

1 Sohaila Sagheb, SBN 144202
2 Law Office of Sohaila Sagheb
3 21112 Ventura Blvd.
4 Woodland Hills, California 91364
5 Phone: (818) 346-3724
6 Fax: (818) 702-9916
7 sslawoffice@sbcglobal.net

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DEPT. 93

SAMANTHA

DESSNER

FILED
Superior Court Of California
County Of Los Angeles

JAN 06 2014

Sherri R. Garcia, Executive Officer/Clerk
By Judi Lara Deputy

Attorneys for Plaintiff Julie Frank

FSC: 06 / 2 2 / 2015 TRIAL: 07 / 0 6 / 2015 OSC: 01 / 0 6 / 2017

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

JULIE FRANK,

Plaintiff,

vs.

KAISER FOUNDATION HOSPITAL,
KAISER FOUNDATION HEALTH PLAN,
INC., SOUTHERN CALIFORNIA
PERMANENTE MEDICAL GROUP,
BRIAN JAI SHIN, M.D., PETER W K
YEUNG, M.D., BRIAN A. AHANGAR,
M.D. and DOES 1 to 100, inclusive,
Defendants.

CASE NO.

BC582249

COMPLAINT FOR MEDICAL
MALPRACTICE

[UNLIMITED JURISDICTION]

COMES NOW Plaintiff JULIE FRANK and says as follows:

GENERAL ALLEGATIONS

1. Plaintiff JULIE FRANK, is and at all times mentioned in the Complaint was, a
resident of the County of Los Angeles, State of California and a member of Kaiser Permanente
Medical Center of Baldwin Park.

2. Plaintiff is informed and believes and on that information and belief alleges that
defendant BRIAN JAI SHIN, M.D., is a doctor of medicine, with a specialty in radiology and
other areas of specialty unknown to the Plaintiff, who at all times mentioned in this Complaint

CIT/CASE: BC582249
LEAD/DEF#:
RECEIPT # CCH5267280
DATE PAID 01/06/14 10:05 AM
PAYMENT: \$435.00
RECEIVED: 310
CHECK: \$35.00
CASH: \$0.00
CHARGE: \$0.00
CAR: \$0.00

1 practiced medicine in the County of Los Angeles, State of California.

2 3. Plaintiff is informed and believes and on that information and belief alleges that
3 defendant PETER W K YEUNG, M.D., is a doctor of medicine, with a specialty in orthopedics,
4 surgery, pain management and other areas of specialty unknown to the Plaintiff, who at all
5 times mentioned in this Complaint practiced medicine in the County of Los Angeles, State of
6 California.

7 4. Plaintiff is informed and believes and on that information and belief alleges that
8 defendant BRIAN A. AHANGAR, M.D., is a doctor of medicine, with a specialty in
9 orthopedics, surgery, pain management and other areas of specialty unknown to the Plaintiff,
10 who at all times mentioned in this Complaint practiced medicine in the County of Los Angeles,
11 State of California.

12 5. Plaintiff is informed and believes and on that information and belief alleges that
13 defendants KAISER FOUNDATION HOSPITAL, KAISER FOUNDATION HEALTH PLAN,
14 INC., SOUTHERN CALIFORNIA PERMANENTE MEDICAL GROUP (hereinafter
15 collectively "KAISER") are and were at all times mentioned in this Complaint, business entities
16 doing business in the area of medical care in the County of Los Angeles, State of California.
17 Plaintiff is informed and believes that defendants SHIN, YEUNG and AHANGAR are
18 employees or agents of Kaiser and that they were working Kaiser Baldwin Park in 2012-2013,
19 during which time they rendered care and treatment to the Plaintiff. Further, Plaintiff is
20 informed and believes that defendants SHIN, YEUNG and AHANGAR conduct as alleged
21 herein, occurred in the course and scope of their employment and/or agency with KAISER.

22 6. Plaintiff is ignorant of the true names and capacities of defendants sued in this
23 Complaint as Does 1 through 100, inclusive, and therefore sues these defendants by these
24 fictitious names. Plaintiff will amend this Complaint to allege their true names and capacities
25 when ascertained. Plaintiff is informed and believes and alleges on this information and belief
26 that each of the fictitiously named defendants are negligently or otherwise responsible in some
27 manner for the occurrences alleged in this Complaint, and that plaintiff's injuries and damages
28 as alleged in this Complaint were proximately caused by that conduct.

7. Plaintiff is informed and believes and on this information and belief alleges that
at all times mentioned in this Complaint each of the defendants was the agent or employee of
each of the remaining defendants, and in doing the things alleged in this Complaint, were acting

1 within the course and scope of this agency and employment.

2 8. Plaintiff is informed and believes, and on that basis alleges, that at all times
3 herein mentioned there existed and continues to exist a unity of interest and ownership among
4 the defendants such that any individuality and separateness has ceased to exist.

5 9. Plaintiff is informed and believes, and on that basis alleges, that defendant
6 KAISER and DOES 1 through 50, inclusive, were and are engaged in the owning, operating,
7 maintaining, managing of a medical group which is engaged in rendering medical, surgical,
8 hospital, diagnostic, nursing and other care to the general public for compensation in Los
9 Angeles County, California; all the acts Complained of herein by Plaintiff against said
10 defendants, were done and performed by said defendants by and through their duly authorized
11 agents, servants, joint venturers, and employees, each of whom and all of whom were at all
12 times mentioned herein acting within the course, purpose and scope of their agency, joint
13 venture or employment and their conduct was ratified by all other defendants.

14 10. Plaintiff has Complied with Code of Civil Procedure Section 364 by giving
15 Notice to Kaiser of her Intention to Commence action more than 90 days prior to the
16 filing of this Complaint.

17 11. The acts of negligence complained of herein occurred less than one year prior to
18 the filing of this Complaint or it has been less than one year since plaintiff knew or should have
19 known that the negligent conduct of defendants caused her harm or injury, or the one year
20 statute has been extended by 90 days to accommodate service of the Notice of Intention to
21 Commence action.

22 12. Plaintiff is informed and believes that there is no viable and/or enforceable
23 arbitration agreement which applies to this within action. If defendant asserts the existence of
24 an arbitration agreement, Plaintiff denies its viability or enforceability. However, if it is
25 determined, by a court of competent jurisdiction, that a viable and enforceable arbitration
26 agreement exists between Plaintiff and defendants or any one defendant herein, the filing and
27 service of this Complaint shall operate as a viable and enforceable demand for arbitration.

28 STATEMENT OF FACTS

13. Plaintiff Julie Frank is a 54 year old retired police office injured in the line of
duty. Plaintiff's injuries included pain to her back.

1 14. In or about July, 2012, Plaintiff noticed that her back pain had become
2 unbearable. In fact, at this time, Plaintiff became unable to stand and stay upright on her own.

3 15. On July 10, 2012, Plaintiff was seen by defendant Yeung, who ordered an MRI
4 of the lumbar spine.

5 16. On July 11, 2012, an MRI was conducted and read by the radiologist SHIN who
6 stated that his impression was degenerative disc disease at L3 – 4 and L4 – 5. Specifically, at L4
7 – 5, Defendant SHIN reported mild disc space narrowing with dessication; moderate posterior
8 central disc protrusion; no neuroforaminal stenosis and therefore no nerve impingement.

9 17. Plaintiff underwent conservative treatment modalities with Defendant YEUNG
10 but Plaintiff's condition continued to become worse. Plaintiff was hospitalized at Kaiser for
11 approximately two weeks but was told during her hospitalization that there were no indications
12 for surgery on her back. She was told that her condition was degenerative and that there was
13 nothing that could be done other than physical therapy, medication and/or epidurals, all of
14 which Plaintiff attempted for relief.

15 18. Some of this treatment, particularly the physical therapy, only made the pain
16 worse. Experiencing no relief under the care of Defendant YEUNG, Plaintiff requested transfer
17 to Defendant AHANGAR, who wrote in his initial report regarding the Plaintiff that Plaintiff
18 had requested transfer of care and was therefore following up for low back pain but that
19 Plaintiff was doing better with pain control. This is a misstatement of the subjective complaints
20 of the Plaintiff who reported to Defendant AHANGAR that she had received no relief through
21 her treatment with Defendant YEUNG and that her condition was becoming worse, resulting in
22 a loss of bladder control, and therefore Plaintiff sought the change of care to a new physician
23 for proper diagnosis and treatment. However, Defendant AHANGAR diagnosed Plaintiff
24 improperly, not realizing that Plaintiff needed surgery.

25 19. Plaintiff was prescribed various pain medication which either did not work or
26 made her sick.

27 20. No longer able to bear the pain and having received no answers from Kaiser, on
28 January 16, 2013 Plaintiff went to Cedars Sinai for examination. At Cedars Plaintiff was
finally properly diagnosed, using the MRI Plaintiff brought with her from Kaiser. Properly
read, the MRI showed disk herniation at L4-L5 with nerve root compression, which was
causing her pain. Plaintiff's lower back was operated on the same day at Cedars.

1 21. The delay in proper diagnosis and treatment has resulted in damage to Plaintiff,
2 which damage is believe to be permanent and irreparable.

3
4 FIRST CAUSE OF ACTION

5 MEDICAL MALPRACTICE

6 (Plaintiff against All Defendants)

7 22. Plaintiff hereby incorporates herein by reference paragraphs 1 through 21 and
8 realleges same herein as though fully set forth.

9 23. At all times herein mentioned, Defendants and each of them held themselves out
10 to the general public and to Plaintiff as skilled professionals in the science of medicine,
11 radiology, orthopedics, pain management, surgery, nursing, hospital care, medical attendant and
12 related care; and said Defendants held themselves out to the general public and to the Plaintiff
13 as possessing that degree of knowledge and skill customarily possessed and exercised by other
14 doctors of medicine, surgeons, physicians, orthopedists, pain management, nurses and hospital
15 attendants engaged in the same or similar locality as that of Defendants and each of them.

16 24. At all relevant times Defendants agreed to perform and undertook to perform for
17 Plaintiff all services necessary in the care of Plaintiff which included, but was not limited to,
18 examination, evaluation, diagnosis, and care and treatment of Plaintiff; in so doing, the
19 Defendants, and each of them, established a physician/nurse/hospital/caregiver relationship
20 with Plaintiff giving rise to each Defendant's duty to Plaintiff to provide skillful management
21 of medical care.

22 25. At all relevant times Defendants, and each of them, were negligent, careless and
23 unskillful in their examination, evaluation, diagnosis, and care and treatment of Plaintiff,
24 including, but not limited to the care and treatment of Plaintiff which thereby legally caused
25 Plaintiff's injury as hereinafter set forth. Said negligence includes, but is not limited to the
26 following:

- 27 A. Failure to properly read radiology films, including, but not limited to the
28 MRIs;
 B. Failure to properly and accurately diagnose the cause of Plaintiff's lower
 back pain radiating to the right leg for more than 6 months;
 C. Failure to perform appropriate testing for proper diagnosis of the cause of

1 Plaintiff's lower back pain radiating to the right leg for more than 6 months;

2 D. Failure to properly treat Plaintiff's lower back pain radiating to the right
3 leg for more than 6 months;

4 E. Failure to intervene surgically to remediate Plaintiff's orthopedic
5 condition, back pain, leg pain and discomfort;

6 F. Failure to refer Plaintiff to physicians with the expertise in diagnosing
7 and treating Plaintiff's condition;

8 G. Overmedicating the Plaintiff, failing to monitor the overmedication of
9 Plaintiff.

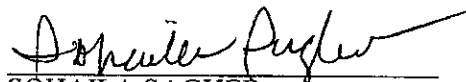
10 26. As a legal result of the negligence of all Defendants, and each of them, Plaintiff
11 suffered injury which injury may be irreparable, and for which Plaintiff is required to obtain
12 medical care and incur medical expenses, all of which has damaged Plaintiff in an amount
13 according to proof.

14 WHEREFORE, Plaintiff prays judgment against defendants, and each of them, as follows:

- 15 1. For Compensatory and general damages as are ascertained before final judgment
16 in this action;
- 17 2. For costs of suit incurred herein; and
- 18 4. For such other and further relief as the court may deem proper.

19 LAW OFFICE OF SOHAILA SAGHEB

20 DATED: January 4, 2014

21 

22 SOHAILA SAGHEB
23 Attorney for Plaintiff
24 Julie Frank

| | | | |
|--|--|---|--|
| ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Sohaila Sagheb, SBN 144202 Law Office of Sohaila Sagheb 21112 Ventura Blvd. Woodland Hills, CA 91364 TELEPHONE NO: 818-346-3724 FAX NO: 818-702-9916 | | FOR COURT USE ONLY <div style="border: 1px solid black; padding: 5px; margin: 10px 0;"> FILED Superior Court Of California County Of Los Angeles </div> <div style="font-size: 1.2em; margin: 10px 0;">JAN 06 2014</div> Sherri R. Carter, Executive Officer/Clerk By <u>Judi Lara</u> , Deputy | |
| ATTORNEY FOR (Name): Plaintiff JULIE FRANK | | | |
| SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles STREET ADDRESS: 111 N. Hill Street MAILING ADDRESS: Same CITY AND ZIP CODE: Los Angeles, CA 90012 BRANCH NAME: Central District | | | |
| CASE NAME: Frank v. Kaiser | | | |
| CIVIL CASE COVER SHEET <input checked="" type="checkbox"/> Unlimited (Amount demanded exceeds \$25,000) <input type="checkbox"/> Limited (Amount demanded is \$25,000 or less) | | Complex Case Designation <input type="checkbox"/> Counter <input type="checkbox"/> Joinder Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402) | CASE NUMBER: BC 582249 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) |
|---|--|---|
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 |
|--|--|
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: **January 4, 2014**

Sohaila Sagheb, 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:

Frank V. Lawler

CASE NUMBER

BC 582249

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 10 ☐ 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 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 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) <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., 2., 4. 1., 2., 4. 1., 2., 3. 1., 2., 4. |
| | Business Tort (07) | <input type="checkbox"/> A6029 Other Commercial/Business Tort (not fraud/breach of contract) | 1., 2., 3. |
| Non-Personal Injury/Property Damage/Wrongful Death Tort | 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. |

| SHORT TITLE: | | CASE NUMBER |
|--|---|--|
| 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:

CASE NUMBER

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:

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 NUMBER UNDER COLUMN C WHICH APPLIES IN THIS CASE | | | ADDRESS: |
| <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. | | | 1011 Baldwin Park Blvd. |
| CITY: | STATE: | ZIP CODE: | |
| Baldwin Park | CA | 91706 | |

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 LASC Central 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: 1/4/14

 (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.

01/06/2014