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6 DAVID K. DORENFELD, State Bar No.: 145056
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8 Attorneys for Plaintiff
9 TASHA TAHERI

FILED
LOS ANGELES SUPERIOR COURT

MAY 30 2013

JOHN A. CLARKE, CLERK
BY MARY FLORES, DEPUTY

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **FOR THE COUNTY OF LOS ANGELES**

12 TASHA TAHERI,

13 Plaintiff

14 vs.

15 KAISER PERMANENTE, a business
16 organization form unknown; and DOES 1
17 through 20, Inclusive,

18 Defendants.

Case No.:

BC 510 521

COMPLAINT FOR:

1. **COMMON LAW WRONGFUL
DISCHARGE IN VIOLATION
OF PUBLIC POLICY
("TAMENY" CLAIM)**
2. **WRONGFUL DISCHARGE
ARISING FROM BREACH OF
STATUTORY DUTIES**

19 COMES NOW Plaintiff TASHA TAHERI and alleges as follows:

GENERAL ALLEGATIONS

20 1. Plaintiff TASHA TAHERI ("Plaintiff") was and is a resident of the County of Los
21 Angeles, State of California. At all material times, Plaintiff worked for Defendant KAISER
22 PERMANENTE, and DOES 1 through 20, in the State of California.

23 2. Plaintiff is informed and believes and thereon alleges that Defendant KAISER
24 PERMANENTE is a business organization form unknown and located at 5601 De Soto Avenue,
25 Woodland Hills, California, in the County of Los Angeles, State of California. At all material
26 times, Defendant KAISER PERMANENTE ("Defendant") was Plaintiff's employer.

27 3. Plaintiff is informed and believes and thereon alleges that Defendants named herein
28 as DOES 1 through 20 are in some manner responsible for the events and wrongful conduct

CIT CASE: EC510521
LEAFLET #:
RECEIVED: 04/30/13
DATE PAID: 05/01/13
FEE: \$45.00
RECEIVED: 05/01/13
FEE: \$45.00
CLOCK: \$35.00
CLOCK: \$0.00
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CLOCK: \$0.00

55
Malcolm Mackey
SNYDER ♦ DORENFELD, LLP

1 described herein, and are liable to Plaintiff for the damages Plaintiff has incurred. The true names
2 and capacities of said Defendants, whether individual, corporate, associate or otherwise, are
3 unknown to Plaintiff, who therefore sues said Defendants by such fictitious names, and Plaintiff
4 will amend this Complaint to show their true names and capacities when same has been
5 ascertained.

6 4. Plaintiff is informed and believes and thereon alleges that at all times mentioned
7 herein Defendants, and each of them, were the agents, servants, and co-conspirators of each of the
8 remaining Defendants, and of each other, and at all times mentioned herein Defendants, and each
9 of them, were acting within the knowledge of one another within the course and scope of their
10 agency, service, employment and conspiracy, and ratified and approved the acts of one another.

11 5. All allegations made in this Complaint to any act or omission on the part of a
12 Defendant or Defendants shall also be deemed to refer to the act or omission of each Defendant,
13 whether acting individually, jointly and/or severally.

14 6. All of the unlawful acts complained of herein occurred in the County of Los
15 Angeles, State of California.

16 7. Plaintiff filed a timely claim with the Department of Fair Employment and Housing
17 ("DFEH") against Defendant. Attached hereto as Exhibit "1" is a true and correct copy of said
18 Discrimination Complaint to the DFEH. Thereafter, on or about May 8, 2013, the DFEH issued to
19 Plaintiff the appropriate "Right-to-Sue" Notice as against Defendants, and each of them. Attached
20 hereto as Exhibit "2" is a true and correct copy of said "Right-to-Sue" Notice.

21 8. Plaintiff demands a jury trial in this matter.

22 **FACTUAL BACKGROUND**

23 9. Plaintiff realleges all prior paragraphs and incorporates them by reference as though
24 fully set forth at length herein.

25 10. Plaintiff's employment with Defendant began in or around 2005. Plaintiff was
26 initially hired as a Patient Transporter. However, thereafter, Plaintiff completed the required
27 education and consequently was promoted to the position of Lab Assistant in or around 2007.

28 11. Thereafter, in or around 2009, Plaintiff began experiencing harassment and

1 discrimination from her co-workers. For instance, Plaintiff was called names, ridiculed because
2 she was a lesbian, ridiculed because of her Mexican accent. One of her co-workers made
3 threatening advances with her body toward Plaintiff; i.e. as if the co-worker was about to
4 physically assault Plaintiff. Religious stickers (i.e. containing "666") were placed on Plaintiff's
5 locker and a noose was hung on Plaintiff's locker. Additionally, another co-worker made repeated
6 sexual advances toward her even though Plaintiff continued to tell him that she was not interested.

7 12. Despite the fact that Plaintiff repeatedly reported the above described harassment
8 and discrimination to her supervisors and/or management, and despite Defendant's management's
9 repeated promises that they would "take care of it", no remedy was ever proffered by Defendant.

10 13. Notwithstanding the above described harassment and discrimination, Plaintiff loved
11 her work and loved to help and care for the patients that she dealt with on a daily basis. Moreover,
12 Plaintiff was involved in many of Defendant's events, such as its annual Triathlon, and donations
13 made on behalf of Defendant to community clinics.

14 14. Because of the harassment and discrimination described hereinabove, Plaintiff
15 befriended a male co-worker, Eduardo Morales, confiding some of the problems to him. At or
16 around that time, Plaintiff needed to find other living arrangements to get away from a dangerous
17 situation she was dealing with at home. Eduardo Morales had a large house and told Plaintiff that
18 she could stay there (with her children) as long as she needed. Plaintiff and her children moved
19 into the home of Eduardo Morales in early February 2012.

20 15. Plaintiff continued to experience the hostile work environment up until mid May
21 2012. On or about May 16, 2012, Plaintiff was at home when the home was raided by police and
22 S.W.A.T., at which time medical supplies were found inside a locked room within the home. The
23 police had asked Plaintiff if she had knowledge of what was in that room, to which she said she did
24 not. Eduardo Morales was arrested for the theft of Defendant's medical supplies.

25 16. Defendant immediately (on May 16, 2012) placed Plaintiff on Investigatory
26 Suspension to enable Defendant "time to review the circumstances and facts regarding a
27 confidential investigation".

28 17. On or about May 18, 2012, Defendant interviewed Plaintiff, as well as Eduardo

1 Morales (separately), regarding the supplies that were found within the home. Plaintiff advised
2 that she had no knowledge of any stealing of medical supplies and further, had no knowledge of
3 what was contained inside the locked room within the home. Upon information and belief,
4 Plaintiff alleges that Eduardo Morales also advised Defendant that Plaintiff had no knowledge of
5 any stealing of medical supplies and further, had no knowledge of what was contained inside the
6 locked room within the home.

7 18. Nevertheless, less than two (2) weeks later, on May 29, 2012, Defendant terminated
8 Plaintiff's employment on the grounds that Plaintiff was involved in the theft of the medical
9 supplies; however provided no factual support for such allegations.

10 19. Thereafter, Plaintiff underwent Defendant's Grievance Procedure, along with her
11 Union steward, wherein Plaintiff requested to be reinstated. However, on or about May 9, 2013,
12 Plaintiff received Defendant's decision in response to Plaintiff's Grievance. Despite statements
13 previously made to the contrary, Defendant concluded that Plaintiff's "statements are not
14 believable" and the "only logical and reasonable conclusion is that she did have knowledge of the
15 theft" and Defendant rejected Plaintiff's Grievance and request to be reinstated. Plaintiff believes
16 and thereon alleges that the real reason for Defendant's termination of Plaintiff is because of
17 Plaintiff's continuous complaints to management regarding the ongoing discrimination and
18 harassment.

19 **FIRST CAUSE OF ACTION**

20 **Common Law Wrongful Discharge In Violation of Public Policy**

21 **("Tameny" Claim)**

22 **(Against All Defendants)**

23 20. Plaintiff realleges all prior paragraphs and incorporates them by reference as though
24 fully set forth at length herein.

25 21. At all material times, Defendants, including DOES, were business entities
26 authorized to conduct business in the State of California.

27 22. At all material times, it was a fundamental public policy of the State of California
28 that persons are free and equal from discrimination and are entitled to the full and equal

1 accommodations, advantages, facilities, privileges, or services in all business establishments or
2 every kind whatsoever.

3 23. Defendants, including DOES, violated this public policy by discriminating against
4 Plaintiff because of race, sex, national orginal, sexual orientation, and terminating Plaintiff without
5 sufficient justification.

6 24. As a direct and proximate result of Defendants' unlawful conduct, Plaintiff has
7 suffered stress, anxiety, emotional distress and mental distress. As a further direct and proximate
8 result of Defendants' unlawful conduct, Plaintiff has incurred a loss of earnings, as well as a loss of
9 other employment benefits and opportunities. Plaintiff continues to suffer this loss of earnings,
10 other employment benefits and opportunities, on an ongoing basis. Plaintiff is therefore entitled to
11 general and compensatory damages in amounts to be proven at the time of trial.

12 25. The conduct of Defendants, including DOES, was malicious, outrageous,
13 oppressive, and done with a willful and conscious disregard of Plaintiff's rights with the
14 knowledge of an employer's economic power over its employees. Defendants, including DOES,
15 through its supervisors and/or agents authorized, condoned and/or ratified the conduct of all of the
16 other Defendants, including DOES, and/or their agents. Consequently, Plaintiff is entitled to
17 punitive damages in an amount to be determined at the time of trial.

18 26. As a further direct and proximate result of Defendants' unlawful conduct, Plaintiff
19 has been compelled to retain the services of counsel, and has thereby incurred, and will continue to
20 incur, legal fees and costs to enforce his rights and vindicate Defendants' above described
21 violations of the law. Plaintiff requests that attorney's fees be awarded pursuant to the California
22 *Code of Civil Procedure* §1021.5 due to the enforcement of the important rights affecting the
23 public interest.

24 27. Additionally, as a further direct and proximate result of Defendants' unlawful
25 conduct, Plaintiff is seeking any applicable statutory penalties pursuant to the California *Civil Code*
26 §52(a), as determined by the Court.

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1 33. As a further direct and proximate result of Defendants' unlawful conduct, Plaintiff
2 has been compelled to retain the services of counsel, and has thereby incurred, and will continue to
3 incur, legal fees and costs to enforce his rights and vindicate Defendants' above described
4 violations of the law. Plaintiff requests that attorney's fees be awarded pursuant to the California
5 *Code of Civil Procedure* §1021.5 due to the enforcement of the important rights affecting the
6 public interest.

7
8 **WHEREFORE**, Plaintiff prays for the following judgments and relief according to proof:

- 9 1. General and compensatory damages;
10 2. Punitive damages;
11 3. Reasonable costs and attorney's fees;
12 4. Loss of earnings, benefits and present value of future loss of earnings;
13 5. For the costs of suit herein incurred;
14 6. For prejudgment interest as allowed by law; and
15 7. For such other and further relief as this Court may deem proper.

16
17
18
19 Dated: 5/24

SNYDER ♦ DORENFELD, LLP

20
21 By: 

22 DAVID K. DORENFELD
RODGER S. GREINER

Attorneys for Plaintiff TASHA TAHERI

Courthouse News Service

05/31/2013

Courthouse News Service

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Los Angeles 800-421-8703 • Atlanta 800-325-7580



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STATE OF CALIFORNIA | State and Consumer Services Agency

GOVERNOR EDMUND G. BROWN JR.
DIRECTOR PHYLLIS W. CHENG

DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

2218 Kausen Drive, Suite 100 | Elk Grove | CA 95758
800-884-1684 | Videophone 916-226-5285 | TDD 800-700-2320
www.dfeh.ca.gov | email: contact.center@dfeh.ca.gov

May 08, 2013

RE: Notice of Filing of Discrimination Complaint
DFEH Matter Number: 116816-51232
Right to Sue: Taheri /

To All Respondent(s):

Enclosed is a copy of a complaint of discrimination that has been filed with the Department of Fair Employment and Housing (DFEH) in accordance with Government Code section 12960. This constitutes service of the complaint pursuant to Government Code section 12962. The complainant has requested an authorization to file a lawsuit. This case is not being investigated by the DFEH and is being closed immediately. A copy of the Notice of Case Closure and Right to Sue is enclosed for your records.

Please refer to the attached complaint for a list of all respondent(s) and their contact information.

No response to DFEH is requested or required.

Sincerely,

Department of Fair Employment and Housing

05 / 31 / 2013

121

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**DFEH MATTER NUMBER
116816-51232COMPLAINANT
Tasha Taheri

NAMED IS THE EMPLOYER, PERSON, AGENCY, ORGANIZATION OR GOVERNMENT ENTITY WHO DISCRIMINATED AGAINST ME

RESPONDENT	ADDRESS	PHONE
, Kaiser Permanente	5601 De Soto Avenue Woodland Hills CA 91365	(818) 719-2000

AGENT FOR SERVICE	ADDRESS	PHONE
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NO. OF EMPLOYEES	MOST RECENT DISCRIMINATION TOOK PLACE	TYPE OF EMPLOYER
0	May 29, 2012	

CO-RESPONDENT(S)	ADDRESS
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05/31/2013

DATE FILED May 08, 2013
MODIFIED May 08, 2013REVISED APRIL 2013
PAGE 1/3

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**DFEH MATTER NUMBER
116816-51232

I ALLEGE THAT I EXPERIENCED Discrimination
ON OR BEFORE May 29, 2012
BECAUSE OF MY Other
AS A RESULT, I WAS Terminated

STATEMENT OF FACTS

Complainant was hired by Respondent Kaiser Permanente on or about December 5, 2005. Initially, Complainant was hired as a Patient Transporter, however, Complainant attended the appropriate schooling and training in order to move up to the position of Lab Assistant. In or around 2009, Complainant began experiencing harassment from her co-workers. Complainant was called derogatory names and was ridiculed for being a Lesbian. Complainant is Mexican and was also ridiculed because of her accent when she spoke. Other instances took place wherein religious stickers were placed on her locker, such as the numbers "666". The harassment was so severe at times that Complainant felt her safety and well being were threatened. For instance, there were occasions when a noose would be hung on Complainant's locker and one of her co-workers would lunge toward her in such a physically aggressive and hostile manner as if Complainant was about to be physically assaulted. Another co-worker [male] often made unwanted sexual advances toward Complainant. Throughout the entire time that Complainant was being harassed while at work, Complainant continued to report such instances to her supervisor. However, despite management's repeated promises to "take care of it", no remedy and/or disciplinary action was ever taken and therefore, the harassment continued to occur. Moreover, Complainant was supposed to be on maternity leave for three [3] months and her supervisor called her and told Complainant that if she did not return to work immediately [1 1/2 months early], she would be fired. Such conduct continued to occur until the time of Complainant's termination [noted below] despite Complainant's repeated complaints to management. Thereafter, in or around February 2012, Complainant became a roommate in the home of another employee of Respondent. On or about May 16, 2012, Respondent had Complainant's roommate arrested for stealing medical supplies from Respondent. Also on or about May 16, 2012, Respondent placed Complainant on Investigatory Suspension. Immediately thereafter, on or about May 18, 2012, Respondent conducted an Investigatory Interview wherein Complainant informed Respondent that the co-worker that was arrested was not her boyfriend, that the room in the home where the co-worker kept Respondent's medical supplies was kept locked by the co-worker, and that Complainant had no involvement in or knowledge of any of the illegal activity on the part of the co-worker until the co-worker was arrested. Respondent insisted that Complainant assist with their prosecution against the co-worker and confirm that the co-worker was stealing. Complainant refused to do so because she did not have such knowledge. Nevertheless, shortly thereafter on or about May 29, 2012, Respondent terminated Complainant alleging that Complainant engaged in gross misconduct and violated Respondent's Principles of Responsibility - Code of Conduct.

DATE FILED May 08, 2013
MODIFIED May 08, 2013REVISED APRIL 2013
PAGE 2/3

05/31/2013

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**DFEH MATTER NUMBER
116816-51232

SIGNED UNDER PENALTY OF PERJURY

I wish to pursue this matter in court. I hereby request that the Department of Fair Employment and Housing provide a right to sue. I understand that if I want a federal right to sue notice, I must visit the U.S. Equal Employment Opportunity Commission (EEOC) to file a complaint within 30 days of receipt of the DFEH "Notice of Case Closure and Right to Sue," or within 300 days of the alleged discriminatory act, whichever is earlier.

I have not been coerced into making this request, nor do I make it based on fear of retaliation if I do not do so. I understand it is the Department of Fair Employment and Housing's policy to not process or reopen a complaint once the complaint has been closed on the basis of "Complainant Elected Court Action."

By submitting this complaint, I am declaring under penalty of perjury under the laws of the State of California that, to the best of my knowledge, all information contained in this complaint is true and correct, except matters stated on my information and belief, and I declare that those matters I believe to be true.

Verified by David K. Dorenfeld, attorney for Complainant, Attorney for Complainant, and dated on May 08, 2013 at Woodland Hills, CA.

DATE FILED May 08, 2013
MODIFIED May 08, 2013REVISED APRIL 2013
PAGE 3/3

05/31/2013

Courthouse News Service

05/31/2013

Courthouse News Service

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STATE OF CALIFORNIA | State and Consumer Services Agency

GOVERNOR EDMUND G. BROWN JR.
DIRECTOR PHYLLIS W. CHENG

DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
800-884-1684 | Videophone: 916-226-5285 | TDD 800-700-2320
www.dfeh.ca.gov | email: contact.center@dfeh.ca.gov

May 08, 2013

Tasha Taheri
P.O. Box 6951
Woodland Hills, CA 91365

RE: **Notice of Case Closure and Right to Sue**
DFEH Matter Number: 116816-51232
Right to Sue: Taheri / , Kaiser Permanente

Dear Tasha Taheri:

This letter informs you that the above-referenced complaint was filed with the Department of Fair Employment and Housing (DFEH) has been closed effective May 08, 2013 because an immediate Right to Sue notice was requested. DFEH will take no further action on the complaint.

This letter is also your Right to Sue notice. According to Government Code section 12965, subdivision (b), a civil action may be brought under the provisions of the Fair employment and Housing Act against the person, employer, labor organization or employment agency named in the above-referenced complaint. The civil action must be filed within one year from the date of this letter.

To obtain a federal Right to Sue notice, you must visit the U.S. Equal Employment Opportunity Commission (EEOC) to file a complaint within 30 days of receipt of this DFEH Notice of Case Closure or within 300 days of the alleged discriminatory act, whichever is earlier.

Sincerely,

Department of Fair Employment and Housing

Enclosures

cc: Kaiser Permanente, Agent for Service for

05 / 31 / 2013

Ed

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):

David K. Dorenfeld, Esq. (SBN: 145056)

SNYDER * DORENFELD, LLP

5010 Chesebro Road, Agoura Hills, CA 91301

TELEPHONE NO.: (818) 865-4000

FAX NO.: (818) 865-4010

ATTORNEY FOR (Name): Plaintiff TASHA TAHERI

SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles

STREET ADDRESS: 111 N. Hill Street

MAILING ADDRESS:

CITY AND ZIP CODE: Los Angeles, CA 90012

BRANCH NAME: Stanley Mosk Courthouse - Central District

FILED CM-010
FOR COURT USE ONLY

LOS ANGELES SUPERIOR COURT

MAY 30 2013

JUDITH A. CLARKE, CLERK
BY MARY EVANS, DEPUTY

CASE NAME:

TAHERI v. KAISER PERMANENTE, et al.

CIVIL CASE COVER SHEET

☒ Unlimited (Amount demanded exceeds \$25,000) ☐ Limited (Amount demanded is \$25,000 or less)

Complex Case Designation

☐ Counter ☐ Joinder

Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)

CASE NUMBER:

BC 510 521

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

☐ Auto (22)
☐ Uninsured motorist (46)

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

☐ Asbestos (04)
☐ Product liability (24)
☐ Medical malpractice (45)
☐ Other PI/PD/WD (23)

Non-PI/PD/WD (Other) Tort

☐ Business tort/unfair business practice (07)
☐ Civil rights (08)
☐ Defamation (13)
☐ Fraud (18)
☐ Intellectual property (19)
☐ Professional negligence (25)
☐ Other non-PI/PD/WD tort (35)

Employment

☒ Wrongful termination (36)
☐ Other employment (15)

Contract

☐ Breach of contract/warranty (06)
☐ Rule 3.740 collections (09)
☐ Other collections (09)
☐ Insurance coverage (18)
☐ Other contract (37)

Real Property

☐ Eminent domain/inverse condemnation (14)
☐ Wrongful eviction (33)
☐ Other real property (28)

Unlawful Detainer

☐ Commercial (31)
☐ Residential (32)
☐ Drugs (33)

Judicial Review

☐ Asset forfeiture (05)
☐ Petition re: arbitration award (11)
☐ Writ of mandate (02)
☐ Other judicial review (39)

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

☐ Antitrust/Trade regulation (03)
☐ Construction defect (10)
☐ Mass tort (40)
☐ Securities litigation (28)
☐ Environmental/Toxic tort (30)
☐ Insurance coverage claims arising from the above listed provisionally complex case types (41)

Enforcement of Judgment

☐ Enforcement of judgment (20)

Miscellaneous Civil Complaint

☐ RICO (27)
☐ Other complaint (not specified above) (42)

Miscellaneous Civil Petition

☐ Partnership and corporate governance (21)
☐ Other petition (not specified above) (43)

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. ☐ Large number of separately represented parties
b. ☐ Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve
c. ☐ Substantial amount of documentary evidence
d. ☐ Large number of witnesses
e. ☐ Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court
f. ☐ 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): TWO

5. This case ☐ is ☒ is not a class action suit.

6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)

Date: May 29, 2013

David K. Dorenfeld

(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 (48) (if the case involves an uninsured motorist claim subject to arbitration, check this item instead of Auto)

Other PIPD/W (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 PIPD/W (23)
Premises Liability (e.g., slip and fall)
Intentional Bodily Injury/PIPD/W (e.g., assault, vandalism)
Intentional Infliction of Emotional Distress
Negligent Infliction of Emotional Distress
Other PIPD/W

Non-PIPD/W (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 (18)
Intellectual Property (19)
Professional Negligence (25)
Legal Malpractice
Other Professional Malpractice (not medical or legal)
Other Non-PIPD/W Tort (35)
Employment
Wrongful Termination (38)
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) (08)
Collection Case—Seller Plaintiff
Other Promissory Note/Collections Case
Insurance Coverage (not provisionally compulsory) (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

SHORT TITLE:

TAHERI v. KAISER PERMANENTE, et al.

CASE NUMBER

BC 510521

**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 3-5 ☐ 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 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 type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death	1., 4. 1., 4. 1., 3. 1., 4.

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TAHERI v. KAISER PERMANENTE, et al.

Non-Personal Injury/Property
Damage/Wrongful Death Tort

Employment

Contract

Real Property

Unlawful Detainer

A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Business Tort (07)	<input type="checkbox"/> A6029 Other Commercial/Business Tort (not fraud/breach of contract)	1., 3.
Civil Rights (08)	<input type="checkbox"/> A6005 Civil Rights/Discrimination	1., 2., 3.
Defamation (13)	<input type="checkbox"/> A6010 Defamation (slander/libel)	1., 2., 3.
Fraud (16)	<input type="checkbox"/> A6013 Fraud (no contract)	1., 2., 3.
Professional Negligence (25)	<input type="checkbox"/> A6017 Legal Malpractice <input type="checkbox"/> A6050 Other Professional Malpractice (not medical or legal)	1., 2., 3. 1., 2., 3.
Other (35)	<input type="checkbox"/> A6025 Other Non-Personal Injury/Property Damage tort	2., 3.
Wrongful Termination (36)	<input checked="" type="checkbox"/> A6037 Wrongful Termination	1., 2., 3.
Other Employment (15)	<input type="checkbox"/> A6024 Other Employment Complaint Case <input type="checkbox"/> A6109 Labor Commissioner Appeals	1., 2., 3. 10.
Breach of Contract/ Warranty (06) (not insurance)	<input type="checkbox"/> A6004 Breach of Rental/Lease Contract (not unlawful detainer or wrongful eviction) <input type="checkbox"/> A6008 Contract/Warranty Breach - Seller Plaintiff (no fraud/negligence) <input type="checkbox"/> A6019 Negligent Breach of Contract/Warranty (no fraud) <input type="checkbox"/> A6028 Other Breach of Contract/Warranty (not fraud or negligence)	2., 5. 2., 5. 1., 2., 5. 1., 2., 5.
Collections (09)	<input type="checkbox"/> A6002 Collections Case-Seller Plaintiff <input type="checkbox"/> A6012 Other Promissory Note/Collections Case	2., 5., 6. 2., 5.
Insurance Coverage (18)	<input type="checkbox"/> A6015 Insurance Coverage (not complex)	1., 2., 5., 6.
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:

CASE NUMBER

TAHERI v. KAISER PERMANENTE, et al.

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 Above
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.
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: TAHERI v. KAISER PERMANENTE, 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 appropriate boxes for the numbers shown under Column C for the type of action that you have selected for this case. <input type="checkbox"/> 1. <input checked="" type="checkbox"/> 2. <input type="checkbox"/> 3. <input type="checkbox"/> 4. <input type="checkbox"/> 5. <input type="checkbox"/> 6. <input type="checkbox"/> 7. <input type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10.		ADDRESS: 5601 De Soto Avenue
CITY: Woodland Hills	STATE: CA	ZIP CODE: 91365

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 Los Angeles Superior 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: 5/29

(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.

05/31/2011