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GOAR ALOYAN

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES
(Unlimited Civil Case)

GOAR ALOYAN, an individual,
Plaintiff,

v.

KAISER FOUNDATION HEALTH PLAN, a
California Medical Corporation; KAISER
PERMANENTE, a California Medical
Corporation; JOCELYN S. BASILLO, an
individual; and DOES 1 through 20,
Defendants.

Case No.

BC 488099

COMPLAINT FOR:

- (1) MEDICAL MALPRACTICE
(PROFESSIONAL NEGLIGENCE)
- (2) WRONGFUL DEATH
- (3) REFUSAL TO RENDER
EMERGENCY MEDICAL SERVICES
OR ASSISTANCE
- (4) LOSS OF CONSORTIUM
- (5) NEGLIGENT INFLICTION OF
EMOTIONAL DISTRESS

Plaintiff Goar Aloyan alleges as follows:

I. INTRODUCTION

1. Plaintiff Goar Aloyan brings this action to recover damages stemming from the professional negligence of Defendants and each of them, as well as for wrongful death, refusal to render emergency medical services, loss of consortium, and negligent infliction of emotional distress.

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

JUL 11 2012

John A. Clarke, Executive Officer/Clerk
BY Shamya Wesley Deputy

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91402

Court Case News Service

CT/CASE: BC488099-1
RECEIPT #: 684658013
DATE PAID: 07/11/12 12:54 PM
PAYMENT: \$435.00
RECEIVED: 0310
CHECK: 435.00
CASH:
CHANGE:
CARD:

1 II. THE PARTIES

2 2. At all times herein mentioned, Plaintiff Goar Aloyan ("Mrs. Aloyan"), an
3 individual, was the wife of decedent, Trdat Arakelyan ("Mr. Arakelyan"), a patient of
4 Defendants, and a resident of the County of Los Angeles.

5 3. Based on information and belief, at all times herein mentioned, Defendant
6 Kaiser Foundation Health Plan, a California Medical corporation, was, an association of
7 physicians and surgeons duly authorized to practice medicine with an Emergency
8 Department, with its principal place of business in Los Angeles County, California.

9 4. Based on information and belief, at all times herein mentioned, Defendant
10 Kaiser Permanente, a California Medical corporation, was, an association of physicians and
11 surgeons duly authorized to practice medicine with an Emergency Department, with its
12 principal place of business in Los Angeles County, California.

13 5. Based on information and belief, at all times herein mentioned, Defendant
14 Jocelyn S. Basililo, an individual, was employed by the other named defendants as a
15 registered nurse in Defendant's Emergency Department in Los Angeles County, California.

16 6. Plaintiff is unaware of the true names and capacities of DOES 1 through 20,
17 inclusive, and therefore sues them by fictitious names. Plaintiff is informed and believes,
18 and on the basis of that information and belief alleges, that each of these defendants was in
19 some manner negligently and proximately responsible for the events and happenings
20 alleged in this complaint and for plaintiff's injuries and damages.

21 7. Plaintiff is informed and believes, and on the basis of that information and
22 belief alleges, that at all times mentioned in this complaint, defendants, and DOES 1 through
23 20 were the agents and employees of their codefendants, and in doing the acts alleged in
24 this complaint were acting within the course and scope of that agency and employment.
25 Each defendant, when acting as a principal, was negligent in the selection and hiring of
26 each other defendant as an agent or employee.

27

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1 III. JURISDICTION AND VENUE.

2 8. The Defendants' acts, including but not limited to the professional negligence
3 and medical malpractice that caused Plaintiff's damages as alleged herein all occurred in
4 the County of Los Angeles, State of California.

5 9. This Court has jurisdiction over the present matter because, as delineated
6 within this complaint, the nature of the claims and amounts in controversy meet the
7 requirements for jurisdiction in the Superior Court of Los Angeles.

8 10. On October 25, 2011, plaintiff served notice, pursuant to CCP §364, to
9 defendants of plaintiff's intention to sue them for professional negligence.

10 IV. FACTS

11 11. On Friday, September 23, 2011, decedent, Trdat Arakelyan, was a passenger
12 in a car being driven by his wife, Goar Aloyan, when he began complaining of severe chest
13 pain. Mrs. Aloyan immediately recognized her husband's grave medical condition because
14 she is very familiar with heart attack symptoms due to her employment experience at a
15 cardiologist's office. Hence, she quickly turned the car around and rushed him to the
16 nearest hospital – Kaiser Permanente Hospital located at 13652 Cantara Street in Panorama
17 City.

18 12. At approximately 8:40 p.m., Mrs. Aloyan pulled up to the curb at Kaiser's
19 Emergency facility, so that her husband would not lose any time getting immediate medical
20 assistance. Mr. Arakelyan exited the car and headed into the hospital for help while his wife
21 went to park the car.

22 13. FROM THE INSTANT MR. ARAKELYAN ENTERED KAISER'S
23 EMERGENCY WAITING ROOM AT 8:40 P.M., EVERY SECOND OF THE TRAGEDY
24 THAT ENSUED HAS BEEN CAPTURED BY VIDEO SURVEILLANCE FOOTAGE.¹

25 14. Upon entering the emergency room, Mr. Arakelyan walked directly to the
26 intake nurse, Jocelyn Basillio, and informed her of his severe chest pain, shortness of breath,
27 and profuse sweating. Rather than immediately assessing the severity of Mr. Arakelyan's

28 ¹ All references to times in this Complaint are based on the timestamp indicator on Kaiser's surveillance video.

1 life threatening symptoms at triage, the receptionist negligently handed Mr. Arakelyan
2 numerous forms and instructed him to be seated and fill out the forms before he would be
3 helped.

4 15. Mr. Arakelyan was left with no choice. Still experiencing and exhibiting
5 numerous symptoms of a heart attack, he unwillingly complied and sat immediately across
6 the reception nurse in the empty waiting room with the paperwork clenched in one hand,
7 with his other hand cradling his chest. He leaned back and rested his head on his chair to
8 lessen the chest pains he was enduring.

9 16. Having parked the car, Mrs. Aloyan rushed into the waiting room at
10 approximately 8:42 p.m., and was surprised to find her husband still seated in the empty
11 waiting room in pain and distress. After quickly checking on him, she immediately walked
12 over to the reception window and demanded that they admit her husband. She too was
13 given no other option but to return to the empty waiting room to wait and fill out his
14 paperwork.

15 17. Although she walked back to be at her husband's side, noticing his severe
16 pain, Mrs. Aloyan again anxiously walked back to the reception window around 8:43 p.m.
17 and again demand immediate medical assistance. Mr. Arakelyan still remained helpless
18 and in pain in his chair.

19 18. Unfortunately, while being ignored and denied treatment by the Emergency
20 Room staff, at 8:45 p.m., while seated in the empty waiting room, Mr. Arakelyan went into
21 cardiac arrest and collapsed. His limp body slid down off his chair.

22 19. Using all her strength, Mrs. Aloyan attempted by herself to lift her husband,
23 but his body remained limp. Panic ensued in the waiting room. An unknown gentleman
24 who witnessed what was going on ran over to help Mrs. Aloyan as she was struggling to lift
25 her husband. The concerned man waved at a security guard who was seated near the
26 reception window, for help. The man took a second look at Mr. Arakelyan and began angrily
27 yelling in the direction of the reception window. At 8:46 p.m., three hospital employees

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1 finally came out and began attempting to lift Mr. Arakelyan. Nurses also then appeared with
2 a stretcher and lifted Mr. Arakelyan onto the stretcher.

3 20. Mrs. Aloyan powerlessly stood at the foot of the stretcher and watched as the
4 nurses placed her husband's body on the stretcher. The nurses rolled Tıdat Arakelyan away
5 from the waiting room and Mrs. Aloyan followed them. At some time thereafter, CPR was
6 initiated and Code Blue was finally called. Mr. Arakelyan by this point had no pulse. After
7 further time, Mr. Arakelyan was administered medication and multiple shocks but remained
8 pulseless and unresponsive. Shortly thereafter he was pronounced dead.

9
10 FIRST CAUSE OF ACTION

11 MEDICAL MALPRACTICE (PROFESSIONAL NEGLIGENCE)

12 (Goar Aloyan Against All Defendants and DOES 1 through 20)

13 21. Plaintiff repeats and realleges each of the allegations contained in the
14 preceding paragraphs 1 through 20 and incorporates same as though fully set forth herein.

15 22. On September 23, 2011, Mr. Arakelyan arrived at Defendants' emergency
16 department seeking immediate medical attention for his severe chest pain. Defendants had
17 a duty to use such skill, prudence, and diligence as other emergency facilities in the same or
18 similar locality in similar circumstances commonly possess and exercise, and to provide
19 such immediate care to patients like Mr. Arakelyan.

20 23. Defendants failed to exercise their duty to assess the level of risk that Mr.
21 Arakelyan presented and to provide the appropriate diagnosis and care. In assessing the
22 level of risk that Mr. Arakelyan presented, Defendants should have immediately admitted
23 Mr. Arakelyan to the emergency department and conducted an EKG to be analyzed by a
24 physician. Following an EKG that would have undoubtedly shown that Mr. Arakelyan was
25 is severe cardiac distress, a physician should have administered various forms of medication
26 and performed the necessary procedures commonly employed to avoid death resulting from
27 a heart attack.

1 24. At all times mentioned in this complaint, Defendants were negligent in that
2 they failed to possess and exercise, in both diagnosis and treatment, the reasonable degree
3 of knowledge and skill that is ordinarily possessed and exercised by other emergency
4 department nurses and physicians in the same or similar locality under similar
5 circumstances, in that, among other things, Defendants breached that duty by failing to
6 triage Mr. Arakelyan as a patient suffering a severe cardiac emergency. Defendants
7 negligently dismissed Mr. Arakelyan's request for immediate medical attention and instead
8 told him to fill out forms and wait to be seen. Mr. Arakelyan should not have been forced to
9 wait and fill out paperwork while suffering a heart attack. Given his age, gender, chief
10 complaints and physical appearance, the Defendants should have clearly recognized the
11 grave possibility that Mr. Arakelyan was suffering a heart attack.

12 25. Defendant Basililo and the emergency room staff failed to accurately triage
13 Mr. Arakelyan while he was in severe pain and cardiac distress.

14 26. Defendant Basililo and all other emergency room admitting staff again failed to
15 recognize the urgency of the situation even after the Goar Aloyan entered the emergency
16 room reception area and frantically explained the situation and demanded immediate
17 medical attention several times. Defendant Basililo and the emergency room staff failed to
18 provide the necessary medical attention that Mr. Arakelyan required.

19 27. Defendants' negligent conduct in failing to provide Mr. Arakelyan with
20 emergency medical assistance was a proximate cause of Mr. Arakelyan's death. It is
21 common practice for emergency departments to provide immediate assessment and care
22 even when presented with acute cardiac syndromes. There exist numerous procedures in
23 preventing death from a heart attack but none were timely nor properly employed to save
24 Mr. Arakelyan's life. At intake, Defendant failed to recognize the extremely high level of risk
25 that Mr. Arakelyan presented. In the failure to recognize the risk level, the Defendant failed
26 the first step in triage. As a result of refusing to immediately admit Mr. Arakelyan, none of
27 the immediate procedures available in diagnosing cardiac distress were utilized either.
28

1 Finally, of all the available procedures that exist to prevent cardiac failure, they were either
2 wholly ignored or at best administered untimely.

3 28. Mrs. Aloyan has suffered actual loss or damage resulting from the death of her
4 husband due to Defendants' professional negligence.

5
6 SECOND CAUSE OF ACTION

7 WRONGFUL DEATH

8 (Goar Aloyan Against All Defendants and DOES 1 through 20)

9 29. Plaintiff repeats and realleges each of the allegations contained in the
10 preceding paragraphs 1 through 29 and incorporates the same as though fully set forth
11 herein.

12 30. Mr. Arakelyan's death was directly caused by the Defendants' conduct or in
13 this case, lack thereof, in failing to provide immediate medical attention to Mr. Arakelyan
14 while he was intentionally ignored as he waited in Defendant's Emergency Department
15 suffering a cardiac emergency.

16 31. Defendants had the duty but failed and refused to provide immediate medical
17 care to Mr. Arakelyan. Thus, Defendants were negligent, reckless, or engaged in intentional
18 conduct, resulting in the death of Mr. Arakelyan.

19 32. Mr. Arakelyan's wife, Mrs. Aloyan, is still alive. Mrs. Aloyan has suffered
20 monetary damages because of the decedent's death.

21 THIRD CAUSE OF ACTION

22 REFUSAL TO RENDER EMERGENCY MEDICAL SERVICES

23 (Goar Aloyan Against All Defendants and DOES 1 through 20)

24 33. Plaintiff repeats and realleges each of the allegations contained in the
25 preceding paragraphs 1 through 33 and incorporates the same as though fully set forth
26 herein.

27 34. On September 23, 2011, and at all times herein mentioned, Defendants'
28 Emergency Room was fully equipped and staffed with physicians, nurses, intake personnel,

1 and other Emergency Department staff, to provide emergency medical services to any
2 member of the public who came to the hospital with urgent medical problems.

3 35. On September 23, 2011, at approximately 8:40 p.m, decedent, Mr. Arakelyan
4 was brought to Defendants' Emergency Department, seeking immediate care and treatment
5 for heart attack symptoms including severe chest pain, epigastric pain and profuse
6 sweating.

7 36. Mr. Arakelyan was visibly in severe pain and distress. He explained the
8 details of his symptoms to Defendant Basililo and the hospital staff. Despite Mr. Arakelyan's
9 pleas, Defendants failed to determine that the decedent was suffering a cardiac emergency.
10 Rather than immediately providing the urgent medical treatment that he required,
11 Defendants instructed the decedent to sit, wait, and fill out forms.

12 37. As a proximate result of Defendants' negligent failure to provide Mr.
13 Arakelyan the necessary emergency medical services, and as a proximate result of the delay
14 that Defendants' negligence caused, Mr. Arakelyan died.

15 FOURTH CAUSE OF ACTION

16 LOSS OF CONSORTIUM

17 (Goar Aloyan Against All Defendants and DOES 1 through 20)

18 38. Plaintiff repeats and realleges each of the allegations contained in the
19 preceding paragraphs 1 through 38 and incorporates the same as though fully set forth
20 herein.

21 39. Mrs. Aloyan was caused to be deprived of the love, affection, services,
22 comfort, solace, assistance, consortium, companionship of her spouse, all to her damage,
23 inconvenience, discomfort and loss in an amount and extent subject to proof and beyond the
24 jurisdictional minimum of this Court, as a result of Defendants' conduct in causing the death
25 of her husband, Tigran Arakelyan.

26 40. Mrs. Aloyan also suffered immense hard, mental anguish, and emotional
27 distress as she watched her husband suffer through pain and ultimately, his death.
28

41. Mrs. Aloyan was further caused and continues to be deprived of and denied the full enjoyment of her marital state all to her damage, as a result of the negligent conduct of Defendants in causing the above referenced death of her husband. Mrs. Aloyan suffered actual damages in an amount to be proven at trial.

FIFTH CAUSE OF ACTION

NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS

(Goar Aloyan Against All Defendants and DOES 1 through 20)

42. Plaintiff repeats and realleges each of the allegations contained in the preceding paragraphs 1 through 42 and incorporates the same as though fully set forth herein.

43. Mrs. Aloyan was present with her husband in Defendant's Emergency Department and was aware that, while her husband was suffering a severe medical emergency, the Defendants were ignoring his pleas for help. Mrs. Aloyan witnessed her husband suffer through severe chest pain, profuse sweating and shortness of breath, while Defendants refused to provide any assistance. She realized her husband's life was at risk and that his unassisted condition could become lethal, but she was helpless. Mrs. Aloyan tried to intervene and seek assistance herself, but the Defendants maintained their refusal to attend to Mr. Arakelyan's emergency condition. Mrs. Aloyan's fears soon became reality when her husband slumped to his death beside her.

44. Mrs. Aloyan suffered severe emotional distress as a result of witnessing the helpless suffering and ultimate death of her husband. The Defendants' negligence in failing to provide Mr. Arakelyan with emergency medical assistance was a proximate cause of his death.

PRAYER FOR RELIEF

WHEREFORE, Goar Aloyan prays for a judgment against Defendants, and each of them as follows:

1. For special damages, according to proof;
2. For general damages in an amount according to proof;
3. For costs of suit herein incurred;
4. For prejudgment interest; and
5. For such other and further relief as the Court may deem just and proper.

Dated: July 5, 2012

GOURJIAN LAW GROUP, P.C.

By: 

Varand Gourjian, Esq.
Attorney for Plaintiff,
Goar Aloyan

Dated: July 5, 2012

LAW OFFICES OF ALISA A. KONANYAN

By: 

Alisa A. Konanyan, Esq.
Attorney for Plaintiff,
Goar Aloyan

07/11/12

gourjanlawgroup

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, Street address, city, county, and zip): Varand Gourjian, Esq. (SBN 205344) GOURJIAN LAW GROUP, P.C. 101 North Brand Boulevard, Suite 1200 Glendale, California 91203 TELEPHONE NO.: (818) 956-0100 FAX NO.: (818) 956-0123 ATTORNEY FOR (Name): Plaintiff, Goar Aloyan		FOR COURT USE ONLY FILED SUPERIOR COURT OF CALIFORNIA COUNTY OF LOS ANGELES JUL 11 2012 John A. Clark, Executive Officer/Clerk BY <u>[Signature]</u> Deputy Shaumya Wesley	
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles STREET ADDRESS: 111 North Hill Street MAILING ADDRESS: CITY AND ZIP CODE: Los Angeles, 90012 BRANCH NAME: Stanley Mosk, Central District		CASE NAME: Goar Aloyan vs. Kaiser Foundation Health Plan, et al.	
CIVIL CASE COVER SHEET <input checked="" type="checkbox"/> Unlimited (Amount demanded exceeds \$25,000) <input type="checkbox"/> Limited (Amount demanded is \$25,000 or less)		Complex Case Designation <input type="checkbox"/> Counter <input type="checkbox"/> Joinder Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)	
CASE NUMBER: 80488099		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 b. <input type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve c. <input type="checkbox"/> Substantial amount of documentary evidence	d. <input type="checkbox"/> Large number of witnesses 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 f. <input type="checkbox"/> Substantial postjudgment judicial supervision
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3. Remedies sought (check all that apply): a. ☒ monetary b. ☐ nonmonetary; declaratory or injunctive relief c. ☐ punitive

4. Number of causes of action (specify): Medical Malpractice, Wrongful Death, Refusal to Render Medical Services, Loss of Consortium, Negligent Infliction of Emotional Distress

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 10, 2012
 Varand Gourjian, 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 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:

Goar Aloyan v. Kaiser Foundation Health Plan, et al.

CASE NUMBER

BC 488099

**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 5 ☐ 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	1., 4.
		<input checked="" type="checkbox"/> A7240 Other Professional Health Care Malpractice	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 checked="" type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death	1., 4. 1., 4. 1., 3. 1., ④

SHORT TITLE:

Goar Aloyan v. Kaiser Foundation Health Plan, et al.

CASE NUMBER

Non-Personal Injury/Property
Damage/ Wrongful Death Tort

Employment

Contract

Real Property

Unlawful Detainer

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

SHORT TITLE:

Goar Aloyan v. Kaiser Foundation Health Plan, et al.

CASE NUMBER

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

SHORT TITLE:

Goar Aloyan v. Kaiser Foundation Health Plan, et al.

CASE NUMBER

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

REASON: Check the appropriate boxes for the numbers shown under Column C for the type of action that you have selected for this case. <input type="checkbox"/> 1. <input type="checkbox"/> 2. <input type="checkbox"/> 3. <input 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: 13652 Cantara Street Panorama City, CA 91402
CITY: Panorama City	STATE: CA	ZIP CODE: 91402	

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: July 10, 2012

(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.