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EX-PARTE

THE KERNAN LAW FIRM
9663 Santa Monica Blvd., Suite 450
Beverly Hills, California 90210
(310) 490-9777

1 S. Michael Kernan, State Bar No. 181747
R. Paul Katrinak, State Bar No. 164057
2 THE KERNAN LAW FIRM
9663 Santa Monica Blvd Suite 450
3 Beverly Hills, California 90210
Telephone: (310) 490-9777
4 Facsimile: (310) 861-0503

5 Attorneys for Plaintiff
JANE DOE

FILED
Superior Court of California
County of Los Angeles

AUG 22 2017

Sherri R. Carter, Executive Officer/Clerk
By M. Soto, Deputy
Moses Soto

D-49 Hill

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

11 JANE DOE, an individual;
12 Plaintiff,
13 vs.
14 ROE CORPORATION, form of business
entity unknown; and DOES 1 through 50,
15 inclusive,
16 Defendants.

Case No.: BC 673258

COMPLAINT FOR INJUNCTION AND
DAMAGES FOR:

- (1) VIOLATION OF CIVIL CODE § 1708.85;
- (2) VIOLATION OF COMMON LAW RIGHT OF PUBLICITY; AND
- (3) VIOLATION OF BUSINESS & PROFESSIONS CODE § 17200, ET SEQ.

22 Plaintiff JANE DOE, alleges as follows:

FACTS COMMON TO ALL CAUSES OF ACTION

- 24 1. Plaintiff Jane Doe, at all times material hereto, is and was an international
25 known entertainer and actress, and is doing business in the County of Los Angeles, State
26 California.
- 27 2. Plaintiff is informed and believes and, based upon such information and belief
28 alleges, that Defendant Roe Corporation is a business entity of unknown form and is doing

08/22/2017

1
COMPLAINT

RECEIPT #: CCH524880005
DATE PAID: 08/22/17 08:16 AM
PAYMENT: \$435.00
RECEIVED: 310
CASH: \$0.00
CHECK: \$0.00
CHANGE: \$0.00
CARD: \$435.00

CIT/CASE: BC673258
LEA/DEF#:

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1 business in the County of Los Angeles, State of California, and is and/or was carrying out the
2 activities and/or causing the injuries and damages complained of herein in the County of Los
3 Angeles, California, and elsewhere.

4 3. Pursuant to the text and pictures on Defendant Roe Corporation's website,
5 Plaintiff is informed and believes, and on that basis alleges, that Defendant was involved in the
6 creation and maintenance of said website.

7 4. Plaintiff is informed and believes, and on that basis alleges, that Defendant and
8 DOES 1 through 25, inclusive, were involved in the theft of the photographs, the posting of the
9 photographs, or have knowingly placed advertisements on Defendant's website with the intent
10 and purpose of profiting from the name and/or likeness of Plaintiff.

11 5. Plaintiff is informed and believes, and based upon such information and belief,
12 alleges that Defendants, and each of them, were the agents, employees, partners, joint
13 venturers, co-conspirators, owners, principals, and employers of the remaining defendants, and
14 each of them, and are, and at all times herein mentioned were, acting within the course and
15 scope of that agency, partnership, employment, conspiracy, ownership, or joint venture.
16 Plaintiff is further informed and believes and, based upon such information and belief, alleges
17 that the acts and conduct herein alleged of each such Defendant were known to, authorized by,
18 and/or ratified by the other defendants, and each of them.

19 6. Plaintiff is informed and believes, and based upon such information and belief,
20 alleges that Defendants Roe Corporation and DOES 26 through 50, who obtained the photos,
21 are and at all material times were, the alter egos of each other and there exists at all times a
22 unity of interest and ownership among such defendants such that any separateness has seized to
23 exist in that each Defendant used the assets of the other for their separate individual purposes,
24 and caused assets to be transferred to each other without adequate consideration. Plaintiff
25 further alleges on the basis of information and belief that Defendants completely owned,
26 dominated, controlled, used, maintained, managed, and operated each other and intermingled
27 assets of said alter egos for their convenience and the obligation, duty, and liability of such
28 Defendants alleged herein shall be deemed the obligation, duty, and liability of the alter ego.

DEFENDANT'S UNLAWFUL ACTIVITIES

1
2 11. Upon information and belief, the primary business of Defendant is the creation
3 and maintenance of pornographic websites on the Internet. Defendants Roe Corporation and
4 DOES 1 through 50, inclusive, maintain the pornographic websites.

5 12. Upon information and belief, Defendant and each of the Hyperlink Websites are
6 degrading and patently offensive to the reasonable person and appearance in such website, in
7 itself, is personally degrading. Such websites, and each of them, are not designed to present
8 any newsworthy information, but to appeal to the prurient interests of the users, and lack any
9 serious literary, artistic, political, or scientific value.

10 13. Upon information and belief, Defendant's Website, and each of the Hyperlink
11 Websites generate revenue in two principal manners. First, they run banner advertisements on
12 their Internet pages and receive financial or other consideration depending upon the number of
13 impressions or "hits" caused by users accessing particular pages of the website containing the
14 banner advertisements. These banner advertisements are, in fact, hyperlinks to the advertised
15 websites. Second, they receive financial or other consideration from age verification
16 companies that register, for an annual fee, users as adults enabling the user to enter the
17 pornographic websites.

18 14. Because these pornographic websites receive financial or other remuneration
19 simply from users visiting the Internet website, they employ various methods to entice users to
20 visit a website. Most of these methods involve the manipulation of the Internet search engines
21 that catalog and inventory the contents of websites located on the Internet. These search
22 engines are utilized by internet users throughout the United States, including this judicial
23 district, to locate desired material or information on the Internet.

24 15. Defendant's Website features the name and photograph of Plaintiff. The website
25 is little more than a page featuring three separate banner advertisements for hyperlink
26 connections to the pornographic Hyperlink Websites.

27 16. One method employed by pornographic websites, such as those of Defendant, is
28 the creation of METAfiles or METAtags that contain key words which all Internet search

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1 engines utilize in order to catalog information on the Internet. The METAfiles are files
2 attached to web pages (which comprise websites) in their source code programming that were
3 designed to describe the graphics and other content contained on the Internet web page.
4 METAfiles are not immediately readable by Internet users, but are accessible and readable by
5 search engines on the Internet.

6 17. These METAfiles, in essence, serve as advertisement flags for websites and are
7 designed specifically to lure Internet users to the websites in order to generate revenue.

8 18. Most search engines not only include the domain name or Uniform Resource
9 Locator ("URL") of the websites that contain the requested information, but also the actual
10 words from the website surrounding the requested information.

11 19. Plaintiff has not at any time granted any of the Defendants' permission to use
12 her name, likeness, photograph, or image to promote the Website, the Hyperlink Websites, or
13 any other pornographic websites.

14 20. Defendants knowingly trade on and exploit Plaintiff's identity, reputation, and
15 other indicia closely associated with her. The activities of Defendants are for the calculated
16 purpose of deriving a commercial benefit from Plaintiff's famous name, photograph, and/or
17 likeness. Their activities are designed to falsely suggest a connection with or sponsorship by
18 Plaintiff that does not exist, or to cause mistake and deceive as to Plaintiff's approval of
19 Defendants' websites.

20 **FIRST CAUSE OF ACTION**

21 **(Violation of Civil Code Section 1708.85 Against All Defendants)**

22 21. Plaintiff repeats, re-alleges and incorporates by reference Paragraphs 1 through
23 20, inclusive, as if fully set forth herein.

24 22. Plaintiff's cellular telephone/iCloud was hacked and sexually explicit
25 photographs as defined in Civil Code Section 1708.85 were intentionally distributed by DOES
26 1 through 5 on Defendant ROE CORPORATION'S website.

27 23. Defendants intentionally distributed same without the consent of Plaintiff.
28 Defendants knew that Plaintiff had a reasonable expectation that the material would remain

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1 private, the distributed material exposes an intimate body part of Plaintiff, as well as showing
2 other acts of sexual penetration, and Plaintiff has suffered general or special damages.

3 24. The photographs show a portion of the genitals, as well as portions of the
4 breasts below the top of the areola, that is uncovered and/or visible.

5 25. Defendants are liable for distribution of same, and do not meet any of the
6 exceptions within the statute. Defendant Roe Corporation has no agreement with Plaintiff.
7 Does 1 through 5 did not have permission to post same. There was no waiver of the privacy
8 rights and this is material which, as noted, is not a matter for the public and was not intended
9 by Plaintiff to be a matter for the public. The material was not filmed in a public place and was
10 not previously distributed.

11 26. As noted in Civil Code Section 1708.85(d), Plaintiff is entitled to equitable
12 relief. That section states:

13 (d) In addition to any other relief available at law, the court may order equitable relief
14 against the person violating subdivision (a), including a temporary restraining order, or
15 a preliminary injunction or a permanent injunction ordering the defendant to cease
16 distribution of material. The court may grant injunctive relief maintaining the
17 confidentiality of a plaintiff using a pseudonym as provided in subdivision (f).

18 27. Plaintiff also seeks her attorneys fees as permitted by Section (e).

19 (e) The court may also grant, after holding a properly noticed hearing, reasonable
20 attorney's fees and costs to the prevailing plaintiff.

21 28. Plaintiff had a reasonable expectation of privacy in the photographs on her
22 telephone and iCloud.

23 29. Plaintiff did not consent to Defendants' distribution of these photo recordings.

24 30. In acting as alleged above, Defendants violated Plaintiff's privacy rights and
25 unlawfully distributed Plaintiff's private sexually explicit materials in violation of Civil Code
26 Section 1708.85.

27 31. Plaintiff suffered harm, including, but not limited to, suffering, anguish, fright,
28 horror, nervousness, grief, anxiety, worry, shock, humiliation, embarrassment, shame,
mortification, hurt feelings, disappointment, depression and feelings of powerlessness.

1 32. Defendants' conduct was a substantial factor in causing Plaintiff's harm.

2 33. Plaintiff's harm is irreparable harm if an injunction does not issue, and therefore
3 seeks injunctive relief.

4 34. Plaintiff is informed and believes, and based thereon alleges, that Defendants,
5 and each of them, in doing the things herein alleged, acted willfully, maliciously, oppressively,
6 fraudulently, and despicably with full knowledge of the adverse effect of their actions on
7 Plaintiff, and with willful and deliberate disregard of the consequences to Plaintiff. By reason
8 thereof, Plaintiff is entitled to recover punitive and exemplary damages from Defendants in an
9 amount to be determined at the time of trial.

10 **SECOND CAUSE OF ACTION**

11 **(Violation of Common Law Right of Publicity Against All Defendants)**

12 35. Plaintiff repeats, re-alleges and incorporates by reference Paragraphs 1 through
13 34, inclusive, as if fully set forth herein.

14 36. Defendants' unauthorized use of Plaintiff's name, photograph, and image in
15 relationship with the creation and management of Defendant's website, and the enticement to
16 other pornographic websites, including the Hyperlink Websites, where there is a sale of
17 memberships to other websites to view pornographic photographs, willfully misappropriates
18 Plaintiff's identity for Defendants' commercial advantage in violation of Plaintiff's right of
19 publicity under the common law of California and other states. Such misappropriation includes
20 the use of Plaintiff's name to lure people to Defendants' websites and using Plaintiff's name,
21 image, photograph, and likeness to sell memberships to pornographic websites advertised on
22 other such websites.

23 37. As a direct and proximate result of the aforesaid wrongful acts of Defendants,
24 and each of them, Plaintiff has been damaged in an amount that is not yet fully ascertainable.
25 When Plaintiff has ascertained the full amount of damages, she will seek leave of the court to
26 amend this Complaint accordingly.

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1 38. Additionally, due to the irreparable harm that Plaintiff is suffering based on the
2 continued display of Plaintiff's private and personal photographs, Plaintiff requests temporary,
3 preliminary, and permanent injunctive relief.

4 39. Plaintiff is informed and believes, and based thereon alleges, that Defendants,
5 and each of them, in doing the things herein alleged, acted willfully, maliciously, oppressively,
6 fraudulently, and despicably with full knowledge of the adverse effect of their actions on
7 Plaintiff, and with willful and deliberate disregard of the consequences to Plaintiff. By reason
8 thereof, Plaintiff is entitled to recover punitive and exemplary damages from Defendants in an
9 amount to be determined at the time of trial.

10 **THIRD CAUSE OF ACTION**

11 **(Violation of Business & Professions Code Section 17200, et seq., Against All Defendants)**

12 40. Plaintiff repeats, re-alleges and incorporates by reference Paragraphs 1 through
13 39, inclusive, as if fully set forth herein.

14 41. Defendants' unauthorized use of Plaintiff's name, image, photograph, and
15 likeness is likely to cause confusion, mistake, or deception as to the source, affiliation, or
16 sponsorship of Defendants and Defendants' goods and/or websites. The public is likely to
17 believe that Defendants' goods and/or websites are somehow connected with, affiliated with,
18 or related to Plaintiff. Defendants' unauthorized use of Plaintiff's name, photograph, and
19 image falsely represents Defendants as being legitimately connected with Plaintiff, and places
20 beyond Plaintiff's control her own reputation and ability to control the use of her name and
21 image.

22 42. On information and belief, Defendants' acts of unfair competition are willful
23 and deliberate and with the intent to reap the benefits of Plaintiff's goodwill and violate
24 California Business & Professions Code Section 17200, et seq.

25 43. The aforesaid conduct is causing Plaintiff to suffer irreparable injury and
26 damage, and, unless restrained, will cause her further irreparable injury and damage. Plaintiff
27 has no adequate remedy at law.
28

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1 6. For preliminary and permanent injunction, for an order restraining Defendants,
2 and each of them, from directly or indirectly making any use of Plaintiff's name, photograph,
3 image and likeness in any manner.

4 **AS TO THE THIRD CAUSE OF ACTION**

5 1. General and special damages against Defendants, and each of them, in
6 accordance with proof at trial, together with interest thereon at the legal rate;

7 2. For an accounting of all gross revenues and profits received by Defendants as a
8 result of the unauthorized use of Plaintiff's name, photograph, image, and likeness;

9 3. For an award of the gross revenues received by Defendants as a result of the
10 unauthorized use of Plaintiff's name, photograph, image, and likeness;

11 4. For a preliminary and permanent injunction, for an order restraining
12 Defendants, and each of them, from directly or indirectly making any use of Plaintiff's name,
13 photograph, image, and likeness in any manner;

14 **AS TO ALL CAUSES OF ACTION**

15 1. For all costs of suit incurred herein;

16 2. For preliminary and permanent injunctive relief;

17 3. For such other and further relief as the Court may deem to be appropriate.

20 DATED: August 22, 2017

THE KERNAN LAW FIRM

22 By: S. Michael Kernan
23 S. Michael Kernan
24 Attorneys for Plaintiff
25 JANE DOE

THE KERNAN LAW FIRM
9663 Santa Monica Blvd., Suite 450
Beverly Hills, California 90210
(310) 490-9777

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CM-010

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): S. Michael Kernan, SBN 181747 The Kernan Law Firm 9663 Santa Monica Boulevard, Suite 450 Beverly Hills, California 90210 TELEPHONE NO.: (310) 490-9777 FAX NO.: (310) 861-0503 ATTORNEY FOR (Name): mkernan@kernanlaw.net	FOR COURT USE ONLY FILED Superior Court of California County of Los Angeles AUG 22 2017 Sherri R. Carter, Executive Officer/Clerk By <u>M. Soto</u> , Deputy Moses Soto
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles STREET ADDRESS: 111 North Hill Street MAILING ADDRESS: 111 North Hill Street CITY AND ZIP CODE: Los Angeles, California 90012 BRANCH NAME: Stanley Mosk	CASE NAME: Jane Doe v. Roe Corporation et al.
CIVIL CASE COVER SHEET <input checked="" type="checkbox"/> Unlimited (Amount demanded exceeds \$25,000) <input type="checkbox"/> Limited (Amount demanded is \$25,000 or less)	Complex Case Designation <input type="checkbox"/> Counter <input type="checkbox"/> Joinder Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)
CASE NUMBER: BC 673258	JUDGE: DEPT:

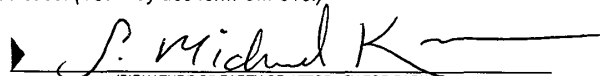
Items 1-6 below must be completed (see instructions on page 2).

1. Check one box below for the case type that best describes this case:

Auto Tort <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46) Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort <input type="checkbox"/> Asbestos (04) <input type="checkbox"/> Product liability (24) <input type="checkbox"/> Medical malpractice (45) <input type="checkbox"/> Other PI/PD/WD (23) Non-PI/PD/WD (Other) Tort <input checked="" type="checkbox"/> Business tort/unfair business practice (07) <input type="checkbox"/> Civil rights (08) <input type="checkbox"/> Defamation (13) <input type="checkbox"/> Fraud (16) <input type="checkbox"/> Intellectual property (19) <input type="checkbox"/> Professional negligence (25) <input type="checkbox"/> Other non-PI/PD/WD tort (35) Employment <input type="checkbox"/> Wrongful termination (36) <input type="checkbox"/> Other employment (15)	Contract <input type="checkbox"/> Breach of contract/warranty (06) <input type="checkbox"/> Rule 3.740 collections (09) <input type="checkbox"/> Other collections (09) <input type="checkbox"/> Insurance coverage (18) <input type="checkbox"/> Other contract (37) Real Property <input type="checkbox"/> Eminent domain/inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (26) Unlawful Detainer <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38) Judicial Review <input type="checkbox"/> Asset forfeiture (05) <input type="checkbox"/> Petition re: arbitration award (11) <input type="checkbox"/> Writ of mandate (02) <input type="checkbox"/> Other judicial review (39)	Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403) <input type="checkbox"/> Antitrust/Trade regulation (03) <input type="checkbox"/> Construction defect (10) <input type="checkbox"/> Mass tort (40) <input type="checkbox"/> Securities litigation (28) <input type="checkbox"/> Environmental/Toxic tort (30) <input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41) Enforcement of Judgment <input type="checkbox"/> Enforcement of judgment (20) Miscellaneous Civil Complaint <input type="checkbox"/> RICO (27) <input type="checkbox"/> Other complaint (not specified above) (42) Miscellaneous Civil Petition <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> Other petition (not specified above) (43)
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2. This case is is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:
- a. Large number of separately represented parties d. Large number of witnesses
 b. Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve e. Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court
 c. Substantial amount of documentary evidence f. Substantial postjudgment judicial supervision
3. Remedies sought (check all that apply): a. monetary b. nonmonetary; declaratory or injunctive relief c. punitive
4. Number of causes of action (specify): Violation of C.C. §1708.85; Right of Publicity; Bus. & Prof. § 17200
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: August 22, 2017
S. Michael Kernan


(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

NOTICE

Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.

File this cover sheet in addition to any cover sheet required by local court rule.

If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.

Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

Page 1 of 2

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

08/2/2017

SHORT TITLE: Jane Doe v. Roe Corporation, et al.	CASE NUMBER: BC 673258
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**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 2.3 in all new civil case filings in the Los Angeles Superior Court.

Step 1: After completing the Civil Case Cover Sheet (Judicial Council form CM-010), find the exact case type in Column A that corresponds to the case type indicated in the Civil Case Cover Sheet.

Step 2: In Column B, check the box for the type of action that best describes the nature of the case.

Step 3: In Column C, circle the number which explains the reason for the court filing location you have chosen.

Applicable Reasons for Choosing Court Filing Location (Column C)

- | | |
|--|---|
| <ul style="list-style-type: none"> 1. Class actions must be filed in the Stanley Mosk Courthouse, Central District. 2. Permissive filing in central district. 3. Location where cause of action arose. 4. Mandatory personal injury filing in North District. 5. Location where performance required or defendant resides. 6. Location of property or permanently garaged vehicle. | <ul style="list-style-type: none"> 7. Location where petitioner resides. 8. Location wherein defendant/respondent functions wholly. 9. Location where one or more of the parties reside. 10. Location of Labor Commissioner Office. 11. Mandatory filing location (Hub Cases – unlawful detainer, limited non-collection, limited collection, or personal injury). |
|--|---|

Auto Tort
Other Personal Injury/Property Damage/Wrongful Death Tort
7/10/2017 8/22/2017

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, 4, 11
Uninsured Motorist (46)	<input type="checkbox"/> A7110 Personal Injury/Property Damage/Wrongful Death – Uninsured Motorist	1, 4, 11
Asbestos (04)	<input type="checkbox"/> A6070 Asbestos Property Damage <input type="checkbox"/> A7221 Asbestos - Personal Injury/Wrongful Death	1, 11 1, 11
Product Liability (24)	<input type="checkbox"/> A7260 Product Liability (not asbestos or toxic/environmental)	1, 4, 11
Medical Malpractice (45)	<input type="checkbox"/> A7210 Medical Malpractice - Physicians & Surgeons <input type="checkbox"/> A7240 Other Professional Health Care Malpractice	1, 4, 11 1, 4, 11
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, 11 1, 4, 11 1, 4, 11 1, 4, 11

SHORT TITLE: Jane Doe v. Roe Corporation, et al.	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
Non-Personal Injury/ Property Damage/ Wrongful Death Tort	Business Tort (07)	<input checked="" type="checkbox"/> A6029 Other Commercial/Business Tort (not fraud/breach of contract)	1, 2, 3
	Civil Rights (08)	<input type="checkbox"/> A6005 Civil Rights/Discrimination	1, 2, 3
	Defamation (13)	<input type="checkbox"/> A6010 Defamation (slander/libel)	1, 2, 3
	Fraud (16)	<input type="checkbox"/> A6013 Fraud (no contract)	1, 2, 3
	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	1, 2, 3
Employment	Wrongful Termination (36)	<input type="checkbox"/> A6037 Wrongful Termination	1, 2, 3
	Other Employment (15)	<input type="checkbox"/> A6024 Other Employment Complaint Case <input type="checkbox"/> A6109 Labor Commissioner Appeals	1, 2, 3 10
Contract	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 <input type="checkbox"/> A6034 Collections Case-Purchased Debt (Charged Off Consumer Debt Purchased on or after January 1, 2014)	5, 6, 11 5, 11 5, 6, 11
	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, 9
	Eminent Domain/Inverse Condemnation (14)	<input type="checkbox"/> A7300 Eminent Domain/Condemnation Number of parcels_____	2, 6
	Wrongful Eviction (33)	<input type="checkbox"/> A6023 Wrongful Eviction Case	2, 6
Real Property	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)	6, 11
	Unlawful Detainer-Residential (32)	<input type="checkbox"/> A6020 Unlawful Detainer-Residential (not drugs or wrongful eviction)	6, 11
Unlawful Detainer	Unlawful Detainer- Post-Foreclosure (34)	<input type="checkbox"/> A6020F Unlawful Detainer-Post-Foreclosure	2, 6, 11
	Unlawful Detainer-Drugs (38)	<input type="checkbox"/> A6022 Unlawful Detainer-Drugs	2, 6, 11

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**CIVIL CASE COVER SHEET ADDENDUM
AND STATEMENT OF LOCATION**

SHORT TITLE: Jane Doe v. Roe Corporation, et al.	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
Judicial Review	Asset Forfeiture (05)	<input type="checkbox"/> A6108 Asset Forfeiture Case	2, 3, 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	2, 8
		<input type="checkbox"/> A6152 Writ - Mandamus on Limited Court Case Matter	2
		<input type="checkbox"/> A6153 Writ - Other Limited Court Case Review	2
Other Judicial Review (39)	<input type="checkbox"/> A6150 Other Writ /Judicial Review	2, 8	
Provisionally Complex Litigation	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	Enforcement of Judgment (20)	<input type="checkbox"/> A6141 Sister State Judgment	2, 5, 11
		<input type="checkbox"/> A6160 Abstract of Judgment	2, 6
		<input type="checkbox"/> A6107 Confession of Judgment (non-domestic relations)	2, 9
		<input type="checkbox"/> A6140 Administrative Agency Award (not unpaid taxes)	2, 8
		<input type="checkbox"/> A6114 Petition/Certificate for Entry of Judgment on Unpaid Tax	2, 8
		<input type="checkbox"/> A6112 Other Enforcement of Judgment Case	2, 8, 9
Miscellaneous Civil Complaints	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	1, 2, 8
		<input type="checkbox"/> A6040 Injunctive Relief Only (not domestic/harassment)	2, 8
		<input type="checkbox"/> A6011 Other Commercial Complaint Case (non-tort/non-complex)	1, 2, 8
<input type="checkbox"/> A6000 Other Civil Complaint (non-tort/non-complex)	1, 2, 8		
Miscellaneous Civil Petitions	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	2, 3, 9
		<input type="checkbox"/> A6123 Workplace Harassment	2, 3, 9
		<input type="checkbox"/> A6124 Elder/Dependent Adult Abuse Case	2, 3, 9
		<input type="checkbox"/> A6190 Election Contest	2
		<input type="checkbox"/> A6110 Petition for Change of Name/Change of Gender	2, 7
		<input type="checkbox"/> A6170 Petition for Relief from Late Claim Law	2, 3, 8
<input type="checkbox"/> A6100 Other Civil Petition		2, 9	

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SHORT TITLE: Jane Doe v. Roe Corporation, et al.	CASE NUMBER
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Step 4: Statement of Reason and Address: Check the appropriate boxes for the numbers shown under Column C for the type of action that you have selected. Enter the address which is the basis for the filing location, including zip code. (No address required for class action cases).

REASON: <input type="checkbox"/> 1. <input type="checkbox"/> 2. <input type="checkbox"/> 3. <input type="checkbox"/> 4. <input type="checkbox"/> 5. <input type="checkbox"/> 6. <input type="checkbox"/> 7. <input type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10. <input type="checkbox"/> 11.		ADDRESS: 9663 Santa Monica Boulevard, Suite 450
CITY: Beverly Hills	STATE: CA	ZIP CODE: 90210

Step 5: Certification of Assignment: I certify that this case is properly filed in the Central District of the Superior Court of California, County of Los Angeles [Code Civ. Proc., §392 et seq., and Local Rule 2.3(a)(1)(E)].

Dated: August 22, 2017


 (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. 02/16).
5. Payment in full of the filing fee, unless there is court order for waiver, partial or scheduled payments.
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.

08/22/2017

General Information

Court	CA Superior Court - Los Angeles County
Docket Number	BC673258
Status	OPEN