

ORIGINAL

3
Assigned GROSS
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FILED
Superior Court of California
County of Los Angeles

JUL 17 2018

Sherri R. Carter, Executive Officer/Clerk
By Ricardo Perez Deputy
Ricardo Perez

Attorneys for Plaintiffs,
HARRY PERSAUD, SONIKA PERSAUD, and SHARMILA BHAWANI

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

HARRY PERSAUD; SONIKA
PERSAUD; and SHARMILA
BHAWANI;

Plaintiffs,

vs.

KAISER FOUNDATION HOSPITALS;
KAISER FOUNDATION HEALTH
PLAN; SOUTHERN CALIFORNIA
PERMANENTE MEDICAL GROUP;
and DOES 1-30, Inclusive.

Defendants.

CASE NO: ***
(Assigned to the Hon. ***, Dept. ***)
Filed: ***
Trial: ***

COMPLAINT FOR DAMAGES

I. WRONGFUL DEATH

RECEIVED: \$435.00
CASH: \$0.00
CHANGE: \$0.00
CARD: \$0.00
CHECK: \$435.00
DATE PAID: 07/18/18 03:23 PM
PAYMENT: \$435.00 310
RECEIPT #: CCHS21665044

COME NOW, plaintiffs, and alleges against defendants, and each of them, as follows:

GENERAL ALLEGATIONS

1. At all times herein mentioned, decedent, MATADAI PERSAUD, and plaintiff, HARRY PERSAUD resided in the County of Los Angeles, State of California.

2. At all times herein mentioned plaintiff, HARRY PERSAUD was the husband of the decedent, Matadai Persaud. Plaintiffs SONIKA PERSAUD and SHARMILA BHAWANI are the children of Matadai Persaud.

3. Decedent, Matadai Persaud died on May 3, 2018.

1 4. Plaintiffs are informed and believe and thereon allege that each of the defendants sued
2 herein at all times pertinent to the times hereto were and are residents of and are doing business in the
3 County of Los Angeles, State of California.

4 5. At all times herein mentioned, the defendants, KAISER FOUNDATION HOSPITALS,
5 KAISER FOUNDATION HEALTH PLAN, SOUTHERN CALIFORNIA PERMANENTE MEDICAL
6 GROUP, and Does 1 through 30, inclusive, were and are engaged in the owning, operating, maintaining,
7 managing and engaged in rendering medical, surgical, hospital, diagnostic, nursing and other care to the
8 general public for compensation in Los Angeles County, at Kaiser Permanente Downey Medical Center;
9 all the acts complained of herein by plaintiffs against said defendants were done and performed by said
10 defendants by and through their duly authorized agent, joint venturers, and employees, each of whom and
11 all of whom were at all times mentioned herein acting within the course, purpose and scope of their joint
12 venture or employment and their conduct was ratified by the defendants, KAISER FOUNDATION
13 HOSPITALS; KAISER FOUNDATION HEALTH PLAN; SOUTHERN CALIFORNIA PERMANENTE
14 MEDICAL GROUP, and Does 1 through 30, inclusive. Further, these defendants selected and assigned
15 physicians and other health care professionals to care for and treat the decedent and through words or
16 actions held those individuals out as agents or employees, knowing and expecting decedent and the
17 plaintiffs to rely upon those actions or words and the decedent and the plaintiffs did so rely. Those
18 individuals were the ostensible agents of these defendants.

19 6. At all times herein mentioned, defendants and each of them, held themselves out to the
20 general public and to the decedent and the plaintiffs as skilled professionals in the science of medicine,
21 surgery, nursing, hospital care, medical attendant and related care; and said defendants held themselves
22 out to the general public and to the decedent and the plaintiffs as possessing that degree of knowledge and
23 skill customarily possessed and exercised by other physicians, surgeons, nurses, and hospital attendants
24 engaged in the same or similar locality as that of defendants, and each of them.

25 7. The true names, identities and capacities, whether individual, associate, corporate or
26 otherwise of defendants Does 1 to 30, inclusive, and each Doe in between, are unknown to plaintiffs at this
27 time, who therefore sue said defendants by such fictitious names. When the true names and capacities of
28 such fictitiously designated defendants are ascertained, plaintiffs will amend this Complaint to insert said

1 true names, identities, and capacities, together with the proper charging allegations. Plaintiffs are informed
2 and believe, and thereon allege, that each of the defendants sued herein as a Doe is responsible in some
3 actionable manner for the events and happenings herein alleged and thereby legally causing the injuries
4 and damages to the various plaintiffs as hereinafter set forth.

5 8. At all times herein mentioned, each of the defendants sued herein, whether by their
6 actual name or fictitious name, was the agent, alter ego, servant, joint venturer or employee of each other
7 and of his said co-defendants and was as such acting within the purpose and scope of said
8 agency, venture, service or employment, and each of the defendants, as aforesaid, whether referred to by
9 their actual names or fictitious names, when acting as a principal was negligent in the selection and hiring
10 of each and every other co-defendant as an agent, servant, or employee and, further, expressly directed,
11 consented to, approved, affirmed and ratified each and every action taken by the co-defendants.

12 **FIRST CAUSE OF ACTION ON BEHALF OF PLAINTIFFS AGAINST ALL DEFENDANTS**

13 **FOR WRONGFUL DEATH**

14 9. Plaintiffs allege and incorporate hereby by reference all of the allegations contained in
15 Paragraphs 1 through 8 of the General Allegations of this complaint.

16 10. On April 30, 2018, the decedent, Matadai Persaud, was taken emergently to Kaiser
17 Permanente Downey Medical Center (Kaiser Downey) after suffering an acute onset of slurred speech.
18 At Kaiser Downey she was seen by emergency room physicians who suspected an acute ischemic stroke.
19 Mrs. Persaud was evaluated by Dr. Soyun Kim in the emergency room for a suspected stroke. Mrs.
20 Persaud was sent to a CT scan pursuant to Kaiser's stroke protocol and was then evaluated by a tele-stroke
21 neurologist Dr. Omer Rafiq Khayali. During her admission to Kaiser Downey, decedent remained under
22 the sole and exclusive care and control of the defendants and each of them during all times mentioned
23 herein.

24 11. During said periods of time herein and above alleged the defendants and each of them and
25 Does 1 to 30, and each of them, agreed to perform and undertook to perform for the decedent all services
26 necessary in the care and treatment of decedent, which included, but was not limited to examinations,
27 laboratory evaluations, laboratory analysis, imaging studies, and treatment of the decedent, and in so doing,
28 the defendants and each of them, established a physician/nurse/hospital/care giver relationship with the

1 decedent to provide skillful management of decedent's medical care.

2 12. During said periods of time herein above alleged, defendants and each of them, and
3 Does 1 to 30, and each of them, were negligent, careless and unskillful in their management of the
4 decedent's medical condition, including, but not limited to, the following: negligent evaluations; failure
5 to properly interpret imaging studies, negligent administration of medication, among other deviations from
6 the standard of care.

7 13. More specifically, while at Kaiser Downey, physicians failed to properly interpret a CT scan
8 that showed a completed ischemic stroke in decedent's basal ganglia. Such a finding is a direct
9 contravention to the administration of TPA. Additionally, the Kaiser tele-stroke neurologist negligently
10 failed to review the available imaging and improperly recommended the administration of TPA in the face
11 of an NIH stroke scale of 1. As a result of this negligence, Mrs. Persaud suffered a massive hemorrhage
12 and died.

13 14. As a direct and legal result of said negligence, carelessness and unskillfulness of defendants,
14 and each of them, and Does 1 to 30, inclusive, and each of them, decedent died on May 3, 2013 from
15 complications of a massive brain bleed.

16 15. As a legal and proximate result of the wrongful acts of defendants and each of them,
17 decedent died, and as a result, plaintiffs have suffered the loss of their wife's and mother's financial
18 support, house hold support, household services, guidance, love, companionship, and support. In addition,
19 plaintiffs have suffered general damage for the loss of Mrs. Persaud, all to their general damages. Finally,
20 as a result of Mrs. Persaud's death, her family has incurred damages in the form of special damages in
21 connection with her death and medical expenses.

22 **PRAYER**

23 **WHEREFORE**, plaintiffs pray for judgment against defendants, and each of them, as follows:

- 24 1. General damages according to proof;
25 2. Special damages according to proof;
26 3. Legal interest according to proof;
27 4. Any other and further relief as the Court deems just and proper.

28 ///

1 DATED: July 16, 2018

LAW OFFICES OF MARSHALL SILBERBERG

2
3 By 

4 Marshall Silberberg
5 William S. Collins
6 Attorneys for Plaintiffs
7 HARRY PERSAUD, SONIKA PERSAUD, and
8 SHARMILA BHAWANI

9 DEMAND FOR JURY TRIAL

10 Plaintiffs demand a jury trial.

11 DATED: July 16, 2018

LAW OFFICES OF MARSHALL SILBERBERG

12
13 By 

14 Marshall Silberberg
15 William S. Collins
16 Attorneys for Plaintiffs
17 HARRY PERSAUD, SONIKA PERSAUD, and
18 SHARMILA BHAWANI

07/19/2018

ORIGINAL

CM-010

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number and address) Marshall Silberberg 58303 Law Offices of Marshall Silberberg 3333 Michelson Drive, Suite 710 Irvine, CA 92612 TELEPHONE NO.: (949) 718-0960 FAX NO.: (949) 266-5811 ATTORNEY FOR (Name): Plaintiff		FOR COURT USE ONLY FILED Superior Court of California County of Los Angeles JUL 17 2018 Sherri B. Carter, Executive Officer/Clerk By <u>Ricardo Perez</u> Deputy Ricardo Perez
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES STREET ADDRESS: 312 Spring Street MAILING ADDRESS: CITY AND ZIP CODE: Los Angeles 90012 BRANCH NAME: Spring Street Courthouse		
CASE NAME: PERSAUD v. KAISER		
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: BC714101 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 PI/PD/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 PI/PD/WD (23) Non-PI/PD/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-PI/PD/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)
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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): 1
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: July 16, 2018
 William S. Collins

(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

CM-010

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:**

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 P/DP/DWD (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 P/DP/DWD (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 P/DP/DWD

Non-P/DP/DWD (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-P/DP/DWD 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 Judgment (Out of County)
Confession of Judgment (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 From Late Claim
Other Civil Petition

ORIGINALSHORT TITLE:
PERSAUD v. KAISER

CASE NUMBER

BG714101

**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 2.3 in all new civil case filings in the Los Angeles Superior Court.

Step 1: After completing the Civil Case Cover Sheet (Judicial Council form CM-010), find the exact case type in Column A that corresponds to the case type indicated in the Civil Case Cover Sheet.

Step 2: In Column B, check the box for the type of action that best describes the nature of the case.

Step 3: In Column C, circle the number which explains the reason for the court filing location you have chosen.

Applicable Reasons for Choosing Court Filing Location (Column C)

- Class actions must be filed in the Stanley Mosk Courthouse, Central District.
- Permissive filing in central district.
- Location where cause of action arose.
- Mandatory personal injury filing in North District.
- 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's Office.
- Mandatory filing location (Hub Cases – unlawful detainer, limited non-collection, limited collection, or personal injury).

FAXED

Auto Tort
Other Personal Injury/Property Damage/Wrongful Death Tort

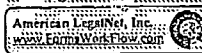
A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons (See Step 3 Above)
Auto (22)	<input type="checkbox"/> A7100 Motor Vehicle Personal Injury/Property Damage/Wrongful Death	1, 4, 11
Uninsured Motorist (46)	<input type="checkbox"/> A7110 Personal Injury/Property Damage/Wrongful Death Uninsured Motorist	1, 4, 11
Asbestos (04)	<input type="checkbox"/> A6070 Asbestos Property Damage	1, 11
	<input type="checkbox"/> A7221 Asbestos Personal Injury/Wrongful Death	1, 4, 11
Product Liability (24)	<input type="checkbox"/> A7260 Product Liability (not asbestos or toxic/environmental)	1, 4, 11
Medical Malpractice (45)	<input checked="" type="checkbox"/> A7210 Medical Malpractice Physicians & Surgeons	1, 4, 11
	<input type="checkbox"/> A7240 Other Professional Health Care Malpractice	1, 4, 11
Other Personal Injury Property Damage Wrongful Death (23)	<input type="checkbox"/> A7250 Premises Liability (e.g., slip and fall)	1, 4, 11
	<input type="checkbox"/> A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.)	1, 4, 11
	<input type="checkbox"/> A7270 Intentional Infliction of Emotional Distress	1, 4, 11
	<input type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death	1, 4, 11

LACIV-109 (Rev 2/16)
LASC Approved 03/04

**CIVIL CASE COVER SHEET ADDENDUM
AND STATEMENT OF LOCATION**

Local Rule 2.3

Page 1 of 4



SHORT TITLE:
PERSAUD v. KAISER

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, 2, 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	1, 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 <input type="checkbox"/> A6034 Collections Case-Purchased Debt (Charged Off Consumer Debt Purchased on or after January 1, 2014)	5, 6, 11 5, 11 5, 6, 11
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, 9
Eminent Domain/Inverse Condemnation (14)	<input type="checkbox"/> A7300 Eminent Domain/Condemnation Number of parcels _____	2, 6
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)	6, 11
Unlawful Detainer-Residential (32)	<input type="checkbox"/> A6020 Unlawful Detainer-Residential (not drugs or wrongful eviction)	6, 11
Unlawful Detainer- Post-Foreclosure (34)	<input type="checkbox"/> A6020F Unlawful Detainer-Post-Foreclosure	2, 6, 11
Unlawful Detainer-Drugs (38)	<input type="checkbox"/> A6022 Unlawful Detainer-Drugs	2, 6, 11

ACIV 109 (Rev 2/16)
ASC Approved C3-04

**CIVIL CASE COVER SHEET ADDENDUM
AND STATEMENT OF LOCATION**

Local Rule 2.3
Page 2 of 4

American LegalNet, Inc.
www.FormsWorkflow.com

SHORT TITLE:
PERSAUD v. KAISER

CASE NUMBER:

Judicial Review

Provisionally Complex Litigation

Enforcement of Judgment

Miscellaneous Civil Complaints

Miscellaneous Civil Petitions

A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 and Above
Asset Forfeiture (05)	<input type="checkbox"/> A6108 Asset Forfeiture Case	2, 3, 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
Other Judicial Review (39)	<input type="checkbox"/> A6150 Other Writ/Judicial Review	2, 8
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 (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, 5, 11 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 <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
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/Change of Gender <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, 8 2, 9

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**CIVIL CASE COVER SHEET ADDENDUM
AND STATEMENT OF LOCATION**

Local Rule 2.3

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SHORT TITLE: PERSAUD v. KAISER	CASE NUMBER
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Step 4: Statement of Reason and Address: Check the appropriate boxes for the numbers shown under Column C for the type of action that you have selected. Enter the address which is the basis for the filing location, including zip code. (No address required for class action cases).

REASON: <input checked="" 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. <input checked="" type="checkbox"/> 11.		ADDRESS: 9333 Imperial Highway
CITY: Downey	STATE: CA	ZIP CODE: 90242

Step 5: Certification of Assignment: I certify that this case is properly filed in the Central Judicial District of the Superior Court of California, County of Los Angeles [Code Civ. Proc., §392 et seq., and Local Rule 2.3(a)(1)(E)].

Dated: July 16, 2018

(SIGNATURE OF ATTORNEY/FILING PARTY)
William S. Collins

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 CIM-010.
4. Civil Case Cover Sheet Addendum and Statement of Location form, LACIV 109, LASC Approved 03-04 (Rev. 02/16).
5. Payment in full of the filing fee, unless there is court order for waiver, partial or scheduled payments.
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.

07/19/2018

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**CIVIL CASE COVER SHEET ADDENDUM
AND STATEMENT OF LOCATION**

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