

ORIGINAL

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FILED
LOS ANGELES SUPERIOR COURT

MAR 13 2013

JOHN A. CLARKE, CLERK
BY AMBER HAVES, DEPUTY

054 Ernest Hudson Jr
SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES - CENTRAL DISTRICT

DOROTHY M. HO, an individual

Plaintiff,

v.

DR. DOREEN MURRAY, an individual;
KAISER FOUNDATION HOSPITALS, a
California Corporation; and Does 1-10
inclusive,

Defendant.

CASE NO.

BC502883

PLAINTIFF HO'S COMPLAINT AGAINST
DEFENDANT DR. DOREEN MURRAY AND
KAISER PERMANENTE FOR MEDICAL
MALPRACTICE

PLAINTIFF DOROTHY M. HO HEREBY ALLEGES AS FOLLOWS:

GENERAL ALLEGATIONS

1. Plaintiff DOROTHY M. HO (hereinafter as "Plaintiff HO") is, and was, at all times, an individual residing in the County of Los Angeles, State of California.
2. Defendant DR. DOREEN MURRAY (hereinafter as "MURRAY") is, and, was at all times, an individual doing business in the County of Los Angeles, State of California and a surgeon at the Los Angeles Medical Center located at 4867 Sunset Boulevard, Los Angeles, CA 90027, which is operated by Kaiser Foundation Hospitals.
3. Defendant KAISER FOUNDATION HOSPITALS (hereinafter as "KAISER") is, and, was at all times, a corporation doing business in the County of Los Angeles, State of California.

PLAINTIFF HO'S COMPLAINT FOR DAMAGES

CIT/CASE: BC502883
LEA/DEF#: 03/13/2013
RECEIVED: 03/13/13 03:18 PM
DATE PAID: 03/13/13 03:18 PM
FEE: \$35.00
CHECK: \$35.00
CASH: \$0.00
TOTAL: \$35.00

1 4. Plaintiff is ignorant of the true names and capacities of Defendants as sued in this Complaint
2 as DOES 1-10, inclusive, and therefore sues these Defendants by these fictitious names. Plaintiff will
3 amend this Complaint to allege their true names and capacities when ascertained. Plaintiff is informed
4 and believes, and based thereon alleges that, each of the fictitiously named Defendants is in some
5 actionable manner legally responsible for the acts alleged herein.

6 5. On November 29, 2011, Plaintiff HO underwent a medical operation performed by
7 Defendant MURRAY at the Los Angeles Medical Center for a hysteroscopy following abnormal findings
8 on Plaintiff's prior radiology exam and postmenopausal bleeding. During the operation, as was later
9 discovered, Defendant MURRAY apparently, in attempts to remove a polyp during the course of the
10 medical surgery, noted a protrusion of tan colored tissue, which Defendant MURRAY then attempted to
11 remove from Plaintiff's cervix. As Defendant MURRAY continued to pull on the tissue, it continued to
12 elongate and when the tissue was sufficiently removed from the vaginal area, it was discovered that the
13 tissue was not of gynecologic origin. Upon further consultation and confirmation with other medical staff,
14 it was determined that Defendant had perforated Plaintiff's uterus and instead caused a small bowel
15 injury to Plaintiff's bowel due to a tear in her bowels caused by said surgery.

16 6. As a result of the uterine perforation and tear of the small bowel caused by Defendant
17 MURRAY, a bowel resection and anastomosis was then immediately performed upon Plaintiff HO during
18 which a large portion, i.e. approximately 40 cm, of Plaintiff's small bowel had to be removed.

19 7. After the operation, Defendant MURRAY informed Plaintiff HO that despite the
20 complication during the procedure, i.e. perforation and small bowel tear, that Plaintiff would make a full
21 recovery and would suffer no further, significant effects from the medical complications from the
22 procedure. Defendant MURRAY also informed Plaintiff HO, at such time, claims and statements made
23 that the operation performed had been completed successfully. Plaintiff HO, however, was hospitalized
24 from this surgery for approximately 9 days, from November 29, 2011 until December 8, 2011 while
25 recovering from this surgery performed. During this time, Plaintiff HO suffered from vomiting,
26 abdominal cramping, bloating, and pain, which she was advised were normal complaints arising from
27 such surgery.
28

1 8. Thereafter, Plaintiff HO was discharged from the Los Angeles Medical Center on or about
2 December 8, 2011.

3 9. Afterwards, Plaintiff HO went back for multiple medical follow up examinations with other
4 medical care professionals over the subsequent weeks and months thereafter, and was told the
5 recuperation or rehabilitation process arising from said surgery would likely take months for a full
6 recovery.

7 10. Plaintiff HO, however, continued to suffer from physical pain and suffering such as
8 abdominal pain and discomfort and was compelled to take a leave of absence from her work and position
9 as a pharmacist at Kaiser given her medical issues from the surgery, i.e. inability to remain standing for an
10 extended period of time and inability to lift objects of significant weight.

11 11. It was not until late March 2012, approximately 4 months after her surgery performed by
12 Defendant MURRAY and after further consultation with various additional medical professionals, that
13 Plaintiff came to realize and discovered that she had more severe, physical complications from said
14 surgery which was later determined to be resultant injury caused by the subject medical procedure
15 performed by Defendant MURRAY, i.e. inability to eat much, inability to eat greasy foods, inability to
16 undertake hikes, travel abroad, etc. As a direct consequence, Plaintiff had already begun to develop major
17 depressive and anxiety disorders for which Plaintiff HO was prescribed and was taking medications such
18 as Xanax, Cymbalta, and Ativan. These continuing physical complications, mental and/or emotional
19 disorders further caused Plaintiff HO to suffer severe depression, inability to concentrate, loss of interest,
20 heightened anxiety regarding her physical health, and a fear of leaving her home residence.

21 12. Plaintiff HO, at no time prior to the medical surgery performed by Defendant MURRAY, had
22 suffered from such physical, emotional, and mental harms and injuries suffered, which injuries are all
23 believed to be arising from and due to the life-threatening medical complications suffered and caused by
24 the surgery performed by Defendant MURRAY, which effects and their impact was not determined or
25 discovered by Plaintiff HO to have been caused by the surgery performed until in or about the late March
26 2012 time period.

27 13. As a direct consequence of Defendant MURRAY's medical negligence in the carrying out of
28 and/or performance of said medical surgery, which Plaintiff HO did not realize was creating far-reaching

1 medical issues and problems not fully understood and realized until much later, Plaintiff HO has suffered
2 continuing serious and debilitating medical limitations to her person, resulting in serious bodily harm and
3 injury to her person, both physically and emotionally, not discovered and confirmed until several months
4 later after the surgery performed.

5 14. Plaintiff HO now seeks proper recompense in the form of monetary damages in an amount
6 not less than \$250,000.00, in a total amount to be proven at time of trial of this matter.

7 **FIRST CAUSE OF ACTION**

8 **(FOR MEDICAL MALPRACTICE AGAINST ALL DEFENDANTS)**

9 15. Plaintiff HO repeats and re-alleges Paragraphs 1 through 14 of the GENERAL
10 ALLEGATIONS above, and incorporates them by reference as if fully set forth herein.

11 16. As previously stated, on November 29, 2011, Plaintiff HO underwent a medical operation
12 performed by Defendant MURRAY for a hysteroscopy following abnormal findings on Plaintiff's prior
13 radiology exam and postmenopausal bleeding. During the operation, as was later discovered, Defendant
14 MURRAY apparently, in attempts to remove a polyp during the course of the medical surgery, noted a
15 protrusion of tan colored tissue, which Defendant MURRAY then attempted to remove from Plaintiff's
16 cervix. As Defendant MURRAY continued to pull on the tissue, it continued to elongate and when the
17 tissue was sufficiently removed from the vaginal area, it was discovered that the tissue was not of
18 gynecologic origin. Upon further consultation and confirmation with other medical staff, it was
19 determined that Defendant had perforated Plaintiff's uterus and instead caused a small bowel injury to
20 Plaintiff's bowel due to a tear in her bowels caused by said surgery.

21 17. In this, Defendant MURRAY failed in Defendant's position as a trusted surgeon to perform
22 the surgery with the level of skill, knowledge, and care that other reasonably careful surgeons would use
23 in similar circumstances when confronted with a tissue of unknown origin attached to and protruding
24 from an abnormal growth.

25 18. As a result of the uterine perforation and tear of the small bowel caused by Defendant
26 MURRAY, a bowel resection and anastomosis was then immediately performed upon Plaintiff HO during
27 which a large portion, i.e. approximately 40 cm, of Plaintiff's small bowel had to be removed.
28

1 19. After the operation, Defendant MURRAY informed Plaintiff HO that despite the
2 complication during the procedure, i.e. perforation and small bowel tear, that Plaintiff would make a full
3 recovery and would suffer no further, significant effects from the medical complications from the
4 procedure.

5 20. Defendant MURRAY failed in Defendant's position as a trusted surgeon, i.e. gynecologist,
6 to adequately and fully educate and inform the patient of her true medical condition and as to the serious
7 medical issues and/or surgical complications which had arisen at the time of the performance of the
8 medical procedure carried out on Plaintiff HO by Defendant MURRAY at such time. Defendant MURRAY
9 further failed to properly advise Plaintiff HO of the very serious medical issues and medical problems
10 which the resectioning and removal of a significant portion of her bowel would cause and create, as well
11 as potentially life-threatening limitations on her day to day physical activities, health, and well-being.

12 21. As a direct consequence of Defendant MURRAY's medical malpractice arising from the
13 negligent performance of the medical procedure carried out on or about November 29, 2011, Plaintiff HO
14 has incurred serious medical injuries, bodily harm, physical and mental distress and significant medical
15 expenses for additional medical care and treatment. Furthermore, due to Defendant's failure to properly
16 operate on Plaintiff, Plaintiff HO has continually been suffering from worsened health and medical
17 conditions, which could have been prevented had Defendant MURRAY properly performed Defendant's
18 medical duties adequately and non-negligently in the first instance.

19 22. In specific, in or about late March 2012, and after further consultation with various medical
20 professionals, Plaintiff came to realize and soon discovered that she had and continued to suffer from
21 more severe, physical complications from said surgery and began to develop continuing physical
22 complications which impacted her day to day life activities, i.e. inability to eat much, inability to eat
23 greasy foods, inability to undertake hikes, travel abroad, and which caused her continuing depressive and
24 anxiety related disorders for which Plaintiff HO was prescribed and was taking medications such as
25 Xanax, Cymbalta, and Ativan. These continuing physical complications, mental and/or emotional
26 disorders did not cease as was originally believed would be the case but continued to persist and further
27 caused Plaintiff HO to suffer more major and severe depression, causing her further to suffer from
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1 inability to concentrate, loss of interest, heightened anxiety regarding her future physical health and
2 welfare, and even a fear of leaving her home residence to undertake daily life activities.

3 23. Plaintiff HO, at no time prior to the medical surgery performed by Defendant MURRAY, had
4 suffered from such physical, emotional, and mental harms and injuries now being suffered, which injuries
5 are all believed to have arisen and be caused as a direct consequence of the medical complications suffered
6 and caused by the surgery performed by Defendant MURRAY.

7 24. As a direct consequence of Defendant MURRAY's medical negligence in the carrying out of
8 and/or performance of said medical surgery, which Plaintiff HO did not realize was creating far-reaching
9 medical issues and problems then not fully understood and realized until months later, Plaintiff HO has
10 suffered and continued to suffer numerous serious and severely traumatic events, and resultant serious
11 bodily harm and injury to her person, both physically and emotionally as caused by the medical surgery
12 performed by Defendant MURRAY, which severity of the medical consequences and potential medical
13 negligence and harm caused was not recognized and realized by Plaintiff HO until in or about the late
14 March 2012 time period.

15 25. As such, Plaintiff HO now seeks proper monetary compensation for all of her pain and
16 suffering arising from the bodily harm caused to her, both physically and emotionally, for the increasing
17 loss in her medical health and condition, and other resultant losses arising from this botched and
18 deficiently, and negligently performed medical procedure, as well as her medical expenses incurred due
19 to Defendant MURRAY's medical malpractice in the surgery performed.

20 26. All such monetary damages and additional damages are in an amount to be determined at
21 trial, but, at a minimum, not less than \$250,000.00 plus interest. Such damages, including interest on such
22 amounts will be proven at time of Trial of this matter.

23
24 WHEREFORE, Plaintiff HO prays for relief by judgment against Defendant MURRAY, as
25 follows:


- 26 1. For a Judicial Decree awarding to Plaintiff all of her monetary damages in an amount
27 not less than \$250,000.00 plus interest accrued herein;
28 2. For costs of suit; and

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3. For such other and further relief as the Court deems just and proper.

Dated: March 13, 2013

LAW OFFICES OF DAVID S. LIN

By 
David S. Lin, Esq.
Attorney for Plaintiff
DOROTHY M. HO

Courthouse News Service

03/13/2013

ORIGINAL

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): David S. Lin, SBN 156110 LAW OFFICES OF DAVID S. LIN 80 S. Lake Ave., Suite 512 Pasadena, CA 91101 TELEPHONE NO.: (626) 792-9688 FAX NO.: (626) 792-9116 ATTORNEY FOR (Name): Plaintiff DOROTHY M. HO		FOR COURT USE ONLY FILED LOS ANGELES SUPERIOR COURT MAR 13 2013 JOHN A. CLARKE, CLERK BY <i>[Signature]</i> DEPUTY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles STREET ADDRESS: 111 North Hill Street MAILING ADDRESS: 111 North Hill Street, Los Angeles, CA 90012 CITY AND ZIP CODE: Los Angeles, CA 90012 BRANCH NAME: Central District		
CASE NAME: Ho v. Murray, 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: 80502883 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: March 13, 2013

David S. Lin

(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

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 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 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

ORIGINAL

SHORT TITLE:

Ho v. Murray, et. al.

CASE NUMBER

BC502883

**CIVIL CASE COVER SHEET ADDENDUM AND STATEMENT OF LOCATION
(CERTIFICATE OF GROUNDS FOR ASSIGNMENT TO COURTHOUSE LOCATION)**

This form is required pursuant to LASC 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 3 ☐ HOURS/ ☒ DAYS

Item II. Select 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 Los Angeles Superior Court Local Rule 2.0.

Applicable Reasons for Choosing Courthouse Location (see Column C below)

1. Class Actions must be filed in the County Courthouse, Central District.
2. May be filed in Central (Other county, or no Bodily Injury/Property Damage).
3. Location where cause of action arose.
4. Location where bodily injury, death or damage occurred.
5. Location where performance required or defendant resides.
6. Location of property or permanently garaged vehicle.
7. Location where petitioner resides.
8. Location where defendant/respondent functions wholly.
9. Location where one or more of the parties reside.
10. Location of Labor Commissioner Office.

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

	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Auto Tort	Auto (22)	<input type="checkbox"/> A7100 Motor Vehicle - Personal Injury/Property Damage/Wrongful Death	1., 2., 4.
	Uninsured Motorist (46)	<input type="checkbox"/> A7110 Personal Injury/Property Damage/Wrongful Death – Uninsured Motorist	1., 2., 4.
Other Personal Injury/Property Damage/Wrongful Death Tort	Asbestos (04)	<input type="checkbox"/> A6070 Asbestos Property Damage <input type="checkbox"/> A7221 Asbestos – Personal Injury/Wrongful Death	2. 2.
	Product Liability (24)	<input type="checkbox"/> A7260 Product Liability (not asbestos or toxic/environmental)	1., 2., 3., 4., 8.
	Medical Malpractice (45)	<input checked="" type="checkbox"/> A7210 Medical Malpractice - Physicians & Surgeons <input type="checkbox"/> A7240 Other Professional Health Care Malpractice	1., 2., 4. 1., 2., 4.
	Other Personal Injury Property Damage Wrongful Death (23)	<input type="checkbox"/> A7250 Premises Liability (e.g., slip and fall)	1., 2., 4.
		<input type="checkbox"/> A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.)	1., 2., 4.
<input type="checkbox"/> A7270 Intentional Infliction of Emotional Distress		1., 2., 3.	
<input type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death		1., 2., 4.	
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., 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.

Non-Personal Injury/Property Damage/
Wrongful Death Tort (Cont'd.)

Employment

Contract

Real Property

Judicial Review Unlawful Detainer

SHORT TITLE: Ho v. Murray, et. al.	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
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- Drugs (38)	<input type="checkbox"/> A6022 Unlawful Detainer-Drugs	2., 6.
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.

SHORT TITLE: Ho v. Murray, et. al.	CASE NUMBER
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Judicial Review (Cont'd.)

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 Above
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.
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., 9. 2., 6. 2., 9. 2., 8. 2., 8. 2., 8., 9.
RICO (27)	<input type="checkbox"/> A6033 Racketeering (RICO) Case	1., 2., 8.
Other Complaints (Not Specified Above) (42)	<input type="checkbox"/> A6030 Declaratory Relief Only <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 <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: Ho v. Murray, et. al.	CASE NUMBER
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Item III. Statement of Location: Enter the address of the accident, party's residence or place of business, performance, or other circumstance indicated in Item II., Step 3 on Page 1, as the proper reason for filing in the court location you selected.

REASON: CHECK THE NUMBER UNDER COLUMN C WHICH APPLIES IN THIS CASE			ADDRESS: 4867 Sunset Blvd.
<input type="checkbox"/> 1. <input type="checkbox"/> 2. <input checked="" type="checkbox"/> 3. <input checked="" type="checkbox"/> 4. <input checked="" type="checkbox"/> 5. <input type="checkbox"/> 6. <input type="checkbox"/> 7. <input checked="" type="checkbox"/> 8. <input checked="" type="checkbox"/> 9. <input type="checkbox"/> 10.			
CITY: Los Angeles	STATE: CA	ZIP CODE: 90027	

Item IV. Declaration of Assignment: I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that the above-entitled matter is properly filed for assignment to the Stanley Mosk courthouse in the Central District of the Los Angeles Superior Court (Code Civ. Proc., § 392 et seq., and LASC Local Rule 2.0, subds. (b), (c) and (d)).

Dated: March 13, 2013

(SIGNATURE OF ATTORNEY/FILING PARTY)

PLEASE HAVE THE FOLLOWING ITEMS COMPLETED AND READY TO BE FILED IN ORDER TO PROPERLY COMMENCE YOUR NEW COURT CASE:

1. Original Complaint or Petition.
2. If filing a Complaint, a completed Summons form for issuance by the Clerk.
3. Civil Case Cover Sheet form CM-010.
4. Complete Addendum to Civil Case Cover Sheet form LACIV 109 (Rev. 01/07), LASC Approved 03-04.
5. Payment in full of the filing fee, unless fees have been waived.
6. Signed order appointing the Guardian ad Litem, JC form FL-935, if the plaintiff or petitioner is a minor under 18 years of age, or if required by Court.
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.