

1 Rafael Bernardino, Jr. SBN 118690
2 Stanley L. Friedman SBN 120551
3 HOBSON DUNOGG BERNARDINO + DAVIS, LLP
333 South Hope Street, Suite 4000
4 Los Angeles, California 90071
Telephone: (213) 406-2958

5 Attorneys for Plaintiff
6 J-M MANUFACTURING COMPANY, INC.

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

JUN 02 2011

John A. Chittre, Executive Officer/Clerk
BY Shaunya Wesley, Deputy

6017
90045

D33 Charles Palmer

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 COUNTY OF LOS ANGELES - STANLEY MOSK COURTHOUSE

11 J-M MANUFACTURING COMPANY, INC., a)
12 Delaware Corporation,)

13 PLAINTIFF,)

14 vs.)

15 MCDERMOTT WILL & EMERY, a Business)
16 Entity, form unknown; and DOES 1 through 100,)
inclusive,)

17 Defendants.)

Case Number: BC 462832

COMPLAINT FOR DAMAGES

18
19
20
21 **COMES NOW**, plaintiff J-M MANUFACTURING COMPANY, INC., a Delaware

22 Corporation doing business as JM Eagle ("JME" or "PLAINTIFF"), complaining of defendants
23 MCDERMOTT WILL & EMERY, a business entity, form unknown ("MWE" or "McDermott")
24 and DOES 1 through 100, inclusive, and each of them, (collectively referred to herein as
25 "DEFENDANTS") as follows:

26
27
28
CIT/CASE: BC462832 LEA/DEF#: 0310
RECEIPT #: CCH465980075
DATE PAID: 06/02/11 03:06:06 PM
AMOUNT: \$395.00
EFFECT ID: 395.00
CASH: 395.00
CHECK: 0
CARD: 0
CHARGE: 0

06/02/11

1 **GENERAL ALLEGATIONS**

2 **A. Identity of the parties and venue.**

3 1. PLAINTIFF JME is now, and at all times herein was, a Delaware Corporation, in
4 good standing and licensed to do business in Los Angeles County, California. JME's corporate
5 headquarters is in the County of Los Angeles, City of Los Angeles. The factual events set forth
6 herein occurred within Los Angeles County, State of California; accordingly, venue is proper in
7 the above-entitled court.

8 2. Defendant MWE is now, and at all times herein was, a business entity, form
9 unknown. PLAINTIFF is informed and believes and thereon allege that this defendant resides in
10 Los Angeles County, California, and has been doing business in Los Angeles County, California.

11 3. The true names or capacities, whether individual, corporate, associate, or otherwise
12 of defendants named in this action as Does 1-100 ("DOES") are unknown to PLAINTIFF, who
13 therefore sues such defendants by such fictitious names. PLAINTIFF will seek leave of this
14 Honorable Court to amend this Complaint when the true names and/or capacities of said
15 defendants have been ascertained. Said fictitiously named defendants are in some manner
16 proximately responsible for the damages suffered by PLAINTIFF herein.

17
18 **B. Agency allegations.**

19 4. Each of the defendants including the fictitiously named DOE defendants, was the
20 agent, or employee, partner or officer, director or joint venturer of cross-defendants herein, and
21 doing the things herein alleged was acting within the course and scope of said agency,
22 employment, partnership, joint venture, or association and under the direction of, and with the
23 consent and permission, advance knowledge and/or ratification of the other defendants.

24 5. At all times relevant, defendants including the fictitiously named DOE defendants,
25 and each of them, formed and operated under a common plan and agreement, with the resulting
26 injuries and damages to PLAINTIFF arising from acts done in furtherance of the common design.

27
28
06/02/11

1 **C. Venue.**

2 6. Venue is proper in Los Angeles County pursuant to California *Code of Civil*
3 *Procedure* section 395(a) because PLAINTIFF entered into a contract with defendants in Los
4 Angeles County; and because defendants were to perform legal services for PLAINTIFF herein
5 in “the *Underlying Action*.”
6

7 **D. “The Case Within The Case.”**

8 7. JME retained McDermott to represent it regarding subpoenas received in 2006 and
9 2007 from the federal, California, and Tennessee governments. The subpoenas sought
10 information regarding the False Claims Act allegations made in *United States ex rel. Hendrix v.*
11 *J-M Manufacturing Co.*, which was then a non-public complaint filed under seal. Each of the
12 subpoenas required JME to produce paper and electronic documents.

13 8. McDermott worked with JME to identify about 160 custodians who likely had
14 responsive electronic information. McDermott then made electronic copies of the custodians’
15 data and transferred the data to a third-party electronic discovery vendor, Stratify. Stratify used a
16 list of keywords to search the data for responsive information. (The keyword list was developed
17 jointly by McDermott and the Assistant United States Attorney working on the matter.)
18 McDermott produced documents containing the keywords to the federal government. The
19 government found a significant number of privileged documents and asked JME (through
20 McDermott) to conduct a privilege review and submit a new production set.

21 9. Pursuant to the government’s request, responsive documents were filtered through
22 a second keyword list to determine if the documents were privileged. Contract attorneys,
23 employed by MWE, reviewed the documents that were identified as potentially privileged and
24 divided them into three categories: responsive but privileged; responsive and not privileged; and,
25 non-responsive. MWE’s Attorneys performed limited spot-checking of the contract attorneys’
26 work, but the firm did not thoroughly review the categorizations or conduct any further privilege
27 review. About 250,000 electronic documents were produced to the governmental entities,
28

86/02/11

1 including many based on the contract attorneys' assessments of responsiveness and privilege.

2 10. In March 2010, JME retained the law firm of Sheppard Mullin Richter &
3 Hampton, LLP ("Sheppard") to replace McDermott. In or about June 2010, counsel for the real
4 party in interest (the "Relator") informed Sheppard that it had received JME's document
5 production from the federal government. Relator's counsel discovered that some documents
6 appeared to be privileged and segregated those documents. Thereafter, Sheppard asked
7 Relator's counsel to destroy or return the privileged documents. Relator's counsel refused,
8 alleging that JME waived the attorney-client privilege with respect to the subject matter of the
9 documents because MWE twice conducted privilege reviews before producing the documents to
10 the government. JME is informed and believes and thereon alleges that approximately 3,900
11 privileged documents were produced by MWE and that such 3,900 documents should not have
12 been produced by MWE.

13
14 **FIRST CAUSE OF ACTION**
15 **Legal Malpractice against all Defendants.**

16 11. PLAINTIFF refers to and incorporates paragraphs 1 through 10 of this Complaint
17 as though set full herein.

18 12. Defendants owed PLAINTIFF a duty to render legal services competently.
19 Defendants breached that duty by, *inter alia*, producing privileged documents to parties adverse
20 to JME in litigation without obtaining its informed consent, failing to supervise attorneys and
21 vendors MWE contracted with to perform the review and production of documents, and charging
22 JME fees and costs for performance of such work that was not properly performed, or not
23 performed at all.

24 13. PLAINTIFF alleges, upon information and belief, that McDermott failed to inform
25 PLAINTIFF that attorney-client privileged documents and other privileged documents had been
26 disclosed, and further failed to disclose the scope of such release of privileged documents.

27 14. Defendants breach caused JME damages in an amount to be proved according to
28 proof at trial, but in no event less than the jurisdictional minimum of this Court.

SECOND CAUSE OF ACTION
Breach of Fiduciary Duty against all defendants

1
2
3 15. PLAINTIFF refers to and incorporates paragraphs 1 through 14 of this Complaint
4 as though set full herein.

5 16. Defendants owed PLAINTIFF a fiduciary duty. Defendants breached that duty by,
6 *inter alia*, producing privileged documents to parties adverse to JME in several lawsuits, failing
7 to supervise attorneys and vendors MWE contracted with to perform the review and production
8 of documents, and charging JME fees and costs for performance of such work that was not
9 properly performed, or not performed at all.

10 17. Defendants breach caused JME damages in an amount to be proved according to
11 proof at trial, but in no event less than the jurisdictional minimum of this Court.

12 18. The actions of defendants were (1) fraudulent, meaning an intentional
13 misrepresentation, deceit, or concealment of a material fact known to the defendants with the
14 intention on the part of the defendant of thereby depriving a person of property or legal rights or
15 otherwise causing injury; (2) malicious, meaning conduct which is intended by the defendants to
16 cause injury to the PLAINTIFFs or despicable conduct which is carried on by the defendants with
17 a willful and conscious disregard of the rights or safety of others; (3) and/or oppressive, meaning
18 despicable conduct that subjects a person to cruel and unjust hardship in conscious disregard of
19 that person's rights; and done with the intention of depriving PLAINTIFFs of substantial rights.
20 PLAINTIFFs are therefore entitled to punitive damages in a sufficient amount to make an
21 example of, punish defendants, and deter future fraudulent, oppressive and malicious misconduct
22 in an amount according to proof at trial.

THIRD CAUSE OF ACTION
(Accounting- Against All Defendants)

23
24
25
26 19. PLAINTIFF refers to and incorporates paragraphs 1 through 18 of this Complaint
27 as though fully set forth herein.
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

20. PLAINTIFF is informed and believes and thereon alleges that Defendants "marked up" fees and costs paid to contract attorneys and vendors and failed to disclose that such fees and costs were being "marked up." Because Defendants did not have a written contract with JME, or other authority, to "mark up" such fees and costs, such "mark up" was unlawful.

21. The amount of the "mark up" is unknown to PLAINTIFF and cannot be ascertained without an accounting of the amounts paid for such contract attorneys and vendors.

WHEREFORE, PLAINTIFF prays for judgment against Defendants, as follows:

ON THE FIRST CAUSE OF ACTION:

- 1. Damages according to proof at trial.

ON THE SECOND CAUSE OF ACTION:

- 1. Damages according to proof at trial.
- 2. Punitive damages in an amount according to proof at trial.

ON THE THIRD CAUSE OF ACTION:

- 1. An accounting of the fees and costs paid to contract attorneys and vendors.

ON ALL CAUSES OF ACTION:

- 1. For costs of suit incurred herein.
- 2. For a reasonable attorneys fee.
- 3. Such other and further relief as the Court may deem just and proper.

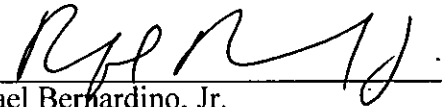
Respectfully submitted,

06/02/11

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Dated: June 1, 2011.

HOBSON, DUNOGG, BERNARDINO & DAVIS, LLP

By: 
Rafael Bernardino, Jr.
Attorneys for PLAINTIFF
J-M MANUFACTURING COMPANY, INC.

05/02/11

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):
Rafael Bernardino, Jr. SBN 118690
Hobson, Dungog, Bernardino & Davis, LLP
333 South Hope Street, Suite 4000
Los Angeles, California 90071
TELEPHONE NO.: (213) 406-2958 FAX NO.: (888) 308-9087
ATTORNEY FOR (Name): J-M Manufacturing Company, Inc.

SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles
STREET ADDRESS: 111 North Hill Street
MAILING ADDRESS:
CITY AND ZIP CODE: Los Angeles, California 90012
BRANCH NAME: Stanley Mosk Court House

CASE NAME:
J-M Manufacturing Company, Inc. v. McDermott Will & Emery, LLP

CIVIL CASE COVER SHEET
[checked] 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)

FOR COURT USE ONLY
FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES
JUN 02 2011
John A. Clark, Executive Officer/Clerk
BY [Signature] Deputy
Shaunya Wesley

CASE NUMBER: BC 462832
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 (16), [] Intellectual property (19), [checked] 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 (26)
Unlawful Detainer: [] Commercial (31), [] Residential (32), [] Drugs (38)
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 [checked] 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. [checked] monetary b. [] nonmonetary; declaratory or injunctive relief c. [checked] punitive
4. Number of causes of action (specify): Three
5. This case [] is [checked] 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: June 1, 2011
Rafael Bernardino, Jr.

[Signature]
(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.

INSTRUCTIONS ON HOW TO COMPLETE THE COVER SHEET

To Plaintiffs and Others Filing First Papers. If you are filing a first paper (for example, a complaint) in a civil case, you must complete and file, along with your first paper, the *Civil Case Cover Sheet* contained on page 1. This information will be used to compile statistics about the types and numbers of cases filed. You must complete items 1 through 6 on the sheet. In item 1, you must check **one** box for the case type that best describes the case. If the case fits both a general and a more specific type of case listed in item 1, check the more specific one. If the case has multiple causes of action, check the box that best indicates the **primary** cause of action. To assist you in completing the sheet, examples of the cases that belong under each case type in item 1 are provided below. A cover sheet must be filed only with your initial paper. Failure to file a cover sheet with the first paper filed in a civil case may subject a party, its counsel, or both to sanctions under rules 2.30 and 3.220 of the California Rules of Court.

To Parties in Rule 3.740 Collections Cases. A "collections case" under rule 3.740 is defined as an action for recovery of money owed in a sum stated to be certain that is not more than \$25,000, exclusive of interest and attorney's fees, arising from a transaction in which property, services, or money was acquired on credit. A collections case does not include an action seeking the following: (1) tort damages, (2) punitive damages, (3) recovery of real property, (4) recovery of personal property, or (5) a prejudgment writ of attachment. The identification of a case as a rule 3.740 collections case on this form means that it will be exempt from the general time-for-service requirements and case management rules, unless a defendant files a responsive pleading. A rule 3.740 collections case will be subject to the requirements for service and obtaining a judgment in rule 3.740.

To Parties in Complex Cases. In complex cases only, parties must also use the *Civil Case Cover Sheet* to designate whether the case is complex. If a plaintiff believes the case is complex under rule 3.400 of the California Rules of Court, this must be indicated by completing the appropriate boxes in items 1 and 2. If a plaintiff designates a case as complex, the cover sheet must be served with the complaint on all parties to the action. A defendant may file and serve no later than the time of its first appearance a joinder in the plaintiff's designation, a counter-designation that the case is not complex, or, if the plaintiff has made no designation, a designation that the case is complex.

CASE TYPES AND EXAMPLES

Auto Tort

- Auto (22)—Personal Injury/Property Damage/Wrongful Death
- Uninsured Motorist (46) (*if the case involves an uninsured motorist claim subject to arbitration, check this item instead of Auto*)

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

- Asbestos (04)
 - Asbestos Property Damage
 - Asbestos Personal Injury/Wrongful Death
- Product Liability (*not asbestos or toxic/environmental*) (24)
- Medical Malpractice (45)
 - Medical Malpractice—Physicians & Surgeons
 - Other Professional Health Care Malpractice
- Other PI/PD/WD (23)
 - Premises Liability (e.g., slip and fall)
 - Intentional Bodily Injury/PD/WD (e.g., assault, vandalism)
 - Intentional Infliction of Emotional Distress
 - Negligent Infliction of Emotional Distress
 - Other PI/PD/WD

Non-PI/PD/WD (Other) Tort

- Business Tort/Unfair Business Practice (07)
- Civil Rights (e.g., discrimination, false arrest) (*not civil harassment*) (08)
- Defamation (e.g., slander, libel) (13)
- Fraud (16)
- Intellectual Property (19)
- Professional Negligence (25)
 - Legal Malpractice
 - Other Professional Malpractice (*not medical or legal*)
- Other Non-PI/PD/WD Tort (35)

Employment

- Wrongful Termination (36)
- Other Employment (15)

Contract

- Breach of Contract/Warranty (06)
 - Breach of Rental/Lease Contract (*not unlawful detainer or wrongful eviction*)
- Contract/Warranty Breach—Seller Plaintiff (*not fraud or negligence*)
- Negligent Breach of Contract/Warranty
- Other Breach of Contract/Warranty
- Collections (e.g., money owed, open book accounts) (09)
- Collection Case—Seller Plaintiff
- Other Promissory Note/Collections Case
- Insurance Coverage (*not provisionally complex*) (18)
 - Auto Subrogation
 - Other Coverage
- Other Contract (37)
 - Contractual Fraud
 - Other Contract Dispute

Real Property

- Eminent Domain/Inverse Condemnation (14)
- Wrongful Eviction (33)
- Other Real Property (e.g., quiet title) (26)
 - Writ of Possession of Real Property
 - Mortgage Foreclosure
 - Quiet Title
 - Other Real Property (*not eminent domain, landlord/tenant, or foreclosure*)

Unlawful Detainer

- Commercial (31)
- Residential (32)
- Drugs (38) (*if the case involves illegal drugs, check this item; otherwise, report as Commercial or Residential*)

Judicial Review

- Asset Forfeiture (05)
- Petition Re: Arbitration Award (11)
- Writ of Mandate (02)
 - Writ—Administrative Mandamus
 - Writ—Mandamus on Limited Court Case Matter
 - Writ—Other Limited Court Case Review
- Other Judicial Review (39)
 - Review of Health Officer Order
 - Notice of Appeal—Labor Commissioner Appeals

Provisionally Complex Civil Litigation (Cal. Rules of Court Rules 3.400–3.403)

- Antitrust/Trade Regulation (03)
- Construction Defect (10)
- Claims Involving Mass Tort (40)
- Securities Litigation (28)
- Environmental/Toxic Tort (30)
- Insurance Coverage Claims (*arising from provisionally complex case type listed above*) (41)

Enforcement of Judgment

- Enforcement of Judgment (20)
 - Abstract of Judgment (Out of County)
 - Confession of Judgment (*non-domestic relations*)
 - Sister State Judgment
 - Administrative Agency Award (*not unpaid taxes*)
 - Petition/Certification of Entry of Judgment on Unpaid Taxes
 - Other Enforcement of Judgment Case

Miscellaneous Civil Complaint

- RICO (27)
- Other Complaint (*not specified above*) (42)
 - Declaratory Relief Only
 - Injunctive Relief Only (*non-harassment*)
 - Mechanics Lien
 - Other Commercial Complaint Case (*non-tort/non-complex*)
 - Other Civil Complaint (*non-tort/non-complex*)

Miscellaneous Civil Petition

- Partnership and Corporate Governance (21)
- Other Petition (*not specified above*) (43)
 - Civil Harassment
 - Workplace Violence
 - Elder/Dependent Adult Abuse
 - Election Contest
 - Petition for Name Change
 - Petition for Relief From Late Claim
- Other Civil Petition

95/02/11

SHORT TITLE:

J-M Manufacturing Company, Inc.

CASE NUMBER

**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 ¹⁰ 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. | 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.

	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 <input type="checkbox"/> A7240 Other Professional Health Care Malpractice	1., 4. 1., 4.
	Other Personal Injury Property Damage Wrongful Death (23)	<input type="checkbox"/> A7250 Premises Liability (e.g., slip and fall)	1., 4.
		<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., 3. 1., 4.

11/28/98

SHORT TITLE:

J-M Manufacturing Company, Inc.

CASE NUMBER

	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
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., 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 checked="" 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.	
Employment	Wrongful Termination (36)	<input type="checkbox"/> A6037 Wrongful Termination	1., 2., 3.
	Other Employment (15)	<input type="checkbox"/> A6024 Other Employment Complaint Case	1., 2., 3.
		<input type="checkbox"/> A6109 Labor Commissioner Appeals	10.
Contract	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.	
Real Property	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	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.

TT/20/9B

SHORT TITLE:

J-M Manufacturing Company, Inc.

CASE NUMBER

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.

11/22/98

SHORT TITLE:

J-M Manufacturing Company, Inc.

CASE NUMBER

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

REASON: Check the appropriate boxes for the numbers shown under Column C for the type of action that you have selected for this case. <input type="checkbox"/> 1. <input checked="" type="checkbox"/> 2. <input checked="" 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: 5200 West Century Boulevard Los Angeles, California 90045
CITY: Los Angeles	STATE: CA	ZIP CODE: 90045

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

Dated: June 1, 2011


 (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.

06/02/11