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Attorneys for Plaintiff
VICKI SCOTT

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FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

MAR 02 2012

John A. Clarke, Executive Officer/Clerk
BY *(Signature)* Deputy
Shaunya Wesley

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – CENTRAL DISTRICT**

VICKI SCOTT, an individual,)
)
Plaintiff,)
)
vs.)
)
SQUIRE SANDERS (US) LLP; an Ohio)
Limited Liability Partnership; JAMES H.)
BRODERICK, JR., an individual; JOHN)
EDWARD KIMBLE, an individual; and)
DOES 1-50, inclusive,)
)
Defendants.)

Case No.:

COMPLAINT FOR: BC 479995

1. DISCRIMINATION BASED ON RACE IN VIOLATION OF CALIFORNIA GOVERNMENT CODE § 12940, ET SEQ. (FEHA);
2. HARASSMENT IN VIOLATION OF CALIFORNIA GOVERNMENT CODE § 12940, ET SEQ. (FEHA);
3. RETALIATION IN VIOLATION OF CALIFORNIA GOVERNMENT CODE § 12940, ET SEQ. (FEHA);
4. FAILURE TO PREVENT DISCRIMINATION/HARASSMENT IN VIOLATION OF CALIFORNIA GOVERNMENT CODE § 12940, ET SEQ. (FEHA);
5. WRONGFUL TERMINATION IN VIOLATION OF GOVERNMENT CODE § 12940, ET SEQ. (FEHA);
6. RETALIATION IN VIOLATION OF LABOR CODE § 1102.41;
7. WRONGFUL TERMINATION IN VIOLATION OF PUBLIC POLICY.

DEMAND FOR JURY TRIAL

CIT/CASE: BC479995 LEA/NEF#:
RECEIPT #: CCH465980095
DATE PAID: 03/02/12 03:09:34 PM
AMOUNT: \$395.00
RECEIVED: 03/10
CHECK # 395.00

1 Plaintiff, VICKI SCOTT, hereby brings her complaint against the above-named
2 Defendants and states and alleges as follows:

3 **PRELIMINARY ALLEGATIONS**

4 1. At all times material herein, Plaintiff, VICKI SCOTT (hereinafter referred to as
5 "Plaintiff") was and is a resident of the State of California, County of Los Angeles.

6 2. Plaintiff is informed and believes and thereon alleges that Defendant SQUIRE
7 SANDERS (US) LLP, (hereinafter referred to as "Defendant SQUIRE SANDERS") is an Ohio
8 Limited Liability Partnership, was at all times mentioned duly licensed to do business, and was
9 and is doing business, under and by virtue of the laws of the State of California, in the county of
10 Los Angeles County.

11 3. Plaintiff is informed and believes and thereon alleges that Defendant JAMES H.
12 BRODERICK, JR., (hereinafter referred to as "Defendant BRODERICK") is an individual
13 employed as a managing partner of the Los Angeles office of Defendant SQUIRE SANDERS,
14 and was and is a resident of the State of California, Los Angeles County.

15 4. Plaintiff is informed and believes and thereon alleges that Defendant JOHN
16 EDWARD KIMBLE, (hereinafter referred to as "Defendant KIMBLE") is an individual
17 employed as a paralegal of Defendant SQUIRE SANDERS, and was and is a resident of the
18 State of California, Los Angeles County.

19 5. The true names and capacities, whether individual, corporate, associate or
20 otherwise of DOES 1 through 50 are unknown to plaintiff who therefore sues these defendants
21 under said fictitious names. Plaintiff is informed and believes that each of the defendants named
22 as a Doe defendant is legally responsible in some manner for the events referred to in this
23 complaint, either negligently, willfully, wantonly, recklessly, tortiously, strictly liable, statutorily
24 liable or otherwise, for the injuries and damages described below to this Plaintiff. Plaintiff will
25 in the future seek leave of this court to show the true names and capacities of these Doe
26 defendants when it has been ascertained.

1 6. Plaintiff is informed and believes, and based thereon alleges, that each defendant
2 acted in all respects pertinent to this action as the agent of the other defendants, carried out a
3 joint scheme, business plan or policy in all respects pertinent hereto, and the acts of each
4 defendant are legally attributable to the other defendants.

5 7. Plaintiff commenced employment with Defendant SQUIRE SANDERS on or
6 about July 17, 2006, as an Executive Legal Secretary. Plaintiff performed her duties
7 competently and with professionalism. Plaintiff was terminated on or about October 24, 2011.

8 8. Plaintiff is an African American female.

9 9. Plaintiff began working for Defendant BRODERICK in the spring of 2007 when
10 his former secretary, Phannie Tsui, stopped working for him after accusing him of abuse and
11 prejudice against racial minorities. Plaintiff was apprehensive about working for Defendant
12 BRODERICK because she had sat next to Ms. Tsui and witnessed Defendant BRODERICK's
13 bad treatment of her. Plaintiff was also aware of an internal investigation of a racism charge
14 brought by Josefina McEvoy, another partner at the firm, against Defendant BRODERICK.
15 Plaintiff expressed her fears of working for Defendant BRODERICK to Lesley Armstrong, the
16 office manager at the time.

17 10. Defendant BRODERICK continuously exhibited a pattern of harassment against
18 Plaintiff while she worked for him. In or around October of 2007, Plaintiff was making several
19 telephone calls to her doctor regarding her need for a surgery. Defendant BRODERICK
20 immediately leapt from his desk, walked over to Plaintiff's desk, then told Plaintiff she was not
21 to make any personal calls. Plaintiff again spoke with Lesley Armstrong about Defendant
22 BRODERICK's behavior and explained she needed to use the phone to discuss her surgery.

23 11. On another occasion, Defendant BRODERICK said to Plaintiff in a sarcastic tone,
24 "you know a lot of words." Immediately after he said that, Defendant BRODERICK caught
25 himself and said, "I didn't mean that." Defendant BRODERICK would also yell at Plaintiff for
26 alleged mistakes she made. When Plaintiff would try to explain she did not make a mistake, he
27 would yell at her saying he did not want "back talk." Defendant BRODERICK constantly spoke
28 to Plaintiff in a condescending manner and would speak to her as if she were a child.

1 12. In or around September of 2009, Plaintiff went to Robert Haas, Chief Human
2 Resources Officer for Defendant SQUIRE SANDERS, crying about how Defendant
3 BRODERICK yelled at her and accused her of not putting a document in his briefcase. Plaintiff
4 was not made aware of the fact that the document needed to be placed in his briefcase, as that
5 task had been assigned to someone else. Plaintiff spoke to Mr. Haas about how Defendant
6 BRODERICK treats Plaintiff differently because of her color. Plaintiff further told Mr. Haas she
7 had been receiving bad reviews ever since she began working for Defendant BRODERICK.

8 13. On or about September 15, 2009, Plaintiff had a conference call with Mr. Haas.
9 During that conversation, Mr. Haas indicated he would speak to Defendant BRODERICK and
10 Jay Hanna, the office administrator at Defendant SQUIRE SANDERS. Immediately after Mr.
11 Haas spoke to Defendant BRODERICK, criticisms about Plaintiff's work began to increase and
12 Defendant BRODERICK began writing up Plaintiff regarding her work performance.

13 14. A few weeks following Plaintiff's conversation with Mr. Haas, Plaintiff contacted
14 Mr. Hanna requesting a reassignment. Mr. Hanna assured Plaintiff that there would be no
15 animosity or hard feelings for requesting the reassignment. Plaintiff requested the reassignment
16 with the understanding that Defendant BRODERICK would not be writing Plaintiff's upcoming
17 performance evaluation.

18 15. In 2009, Plaintiff was reassigned to work for Defendant KIMBLE. Defendant
19 BRODERICK and Defendant KIMBLE became friends on a social level earlier that year.
20 Defendant KIMBLE began harassing Plaintiff regarding assignments that were not even part of
21 Plaintiff's job description. Defendant KIMBLE would get angry at Plaintiff for not doing an
22 assignment she was not even required to do. Defendant KIMBLE some times reprimanded
23 Plaintiff via email and would carbon copy Defendant BRODERICK and Mr. Hanna on said
24 email.

25 16. On one occasion, Defendant KIMBLE sent Plaintiff a scathing email about her
26 assignments. When Plaintiff met with Defendant KIMBLE to discuss the email, Defendant
27 KIMBLE said to Plaintiff in a threatening manner, "if you think that's something, you haven't
28 seen nothing yet."

1 17. Shortly thereafter, Plaintiff conveyed Defendant KIMBLE's threat to the
2 employee association practice at Defendant SQUIRE SANDERS in order to obtain a referral to a
3 counselor for psychiatric assistance due to the harassment. Plaintiff was informed by the
4 employee association practice at Defendant SQUIRE SANDERS that Defendant KIMBLE's
5 remark was a threat. Plaintiff also informed Mr. Haas about her meeting with Defendant
6 KIMBLE and his threat.

7 18. Plaintiff then contacted the Cleveland headquarter office of Defendant SQUIRE
8 SANDERS and complained about the harassment and discriminatory treatment she was
9 receiving from Defendants BRODERICK and KIMBLE.

10 19. A few months following Plaintiff's complaint to the Cleveland office, Plaintiff
11 was given her performance evaluation. Plaintiff received good evaluations from everyone who
12 evaluated her, but she did not receive good evaluations from Defendants BRODERICK and
13 KIMBLE. Plaintiff received an evaluation from Defendant BRODERICK even though she no
14 longer worked for him due to the reassignment. This did not happen to other legal assistants at
15 Defendant SQUIRE SANDERS.

16 20. In or around July 2010, Plaintiff was denied a pay raise as a result of the negative
17 evaluations from Defendants BRODERICK and KIMBLE. Plaintiff was also placed on a 60-day
18 probation period. Plaintiff believes Defendants BRODERICK and KIMBLE gave her negative
19 evaluations in retaliation for complaining about the abusive treatment and harassment.

20 21. On or about July 20, 2010, Plaintiff filed a complaint with the U.S. Equal
21 Employment Opportunity Commission ("EEOC"), alleging race discrimination and retaliation
22 for complaining about race discrimination.

23 22. On or about August 19, 2011, Plaintiff received a call from an investigator at the
24 EEOC who informed her that they will be closing Plaintiff's case and issuing a notice to sue.
25 Plaintiff provided the investigator with an updated mailing address.

26 23. Shortly after the EEOC decided to close Plaintiff's case, Defendant SQUIRE
27 SANDERS terminated Plaintiff's employment on or about October 24, 2011. Plaintiff was told
28 she was being laid off because there was no work for her. However, Plaintiff learned after her

1 termination, a temp legal assistant took over her duties immediately after her termination. A few
2 days following Plaintiff's termination, an employee from the word processing department was
3 transferred into Plaintiff's legal assistant position and took over Plaintiff's former duties.

4 24. On or about November 8, 2011, Plaintiff filed charges with the State of
5 California, Department of Fair Employment and Housing.

6 25. By November 2011, Plaintiff still had not received the notice to sue, so she
7 contacted the EEOC. Plaintiff was informed the notice to sue packet was sent to her former
8 address, and the EEOC will resend the notice to sue to her current address.

9 26. On December 5, 2011, Plaintiff finally received the notice to sue in the mail.

10 27. On or about March 1, 2012, Plaintiff requested a right to sue notice from the
11 DFEH.

12
13 **FIRST CAUSE OF ACTION**

14 **DISCRIMINATION BASED ON RACE**

15 **IN VIOLATION OF GOVERNMENT CODE § 12940 ET SEQ.**

16 **[FAIR EMPLOYMENT AND HOUSING ACT (FEHA)]**

17 **(Against Defendants SQUIRE SANDERS and DOES 1-10 inclusive)**

18 28. Plaintiff incorporates by reference paragraphs 1 through 27 inclusive of this
19 Complaint as if fully set forth at this place.

20 29. At all times herein mentioned, California Government Code § 12940 et seq., the
21 Fair Employment and Housing Act ("FEHA"), were in full force and effect and were binding on
22 Defendants and each of them, as Defendant regularly employed five (5) or more persons.

23 30. California Government Code § 12940(a) requires Defendants to refrain from
24 discriminating against any employee on the basis of race.

25 31. The above said acts of Defendants constituted racial discrimination in violation of
26 public policy and in violation of California Government Code § 12940 et seq.

27 32. As a proximate result of the aforesaid acts of Defendants, and each of them,
28 Plaintiff has suffered actual, consequential and incidental financial losses, including without

1 limitation, loss of salary and benefits, and the intangible loss of employment related
2 opportunities in her field and damage to her professional reputation, all in an amount subject to
3 proof at the time of trial. Plaintiff claims such amounts as damages pursuant to Civil Code §
4 3287 and/or § 3288 and/or any other provision of law providing for prejudgment interest.

5 33. As a proximate result of the wrongful acts of Defendants, and each of them,
6 Plaintiff has suffered and continues to suffer emotional distress, humiliation, mental anguish and
7 embarrassment, as well as the manifestation of physical symptoms. Plaintiff is informed and
8 believes and thereupon alleges that she will continue to experience said physical and emotional
9 suffering for a period in the future not presently ascertainable, all in an amount subject to proof
10 at the time of trial.

11 34. As a proximate result of the wrongful acts of Defendants, and each of them,
12 Plaintiff has been forced to hire attorneys to prosecute her claims herein, and has incurred and is
13 expected to continue to incur attorneys' fees and costs in connection therewith. Plaintiff is
14 entitled to recover attorneys' fees and costs under California Government Code § 12965(b).

15 35. Defendant SQUIRE SANDERS had in place policies and procedures that
16 specifically prohibited discrimination, retaliation, and harassment based on race and required
17 Defendant SQUIRE SANDERS' managers, officers, and agents to prevent race discrimination,
18 retaliation based on race, and harassment based on race/hostile work environment against and
19 upon employees of Defendant SQUIRE SANDERS. Defendants BRODERICK and KIMBLE,
20 were managers, officers, and/or agents of Defendant SQUIRE SANDERS and were aware of
21 Defendant SQUIRE SANDERS' policies and procedures prohibiting discrimination, retaliation,
22 and harassment based on race and required Defendant SQUIRE SANDERS' managers, officers,
23 and agents to prevent race discrimination, retaliation based on race, and harassment based on
24 race/hostile work environment against and upon employees of Defendant SQUIRE SANDERS.
25 However, Defendants BRODERICK and KIMBLE chose to consciously and willfully ignore
26 said policies and procedures and therefore, their outrageous conduct was fraudulent, malicious,
27 oppressive, and was done in wanton disregard for the rights of Plaintiff and the rights and duties
28 owed by each Defendant to Plaintiff. Each Defendant aided, abetted, participated in, authorized,

1 ratified, and/or conspired to engage in the wrongful conduct alleged above. Plaintiff should,
2 therefore, be awarded exemplary and punitive damages against each Defendant in an amount to
3 be established that is appropriate to punish each Defendant and deter others from engaging in
4 such conduct

5
6 **SECOND CAUSE OF ACTION**

7 **HARASSMENT IN VIOLATION OF GOVERNMENT CODE § 12940 ET SEQ.**

8 **[FAIR EMPLOYMENT AND HOUSING ACT (FEHA)]**

9 **(Against All Defendants)**

10 36. Plaintiff incorporates by reference paragraphs 1 through 27 inclusive of this
11 Complaint as if fully set forth at this place.

12 37. At all times herein mentioned, Code § 12940 et seq. was in full force and effect
13 and was binding on Defendants, as Defendants regularly employed five or more persons. Code §
14 12940(k) provides that is an unlawful employment practice for an employer or any other person,
15 because of race, to harass an employee and that any entity shall take all reasonable steps to
16 prevent harassment from occurring.

17 38. Plaintiff is informed and believes, and based thereon alleges, that Defendants
18 willfully and intentionally engaged in a course of conduct designed to harass and intimidate
19 Plaintiff by creating a racially charged hostile work environment.

20 39. Defendants' conduct included, but is not limited to: Defendants BRODERICK
21 and KIMBLE reprimanding and belittling Plaintiff, Defendant BRODERICK falsely accusing
22 Plaintiff of making mistakes, Defendant BRODERICK making inappropriate comments to
23 Plaintiff, Defendant KIMBLE making threatening remarks to Plaintiff, Defendants
24 BRODERICK and KIMBLE providing negative performance evaluations of Plaintiff, and
25 Defendants terminating Plaintiff because of her race and complaint of racial discrimination.
26 Plaintiff complained to Defendant SQUIRE SANDERS, but Defendant SQUIRE SANDERS
27 dismissed Plaintiff's complaints as petty.
28

1 40. Despite full knowledge of Defendants BRODERICK and KIMBLE's conduct,
2 Defendant SQUIRE SANDERS failed to take immediate and appropriate corrective action to
3 prevent the harassment from continuing. At no time did Defendants take any action in regards to
4 this serious and pervasive conduct.

5 41. Defendants' conduct was a concerted pattern of harassment of a repeated, routine
6 and generalized nature. Plaintiff alleges that Defendants' conduct created an unreasonably
7 abusive and offensive work environment.

8 42. Defendants' conduct, as described herein, was offensive and abusive and
9 precluded Plaintiff from working in an environment free from racially discriminatory conduct.
10 Defendants' actions were so severe and pervasive that they altered the conditions of Plaintiff's
11 employment by causing Plaintiff constant stress.

12 43. As a proximate result of the aforesaid acts of Defendants, Plaintiff has suffered
13 actual, consequential and incidental financial losses, including without limitation, loss of salary
14 and benefits, and the intangible loss of employment related opportunities in her field and damage
15 to her professional reputation, all in an amount subject to proof at the time of trial. Plaintiff
16 claims such amounts as damages pursuant to Civil Code § 3287 and/or § 3288 and/or any other
17 provision of law providing for prejudgment interest.

18 44. As a proximate result of the wrongful acts of Defendants, Plaintiff has suffered
19 and continues to suffer emotional distress, humiliation, mental anguish and embarrassment, as
20 well as the manifestation of physical symptoms. Plaintiff is informed and believes, and
21 thereupon alleges, that she will continue to experience said physical and emotional suffering for
22 a period in the future not presently ascertainable, all in an amount subject to proof at the time of
23 trial.

24 45. As a proximate result of the wrongful acts of Defendants, Plaintiff has been forced
25 to hire attorneys to prosecute her claims herein, and has incurred and is expected to continue to
26 incur attorneys' fees and costs in connection therewith. Plaintiff is entitled to recover attorneys'
27 fees and costs under Code § 12965(b).
28

1 46. Defendant SQUIRE SANDERS had in place policies and procedures that
2 specifically prohibited discrimination, retaliation, and harassment based on race and required
3 Defendant SQUIRE SANDERS' managers, officers, and agents to prevent race discrimination,
4 retaliation based on race, and harassment based on race/hostile work environment against and
5 upon employees of Defendant SQUIRE SANDERS. Defendants BRODERICK and KIMBLE,
6 were managers, officers, and/or agents of Defendant SQUIRE SANDERS and were aware of
7 Defendant SQUIRE SANDERS' policies and procedures prohibiting discrimination, retaliation,
8 and harassment based on race and required Defendant SQUIRE SANDERS' managers, officers,
9 and agents to prevent race discrimination, retaliation based on race, and harassment based on
10 race/hostile work environment against and upon employees of Defendant SQUIRE SANDERS.
11 However, Defendants BRODERICK and KIMBLE chose to consciously and willfully ignore
12 said policies and procedures and therefore, their outrageous conduct was fraudulent, malicious,
13 oppressive, and was done in wanton disregard for the rights of Plaintiff and the rights and duties
14 owed by each Defendant to Plaintiff. Each Defendant aided, abetted, participated in, authorized,
15 ratified, and/or conspired to engage in the wrongful conduct alleged above. Plaintiff should,
16 therefore, be awarded exemplary and punitive damages against each Defendant in an amount to
17 be established that is appropriate to punish each Defendant and deter others from engaging in
18 such conduct.
19
20

THIRD CAUSE OF ACTION

RETALIATION IN VIOLATION OF GOVERNMENT CODE § 12940 ET SEQ.

[FAIR EMPLOYMENT AND HOUSING ACT (FEHA)]

(Against Defendant SQUIRE SANDERS and DOES 1-10)

24 47. Plaintiff incorporates by reference paragraphs 1 through 27 inclusive of this
25 Complaint as if fully set forth at this place.

26 48. At all times herein mentioned, Code § 12940 et seq. was in full force and effect
27 and was binding on Defendants, as Defendants regularly employed five or more persons. Code §
28

1 12940(h) makes it unlawful for any person to retaliate against an employee who has opposed a
2 discriminatory practice.

3 49. Plaintiff engaged in protected activity by complaining about discrimination and
4 harassment by Defendants BRODERICK and KIMBLE to Defendant SQUIRE SANDERS on
5 several occasions and subsequently filing a complaint with the EEOC. However, Defendant
6 SQUIRE SANDERS responded by terminating Plaintiff following her complaint of racial
7 discrimination and retaliation for complaining of racial discrimination.

8 50. Shortly after Plaintiff exercised her legal right to put Defendants on notice of the
9 racially charged environment in which she had to work, Defendants initiated a pattern of
10 retaliatory conduct towards Plaintiff, wherein Defendants denied Plaintiff a pay raise, put her on
11 a probationary period for alleged poor performance, and terminated Plaintiff's employment.

12 51. Defendants' conduct, as alleged above, constituted unlawful retaliation in
13 employment on account of Plaintiff's race and complaints as to racial discrimination and
14 harassment in violation of Code § 12940(h).

15 52. As a proximate result of the aforesaid acts of Defendants, Plaintiff has suffered
16 actual, consequential and incidental financial losses, including without limitation, loss of salary
17 and benefits, and the intangible loss of employment related opportunities in her field and damage
18 to her professional reputation, all in an amount subject to proof at the time of trial. Plaintiff
19 claims such amounts as damages pursuant to Civil Code § 3287 and/or § 3288 and/or any other
20 provision of law providing for prejudgment interest.

21 53. As a proximate result of the wrongful acts of Defendants, Plaintiff has suffered
22 and continues to suffer emotional distress, humiliation, mental anguish and embarrassment, as
23 well as the manifestation of physical symptoms. Plaintiff is informed and believes, and
24 thereupon alleges, that she will continue to experience said physical and emotional suffering for
25 a period in the future not presently ascertainable, all in an amount subject to proof at the time of
26 trial.

27 54. As a proximate result of the wrongful acts of Defendants, Plaintiff has been forced
28 to hire attorneys to prosecute her claims herein, and has incurred and is expected to continue to

1 incur attorneys' fees and costs in connection therewith. Plaintiff is entitled to recover attorneys'
2 fees and costs under Code § 12965(b).

3 55. Defendant SQUIRE SANDERS had in place policies and procedures that
4 specifically prohibited discrimination, retaliation, and harassment based on race and required
5 Defendant SQUIRE SANDERS' managers, officers, and agents to prevent race discrimination,
6 retaliation based on race, and harassment based on race/hostile work environment against and
7 upon employees of Defendant SQUIRE SANDERS. Defendants BRODERICK and KIMBLE,
8 were managers, officers, and/or agents of Defendant SQUIRE SANDERS and were aware of
9 Defendant SQUIRE SANDERS' policies and procedures prohibiting discrimination, retaliation,
10 and harassment based on race and required Defendant SQUIRE SANDERS' managers, officers,
11 and agents to prevent race discrimination, retaliation based on race, and harassment based on
12 race/hostile work environment against and upon employees of Defendant SQUIRE SANDERS.
13 However, Defendants BRODERICK and KIMBLE chose to consciously and willfully ignore
14 said policies and procedures and therefore, their outrageous conduct was fraudulent, malicious,
15 oppressive, and was done in wanton disregard for the rights of Plaintiff and the rights and duties
16 owed by each Defendant to Plaintiff. Each Defendant aided, abetted, participated in, authorized,
17 ratified, and/or conspired to engage in the wrongful conduct alleged above. Plaintiff should,
18 therefore, be awarded exemplary and punitive damages against each Defendant in an amount to
19 be established that is appropriate to punish each Defendant and deter others from engaging in
20 such conduct.

21
22 **FOURTH CAUSE OF ACTION**

23 **FAILURE TO PREVENT DISCRIMINATION/HARASSMENT**
24 **IN VIOLATION OF CALIFORNIA GOVERNMENT CODE § 12940 (j) and (k)**
25 **(Against Defendant SQUIRE SANDERS, and DOES 1-10, Inclusive)**

26 56. Plaintiff incorporates by reference paragraphs 1 through 27 inclusive of this
27 Complaints as if fully set forth at this place.
28

1 57. At all times mentioned herein, California Government Code Sections 12940, et
2 seq., including but not limited to Sections 12940 (j) and (k), were in full force and effect and
3 were binding upon Defendants and each of them. These sections impose on an employer a duty
4 to take immediate and appropriate corrective action to end discrimination and harassment and
5 take all reasonable steps necessary to prevent discrimination and harassment from occurring,
6 among other things.

7 58. Defendants failed to take immediate and appropriate corrective action to end the
8 discrimination and harassment. Defendants also failed to take all reasonable steps necessary to
9 prevent the harassment and discrimination from occurring.

10 59. In failing and/or refusing to take immediate and appropriate corrective action to
11 end the discrimination and harassment and in failing and/or refusing to take and or all reasonable
12 steps necessary to prevent harassment and discrimination from occurring, Defendants violated
13 California Government Code § 12940 (j) and (k), causing Plaintiff to suffer damages as set forth
14 above.

15 60. As a proximate result of the aforesaid acts of Defendants, Plaintiff has suffered
16 actual, consequential and incidental financial losses, including without limitation, loss of salary
17 and benefits, and the intangible loss of employment related opportunities in her field and damage
18 to her professional reputation, all in an amount subject to proof at the time of trial. Plaintiff
19 claims such amounts as damages pursuant to Civil Code § 3287 and/or § 3288 and/or any other
20 provision of law providing for prejudgment interest.

21 61. As a proximate result of the wrongful acts of Defendants, Plaintiff has suffered
22 and continues to suffer emotional distress, humiliation, mental anguish and embarrassment, as
23 well as the manifestation of physical symptoms. Plaintiff is informed and believes, and
24 thereupon alleges, that she will continue to experience said physical and emotional suffering for
25 a period in the future not presently ascertainable, all in an amount subject to proof at the time of
26 trial.

27 62. As a proximate result of the wrongful acts of Defendants, Plaintiff has been forced
28 to hire attorneys to prosecute her claims herein, and has incurred and is expected to continue to

1 incur attorneys' fees and costs in connection therewith. Plaintiff is entitled to recover attorneys'
2 fees and costs under Code § 12965(b).

3 63. Defendant SQUIRE SANDERS had in place policies and procedures that
4 specifically prohibited discrimination, retaliation, and harassment based on race and required
5 Defendant SQUIRE SANDERS' managers, officers, and agents to prevent race discrimination,
6 retaliation based on race, and harassment based on race/hostile work environment against and
7 upon employees of Defendant SQUIRE SANDERS. Defendants BRODERICK and KIMBLE,
8 were managers, officers, and/or agents of Defendant SQUIRE SANDERS and were aware of
9 Defendant SQUIRE SANDERS' policies and procedures prohibiting discrimination, retaliation,
10 and harassment based on race and required Defendant SQUIRE SANDERS' managers, officers,
11 and agents to prevent race discrimination, retaliation based on race, and harassment based on
12 race/hostile work environment against and upon employees of Defendant SQUIRE SANDERS.
13 However, Defendants BRODERICK and KIMBLE chose to consciously and willfully ignore
14 said policies and procedures and therefore, their outrageous conduct was fraudulent, malicious,
15 oppressive, and was done in wanton disregard for the rights of Plaintiff and the rights and duties
16 owed by each Defendant to Plaintiff. Each Defendant aided, abetted, participated in, authorized,
17 ratified, and/or conspired to engage in the wrongful conduct alleged above. Plaintiff should,
18 therefore, be awarded exemplary and punitive damages against each Defendant in an amount to
19 be established that is appropriate to punish each Defendant and deter others from engaging in
20 such conduct.

21
22 **FIFTH CAUSE OF ACTION**

23 **WRONGFUL TERMINATION**

24 **IN VIOLATION OF GOVERNMENT CODE § 12940 ET SEQ.**

25 **[FAIR EMPLOYMENT AND HOUSING ACT (FEHA)]**

26 **(Against Defendant SQUIRE SANDERS and DOES 1-10)**

27 64. Plaintiff incorporates by reference paragraphs 1 through 27 inclusive of this
28 Complaint as if fully set forth at this place.

1 65. At all times herein mentioned, California Government Code § 12940 et seq. were
2 in full force and effect and were binding on Defendant and each of them, as Defendant regularly
3 employed five (5) or more persons. California Government Code § 12940 et seq. provides that it
4 is unlawful for an employer, to discharge a person from employment or discriminate against
5 them in compensation or as to the terms, conditions or privileges of employment based on a
6 prohibited employment practice, as stated in California Government Code § 12940 (a)-(o).

7 66. Defendant terminated Plaintiff in violation of FEHA.

8 67. As a proximate result of the aforesaid acts of Defendants, and each of them,
9 Plaintiff has suffered actual, consequential and incidental financial losses, including without
10 limitation, loss of salary and benefits, and the intangible loss of employment related
11 opportunities in her field and damage to her professional reputation, all in an amount subject to
12 proof at the time of trial. Plaintiff claims such amounts as damages pursuant to Civil Code §
13 3287 and/or § 3288 and/or any other provision of law providing for prejudgment interest.

14 68. As a proximate result of the wrongful acts of Defendants, Plaintiff has suffered
15 and continues to suffer emotional distress, humiliation, mental anguish and embarrassment, as
16 well as the manifestation of physical symptoms. Plaintiff is informed and believes, and
17 thereupon alleges, that she will continue to experience said physical and emotional suffering for
18 a period in the future not presently ascertainable, all in an amount subject to proof at the time of
19 trial.

20 69. As a proximate result of the wrongful acts of Defendants, Plaintiff has been forced
21 to hire attorneys to prosecute her claims herein, and has incurred and is expected to continue to
22 incur attorneys' fees and costs in connection therewith. Plaintiff is entitled to recover attorneys'
23 fees and costs under Code § 12965(b).

24 70. Defendant SQUIRE SANDERS had in place policies and procedures that
25 specifically prohibited discrimination, retaliation, and harassment based on race and required
26 Defendant SQUIRE SANDERS' managers, officers, and agents to prevent race discrimination,
27 retaliation based on race, and harassment based on race/hostile work environment against and
28 upon employees of Defendant SQUIRE SANDERS. Defendants BRODERICK and KIMBLE,

1 were managers, officers, and/or agents of Defendant SQUIRE SANDERS and were aware of
2 Defendant SQUIRE SANDERS' policies and procedures prohibiting discrimination, retaliation,
3 and harassment based on race and required Defendant SQUIRE SANDERS' managers, officers,
4 and agents to prevent race discrimination, retaliation based on race, and harassment based on
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6 However, Defendants BRODERICK and KIMBLE chose to consciously and willfully ignore
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8 oppressive, and was done in wanton disregard for the rights of Plaintiff and the rights and duties
9 owed by each Defendant to Plaintiff. Each Defendant aided, abetted, participated in, authorized,
10 ratified, and/or conspired to engage in the wrongful conduct alleged above. Plaintiff should,
11 therefore, be awarded exemplary and punitive damages against each Defendant in an amount to
12 be established that is appropriate to punish each Defendant and deter others from engaging in
13 such conduct.

14
15 **SIXTH CAUSE OF ACTION**

16 **RETALIATION IN VIOLATION OF LABOR CODE SECTION 1102.5**

17 **(Against Defendant SQUIRE SANDERS and DOES 1-10)**

18 71. Plaintiff incorporates by reference paragraphs 1 through 27 inclusive of this
19 Complaint as if fully set forth at this place.

20 72. At all times mentioned herein California Labor Code section 1102.5 et seq. were
21 in full force and effect and were binding on Defendants and each of them.

22 73. California Labor Code section 1102.5(a) states in full, "An employer may not
23 make, adopt, or enforce any rule, regulation, or policy preventing an employee from disclosing
24 information to a government or law enforcement agency, where the employee has reasonable
25 cause to believe that the information discloses a violation of state or federal statute, or a violation
26 or noncompliance with a state or federal rule or regulation."

27 74. California Labor Code section 1102.5(b) states in full, "An employer may not
28 retaliate against an employee for disclosing information to a government or law enforcement

1 agency, where the employee has reasonable cause to believe that the information discloses a
2 violation of state or federal statute, or a violation or noncompliance with a state or federal rule or
3 regulation.”

4 75. California Labor Code section 1102.5(c) states in full, “An employer may not
5 retaliate against an employee for refusing to participate in an activity that would result in a
6 violation of state or federal statute, or a violation or noncompliance with a state or federal rule or
7 regulation.”

8 76. Plaintiff engaged in protected activity by complaining about discrimination and
9 harassment by Defendants BRODERICK and KIMBLE to Defendant SQUIRE SANDERS on
10 several occasions and subsequently filing a complaint with the EEOC. However, Defendant
11 SQUIRE SANDERS responded by terminating Plaintiff following her complaint of racial
12 discrimination and retaliation for complaining of racial discrimination.

13 77. Shortly after Plaintiff exercised her legal right to put Defendants on notice of the
14 racially charged environment in which she had to work, Defendants initiated a pattern of
15 retaliatory conduct towards Plaintiff, wherein Defendants denied Plaintiff a pay raise, put her on
16 a probationary period for alleged poor performance, and terminated Plaintiff’s employment.

17 78. The above acts of Defendants constitute retaliation in violation of California
18 Labor Code section 1102.5; such retaliatory reprimand was a proximate cause of Plaintiff’s
19 damages as stated below.

20 79. Defendants’ conduct, as alleged above, constituted unlawful retaliation in
21 employment on account of Plaintiff’s race and complaints as to racial discrimination and
22 harassment in violation of Code § 12940(h).

23 80. As a proximate result of the aforesaid acts of Defendants, Plaintiff has suffered
24 actual, consequential and incidental financial losses, including without limitation, loss of salary
25 and benefits, and the intangible loss of employment related opportunities in her field and damage
26 to her professional reputation, all in an amount subject to proof at the time of trial. Plaintiff
27 claims such amounts as damages pursuant to Civil Code § 3287 and/or § 3288 and/or any other
28 provision of law providing for prejudgment interest.

1 81. As a proximate result of the wrongful acts of Defendants, Plaintiff has suffered
2 and continues to suffer emotional distress, humiliation, mental anguish and embarrassment, as
3 well as the manifestation of physical symptoms. Plaintiff is informed and believes, and
4 thereupon alleges, that she will continue to experience said physical and emotional suffering for
5 a period in the future not presently ascertainable, all in an amount subject to proof at the time of
6 trial.

7 82. Defendant SQUIRE SANDERS had in place policies and procedures that
8 specifically prohibited discrimination, retaliation, and harassment based on race and required
9 Defendant SQUIRE SANDERS' managers, officers, and agents to prevent race discrimination,
10 retaliation based on race, and harassment based on race/hostile work environment against and
11 upon employees of Defendant SQUIRE SANDERS. Defendants BRODERICK and KIMBLE,
12 were managers, officers, and/or agents of Defendant SQUIRE SANDERS and were aware of
13 Defendant SQUIRE SANDERS' policies and procedures prohibiting discrimination, retaliation,
14 and harassment based on race and required Defendant SQUIRE SANDERS' managers, officers,
15 and agents to prevent race discrimination, retaliation based on race, and harassment based on
16 race/hostile work environment against and upon employees of Defendant SQUIRE SANDERS.
17 However, Defendants BRODERICK and KIMBLE chose to consciously and willfully ignore
18 said policies and procedures and therefore, their outrageous conduct was fraudulent, malicious,
19 oppressive, and was done in wanton disregard for the rights of Plaintiff and the rights and duties
20 owed by each Defendant to Plaintiff. Each Defendant aided, abetted, participated in, authorized,
21 ratified, and/or conspired to engage in the wrongful conduct alleged above. Plaintiff should,
22 therefore, be awarded exemplary and punitive damages against each Defendant in an amount to
23 be established that is appropriate to punish each Defendant and deter others from engaging in
24 such conduct.

25 ///

26 ///

27 ///

28 ///

SEVENTH CAUSE OF ACTION

**WRONGFUL TERMINATION IN VIOLATION OF PUBLIC POLICY
(FEHA)**

(Against Defendant SQUIRE SANDERS and DOES 1-10)

83. Plaintiff incorporates by reference paragraphs 1 through 27 inclusive of this Complaint as if fully set forth at this place.

84. At all times mentioned, the public policy of the State of California, as codified, expressed and mandated in Code § 12940, is to prohibit employers from discriminating, harassing and retaliating against any individual on the basis of, but not limited to, sex, race, age, disability and national origin as identified in California Government Code § 12940 (a)-(o). This public policy of the State of California is designed to protect all employees and to promote the welfare and well being of the community at large. Accordingly, the actions of Defendants, and each of them, in terminating Plaintiff on the grounds alleged and described herein were wrongful and in contravention of the express public policy of the State of California, to wit, the policy set forth in Code § 12940 et seq., and the laws and regulations promulgated thereunder.

85. At all times mentioned herein California Labor Code section 1102.5 et seq. were in full force and effect and were binding on Defendants and each of them. California Labor Code section 1102.5 (b) states in full, "An employer may not retaliate against an employee for disclosing information to a government or law enforcement agency, where the employee has reasonable cause to believe that the information discloses a violation of state or federal statute, or a violation or noncompliance with a state or federal rule or regulation." Plaintiff engaged in protected activity by complaining about discrimination and harassment by Defendants BRODERICK and KIMBLE to Defendant SQUIRE SANDERS on several occasions and subsequently filing a complaint with the EEOC. However, Defendant SQUIRE SANDERS responded by terminating Plaintiff following her complaint of racial discrimination and retaliation for complaining of racial discrimination.

86. As a proximate result of the aforesaid acts of Defendants, Plaintiff has suffered actual, consequential and incidental financial losses, including without limitation, loss of salary

1 and benefits, and the intangible loss of employment related opportunities in her field and damage
2 to her professional reputation, all in an amount subject to proof at the time of trial. Plaintiff
3 claims such amounts as damages pursuant to Civil Code § 3287 and/or § 3288 and/or any other
4 provision of law providing for prejudgment interest.

5 87. As a proximate result of the wrongful acts of Defendants, Plaintiff has suffered
6 and continues to suffer emotional distress, humiliation, mental anguish and embarrassment, as
7 well as the manifestation of physical symptoms. Plaintiff is informed and believes, and thereupon
8 alleges, that she will continue to experience said physical and emotional suffering for a period in
9 the future not presently ascertainable, all in an amount subject to proof at the time of trial.

10 88. As a proximate result of the wrongful acts of Defendants, Plaintiff has been
11 forced to hire attorneys to prosecute her claims herein, and has incurred and is expected to
12 continue to incur attorneys' fees and costs in connection therewith. Plaintiff is entitled to recover
13 attorneys' fees and costs under Code § 12965(b).

14 89. Defendant SQUIRE SANDERS had in place policies and procedures that
15 specifically prohibited discrimination, retaliation, and harassment based on race and required
16 Defendant SQUIRE SANDERS' managers, officers, and agents to prevent race discrimination,
17 retaliation based on race, and harassment based on race/hostile work environment against and
18 upon employees of Defendant SQUIRE SANDERS. Defendants BRODERICK and KIMBLE,
19 were managers, officers, and/or agents of Defendant SQUIRE SANDERS and were aware of
20 Defendant SQUIRE SANDERS' policies and procedures prohibiting discrimination, retaliation,
21 and harassment based on race and required Defendant SQUIRE SANDERS' managers, officers,
22 and agents to prevent race discrimination, retaliation based on race, and harassment based on
23 race/hostile work environment against and upon employees of Defendant SQUIRE SANDERS.
24 However, Defendants BRODERICK and KIMBLE chose to consciously and willfully ignore
25 said policies and procedures and therefore, their outrageous conduct was fraudulent, malicious,
26 oppressive, and was done in wanton disregard for the rights of Plaintiff and the rights and duties
27 owed by each Defendant to Plaintiff. Each Defendant aided, abetted, participated in, authorized,
28 ratified, and/or conspired to engage in the wrongful conduct alleged above. Plaintiff should,

1 therefore, be awarded exemplary and punitive damages against each Defendant in an amount to
2 be established that is appropriate to punish each Defendant and deter others from engaging in
3 such conduct.
4
5

6 **WHEREFORE, Plaintiff prays for judgment as follows:**

- 7 1. For general damages according to proof;
- 8 2. For special damages according to proof;
- 9 3. For punitive damages according to proof;
- 10 4. For attorney fees and costs of suit;
- 11 5. For prejudgment and post-judgment interest according to law; and
- 12 6. For such other and further relief as the court may deem just and proper.

13
14 DATED: March 2, 2012

LAW OFFICES OF JOSEPH M. LOVRETOVICH

15
16
17 By: 

18 JOSEPH M. LOVRETOVICH

19 DAVID F. TIBOR

20 KAREN Y. CHO

21 Attorneys for Plaintiff
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23
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25
26
27
28

DEMAND FOR JURY TRIAL

Plaintiff hereby demands a jury trial.

DATED: March 2, 2012

LAW OFFICES OF JOSEPH M. LOVRETOVICH

By: 

JOSEPH M. LOVRETOVICH

DAVID F. TIBOR

KAREN Y. CHO

Attorneys for Plaintiff

Law Offices of Joseph M. Lovretovich

5941 Variel Avenue
Woodland Hills, CA 91367
(818) 610-8800

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ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State, number, and address):
Joseph M. Lovretovich; David F. Tibor; Karen Cho
LAW OFFICES OF JOSEPH M LOVRETOVICH
5941 Variel Avenue, Woodland Hills, CA 91367
TELEPHONE NO.: 818-610-8800 FAX NO.: 818-610-3030
ATTORNEY FOR (Name): VICKI SCOTT

FOR COURT USE ONLY
FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES
MAR 02 2012
John A. Clarke, Executive Officer/Clerk
BY Shaunya Wesley Deputy

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, 90012
BRANCH NAME: Stanley Mosk Courthouse
CASE NAME: SCOTT v SQUIRE SANDERS (US) LLP

CIVIL CASE COVER SHEET
 Unlimited (Amount demanded exceeds \$25,000) **Limited** (Amount demanded is \$25,000 or less)
Complex Case Designation
 Counter **Joinder**
Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)

CASE NUMBER: **BC 479995**
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) | 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) | 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) |
| Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort
<input type="checkbox"/> Asbestos (04)
<input type="checkbox"/> Product liability (24)
<input type="checkbox"/> Medical malpractice (45)
<input type="checkbox"/> Other PI/PD/WD (23) | Real Property
<input type="checkbox"/> Eminent domain/Inverse condemnation (14)
<input type="checkbox"/> Wrongful eviction (33)
<input type="checkbox"/> Other real property (26) | Enforcement of Judgment
<input type="checkbox"/> Enforcement of judgment (20) |
| 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) | Unlawful Detainer
<input type="checkbox"/> Commercial (31)
<input type="checkbox"/> Residential (32)
<input type="checkbox"/> Drugs (38) | Miscellaneous Civil Complaint
<input type="checkbox"/> RICO (27)
<input type="checkbox"/> Other complaint (not specified above) (42) |
| Employment
<input checked="" type="checkbox"/> Wrongful termination (36)
<input type="checkbox"/> Other employment (15) | 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) | 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 | d. <input type="checkbox"/> Large number of witnesses |
| b. <input type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve | e. <input type="checkbox"/> Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court |
| c. <input type="checkbox"/> Substantial amount of documentary evidence | f. <input type="checkbox"/> Substantial postjudgment judicial supervision |

3. Remedies sought (check all that apply): a. monetary b. nonmonetary; declaratory or injunctive relief c. punitive
4. Number of causes of action (specify): 7
5. This case is is not a class action suit.
6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)

Date: March 2, 2012
Joseph M. Lovretovich; David F. Tibor; Karen Cho (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.

**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 5-7 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) <input type="checkbox"/> A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.) <input type="checkbox"/> A7270 Intentional Infliction of Emotional Distress <input type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death	1., 4. 1., 4. 1., 3. 1., 4.

Non-Personal Injury/ Property
Damage/ Wrongful Death Tort

Employment

Contract

Real Property

Unlawful Detainer

A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Business Tort (07)	<input type="checkbox"/> A6029 Other Commercial/Business Tort (not fraud/breach of contract)	1., 3.
Civil Rights (08)	<input type="checkbox"/> A6005 Civil Rights/Discrimination	1., 2., 3.
Defamation (13)	<input type="checkbox"/> A6010 Defamation (slander/libel)	1., 2., 3.
Fraud (16)	<input type="checkbox"/> A6013 Fraud (no contract)	1., 2., 3.
Professional Negligence (25)	<input type="checkbox"/> A6017 Legal Malpractice	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 checked="" 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.
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- 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.

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.

Judicial Review

Provisionally Complex Litigation

Enforcement of Judgment

Miscellaneous Civil Complaints

Miscellaneous Civil Petitions

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.

<p>REASON: Check the appropriate boxes for the numbers shown under Column C for the type of action that you have selected for this case.</p> <p><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.</p>	<p>ADDRESS:</p> <p>555 South Flower Street</p> <p>#3100</p>	
CITY: LOS ANGELES	STATE: CA	ZIP CODE: 90071

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, subs. (b), (c) and (d)].

Dated: March 2, 2012


 (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.