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**FILED**  
Superior Court Of California  
County Of Los Angeles

AUG 06 2018

Sherri R. Cantor, Executive Officer/Clerk  
By Cristina Grimalta, Deputy  
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Attorneys for Plaintiff  
EMANUEL BROWN

A6024 90012

**SUPERIOR COURT FOR THE STATE OF CALIFORNIA**

**COUNTY OF LOS ANGELES**

**BC 7 16 8 8 0**

EMANUEL BROWN,

CASE NO.:

Plaintiff,

**COMPLAINT FOR DAMAGES:**

v.

1. **DISCRIMINATION IN VIOLATION OF FEHA (Cal. Gov't C. § 12940 et seq.);**
2. **HARASSMENT IN VIOLATION OF FEHA (CAL. GOV'T C. §§ 12940 et seq.)**
3. **RETALIATION IN VIOLATION OF FEHA (Cal. Gov't C. § 12940 et seq.)**

CITY OF LOS ANGELES, a government entity; LOS ANGELES FIRE DEPARTMENT, a government entity; and DOES 1 through 100, inclusive,

Defendants.

**DEMAND FOR JURY TRIAL**

COMES NOW Plaintiff, EMANUEL BROWN, and hereby demands a trial by jury and based on information and belief complains and alleges as follows:

RECEIVED: 310  
 RECEIPT #: CCH195707167  
 DATE PAID: 08/06/18 03:55 PM  
 PAYMENT: \$435.00  
 CHECK: \$435.00  
 CASH: \$0.00  
 CHANGE: \$0.00  
 CARD: \$0.00

CIT/CASE: EC216880  
LEA/DEF#:

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//

THE PARTIES

1  
2           1.       At all times relevant hereto, Plaintiff EMANUEL BROWN (“BROWN” or  
3 “Plaintiff”) was a Firefighter Paramedic employed by the Los Angeles Fire Department (“the  
4 LAFD” or “Department”) and assigned to Fire Station 21 (“FS 21”), and was a competent adult.  
5 Plaintiff joined the LAFD in or around September 2008. Plaintiff was qualified for the position by  
6 reason of his education and training.

7           2.       Since he joined the LAFD, Plaintiff received numerous positive performance  
8 evaluations, as well as commendations from both private citizens and the City of Los Angeles for  
9 his outstanding contributions and achievements in the LAFD.

10          3.       Plaintiff is part of a protected class based on his race and engagement in protected  
11 activity, as further described herein.

12          4.       Plaintiff is informed and believes and thereon alleges that, at all times relevant  
13 hereto, Defendant City was a public entity violating laws within the State of California in the  
14 County of Los Angeles. At all times pertinent hereto, Defendant City owned, controlled, and  
15 operated the law enforcement agency known as the LAFD.

16          5.       Plaintiff is informed and believes and thereupon alleges that Defendants DOES 1  
17 through 100, inclusive, and each of them, at all times relevant hereto, were public, business, and/or  
18 other entities whose form is unknown committing torts in and/or engaged in purposeful economic  
19 activity within the County of Los Angeles, State of California.

20          6.       The true names and capacities of Defendants DOES 1 through 100, and each of  
21 them, whether individual, corporate, associate or otherwise, are unknown to Plaintiff at this time,  
22 therefore Plaintiff sues said Defendants by such fictitious names. Plaintiff will file DOE  
23 amendments, and/or ask leave of court to amend this complaint to assert the true names and  
24 capacities of these Defendants when they have been ascertained. Plaintiff is informed and believes,  
25 and upon such information and belief alleges, that each Defendant herein designated as a DOE was  
26 and is in some manner, negligently, wrongfully, or otherwise, responsible and liable to Plaintiff for  
27 the injuries and damages hereinafter alleged, and that Plaintiff’s damages as herein alleged were  
28 proximately caused by their conduct.

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1 Government Code § 945.4 and § 912.4 Plaintiff filed a timely claim with the Department of Fair  
2 Employment and Housing on August 1, 2018 and received a right-to-sue notice on August 1, 2018.

3 **GENERAL ALLEGATIONS**

4 15. At times relevant to this claim, Plaintiff held the title and rank of Firefighter  
5 Paramedic at FS 21. FS 21 is a specialized station and its Firefighter Paramedics do not rotate  
6 assignments within the station and are assigned strictly to their paramedic duties, rendering the  
7 position a coveted position. During the course of his employment with the City, Plaintiff has  
8 performed his various responsibilities as a Firefighter Paramedic in an exemplary fashion and  
9 otherwise capably performed each and every condition of his employment agreement.

10 16. Beginning in or around April 2017 to present, on a continuing and ongoing basis,  
11 Plaintiff has been subject to numerous acts of race-based discrimination, harassment, and  
12 retaliation for speaking out against and reporting inappropriate and unlawful practices within the  
13 LAFD.

14 17. On Easter morning, April 19, 2017, Plaintiff found fecal matter inside the driver-  
15 side compartment of his rescue vehicle (ambulance). Specifically, the fecal matter was found  
16 inside the compartment that is used exclusively by the driver of such vehicle. Plaintiff stored his  
17 Personal Protective Equipment, including his breathing apparatus, turn-out jacket, and oxygen tank  
18 in this compartment. Moreover, the rescue vehicle was assigned solely to Plaintiff on the days he  
19 worked. The LAFD has a history of fecal matter being used as discriminatory acts against its  
20 African American Firefighters and personnel. As such, this act was directed at Plaintiff with racial  
21 animus.

22 18. Thereafter, Plaintiff spoke to his crew, all of who denied any knowledge of the fecal  
23 substance, before taking up the issue with his Captain. Thereafter, family of FS 21 personnel came  
24 out to the station to visit those who worked the holiday. Plaintiff's wife, had a strange interaction  
25 with Firefighter Marcus Meza ("Meza") who tried to shake her hand while his was noticeably  
26 dirty.

27 19. The next day, on or around April 20, 2017, Plaintiff engaged in protected activity  
28 and contacted Captain II Eric Roberts ("Roberts") to report the discriminatory act. Robert was

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1 disgusted by the discriminatory conduct and placed the complaint with Professional Standards  
2 Bureau ("PSD") as is common LAFD practice and custom, and urged Plaintiff to report the  
3 incident to his direct supervisor, Captain I John Smith ("Smith").

4 20. Thereafter on the same day, Plaintiff again engaged in protected activity and  
5 contacted Captain Smith to report the discriminatory conduct. Smith responded by asking if  
6 Plaintiff was "sure [he] wanted to do this." Plaintiff is unsure if Smith ever followed LAFD  
7 procedure by placing a complaint with PSD.

8 21. On or around April 25, 2017, Plaintiff again addressed the crew at FS 21. Plaintiff  
9 specifically questioned Firefighter Marcus Meza, who denied any knowledge of the incident.

10 22. On or around May 10, 2017, Plaintiff received formal acknowledgement from PSD  
11 of his complaint, corroborating that Captain Roberts did in fact report the complaint to PSD on  
12 April 20, 2017. Plaintiff responded to the notice and wrote a letter stating that the use of feces on  
13 African American Firefighters is a known racist act that has been committed in the past at the  
14 LAFD, specifically within FS 14, commonly known as a "Black [African American] Free Zone."

15 23. On or around June 27, 2017, PSD Captain Patterson interviewed Plaintiff as part of  
16 the ongoing investigation into Plaintiff's complaint. In retaliation against Plaintiff for engaging in  
17 protected activity and in further discrimination against Plaintiff on the basis of his race, Captain  
18 Patterson refused to allow Plaintiff to record the interview, thereby violating Plaintiff's rights  
19 under the Firefighters Bill of Rights ("FBOR").

20 24. On or around February 23, 2018, Plaintiff contacted PSD to inquire on the status of  
21 the complaint. Plaintiff was informed that two investigators were assigned to the investigation and  
22 that it was still an ongoing investigation.

23 25. Also on February 23, 2018, Plaintiff was contacted by a Los Angeles Times  
24 reporter regarding the incident and about going on the record about what happened. On or about  
25 February 24, 2018, Plaintiff contacted Assistant Chief Roy Harvey ("Harvey"), a well-respected  
26 African American veteran of the LAFD, and informed him about the fecal matter incident and that  
27 he had been contacted by the Los Angeles Times. Plaintiff wanted Harvey's advice on the matter  
28 and Harvey informed him that he should not ignore the discriminatory acts.

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1           26. On or around February 27, 2018, Plaintiff spoke to Captain Lillenburg  
2 (“Lillenburg”) about the fecal matter incident and about speaking to the Los Angeles Times.  
3 Lillenburg cautioned Plaintiff that doing so would be a bad idea. Later that evening, Plaintiff  
4 spoke to his crew under belief they would understand the gravity and history of using fecal matter  
5 as a discriminatory act against African Americans and support Plaintiff’s speaking to the Los  
6 Angeles Times. Several Firefighters including Firefighter Jose Rodriguez (“Rodriguez”),  
7 Apparatus Operator John Theodore (“Theodore”), and Engineer Nick Rideal (“Rideal”) expressed  
8 disagreement in Plaintiff’s plan to speak with the Los Angeles Times.

9           27. Later than night, or around 8:30 p.m., Engineer Carlos Chavez (“Chavez”),  
10 Theodore, and Plaintiff were showering in the locker room. Chavez exclaimed to Plaintiff “show  
11 me your dick, faggot.” Theodore then stood behind Plaintiff and whispered, “I’ve got your back,”  
12 awkwardly implying a homosexual advancement. Such comments from Plaintiff’s crew had never  
13 occurred prior to his disclosure of speaking to the Los Angeles Times.

14           28. On or around March 4, 2018, while Plaintiff was in the computer room, Apparatus  
15 Operator De La Cruz passed the room, looked at Plaintiff, and yelled, “No Retaliation!” De La  
16 Cruz was harassing and mocking Plaintiff’s complaint of discrimination to his Captains.

17           29. For an indefinite time thereafter, Firefighter Rodriguez would further harass  
18 Plaintiff by making cork-popping noises whenever Plaintiff walked into the room, insinuating that  
19 he was de-flowering Plaintiff. Such conduct went on for over six-months in further discrimination  
20 against Plaintiff and in retaliation for engaging in protected activity.

21           30. Also on March 4, 2018, Theodore casually mentioned to Plaintiff the importance of  
22 having a living trust, implying that his death was likely and warranted a living trust. Thereafter,  
23 Theodore suggested they watch a video, which Captain Lillenburg played, displaying New York  
24 Firefighters repelling off a building. Theodore then informed Plaintiff that the drill of the day  
25 would be repelling from a three-story window using a belay-line, a drop-bag, and a 150-foot-long,  
26 5/16’s-inch wide rope, which Plaintiff knew to be uncommon and dangerous. Plaintiff then  
27 checked the posted schedule of drills, which did not show the repelling exercise Theodore  
28 purported was scheduled. Moreover, Plaintiff knew that the use of a drop-bag was in violation of

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1 LAFD regulations. Plaintiff knew that such a drill was an attempt to intimidate further retaliate  
2 against Plaintiff, recalling the instance where another African American Firefighter was  
3 discriminated and left dangling sideways from the same building. Said Firefighter left FS 21  
4 shortly thereafter the incident.

5 31. Thereafter, Theodore and Plaintiff head up to the third story to conduct the drill.  
6 Firefighter Westmoreland, who was present, mentioned that someone may die from such a training  
7 drill, further trying to intimidate Plaintiff. Plaintiff believed he would be injured if he attempted  
8 the dangerous and reckless drill, which was only being conducted in retaliation against Plaintiff for  
9 complaining about the fecal matter incident. As Plaintiff was preparing for the drill, Plaintiff's  
10 crew was called out for a structure fire.

11 32. After putting out the fire, Plaintiff and the crew were assigned to stage at  
12 Hollywood High School. While walking inside, Theodore looked at Plaintiff and said, "He  
13 [Plaintiff] is playing right into our hands." Thereafter, Firefighter Rodriguez taunted Plaintiff  
14 stating he was lucky they were called out to the fire and called Plaintiff a "chocolate piece of shit."

15 33. Plaintiff continued to be harassed this day by his crew in retaliation for reporting  
16 the fecal incident and in further discrimination against Plaintiff on the basis of his race. Captain  
17 Dejong made statements to the effect of "Let's see if he [Plaintiff] is as smart as he thinks."  
18 Apparatus Operator De La Cruz questioned if Dejong felt sorry for Plaintiff, and another unknown  
19 member stated they should place a game of "Two Bounce," a physical contact game played to  
20 determine who will wash the dishes, then looked at Plaintiff as he stated Plaintiff might get hurt.  
21 These comments along with the actions earlier in the day gave Plaintiff the impression that his  
22 crew was out to hurt him. As a result of this harassment, Plaintiff contacted Assistant Chief Roy  
23 Harvey ("Harvey"), an African American, who arrived at the high school. None of Plaintiff's crew  
24 bothered him after Harvey arrived.

25 34. Immediately upon returning to FS 21, Plaintiff, fearing for his personal safety,  
26 grabbed an "F18" form, commonly known as an employee-initiated transfer form, and put in for a  
27 transfer to Fire Station 94. Captain Lillenburg witnessed this and instead of putting an end to the  
28 harassment Plaintiff was enduring, informed Plaintiff that he was signing his life away.

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1           35.    On or around the morning of March 5, 2018, Plaintiff walked into the station's  
2 kitchen for coffee. Apparatus Operator Dean Bennett ("Bennett") mocked Plaintiff by asking how  
3 much sugar Plaintiff would be putting into his coffee, insinuating that Plaintiff was soft and weak.

4           36.    As a result of the constant harassment, discrimination and retaliation, Plaintiff  
5 called Battalion Chief Reddix to make a PSD complaint. Instead, Battalion Chief Peralta answered  
6 the phone. Plaintiff engaged in protected activity and explained the sequence of events to Peralta,  
7 who had no knowledge about what had been going on at FS 21, which is Peralta's station.  
8 Peralta's lack of awareness indicated to Plaintiff that his initial complaint was stale and had not  
9 been properly and thoroughly investigated. Immediately after, Battalion Chief Reddix called  
10 Plaintiff, and Plaintiff reported to Reddix that he felt his personal safety was in jeopardy. Reddix  
11 downplayed the severity of the harassment, discrimination, and retaliation Plaintiff was being  
12 subjected to by asking if the call was a "counseling call." Thereafter, Assistant Chief Villanueva  
13 called Plaintiff, and Plaintiff again reported the same conduct to Villanueva. Upon information  
14 and belief, none of these Chiefs followed proper LAFD protocol to initiate a complaint for  
15 misconduct.

16           37.    On or around March 7, 2018, Plaintiff, accompanied by Battalion Chief Reddix,  
17 went to FS 21 to pick up his personal belongings. Also on this day, Plaintiff spoke to Battalion  
18 Chief Peralta, who wanted to confirm that it was Plaintiff's choice to transfer out of FS 21;  
19 Plaintiff conveyed that he had no choice but to transfer due to the ongoing discrimination,  
20 harassment, and retaliation. After loading up his belongings, Battalion Chief Reddix and Assistant  
21 Chief Villanueva invited Plaintiff to a cup of coffee at a local coffee shop. There, Reddix and  
22 Villanueva tried to confirm that Plaintiff's transfer out of FS 21 was voluntary. Plaintiff denied it  
23 was voluntary, but rather a forced transfer to get away from the harassment and retaliation.  
24 Moreover, Villanueva informed Plaintiff that Captain Hart placed Plaintiff on a "threat list,"  
25 further discriminating and retaliating against Plaintiff.

26           38.    On or around March 13, 2018, Plaintiff submitted a second complaint to PSD,  
27 wherein Plaintiff reported that he was being retaliated, harassed, and discriminated on the account  
28 of his race and for reporting such discriminatory misconduct and harassment. Later that day,

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1 Plaintiff spent his first day at FS 91 with Chief Villanueva. During a meeting with others present  
2 Villanueva jokingly stated to Plaintiff "You know we own you right." When Plaintiff asked for  
3 clarification, or around March 15, 2018, Villanueva backtracked and stated that the Department  
4 and Battalion 13 own Plaintiff.

5 39. Plaintiff is informed and believes that command staff at FS 21 were in violation of  
6 LAFD's policy and procedure in failing to transfer out the harassers pending resolution of  
7 Plaintiff's complaint with PSD. As a result, Plaintiff was forced to remain at FS 21 with the  
8 harassers and endure further discrimination, harassment, and retaliation, which in turn led to his  
9 involuntary transfer.

10 40. On or around April 8, 2018, Captain Eric Nelson handed Plaintiff a notice from  
11 PSD indicating his fecal matter complaint was closed due to insufficient evidence. Nelson stated  
12 to Plaintiff "I guess these are your walking papers."

13 41. As a result of transferring out of FS 21, Plaintiff lost out on a HAZMAT bonus and  
14 FLSA bonus. He also lost the coveted position at FS 21 where he did not have to rotate  
15 assignments and remained exclusively assigned the Paramedic assignment.

16 42. On a continuing and ongoing basis, Plaintiff is being retaliated against and harassed  
17 based on his race and additionally being retaliated against for reporting discriminatory conduct  
18 within the LAFD.

19 43. Plaintiff's career has been materially and adversely affected, and irreparably harmed  
20 and damaged by the conduct of the Defendants. Plaintiff was discriminated and retaliated against  
21 on the basis of his race, and was further discriminated, harassed, and retaliated against for  
22 engaging in protected activity and reporting the discriminatory conduct he was being subjected to.  
23 After suffering such discrimination and harassment, he spoke out and formally reported the  
24 misconduct of various Supervisors and Command Staff of FS 21 and to PSD. As a direct and  
25 proximate consequence of reporting such misconduct—which constitutes protected activity under  
26 state and federal law—Defendants, and each of them, retaliated against, discriminated against, and  
27 harassed Plaintiff and subjected Plaintiff to adverse employment actions. Those adverse  
28 employment actions include but are not limited to: being denied a work environment free of

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1 discrimination, harassment, and retaliation, forced to transfer out of FS 21, damage to his  
2 reputation, and interference with Plaintiff's ability to do his job.

3 44. Plaintiff has suffered both general and special damages in the past and present and  
4 will continue to suffer such damages in the future for an unknown period of time. Plaintiff has  
5 also suffered and continues to suffer losses in earnings and other employment benefits, as well as  
6 past and future non-economic injury. This has caused damage to his professional reputation, his  
7 ability to promote, his ability to be selected for other units, his ability to work, will cause him to  
8 have to take a different retirement path, has caused him to lose overtime opportunities and pay, and  
9 will adversely affect his income and his pension and other benefits. Moreover, it has adversely  
10 affected his personal health and well being, including medical expenses, that are anticipated into  
11 the future and may force an early retirement. Plaintiff has also suffered extensive general damages  
12 in the form of anxiety, anguish, and mental suffering. Plaintiff's damages are continuing and in an  
13 amount not yet determined, but in excess of \$25,000.

14 45. The Department's conduct was a violation of Plaintiff's rights under both state and  
15 federal law, including but not limited to the Firefighters Bill of Rights and the Fair Employment  
16 and Housing Act (CAL. GOV'T C. §§ 12940, *et seq.*). Therefore, Defendants, and each of them,  
17 are liable under FEHA, are liable for retaliation in violation of public policy as identified in  
18 *Tamery v. Atlantic Richfield Co.* (1980) 27 Cal.3d 167 and its progeny, and may be liable for  
19 constructive discharge. The wrongful conduct of Defendants, and each of them, is continuing and  
20 ongoing as of the present date.

21  
22 **FIRST CAUSE OF ACTION**

23 **BY PLAINTIFF AGAINST ALL DEFENDANTS**

24 **DISCRIMINATION IN VIOLATION OF FEHA (CAL. GOV'T C. §§ 12940, *ET SEQ.*)**

25 46. Plaintiff re-alleges and incorporates by reference each and every allegation  
26 contained in paragraphs 1-45 of this complaint as though fully set forth herein again.

27 47. At all times herein mentioned, Government Code §§ 12940, *et seq.* was in full force  
28 and effect and was binding upon Defendants, and each of them.

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1           48.     At all times herein mentioned, Plaintiff was in the protected class of persons, *i.e.*, a  
2 person of African American race, and one who engaged in protected activities contemplated by  
3 California Government Code §§ 12940, *et seq.* Plaintiff is informed and believes that Defendants,  
4 and each of them, discriminated against Plaintiff based on his race, for reporting and speaking out  
5 against wrongful and discriminatory treatment based on his race, speaking out against improper  
6 conduct, and for generally attempting to protect and secure his rights and the rights of others under  
7 the FEHA.

8           49.     Commencing before and during 2017, and continuing to the present, Defendants  
9 created and allowed to exist an environment hostile to African American persons and discriminated  
10 against Plaintiff on the basis of his race. Such discrimination was in violation of Government  
11 Code §§ 12940, *et seq.* and the public policy embodied therein.

12           50.     At all times herein mentioned, Defendants, and each of them, had actual and/or  
13 constructive knowledge of the discriminatory conduct levied against Plaintiff by Defendants,  
14 fellow employees and superiors. Moreover, such retaliation, harassment, and discriminatory  
15 conduct was also conducted and/or condoned by Defendants, and each of them.

16           51.     As a direct, foreseeable and proximate result of Defendants' discriminatory conduct  
17 and failure to act, Plaintiff suffered and continues to suffer damages, humiliation, embarrassment,  
18 anxiety, mental anguish and emotional distress. Plaintiff was required to and did employ, and will  
19 in the future employ, physicians and health care providers to examine, treat and care for plaintiff,  
20 and did, and will in the future, incur medical and incidental expenses. The exact amount of such  
21 expenses is unknown to Plaintiff at this time.

22           52.     As a direct, foreseeable and proximate result of the Defendants' discriminatory  
23 conduct, Plaintiff suffered and continues to suffer losses in earnings and other employment  
24 benefits all to his damage in an amount in excess of the minimum jurisdictional limits of this court,  
25 the precise amount of which will be proven at trial.

26           53.     As a further legal result of the above-described conduct of Defendants, and each of  
27 them, Plaintiff has and will continue to incur attorneys' fees and costs in an amount according to  
28 proof.

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1 SECOND CAUSE OF ACTION

2 BY PLAINTIFF AGAINST ALL DEFENDANTS

3 HARASSMENT IN VIOLATION OF FEHA (CAL. GOV'T C. §§ 12940, *ET SEQ.*)

4 54. Plaintiff re-alleges and incorporates by reference each and every allegation  
5 contained in paragraphs 1–53 of this complaint as though fully set forth herein again.

6 55. At all times herein mentioned, Government Code §§ 12940, *et seq.* was in full force  
7 and effect and was binding upon Defendants, and each of them. Said law required Defendants, and  
8 each of them, to refrain from harassing any employee based upon race, and to provide each  
9 employee with a working environment free from harassment based on race.

10 56. At all times herein mentioned, Plaintiff was in the protected class of persons, *i.e.*, a  
11 person of African American race and one who engaged in protected activities contemplated by  
12 California Government Code §§ 12940, *et seq.* Plaintiff is informed and believes that Defendants,  
13 and each of them, harassed him based on his race, for reporting and speaking out against wrongful  
14 and harassing treatment based on his race, speaking out against improper conduct, and for  
15 generally attempting to protect and secure his rights and the rights of others under the FEHA.

16 57. Commencing in 2016, and continuing through Plaintiff's transfer in 2018,  
17 Defendants created and allowed to exist an environment hostile to African Americans at FS 21.  
18 Plaintiff was subject to this differential treatment, and racial comments and actions directed to  
19 Plaintiff. Such harassment was in violation of Government Code §§ 12940, *et seq.* and the public  
20 policy embodied therein.

21 58. At all times herein mentioned, Defendants, and each of them, had actual and/or  
22 constructive knowledge of the harassing conduct levied against Plaintiff by Defendants, fellow  
23 employees and superiors. Moreover, such retaliation, harassment, and discriminatory conduct was  
24 also conducted and/or condoned by Defendants, and each of them.

25 59. As a direct, foreseeable and proximate result of Defendants' harassing conduct and  
26 failure to act, Plaintiff suffered and continues to suffer humiliation, embarrassment, anxiety,  
27 mental anguish and emotional distress. Plaintiff was required to and did employ, and will in the  
28 future employ, physicians and health care providers to examine, treat and care for Plaintiff, and

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1 did, and will in the future, incur medical and incidental expenses. The exact amount of such  
2 expenses is unknown to Plaintiff at this time.

3 60. As a direct, foreseeable and proximate result of the Defendants' harassing conduct,  
4 Plaintiff suffered and continues to suffer losses in earnings and other employment benefits all to  
5 her damage in an amount in excess of the minimum jurisdictional limits of this court, the precise  
6 amount of which will be proven at trial.

7 61. As a further legal result of the above-described conduct of Defendants, and each of  
8 them, Plaintiff has and will continue to incur attorneys' fees and costs in an amount according to  
9 proof.

10  
11 **THIRD CAUSE OF ACTION**

12 **BY PLAINTIFF AGAINST ALL DEFENDANTS**

13 RETALIATION IN VIOLATION OF FEHA (CAL. GOV'T C. §§ 12940, *ET SEQ.*)

14 62. Plaintiff re-alleges and incorporates by reference each and every allegation  
15 contained in paragraphs 1–61 of this complaint as though fully set forth herein again.

16 63. At all times herein mentioned, Government Code §§ 12940, *et seq.*, was in full  
17 force and effect and were binding upon Defendants, and each of them. Said sections required  
18 Defendants, and each of them, to refrain from retaliating against an employee for his opposition to  
19 employment practices prohibited under FEHA.

20 64. At all times herein mentioned, Plaintiff engaged in protected activities contemplated  
21 by Government Code §§ 12940, *et seq.* Plaintiff is informed and believes that Defendants, and  
22 each of them, retaliated against him for seeking a work environment free from race discrimination  
23 and harassment, complaining about the failure provide a work environment free from race  
24 discrimination and harassment, and otherwise speaking out against and opposing inappropriate  
25 workplace behavior, reporting and speaking out against wrongful and discriminatory, harassing,  
26 and retaliatory treatment based on his race, speaking out against improper conduct, and for  
27 generally attempting to protect and secure his rights and the rights of others under the FEHA.  
28

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1           65. Commencing before and occurring in 2017, and continuing to the present,  
2 Defendants created and allowed to exist an environment hostile to African American persons and  
3 retaliated against Plaintiff on the basis of his protected activity. Such retaliation was in violation  
4 of Government Code §§ 12940, *et seq.* and the public policy embodied therein.

5           66. At all times herein mentioned, Defendants, and each of them, had actual and/or  
6 constructive knowledge of the retaliatory conduct levied against Plaintiff by Defendants, fellow  
7 employees and superiors. Moreover, such retaliation, harassment and discriminatory conduct was  
8 also conducted and/or condoned by Defendants, and each of them.

9           67. As a direct, foreseeable and proximate result of Defendants' retaliatory conduct,  
10 Plaintiff suffered and continues to suffer damages, humiliation, embarrassment, anxiety, mental  
11 anguish and emotional distress. Plaintiff was required to and did employ, and will in the future  
12 employ, physicians and health care providers to examine, treat and care for Plaintiff, and did, and  
13 will in the future, incur medical and incidental expenses. The exact amount of such expenses is  
14 unknown to Plaintiff at this time.

15           68. As a direct, foreseeable and proximate result of the Defendants' retaliatory conduct,  
16 Plaintiff suffered and continues to suffer losses in earnings and other employment benefits all to  
17 his damage in an amount in excess of the minimum jurisdictional limits of this court, the precise  
18 amount of which will be proven at trial.

19           69. As a further legal result of the above-described conduct of Defendants, and each of  
20 them, Plaintiff has and will continue to incur attorneys' fees and costs in an amount according to  
21 proof.

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PRAAYER

WHEREFORE, Plaintiff seeks judgment against all Defendants, and each of them, on all Causes of Action for:

1. Physical, mental, and emotional injuries, pain, distress, suffering, anguish, fright, nervousness, grief, anxiety, worry, shame, mortification, injured feelings, shock, humiliation and indignity, as well as other unpleasant physical, mental, and emotional reactions, damages to reputation, and other non-economic damages, in a sum to be ascertained according to proof;
2. Health care, services, supplies, medicines, health care appliances, modalities, and other related expenses in a sum to be ascertained according to proof;
3. Loss of wages, income, earnings, earning capacity, support, domestic services, benefits, and other economic damages in a sum to be ascertained according to proof;
4. Other actual, consequential, and/or incidental damages in a sum to be ascertained according to proof;
5. Attorney fees and costs of suit pursuant to statute;
6. Costs of suit herein incurred;
7. Pre-judgment interest;
8. Such other and further relief as the Court may deem just and proper.

Dated: August 6, 2018

McNICHOLAS & McNICHOLAS, LLP

By: 

Matthew S. McNicholas  
Douglas D. Winter  
Attorneys for Plaintiff  
EMANUEL BROWN

08/07/2018

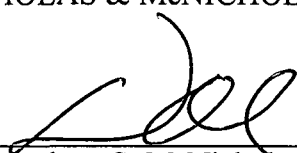
DEMAND FOR JURY TRIAL

Plaintiff EMANUEL BROWN hereby demands a jury trial.

Dated: August 6, 2018

McNICHOLAS & McNICHOLAS, LLP

By: \_\_\_\_\_

  
Matthew S. McNicholas  
Douglas D. Winter  
Attorneys for Plaintiff  
EMANUEL BROWN

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ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):  
McNICHOLAS & McNICHOLAS, LLP Matthew S. McNicholas, SBN 190249  
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ATTORNEY FOR (Name): Plaintiff, EMANUEL BROWN

FOR COURT USE ONLY

**FILED**  
Superior Court Of California  
County Of Los Angeles

AUG 06 2018

Sherril R. Carter, Executive Officer/Clerk  
By Cristina Michel, Deputy  
Cristina Michel

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES  
STREET ADDRESS: 111 N. HILL STREET  
MAILING ADDRESS:  
CITY AND ZIP CODE: LOS ANGELES, CA 90012  
BRANCH NAME: CENTRAL DISTRICT

CASE NAME:  
BROWN v. CITY OF LOS ANGELES, et al.

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

CASE NUMBER:  
**BC 716880**

JUDGE:  
DEPT:

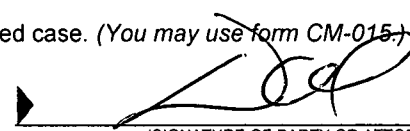
Items 1-6 below must be completed (see instructions on page 2).

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

<input type="checkbox"/> <b>Auto Tort</b> <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46)	<input type="checkbox"/> <b>Contract</b> <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)	<input type="checkbox"/> <b>Provisionally Complex Civil Litigation</b> (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)
<input type="checkbox"/> <b>Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort</b> <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)	<input type="checkbox"/> <b>Real Property</b> <input type="checkbox"/> Eminent domain/Inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (26)	<input type="checkbox"/> <b>Enforcement of Judgment</b> <input type="checkbox"/> Enforcement of judgment (20)
<input type="checkbox"/> <b>Non-PI/PD/WD (Other) Tort</b> <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)	<input type="checkbox"/> <b>Unlawful Detainer</b> <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38)	<input type="checkbox"/> <b>Miscellaneous Civil Complaint</b> <input type="checkbox"/> RICO (27) <input type="checkbox"/> Other complaint (not specified above) (42)
<input type="checkbox"/> <b>Employment</b> <input type="checkbox"/> Wrongful termination (36) <input checked="" type="checkbox"/> Other employment (15)	<input type="checkbox"/> <b>Judicial Review</b> <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)	<input type="checkbox"/> <b>Miscellaneous Civil Petition</b> <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): Three (3)
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 6, 2018  
Douglas D. Winter, Esq.  
(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

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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 2.0 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 14  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.

	<b>A</b> Civil Case Cover Sheet Category No.	<b>B</b> Type of Action (Check only one)	<b>C</b> Applicable Reasons - See Step 3 Above
Auto Tort	Auto (22)	<input type="checkbox"/> A7100 Motor Vehicle - Personal Injury/Property Damage/Wrongful Death	1., 2., 4.
	Uninsured Motorist (46)	<input type="checkbox"/> A7110 Personal Injury/Property Damage/Wrongful Death – Uninsured Motorist	1., 2., 4.
Other Personal Injury/Property Damage/Wrongful Death Tort	Asbestos (04)	<input type="checkbox"/> A6070 Asbestos Property Damage	2.
		<input type="checkbox"/> A7221 Asbestos - Personal Injury/Wrongful Death	2.
	Product Liability (24)	<input type="checkbox"/> A7260 Product Liability (not asbestos or toxic/environmental)	1., 2., 3., 4., 8.
	Medical Malpractice (45)	<input type="checkbox"/> A7210 Medical Malpractice - Physicians & Surgeons	1., 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 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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Non-Personal Injury/ Property  
Damage/ Wrongful Death Tort

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.	
Employment	<input type="checkbox"/> A6037 Wrongful Termination	1., 2., 3.	
	<input checked="" 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)	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.	

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	<b>A</b> Civil Case Cover Sheet Category No.	<b>B</b> Type of Action (Check only one)	<b>C</b> Applicable Reasons - See Step 3 Above		
Judicial Review	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.		
	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 <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.		
	Miscellaneous Civil Complaints	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.	
		Miscellaneous Civil Petitions	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.

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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.

<b>REASON: Check the appropriate boxes for the numbers shown under Column C for the type of action that you have selected for this case.</b>  <input type="checkbox"/> 1. <input checked="" type="checkbox"/> 2. <input type="checkbox"/> 3. <input checked="" 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: 200 North Main Street
CITY: Los Angeles	STATE: CA	ZIP CODE: 90012

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

Dated: August 6, 2018

(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.

08/07/2018