

ORIGINAL

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THE LAW OFFICES OF CARLIN & BUCHSBAUM, LLP LOS ANGELES SUPERIOR COURT

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APR 04 2008

JOHN A. CLARKE, CLERK  
*[Signature]*  
BY D.M. SWAIN, DEPUTY

Attorneys for MELINDA KIMSEY, Plaintiff

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

MELINDA KIMSEY,

CASE NO.

BC388465

Plaintiff,

vs.

COMPLAINT FOR DAMAGES

BELLFLOWER UNIFIED SCHOOL DISTRICT, a school district; LARRY COSTA, an individual; and DOES 1 through 250, inclusive;

(1) HOSTILE WORK ENVIRONMENT HARASSMENT - SEXUAL HARASSMENT; AND  
(2) FAILURE TO PREVENT AND REMEDY HARASSMENT

Defendants.

[DEMAND FOR JURY TRIAL]

COMES NOW the Plaintiff, MELINDA KIMSEY, (who hereinafter shall collectively be referred to as the "Plaintiff" or as "KIMSEY"), who hereby respectfully alleges, avers, and complains, as follows:

CITY/CASE: BC388465 LEA/DEF#: RECEIPT #: CCH121212032 DATE PAID: 04/09/08 03:07:25 PM RECEIVED: 0310 PAYMENT: \$320.00  
CHECK: 320.00  
CASH: 00.00  
CHARGE CARD: 00.00

*Case assigned \$45 Judge Mel Kimsey*



1 7. Defendant LARRY COSTA (sometimes hereinafter referred to as "COSTA") is and at all  
2 times herein mentioned was, and is, an instructor at BUSD, and at all times herein  
3 mentioned, was and is a resident of the County of Los Angeles, State of California.  
4

5 8. Plaintiff is informed and believes and thereon alleges that each of the Defendants herein  
6 were at all times the agent, employee, or representative of each remaining Defendant and  
7 were at all times herein acting within and outside the scope and purpose of said agency  
8 and employment. Plaintiff further alleges that as to each Defendant, whether named, or  
9 referred to as a fictitious name, said Defendants supervised, ratified, controlled,  
10 acquiesced in, adopted, directed, substantially participated in, and/or approved the acts,  
11 errors, or omissions, of each remaining Defendant.  
12

13 9. The true names and capacities of the Defendants named herein as DOES 1 through 250,  
14 inclusive, whether individual, corporate, partnership, association, or otherwise, are  
15 unknown to Plaintiff who therefore sues these Defendants by such fictitious names.  
16 Plaintiff will request leave of court to amend this Complaint to allege their true names  
17 and capacities at such time as they are ascertained.  
18

19 **FACTUAL ALLEGATIONS**  
20

21 10. Plaintiff became employed by Defendant BUSD in or about 1996 as an instructor.  
22

23 11. Beginning in or about 2004, Defendant COSTA began to sexually harass Plaintiff. Such  
24 harassment included, but was not limited to, the following conduct: COSTA routinely  
25 displayed to Plaintiff a banana and two oranges which formed what resembled a penis and  
26 testicles; COSTA asked the client if she was "getting f\*cked at all lately;" COSTA told  
27 Plaintiff that her badge she wears around her neck was her "trying to hide [her] cunt;"  
28 COSTA openly described his love of pornography, telling Plaintiff that he enjoyed

1 “draining the lizard” and “getting his rocks off,” COSTA talked about “splattering” after  
2 watching pornography in his home; COSTA made remarks to Plaintiff that he had  
3 tendencies in the direction of pedophilia and that he was attracted to some of the “very  
4 cute” little girls in Plaintiff’s class; and COSTA handed Plaintiff a note that said she got  
5 an “A+ in heavy petting.” Plaintiff clearly did not reciprocate COSTA’s sexual advances,  
6 and COSTA became very hostile towards Plaintiff as a result of her rejection of him on a  
7 romantic level. COSTA began to routinely call Plaintiff a “f\*cking cunt,” “a whore,” a  
8 “f\*cking whore,” and a “f\*cking bitch.”  
9

10 12. Plaintiff complained to former principal, Judy Rafferty, and to current principal Jose  
11 Alarcon, to no avail. ALARCON told Plaintiff that she should avoid COSTA and that  
12 any attempt to make Plaintiff’s allegations public by pursuing a charge would be a  
13 disaster.  
14

15 13. Because of COSTA’s harassment and ALARCON and BUSD’s failure to remedy and  
16 prevent the harassment, Plaintiff began to suffer from stress, anxiety and depression, as  
17 well as physical injuries resulting from the emotional distress.  
18

19 14. Prior to filing this Complaint, Plaintiff fulfilled any legal requirement or exhausted any  
20 administrative remedy imposed on her by having filed the substance of claims alleged  
21 herein with the California Department of Fair Employment and Housing (hereinafter  
22 “DFEH”), and has received Right to Sue Letters from the DFEH. Plaintiff has therefore  
23 substantially complied with all requirements for the filing of this Complaint and has  
24 exhausted her administrative remedies prior to filing, commencing, and serving the  
25 within action.

26 //  
27 //  
28 //

**FIRST CAUSE OF ACTION**

**(Hostile Work Environment Harassment)**

**(KIMSEY Against Defendants BUSD, COSTA and DOES 1 through 250, inclusive)**

15. The allegations of paragraphs 1 through 14 are re-alleged and incorporated herein by reference as though set forth at length.

16. Defendants and each of them created a hostile environment for Plaintiff making the conditions of her employment intolerable in direct contravention of various statutes and state law decisions including, but not limited to, Government Code § 12940(j).

17. Plaintiff was subjected to sexual harassment, including but not limited to the following: COSTA routinely displayed to Plaintiff a banana and two oranges which formed what resembled a penis and testicles; COSTA asked the client if she was “getting f\*cked at all lately;” COSTA told Plaintiff that her badge she wears around her neck was her “trying to hide [her] cunt;” COSTA openly described his love of pornography, telling Plaintiff that he enjoyed “draining the lizard” and “getting his rocks off;” COSTA talked about “splattering” after watching pornography in his home; COSTA made remarks to Plaintiff that he had tendencies in the direction of pedophilia and that he was attracted to some of the “very cute” little girls in Plaintiff’s class; and COSTA handed Plaintiff a note that said she got an “A+ in heavy petting.” Plaintiff clearly did not reciprocate COSTA’s sexual advances, and COSTA became very hostile towards Plaintiff as a result of her rejection of him on a romantic level. COSTA began to routinely call Plaintiff a “f\*cking cunt,” “a whore,” a “f\*cking whore,” and a “f\*cking bitch.” Plaintiff complained to BUSD principals, RAFFERTY and ALARCON, to no avail. Defendant BUSD did not remedy the harassment by COSTA.

18. Such continual and persistent harassment was not within managerial discretion, as it was

1 illegal conduct in violation of various statutes and state law decisions including, but not  
2 limited to, Government Code Section 12940(j). Such harassment created a hostile  
3 working environment for Plaintiff sufficiently severe and pervasive to alter the conditions  
4 of Plaintiff's employment, making her working conditions intolerable.

5  
6 19. As a direct and legal result of Defendants' willful, knowing, and intentional  
7 discrimination and harassment against Plaintiff, Plaintiff has suffered and continue to  
8 suffer general, consequential, and special damages, including but not limited to *physical*  
9 *injuries, physical sickness*, substantial losses in earnings, other employment benefits, as  
10 well as emotional distress, plus medical expenses, future medical expenses, and  
11 attorneys' fees, all to her damage in an amount according to proof.

12  
13 20. Said willful, knowing, malicious and intentional harassment against Plaintiff justifies the  
14 imposition of punitive damages against Defendant COSTA, and any other individual  
15 defendant, since the harassment is against public policy. Defendants, and each of them,  
16 committed the acts alleged herein maliciously, fraudulently, oppressively, with the  
17 wrongful intention of injuring the Plaintiff, from an improper purpose and evil motive  
18 amounting to malice, and in conscious disregard of the Plaintiff's rights. Based upon the  
19 foregoing, Plaintiff is entitled to recover punitive damages from Defendant COSTA, and  
20 any other individual defendant, in an amount according to proof.

21  
22 **SECOND CAUSE OF ACTION**

23 **(Failure to Remedy and Prevent Harassment in Violation of FEHA)**

24 **(KIMSEY Against Defendants BUSD and DOES 1 through 250, inclusive)**

25  
26 21. The allegations of paragraphs 1 through 20 are re-alleged and incorporated herein by  
27 reference as though fully set forth herein.

1 22. Plaintiff was harassed by her co-worker, COSTA, as alleged in more detail above. Such  
2 conduct is prohibited by FEHA, Cal. Gov. Code §12940(j),(k).  
3

4  
5 23. Under FEHA, employers are required to take all reasonable steps necessary to prevent  
6 unlawful harassment from occurring (Gov. code §12940(j),(k)).  
7

8 24. Defendants, and each of them, knew of the harassing conduct and actions by defendants'  
9 customers, and each of them, because Plaintiff complained of such harassment to  
10 Defendant BUSD's principals RAFFERTY and ALARCON, to no avail. ALARCON  
11 failed to take immediate and appropriate corrective action to stop the harassment.  
12 Instead, ALARCON told Plaintiff merely to avoid COSTA. ALARCON also tried to  
13 dissuade Plaintiff from pursuing a charge through the District Offices because it would be  
14 a "disaster." Plaintiff is informed and believes that COSTA has a record of harassment  
15 towards female co-workers and that Defendant BUSD and principal ALARCON were  
16 aware of COSTA's predisposition to harassment of female co-workers. Plaintiff is  
17 informed and believes that Defendant BUSD did not investigate into her complaints.  
18  
19  
20

21 25. As a direct and legal result of Defendants' conduct, and each of them, Plaintiff has  
22 suffered and continues to suffer general, consequential, and special damages, including  
23 but not limited to substantial losses in earnings, other employment benefits, physical  
24 injuries, physical sickness, as well as emotional distress, plus medical expenses, future  
25 medical expenses, and attorneys' fees, all to her damage in the amount according to  
26 proof.  
27  
28

1 26. As a proximate result of Defendants' conduct, Plaintiff also suffered severe emotional  
2 distress, anxiety, pain and suffering, physical injuries, physical sickness, medical  
3 expenses, future medical expenses, attorneys' fees, and other damages to be determined at  
4 trial according to proof.  
5

6  
7 27. Said actions justify the imposition of punitive damages, against any and all individual  
8 defendants, in that Defendants committed the acts alleged herein maliciously,  
9 fraudulently and oppressively, with the wrongful intention of injuring Plaintiff, from an  
10 improper and evil motives amounting to malice, and in conscious disregard of Plaintiff's  
11 rights. Defendant BUSD had notice and knowledge that Defendant COSTA was  
12 harassing Plaintiff but failed to take reasonable steps to prevent such conduct. Based  
13 upon the foregoing, Plaintiff is entitled to recover punitive damages from Defendants, and  
14 each of them, in an amount according to proof.  
15  
16  
17

18 **PRAYER**

19 1. For damages according to proof, including loss of earnings, deferred compensation,  
20 overtime and other employment benefits;  
21

22  
23 2. For interest on the amount of losses incurred in loss of earnings, deferred compensation,  
24 and other employee benefits at the prevailing legal rate;


25  
26 3. For prejudgment interest on lost wages and benefits;  
27  
28



- 1 4. For general damages, including, but not limited to, damages for *physical injuries and/or*  
2 *physical sickness*, according to proof;  
3  
4  
5 5. For other special damages according to proof, including but not limited to reasonable  
6 medical expenses;  
7  
8 6. For punitive damages according to proof, against the individual defendants;  
9  
10  
11 7. For costs incurred by Plaintiff, including reasonable attorneys' fees and costs of suit, in  
12 obtaining the benefits due Plaintiffs and for violations of Plaintiff's civil rights and wages  
13 as set forth above; and  
14  
15  
16 8. For such other and further relief as the court deems just and proper.  
17

18 Dated: April 2, 2008

THE LAW OFFICES OF CARLIN & BUCHSBAUM, LLP  
A Limited Liability Partnership

21 By   
22 Brent S. Buchsbaum, Attorneys for Plaintiff,  
23 MELINDA KIMSEY


24 //  
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28 //

**DEMAND FOR JURY TRIAL**

Plaintiff hereby respectfully demands a jury trial.

Dated: April 2, 2008

THE LAW OFFICES OF CARLIN & BUCHSBAUM, LLP  
A Limited Liability Partnership

By   
Brent S. Buchsbaum, Attorneys for Plaintiff,  
MELINDA KIMSEY

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ORIGINAL

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):  
 Gary R. Carlin, CSBN: 44945  
 Brent S. Buchsbaum, CSBN: 194816  
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 555 East Ocean Blvd., Suite 818  
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 TELEPHONE NO.: (562)432-8933 FAX NO.: (562)435-1656  
 ATTORNEY FOR (Name): Melinda Kimsey, Plaintiff  
 SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles  
 STREET ADDRESS: 111 North Hill Street  
 MAILING ADDRESS: 111 North Hill Street  
 CITY AND ZIP CODE: Los Angeles, California 90012  
 BRANCH NAME: Central District  
 CASE NAME: KIMSEY v. BELLFLOWER UNIFIED SCHOOL DISTRICT, et al.

FOR COURT USE ONLY

**FILED**  
 LOS ANGELES SUPERIOR COURT

APR 04 2008

JOHN A. CLARKE, CLERK

**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: **BC388465**

JUDGE: **D.M. SWAIN, DEPUTY**


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:
- |  |   |   |
|--|---|---|
| <p><b>Auto Tort</b></p> <p><input type="checkbox"/> Auto (22)</p> <p><input type="checkbox"/> Uninsured motorist (46)</p> <p><b>Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort</b></p> <p><input type="checkbox"/> Asbestos (04)</p> <p><input type="checkbox"/> Product liability (24)</p> <p><input type="checkbox"/> Medical malpractice (45)</p> <p><input type="checkbox"/> Other PI/PD/WD (23)</p> <p><b>Non-PI/PD/WD (Other) Tort</b></p> <p><input type="checkbox"/> Business tort/unfair business practice (07)</p> <p><input type="checkbox"/> Civil rights (08)</p> <p><input type="checkbox"/> Defamation (13)</p> <p><input type="checkbox"/> Fraud (16)</p> <p><input type="checkbox"/> Intellectual property (19)</p> <p><input type="checkbox"/> Professional negligence (25)</p> <p><input type="checkbox"/> Other non-PI/PD/WD tort (35)</p> <p><b>Employment</b></p> <p><input type="checkbox"/> Wrongful termination (36)</p> <p><input checked="" type="checkbox"/> Other employment (15)</p> | <p><b>Contract</b></p> <p><input type="checkbox"/> Breach of contract/warranty (06)</p> <p><input type="checkbox"/> Rule 3.740 collections (09)</p> <p><input type="checkbox"/> Other collections (09)</p> <p><input type="checkbox"/> Insurance coverage (18)</p> <p><input type="checkbox"/> Other contract (37)</p> <p><b>Real Property</b></p> <p><input type="checkbox"/> Eminent domain/Inverse condemnation (14)</p> <p><input type="checkbox"/> Wrongful eviction (33)</p> <p><input type="checkbox"/> Other real property (26)</p> <p><b>Unlawful Detainer</b></p> <p><input type="checkbox"/> Commercial (31)</p> <p><input type="checkbox"/> Residential (32)</p> <p><input type="checkbox"/> Drugs (38)</p> <p><b>Judicial Review</b></p> <p><input type="checkbox"/> Asset forfeiture (05)</p> <p><input type="checkbox"/> Petition re: arbitration award (11)</p> <p><input type="checkbox"/> Writ of mandate (02)</p> <p><input type="checkbox"/> Other judicial review (39)</p> | <p><b>Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403)</b></p> <p><input type="checkbox"/> Antitrust/Trade regulation (03)</p> <p><input type="checkbox"/> Construction defect (10)</p> <p><input type="checkbox"/> Mass tort (40)</p> <p><input type="checkbox"/> Securities litigation (28)</p> <p><input type="checkbox"/> Environmental/Toxic tort (30)</p> <p><input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41)</p> <p><b>Enforcement of Judgment</b></p> <p><input type="checkbox"/> Enforcement of judgment (20)</p> <p><b>Miscellaneous Civil Complaint</b></p> <p><input type="checkbox"/> RICO (27)</p> <p><input type="checkbox"/> Other complaint (not specified above) (42)</p> <p><b>Miscellaneous Civil Petition</b></p> <p><input type="checkbox"/> Partnership and corporate governance (21)</p> <p><input type="checkbox"/> Other petition (not specified above) (43)</p> |
|--|---|---|

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 d.  Large number of witnesses
- b.  Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve e.  Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court
- c.  Substantial amount of documentary evidence 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: **April 3, 2008**  
 Gary R. Carlin, CSBN: 44945 (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

**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 **5-7**  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.      | 6. Location of property or permanently garaged vehicle.    |
| 2. May be filed in Central (Other county, or no Bodily Injury/Property Damage). | 7. Location where petitioner resides.                      |
| 3. Location where cause of action arose.  | 8. Location wherein defendant/respondent functions wholly. |
| 4. Location where bodily injury, death or damage occurred.                      | 9. Location where one or more of the parties reside.       |
| 5. Location where performance required or defendant resides.                    | 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.

	<b>A</b> Civil Case Cover Sheet Category No.	<b>B</b> Type of Action (Check only one)	<b>C</b> 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	2.
		<input type="checkbox"/> A7221 Asbestos - Personal Injury/Wrongful Death	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., 2., 4.
		<input type="checkbox"/> A7240 Other Professional Health Care Malpractice	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

Unlawful Detainer

Judicial Review

SHORT TITLE: <b>KIMSEY v. BELLFLOWER UNIFIED SCHOOL DISTRICT, et al.</b>		CASE NUMBER
<b>A</b> Civil Case Cover Sheet Category No.	<b>B</b> Type of Action (Check only one)	<b>C</b> Applicable Reasons - See Step 3 Above
Professional Negligence (25)	<input type="checkbox"/> A6017 Legal Malpractice	1., 2., 3.
	<input type="checkbox"/> A6050 Other Professional Malpractice (not medical or legal)	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 checked="" type="checkbox"/> A6024 Other Employment Complaint Case	1., 2., 3.
	<input type="checkbox"/> A6109 Labor Commissioner Appeals	10.
Breach of Contract/Warranty (06) (not insurance)	<input type="checkbox"/> A6004 Breach of Rental/Lease Contract (not Unlawful Detainer or wrongful eviction)	2., 5.
	<input type="checkbox"/> A6008 Contract/Warranty Breach -Seller Plaintiff (no fraud/negligence)	2., 5.
	<input type="checkbox"/> A6019 Negligent Breach of Contract/Warranty (no fraud)	1., 2., 5.
	<input type="checkbox"/> A6028 Other Breach of Contract/Warranty (not fraud or negligence)	1., 2., 5.
Collections (09)	<input type="checkbox"/> A6002 Collections Case-Seller Plaintiff	2., 5., 6.
	<input type="checkbox"/> A6012 Other Promissory Note/Collections Case	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	1., 2., 3., 5.
	<input type="checkbox"/> A6031 Tortious Interference	1., 2., 3., 5.
	<input type="checkbox"/> A6027 Other Contract Dispute(not breach/insurance/fraud/negligence)	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	2., 6.
	<input type="checkbox"/> A6032 Quiet Title	2., 6.
	<input type="checkbox"/> A6060 Other Real Property (not eminent domain, landlord/tenant, foreclosure)	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.

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.

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 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.			16703 Clark Avenue
CITY: Bellflower	STATE: CA	ZIP CODE: 90706	

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 Court 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: April 3, 2008

  
 (SIGNATURE OF ATTORNEY/FILING PARTY)  
 Brent S. Buchsbaum, CSBN: 194816

**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.

2008 03/27 10:58 AM LASC