64. The foregoing conduct of Defendants individually, or by and through their managing agents,  
14 was intended by Defendants to cause injury to Plaintiff or was despicable conduct carried on by  
15 Defendants with a willful and conscious disregard of the rights of Plaintiff or subjected Plaintiff to cruel  
16 and unjust hardship in conscious disregard of Plaintiff's rights such as to constitute malice, oppression,  
17 or fraud under Civil Code §3294, thereby entitling Plaintiff to punitive damages in an amount  
18 appropriate to punish or make an example of Defendants.

19 65. Pursuant to Government Code §12965(b), Plaintiff requests a reasonable award of attorneys'  
20 fees and costs, including expert fees pursuant to the FEHA.

21  
22 **SIXTH CAUSE OF ACTION**

23 **WRONGFUL TERMINATION**

24 **IN VIOLATION THE PUBLIC POLICY OF THE STATE OF CALIFORNIA**

25 **(AGAINST KAISER AND DOES 1 THROUGH 20, INCLUSIVE)**

26 66. Plaintiff incorporates, by reference, all the foregoing paragraphs of this Complaint, as though  
27 fully set forth herein.  
28

1           67. At all relevant times mentioned in this complaint, the FEHA was in full force and effect and  
2 was binding on Defendants. This law requires Defendants to refrain, among other things, from  
3 discriminating against any employee on the basis of race, color, national origin, sex, perceived sexual  
4 orientation, disability, and use of medical leave, and from retaliating against any employee who engages  
5 in protected activity. At all times mentioned in this complaint, Article I, Section 8 of the California  
6 Constitution was in full force and effect and binding on Defendants. This law requires Defendants to  
7 refrain from disqualifying a person from pursuing employment on the basis of race, color, national  
8 origin, or sex.

9           68. At all times mentioned in this complaint, it was a fundamental policy of the State of  
10 California that Defendants cannot discriminate and/or retaliate against any employee on the basis of  
11 race, color, national origin, sex, perceived sexual orientation, disability, use of medical leave, or  
12 engagement in protected activity.

13           69. Plaintiff believes and thereon alleges that her disability and/or medical condition and her  
14 engaging in protected activity with respect to these protected classes, and/or some combination thereof,  
15 were factors in Defendants' conduct as alleged hereinabove.

16           70. Such discrimination and retaliation, resulting in the discharge of Plaintiff's employment on  
17 the basis of her disability, Plaintiff's engagement in protected activity, and/or some combination of these  
18 factors, were a proximate cause in Plaintiff's damages as stated below.

19           71. The above said acts of Defendants constitute violations of the Government Code and the  
20 public policy of the State of California embodied therein as set forth above. Defendants violated these  
21 laws by discriminating and retaliating against Plaintiff and terminating her employment in retaliation for  
22 exercise of protected rights.

23           72. The foregoing conduct of Defendants individually, or by and through their managing agents,  
24 was intended by Defendants to cause injury to Plaintiff or was despicable conduct carried on by  
25 Defendants with a willful and conscious disregard of the rights of Plaintiff or subjected Plaintiff to cruel  
26 and unjust hardship in conscious disregard of Plaintiff's rights such as to constitute malice, oppression,  
27 or fraud under Civil Code §3294, thereby entitling Plaintiff to punitive damages in an amount  
28 appropriate to punish or make an example of Defendants.

1  
2 **SEVENTH CAUSE OF ACTION**

3 **DECLARATORY JUDGMENT**

4 **(AGAINST KAISER AND DOES 1 THROUGH 20, INCLUSIVE)**

5 73. Plaintiff incorporates, by reference, all the foregoing paragraphs of this Complaint, as though  
6 fully set forth herein.

7 74. Government Code §12920 sets forth the public policy of the State of California as follows:

8  
9 It is hereby declared as the public policy of this state that it is necessary to protect and  
10 safeguard the right and opportunity of all persons to seek, obtain, and hold  
11 employment without discrimination or abridgment on account of race, religious creed,  
12 color, national origin, ancestry, physical disability, mental disability, medical condition,  
13 genetic information, marital status, sex, gender, gender identity, gender expression, age,  
14 or sexual orientation.

15 It is recognized that the practice of denying employment opportunity and  
16 discriminating in terms of employment for these reasons foments strife and unrest,  
17 deprives the state of the fullest utilization of its capacities for development and  
18 advancement, and substantially and adversely affects the interests of employees,  
19 employers, and the public in general.

20 Further, the practice of discrimination because of race, color, religion, sex, gender  
21 expression, sexual orientation, marital status, national origin, ancestry, familial status,  
22 source of income, disability, or genetic information in housing accommodations is  
23 declared to be against public policy.

24 It is the purpose of this part to provide effective remedies that will eliminate these  
25 discriminatory practices.

26 This part shall be deemed an exercise of the police power of the state for the protection  
27 of the welfare, health, and peace of the people of this state.

28 75. Government Code §12920.5 embodies the intent of the California legislature and states:

In order to eliminate discrimination, it is necessary to provide effective remedies that  
will both prevent and deter unlawful employment practices and redress the adverse  
effects of those practices on aggrieved persons. To that end, this part shall be deemed

1 an exercise of the Legislature's authority pursuant to Section 1 of Article XIV of the  
2 California Constitution.

3 Moreover, Government Code §12921, subdivision (a) says in pertinent part: The  
4 opportunity to seek, obtain, and hold employment without discrimination because of  
5 race, religious creed, color, national origin, ancestry, physical disability, mental  
6 disability, medical condition, genetic information, marital status, sex, gender, gender  
identity, gender expression, age, or sexual orientation is hereby recognized as and  
declared to be a civil right.

7 76. An actual controversy has arisen and now exists between Plaintiff and Defendants  
8 concerning their respective rights and duties as it is believed that Defendants may allege that they did  
9 not harass or discriminate against Plaintiff; that Plaintiff was not terminated as a result of her race, color,  
10 national origin, sex, perceived sexual orientation, disability, use of medical leave, engagement in  
11 protected activities, and/or some combination of these protected characteristics. Plaintiff contends that  
12 Defendants did discriminate against her on the basis on her disability, engagement in protected  
13 activities, and/or some combination of these protected characteristics; and that she was retaliated against  
14 and, ultimately wrongfully terminated as a result of her disability, engagement in protected activities,  
15 and/or some combination of these protected characteristics. Plaintiff is informed and believes, and on  
16 that basis alleges, that Defendants shall dispute Plaintiff's contentions.

17 77. Pursuant to Code of Civil Procedure §1060, Plaintiff desires a judicial determination of her  
18 rights and duties, and a declaration that defendants discriminated against her on the basis disability, use  
19 of medical leave, retaining a workers' compensation attorney, engagement in protected activity, and/or  
20 some combination of these protected characteristics.

21 78. Pursuant to Code of Civil Procedure §1060, Plaintiff seeks a judicial determination of her  
22 rights and duties, and a declaration that her disability, use of medical leave, engagement in protected,  
23 and/or some combination of these protected characteristics was a substantial motivating factor in the  
24 decision to subject her to the aforementioned adverse employment actions.

25 79. A judicial declaration is necessary and appropriate at this time under the circumstances in  
26 order that Plaintiff, for herself and on behalf of employees in the State of California and in conformity  
27 with the public policy of the State, obtain a judicial declaration of the wrongdoing of Defendants and to  
28

05/20/2015

1 condemn such discriminatory employment policies or practices prospectively. *Harris v. City of Santa*  
2 *Monica* (2013) 56 Cal.4<sup>th</sup> 203.

3 80. A judicial declaration is necessary and appropriate at this time such that Defendants may also  
4 be aware of their obligations under the law to not engage in discriminatory practice and to not violate the  
5 law in the future.

6 81. Government Code §12965(b) provides that an aggrieved party, such as the Plaintiff herein,  
7 may be awarded reasonable attorney's fees and costs: "In civil actions brought under this section, the  
8 court, in its discretion, may award to the prevailing party, including the department, reasonable  
9 attorney's fees and costs, including expert witnesses fees." Such fees and costs expended by an  
10 aggrieved party may be awarded for the purpose of redressing, preventing, or deterring discrimination.

11  
12 **PRAYER FOR RELIEF**

13 **WHEREFORE**, Plaintiff seeks judgment against Defendants, and each of them, as follows:

14 1. For a money judgment representing compensatory damages including lost wages, earnings,  
15 commissions, retirement benefits, and other employee benefits, and all other sums of money, together  
16 with interest on these amounts; for other special damages; and for general damages for mental pain and  
17 anguish and emotional distress;

18 2. For prejudgment interest on each of the foregoing at the legal rate from the date the  
19 obligation became due through the date of judgment in this matter;

20 3. For a declaratory judgment reaffirming Plaintiff's equal standing under the law and  
21 condemning Defendants' discriminatory practices;

22 4. For injunctive relief barring Defendants' discriminatory employment policies and practices in  
23 the future;

24 5. For punitive damages, pursuant to Civil Code §§3294 respectively, in amounts sufficient to  
25 punish Defendants for the wrongful conduct alleged herein and to deter such conduct in the future;

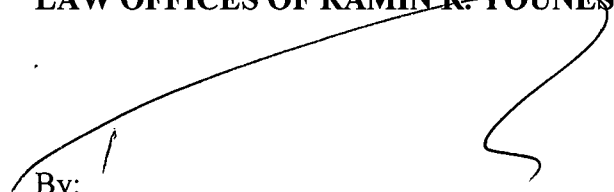
26 6. For costs of suit, attorneys' fees, and expert witness fees pursuant to the FEHA, the Civil  
27 Code, and/or any other basis;

28 7. For post-judgment interest; and

1 8. For any other relief that is just and proper.

2  
3 Dated: May 19, 2015

**LAW OFFICES OF RAMIN R. YOUNESSI**

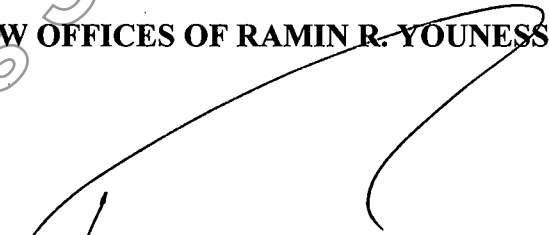
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6 By:   
7 Ramin R. Younessi, Esq.  
8 Attorney for Plaintiff

9 **DEMAND FOR JURY TRIAL**

10 Plaintiff demands a trial by jury on all claims as provided by California Law.

11  
12 Dated: May 19 2015

**LAW OFFICES OF RAMIN R. YOUNESSI**

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15 By:   
16 Ramin R. Younessi, Esq.  
17 Attorney for Plaintiff  
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05/20/2015



<b>ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):</b> Ramin R. Younessi, Esq. <span style="float: right;">SBN 175020</span> Law Offices of Ramin Younessi 3435 Wilshire Blvd, Suite 2200 Los Angeles, CA 90010 TELEPHONE NO.: 213-480-6200 <span style="float: right;">FAX NO.: 213-480-6201</span> ATTORNEY FOR (Name): Sudarshna Prasad		<b>FOR COURT USE ONLY</b>  <div style="font-size: 1.5em; font-weight: bold; margin: 10px 0;">FILED</div> Superior Court of California County of Los Angeles  <div style="font-size: 1.2em; margin: 10px 0;">MAY 20 2015</div> Sherri R. Carter, Executive Officer/Clerk By <u>Cristina Grijalva</u> Deputy Cristina Grijalva
<b>SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles</b> STREET ADDRESS: 111 N. Hill Street MAILING ADDRESS: same as above CITY AND ZIP CODE: Los Angeles, California 90012 BRANCH NAME: Stanley Mosk - Central District		
<b>CASE NAME:</b> Sudarshna Prasad v. Kaiser Foundation Hospitals, a California corporation		
<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)
		<b>CASE NUMBER:</b> <div style="font-size: 1.5em; font-weight: bold; margin-top: 10px;">BC 582504</div>

Items 1-5 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"/> 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<br>b. <input type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve<br>c. <input type="checkbox"/> Substantial amount of documentary evidence | d. <input type="checkbox"/> Large number of witnesses<br>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<br>f. <input type="checkbox"/> Substantial post judgment judicial supervision |
|--|---|

3. Type of remedies sought (check all that apply):

- a. ☒ monetary    b. ☒ non monetary; declaratory or injunctive relief    c. ☒ punitive

4. Number of causes of action (specify): 7 (seven)

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: May 19 2015

Ramin R. Younessi, Esq.

(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 complex case, this cover sheet will be used for statistical purposes only.

Page 1 of 2

## 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 5 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. You do not need to submit a cover sheet with amended papers. 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 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

- Auto (22)-Personal Injury/Property Damage/Wrongful Death
- Uninsured Motorist (46) *(if the case involves an uninsured motorist claim subject to arbitration, check this item instead of Auto)*

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

- Asbestos (04)
  - Asbestos Property Damage
  - Asbestos Personal Injury/Wrongful Death
- Product Liability *(not asbestos or toxic/environmental)* (24)
- Medical Malpractice (45)
  - Medical Malpractice-Physicians & Surgeons
  - Other Professional Health Care Malpractice
- Other PI/PD/WD (23)
  - Premises Liability (e.g., slip and fall)
  - Intentional Bodily Injury/PD/WD (e.g., assault, vandalism)
  - Intentional Infliction of Emotional Distress
  - Negligent Infliction of Emotional Distress
- Other PI/PD/WD

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

- Business Tort/Unfair Business Practice (07)
- Civil Rights (e.g., discrimination, false arrest) *(not civil harassment)* (08)
- Defamation (e.g., slander, libel) (13)
- Fraud (16)
- Intellectual Property (19)
- Professional Negligence (25)
  - Legal Malpractice
  - Other Professional Malpractice *(not medical or legal)*
- Other Non-PI/PD/WD Tort (35)

#### Employment

- Wrongful Termination (36)
- Other Employment (15)

#### Contract

- Breach of Contract/Warranty (06)
  - Breach of Rental/Lease
  - Contract *(not unlawful detainer or wrongful eviction)*
- Contract/Warranty Breach-Seller Plaintiff *(not fraud or negligence)*
- Negligent Breach of Contract/Warranty
- Other Breach of Contract/Warranty
- Collections (e.g., money owed, open book accounts) (09)
  - Collection Case-Seller Plaintiff
- Other Promissory Note/Collections Case
- Insurance Coverage *(not provisionally complex)* (18)
  - Auto Subrogation
  - Other Coverage
- Other Contract (37)
  - Contractual Fraud
  - Other Contract Dispute

#### Real Property

- Eminent Domain/Inverse Condemnation (14)
- Wrongful Eviction (33)
- Other Real Property (e.g., quiet title) (26)
  - Writ of Possession of Real Property
  - Mortgage Foreclosure
  - Quiet Title
- Other Real Property *(not eminent domain, landlord/tenant, or foreclosure)*

#### Unlawful Detainer

- Commercial (31)
- Residential (32)
- Drugs (38) *(if the case involves illegal drugs, check this item; otherwise, report as Commercial or Residential)*

#### Judicial Review

- Asset Forfeiture (05)
- Petition Re: Arbitration Award (11)
- Writ of Mandate (02)
  - Writ-Administrative Mandamus
  - Writ-Mandamus on Limited Court Case Matter
- Writ-Other Limited Court Case Review
- Other Judicial Review (39)
  - Review of Health Officer Order
  - Notice of Appeal-Labor
  - Commissioner Appeals

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

- Antitrust/Trade Regulation (03)
- Construction Defect (10)
- Claims Involving Mass Tort (40)
- Securities Litigation (28)
- Environmental/Toxic Tort (30)
- Insurance Coverage Claims *(arising from provisionally complex case type listed above)* (41)

#### Enforcement of Judgment

- Enforcement of Judgment (20)
  - Abstract of Judgement (Out of County)
  - Confession of Judgement *(non-domestic relations)*
  - Sister State Judgment
  - Administrative Agency Award *(not unpaid taxes)*
  - Petition/Certification of Entry of Judgment on Unpaid Taxes
  - Other Enforcement of Judgment Case

#### Miscellaneous Civil Complaint

- RICO (27)
- Other Complaint *(not specified above)* (42)
  - Declaratory Relief Only
  - Injunctive Relief Only *(non-harassment)*
  - Mechanics Lien
- Other Commercial Complaint Case *(non-tort/non-complex)*
- Other Civil Complaint *(non-tort/non-complex)*

#### Miscellaneous Civil Petition

- Partnership and Corporate Governance (21)
- Other Petition *(not specified above)* (43)
  - Civil Harassment
  - Workplace Violence
  - Elder/Dependent Adult Abuse
  - Election Contest
  - Petition for Name Change
  - Petition for Relief for Late Claim
  - Other Civil Petition

SHORT TITLE:

CASE NUMBER

Prasad v. Kaiser Foundation Hospitals

# CIVIL CASE COVER SHEET ADDENDUM **86582504** 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 5-7 ☐ 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)

- Class Actions must be filed in the Stanley Mosk Courthouse, Central District.
- May be filed in Central (Other county, or no Bodily Injury/Property Damage).
- Location where cause of action arose.
- Location where bodily injury, death or damage occurred.
- Location where performance required or defendant resides.
- Location of property or permanently garaged vehicle.
- Location where petitioner resides.
- Location wherein defendant/respondent functions wholly.
- Location where one or more of the parties reside.
- Location of Labor Commissioner Office.

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

Auto Tort

Other 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: <b>Prasad v. Kaiser Foundation Hospitals</b>	CASE NUMBER
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	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Non-Personal Injury/ Property Damage/ Wrongful Death Tort	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.
Employment	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.
Contract	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.
Real Property	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	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.

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	<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
<b>Judicial Review</b>	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 - Administration 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.
<b>Provisionally Complex Litigation</b>	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.
<b>Enforcement of Judgment</b>	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 Declaration 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.
<b>Miscellaneous Civil Petitions</b>	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 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.

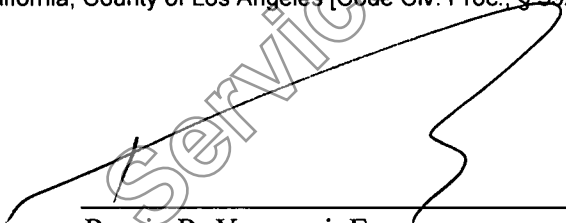
SHORT TITLE: <b>Prasad v. Kaiser Foundation Hospitals</b>	CASE NUMBER
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Item III. Statement of Location: Enter the address of the accident, party's residence or place of business, performance, or other circumstance indicated in Item II., Step 3 on Page 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 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.		ADDRESS: 4715 Sunset Blvd.
CITY: Los Angeles	STATE: CA	ZIP CODE: 90029

Item IV. Declaration of Assignment: I declare under 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 Los Angeles 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: May 19, 2015

  
 Ramin R. Younessi, Esq.  
 (SIGNATURE OF ATTORNEY/FILING PARTY)

**PLEASE HAVE THE FOLLOWING ITEMS COMPLETED AND READY TO BE FILED IN ORDER TO PROPERLY COMMERCE 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 for 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 ordered appointing the Guardian as 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.

05/20/2015