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FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

APR 10 2013

John A. Clarke, Executive Officer/Clerk
BY *Cristina Grijalva* Deputy
Cristina Grijalva

8 Attorney for Plaintiff, KAREN VIPPERMAN

FSC 9/24/14
Trial 10/10/14
OSC 4/11/16

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 COUNTY OF LOS ANGELES—CENTRAL DISTRICT

11 KAREN VIPPERMAN, an individual,
12 Plaintiff,

CASE NO.: **BC505499**

13 vs.

COMPLAINT FOR:

14 GEORGE LLAMAS EDWARDS, an
15 individual, and DOES 1 through 20, inclusive,
16 Defendants.

- 1) ASSAULT;
- 2) BATTERY;
- 3) DEFAMATION;
- 4) INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

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20
21 **COMES NOW**, Plaintiff, KAREN VIPPERMAN, who complains as follows:

22
23 **GENERAL ALLEGATIONS COMMON TO ALL CAUSES OF ACTION**

24 1. Plaintiff, KAREN VIPPERMAN, (hereinafter "Plaintiff"), is an individual and is
25 now, and at all times mentioned in this Complaint, was, a resident of Los Angeles County
26 California.

RECEIVED: 310
DATE PAID: 09/10/13 02:19 PM
PAYMENT: \$45.00
CHECK \$435.00
CASH: \$0.00
HONOR: \$0.00
FEE: \$0.00

CIT/CAUSE: BC505499
LEA/DEF#:

1 2. Defendant, GEORGE LLAMAS EDWARDS, aka GEORGE EDWARDS
2 LLAMAS, aka GEORGE EDWARDZ, (hereinafter "Defendant") is an individual and is now,
3 and at all times mentioned in this Complaint, was a residence of Los Angeles County, California.

4 3. Plaintiff is ignorant of the true names and capacities, whether individual,
5 corporate, associate, or otherwise of DOES 1 through 20, inclusive and therefore, sues said
6 defendants by such fictitious names. Plaintiff is informed and believes and thereon alleges that
7 each of the defendants designated herein as DOE is legally responsible in some manner for the
8 events and happenings herein referred to, and proximately caused injury and damages thereby to
9 Plaintiff as herein alleged.

10 4. Plaintiff is informed and believes and thereon allege that at all times relevant
11 herein mentioned, Defendants and each of them, were authorized and empowered by the other
12 Defendants, and each of them, to act and did so act as the agents, owners, principals, joint
13 venturers, alter egos, co-conspirators, co-partners, or employees of such other defendants, and all
14 things alleged the have been done by them were done in the capacity of and as agents, owners,
15 principals, joint venturers, alter egos, co-conspirators, co-partners, or employees for such other
16 defendants, and each of them, and each of the Defendants has ratified, agreed to and approved
17 the acts of the other Defendants. Therefore, each of the Defendants is liable in some fashion
18 upon the causes of action herein sued upon, whether specifically alleged or not.

19 5. This action is brought in this Court for the reason that the Defendant's acts which
20 give rise to Plaintiff's claims were conducted, transpired, completed in this State, County of Los
21 Angeles.

22
23 **FIRST CAUSE OF ACTION**

24 **ASSAULT**

25 6. (Plaintiff refers to all the paragraphs and allegations contained in paragraphs 1
26 through 5, inclusive, and, by this reference, makes them a part hereof as though fully set forth
27 hereat.)

1 7. On or about March 7, 2013, in the Multipurpose Room of the La Habra Heights
2 City Hall, Defendant swung the lens of a heavy large camera within inches of Plaintiff's face and
3 continued to advance towards Plaintiff despite backing up to maintain her distance from
4 Defendant. Despite Plaintiff's stepping backwards and backing her head up to the point of
5 arching and straining her back, Defendant continued to approach Plaintiff while yelling at her.
6 Plaintiff raised her hands to protect her face, yet Defendant continued to advance towards
7 Plaintiff.

8 8. In doing the acts as alleged above, Defendant intended to, and did cause Plaintiff
9 to be placed in apprehension of harmful and offensive contact at the hands of Defendant.

10 9. As a result of Defendant's acts as alleged above, Plaintiff, in fact, was placed in
11 great apprehension of harmful and offensive contact with Plaintiff's person.

12 10. At no time did Plaintiff consent to any of the acts of Defendant alleged above.

13 11. As a proximate result of the above-referenced acts of Defendant, Plaintiff was
14 hurt and injured in her health, strength, and activity, sustaining injury to her nervous system and
15 person, emotional trauma, mental and physical distress all of which have caused, and continue to
16 cause, Plaintiff great mental, physical, and nervous pain and suffering. As a result of these
17 injuries, Plaintiff has suffered general damages.

18 12. As a further proximate result of the Defendant's acts, Plaintiff has been damaged
19 in that she has been required to expend money and incur obligations for medical services,
20 pharmaceuticals, psychological counseling treatment and sundries reasonably required in the
21 treatment and relief of the injuries herein alleged.

22 13. As a further proximate result of the acts of defendant, plaintiff will continue to
23 incur medical and related expenses. The full amount of these expenses is not known to Plaintiff
24 at this time.

25 14. As a further proximate result of the acts of Defendant, Plaintiff was prevented
26 from attending to her usual business and occupation and continuing for an as yet undetermined
27 period. Plaintiff thereby has lost and will lose earnings.

1 15. In doing the things herein alleged, Defendants have acted with oppression and
2 malice. Plaintiff is therefore, entitled to punitive damages in the amount according to proof.

3
4 **SECOND CAUSE OF ACTION**

5 **BATTERY**

6 16. (Plaintiff refers to all the paragraphs and allegations contained in paragraphs 1
7 through 15, inclusive, and, by this reference, makes them a part hereof as though fully set forth
8 hereat.)

9 17. On or about March 7, 2013, and immediately after approaching Plaintiff with his
10 large camera, Defendant struck Plaintiff's face with the camera. Defendant then again swung the
11 camera and struck the left side of Plaintiff's head; Defendant continued to apply pressure with
12 such continuous force as to cause Plaintiff's body to contort and be pressed to the ground.
13 Refusing to release the camera from Plaintiff's head, Defendant continued to hold Plaintiff down
14 with this heavy weapon.

15 18. In doing the acts alleged above, Defendant acted with the intent to make a
16 harmful and/or offensive contact with Plaintiff's person.

17 19. At no time did Plaintiff consent to any of the acts of Defendant alleged in any
18 cause of action herein.

19 20. As a result of Defendants acts as alleged herein, Plaintiff in fact found the
20 contacts with her person harmful and/or offensive to her person and dignity.

21 21. As a proximate cause result of the acts of Defendant as alleged above, Plaintiff
22 has suffered a concussion, bumps to her head, pain to the left side of her head, neck and back
23 pain, nausea, insomnia, nightmares, and dizziness.

24 22. As a proximate result of the above-referenced acts of Defendant, Plaintiff was
25 hurt and injured in her health, strength, and activity, sustaining injury to her nervous system and
26 person, all of which have caused, and continue to cause, Plaintiff great mental, physical, and
27 nervous pain and suffering. As a result of these injuries, Plaintiff has suffered general damages.

1 23. As a further proximate result of the Defendant's acts, Plaintiff has been damaged
2 in that she has been required to expend money and incur obligations for medical services,
3 pharmaceuticals, radiological services, chiropractic treatment and sundries reasonably required
4 in the treatment and relief of the injuries herein alleged.

5 24. As a further proximate result of the acts of defendant, plaintiff will continue to
6 incur medical and related expenses. The full amount of these expenses is not known to Plaintiff
7 at this time.

8 25. As a further proximate result of the acts of Defendant, Plaintiff was prevented
9 from attending to her usual business and occupation and continuing for an as yet undetermined
10 period. Plaintiff thereby has lost and will lose earnings.

11
12 26. In doing the things herein alleged, Defendants have acted with malice. Plaintiff is
13 therefore, entitled to punitive damages in the amount according to proof.

14
15 **THIRD CAUSE OF ACTION**

16 **DEFAMATION**

17 27. (Plaintiff refers to all the paragraphs and allegations contained in paragraphs 1
18 through 26, inclusive, and, by this reference, makes them a part hereof as though fully set forth
19 hereat.)

20 28. At all times mentioned in this Complaint, Plaintiff, was, and now is, a California
21 Licensed Psychiatric Technician and CEO of Morrison Residential Services. Plaintiff has during
22 all times mentioned herein enjoyed a good reputation in in her community, both generally and in
23 respect her personal life as law abiding citizen.

24 29. On or about March 7, 2013, Defendant loudly stated and repeated to Plaintiff and
25 the attendant crowd the following words, "You killed your son."

26 30. Defendant made said statements loudly in front of Kyle Miller, Sue Ferguson,
27 Shauna Clark, Mike Sprague, Mike Higgins, Floretta Shepard, Glen Sheppard and others whose
28

1 identities are yet to be determined. Defendant intended that the statements would be heard by
2 those present. The people who heard the subject statements understood the defamatory meaning
3 of the statements and that the statements were about Plaintiff.

4 31. The statements are completely false in that Plaintiff did not cause or contribute, in
5 any way, to the death of her son.

6 32. Defendant knew the statements were false when made and/or made said
7 statements with reckless disregard as to the truthfulness of said statements and/or failed to use
8 reasonable care to determine the truth or falsity of the statements.

9 33. The statements are slanderous per se in that they impute to Plaintiff a serious and
10 egregious crime of moral turpitude. The words were understood by those who saw and heard the
11 statements in way that defamed Plaintiff because they present her as a murderer of her own son.

12 34. Said statements are unprivileged publications; said statements do not involve
13 matters of public concern; and, Defendant did not make said statements in furtherance of
14 Defendant's right to petition and speech under the United States or California Constitutions.

15 35. Defendant made the statements that "You killed you son" to Plaintiff's husband,
16 Howard Viperman, several days prior to making the statements to Plaintiff. Defendant has
17 engage in a long continuous campaign of hatred towards Plaintiff and her family by acts of
18 bullying, harassment, annoyance, including but not limited to: Defendant has told Plaintiff, "I'm
19 going to spread that you are harboring a felon on your property"; Defendant has surveilled
20 Plaintiff's home, spied on her family, made false accusations to local code enforcement
21 authorities, e.g., falsely claiming that Plaintiff and her family run an unauthorized and illegal
22 business out of their home, or falsely claiming that Plaintiff's pot-bellied pigs are over the code
23 limit in weight; Defendant has posted hateful publications against Plaintiff and her husband
24 accusing them of being unethical liars; Defendant has a website wherein he has superimposed
25 Plaintiff and her husband's faces on the bodies of rats and given them the name of Viperman
26 family members. In fact, Plaintiff's husband, Howard Viperman, found it necessary to file a
27
28

1 civil claim for Defamation against Defendant in 2009, Los Angeles Superior Court Case No.
2 BC424876.

3 36. Plaintiff's son committed suicide at Plaintiff home several months prior to
4 Defendant's statements. Defendant knew Plaintiff was fragile and still struggling emotionally
5 with the loss of her son; however, knowing said defamatory statements to be false, Defendant
6 made the subject statements only to continue his campaign of torturing Plaintiff and her family.
7 Thus, in consideration of Defendant's past acts towards Plaintiff and her family and the context
8 in which the subjects statements, Defendant made the statements herein which give rise to this
9 cause of action for defamation with clear malice, hatred, and ill will, towards Plaintiff.

10 37. As a direct and proximate result of the above-described publication, Plaintiff has
11 suffered loss to her reputation, shame, mortification, and injury to her feelings.

12 38. As a proximate result of the above-referenced acts of Defendant, Plaintiff was
13 hurt and injured in her health, strength, and activity, sustaining injury to her nervous system and
14 person, all of which have caused, and continue to cause, Plaintiff great mental, physical, and
15 nervous pain and suffering. As a result of these injuries, Plaintiff has suffered general damages.

16 39. As a further proximate result of the Defendant's acts, Plaintiff has been damaged
17 in that she has been required to expend money and incur obligations for medical services,
18 pharmaceuticals, psychological and counseling treatment.

19 40. As a further proximate result of the acts of defendant, plaintiff will continue to
20 incur medical and related expenses. The full amount of these expenses is not known to Plaintiff
21 at this time.

22 41. As a further proximate result of the acts of Defendant, Plaintiff was prevented
23 from attending to her usual business and occupation and continuing for an as yet undetermined
24 period. Plaintiff thereby has lost and will lose earnings.

25 42. In doing the things herein alleged, Defendants have acted with malice. Plaintiff is
26 therefore, entitled to punitive damages in the amount according to proof.
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1 **FOURTH CAUSE OF ACTION**

2 **EMOTIONAL DISTRESS**

3 43. (Plaintiff refers to all the paragraphs and allegations contained in paragraphs 1
4 through 42, inclusive, and, by this reference, makes them a part hereof as though fully set forth
5 hereat.)

6 44. Defendant knew of Plaintiff extreme sensitivity and susceptibility to emotional
7 distress regarding the suicide of her son.

8 45. Despite being aware of such sensitivity and susceptibility and the falsity of the
9 statement, Defendant yelled to Plaintiff and a crowd of her neighbors that she had murdered her
10 son.

11 46. Defendant's statement was extreme and outrageous and has caused Plaintiff
12 severe emotional distress.

13 47. Defendant's statements are without privilege or consent.

14 48. Plaintiff has suffered emotional distress, and Defendant's conduct was a
15 substantial factor in causing Plaintiff's severe emotional distress.

16 49. Defendant's conduct was intentional and malicious and done for the purpose of
17 causing Plaintiff to suffer humiliation, mental anguish, and emotional and physical distress.

18 50. As the proximate result of the acts alleged above, Plaintiff suffered humiliation,
19 mental anguish, and emotional and physical distress, and has been injured in mind and body,
20 including anxiety, stress, and insomnia.

21 51. Plaintiff was hurt and injured in her health, strength, and activity, sustaining
22 injury to her nervous system and person, all of which have caused, and continue to cause,
23 Plaintiff great mental, physical, and nervous pain and suffering. As a result of these injuries,
24 Plaintiff has suffered general damages.

25 52. As a further proximate result of the Defendant's acts, Plaintiff has been damaged
26 in that she has been required to expend money and incur obligations for medical services,
27
28

1 pharmaceuticals, radiological services, chiropractic treatment and sundries reasonably required
2 in the treatment and relief of the injuries herein alleged.

3 53. As a further proximate result of the acts of defendant, plaintiff will continue to
4 incur medical and related expenses. The full amount of these expenses is not known to Plaintiff
5 at this time.

6 54. As a further proximate result of the acts of Defendant, Plaintiff was prevented
7 from attending to her usual business and occupation and continuing for an as yet undetermined
8 period. Plaintiff thereby has lost and will lose earnings.

9 55. In doing the things herein alleged, Defendants have acted with oppression and
10 malice. Plaintiff is therefore, entitled to punitive damages in the amount according to proof.

11
12 WHEREFORE, prays that the court make its declaration and orders and enter its
13 judgment against Defendants, and each of them, as follows:

14 FIRST CAUSE OF ACTION

- 15 1. For general and special damages according to proof;
16 2. For loss of earnings;
17 3. For punitive damages;
18 4. For costs of suit herein incurred;
19 5. For such other and further relief as this court may deem fair, just, and equitable.

20
21 SECOND CAUSE OF ACTION

- 22 1. For general and special damages according to proof;
23 2. For loss of earnings;
24 3. For punitive damages;
25 4. For costs of suit herein incurred;
26 5. For such other and further relief as this court may deem fair, just, and equitable.

27 ///

1 THIRD CAUSE OF ACTION

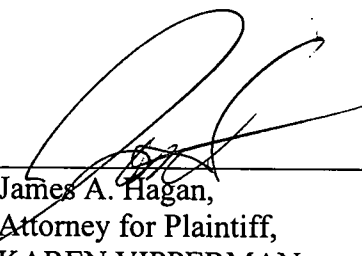
- 2 1. For general and special damages according to proof;
3 2. For loss of earnings;
4 3. For punitive damages;
5 4. For costs of suit herein incurred;
6 5. For such other and further relief as this court may deem fair, just, and equitable.
7

8 FOURTH CAUSE OF ACTION

- 9 1. For general and special damages according to proof;
10 2. For loss of earnings;
11 3. For punitive damages;
12 4. For costs of suit herein incurred;
13 5. For such other and further relief as this court may deem fair, just, and equitable.
14

15 DATED: April 12, 2013

16
17
18 By: _____


James A. Hagan,
Attorney for Plaintiff,
KAREN VIPPERMAN

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

James A. Hagan, (SBN 241832)
LAW OFFICES OF JAMES A. HAGAN
137 N. Marengo Avenue
Pasadena, CA 91101

TELEPHONE NO.: (626) 449-9220

FAX NO.: (866) 577-4269

ATTORNEY FOR (Name):

FOR COURT USE ONLY

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

APR 10 2013

John A. Clarke, Executive Officer/Clerk

BY Cristina Grijalva Deputy
Cristina Grijalva

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

STREET ADDRESS: 111 N. Hill St.

MAILING ADDRESS: Same

CITY AND ZIP CODE: Los Angeles, CA 90012

BRANCH NAME: Central

CASE NAME: KAREN VIPPERMAN v. GEORGE LLAMAS EDWARDS

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:

BC505499

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)
 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 is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:
a. Large number of separately represented parties
b. Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve
c. Substantial amount of documentary evidence
d. Large number of witnesses
e. Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court
f. Substantial postjudgment judicial supervision
3. Remedies sought (check all that apply): a. monetary b. nonmonetary; declaratory or injunctive relief c. punitive
4. Number of causes of action (specify): FOUR
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: 4/10/2013

JAMES A. HAGAN

(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.

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

**CIVIL CASE COVER SHEET ADDENDUM AND
STATEMENT OF LOCATION
(CERTIFICATE OF GROUNDS FOR ASSIGNMENT TO COURTHOUSE LOCATION)**

This form is required pursuant to Local Rule 2.0 in all new civil case filings in the Los Angeles Superior Court.

Item I. Check the types of hearing and fill in the estimated length of hearing expected for this case:

JURY TRIAL? YES CLASS ACTION? YES LIMITED CASE? YES TIME ESTIMATED FOR TRIAL **3** 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 (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.
Asbestos (04)	<input type="checkbox"/> A6070 Asbestos Property Damage	2.
	<input type="checkbox"/> A7221 Asbestos - Personal Injury/Wrongful Death	2.
Product Liability (24)	<input type="checkbox"/> A7260 Product Liability (not asbestos or toxic/environmental)	1., 2., 3., 4., 8.
Medical Malpractice (45)	<input type="checkbox"/> A7210 Medical Malpractice - Physicians & Surgeons	1., 4.
	<input type="checkbox"/> A7240 Other Professional Health Care Malpractice	1., 4.
Other Personal Injury Property Damage Wrongful Death (23)	<input type="checkbox"/> A7250 Premises Liability (e.g., slip and fall)	1., 4.
	<input checked="" type="checkbox"/> A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.)	1., 4.
	<input type="checkbox"/> A7270 Intentional Infliction of Emotional Distress	1., 3.
	<input type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death	1., 4.

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A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Business Tort (07)	<input type="checkbox"/> A6029 Other Commercial/Business Tort (not fraud/breach of contract)	1., 3.
Civil Rights (08)	<input type="checkbox"/> A6005 Civil Rights/Discrimination	1., 2., 3.
Defamation (13)	<input type="checkbox"/> A6010 Defamation (slander/libel)	1., 2., 3.
Fraud (16)	<input type="checkbox"/> A6013 Fraud (no contract)	1., 2., 3.
Professional Negligence (25)	<input type="checkbox"/> A6017 Legal Malpractice <input type="checkbox"/> A6050 Other Professional Malpractice (not medical or legal)	1., 2., 3. 1., 2., 3.
Other (35)	<input type="checkbox"/> A6025 Other Non-Personal Injury/Property Damage tort	2., 3.
Wrongful Termination (36)	<input type="checkbox"/> A6037 Wrongful Termination	1., 2., 3.
Other Employment (15)	<input type="checkbox"/> A6024 Other Employment Complaint Case <input type="checkbox"/> A6109 Labor Commissioner Appeals	1., 2., 3. 10.
Breach of Contract/Warranty (06) (not insurance)	<input type="checkbox"/> A6004 Breach of Rental/Lease Contract (not Unlawful Detainer or wrongful eviction) <input type="checkbox"/> A6008 Contract/Warranty Breach-Seller Plaintiff (no fraud/negligence) <input type="checkbox"/> A6019 Negligent Breach of Contract/Warranty (no fraud) <input type="checkbox"/> A6028 Other Breach of Contract/Warranty (not fraud or negligence)	2., 5. 2., 5. 1., 2., 5. 1., 2., 5.
Collections (09)	<input type="checkbox"/> A6002 Collections Case-Seller Plaintiff <input type="checkbox"/> A6012 Other Promissory Note/Collections Case	2., 5., 6. 2., 5.
Insurance Coverage (18)	<input type="checkbox"/> A6015 Insurance Coverage (not complex)	1., 2., 5., 8.
Other Contract (37)	<input type="checkbox"/> A6009 Contractual Fraud <input type="checkbox"/> A6031 Tortious Interference <input type="checkbox"/> A6027 Other Contract Dispute (not breach/insurance/fraud/negligence)	1., 2., 3., 5. 1., 2., 3., 5. 1., 2., 3., 8.
Eminent Domain/Inverse Condemnation (14)	<input type="checkbox"/> A7300 Eminent Domain/Condemnation Number of parcels	2.
Wrongful Eviction (33)	<input type="checkbox"/> A6023 Wrongful Eviction Case	2., 6.
Other Real Property (26)	<input type="checkbox"/> A6018 Mortgage Foreclosure <input type="checkbox"/> A6032 Quiet Title <input type="checkbox"/> A6060 Other Real Property (not eminent domain, landlord/tenant, foreclosure)	2., 6. 2., 6. 2., 6.
Unlawful Detainer-Commercial (31)	<input type="checkbox"/> A6021 Unlawful Detainer-Commercial (not drugs or wrongful eviction)	2., 6.
Unlawful Detainer-Residential (32)	<input type="checkbox"/> A6020 Unlawful Detainer-Residential (not drugs or wrongful eviction)	2., 6.
Unlawful Detainer-Post-Foreclosure (34)	<input type="checkbox"/> A6020F Unlawful Detainer-Post-Foreclosure	2., 6.
Unlawful Detainer-Drugs (38)	<input type="checkbox"/> A6022 Unlawful Detainer-Drugs	2., 6.

SHORT TITLE:	CASE NUMBER
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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.

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 checked="" type="checkbox"/> 1. <input type="checkbox"/> 2. <input type="checkbox"/> 3. <input type="checkbox"/> 4. <input type="checkbox"/> 5. <input type="checkbox"/> 6. <input type="checkbox"/> 7. <input type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10.	ADDRESS: 1245 Hacienda Blvd.			
<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:33%; padding: 2px;">CITY: La Habra Heights</td> <td style="width:33%; padding: 2px;">STATE: CA</td> <td style="width:33%; padding: 2px;">ZIP CODE: 90631</td> </tr> </table>	CITY: La Habra Heights	STATE: CA	ZIP CODE: 90631	
CITY: La Habra Heights	STATE: CA	ZIP CODE: 90631		

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 **Hill St.** 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: 4/10/2013



 (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.

