

**SUMMONS
(CITACION JUDICIAL)**

NOTICE TO DEFENDANT: CHRISTOPHER BROWN, an individual; LOWELL (AVISO AL DEMANDADO): GRISSOM JR., an individual; DOE X, an individual ; and DOES 1 through 25, inclusive

FOR COURT USE ONLY
(SOLO PARA USO DE LA CORTE)

CONFORMED COPY
ORIGINAL FILED
Superior Court of California
County of Los Angeles

MAY 09 2018

Sherri R. Carter, Executive Officer/Clerk
By Nancy Alvarez, Deputy

YOU ARE BEING SUED BY PLAINTIFF: JANE DOE, an individual
(LO ESTÁ DEMANDANDO EL DEMANDANTE):

CONFORM

NOTICE! You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), or by contacting your local court or county bar association. **NOTE:** The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case. **¡AVISO!** Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información a continuación.

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California, (www.sucorte.ca.gov) o poniéndose en contacto con la corte o el colegio de abogados locales. **AVISO:** Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 ó más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desechar el caso.

The name and address of the court is:
(El nombre y dirección de la corte es):
Superior Court of California, County of Los Angeles
111 North Hill Street

CASE NUMBER: **BC 705683**
(Número del Caso):

Los Angeles, California 90012
The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is: Gloria Allred, SBN 65033
(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):
ALLRED MAROKO & GOLDBERG PC
6300 Wilshire Boulevard, Suite 1500, LOS ANGELES, CA 90048

DATE: **MAY 09 2018** Clerk, by **SHERRI R. CARTER** Deputy
(Fecha) **MAY 09 2018** **SHERRI R. CARTER** (Secretario) **NANCY ALVAREZ** (Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)
(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010)).

[SEAL]

- NOTICE TO THE PERSON SERVED:** You are served
- as an individual defendant.
 - as the person sued under the fictitious name of (specify):
 - on behalf of (specify):
under: CCP 416.10 (corporation) CCP 416.60 (minor)
 CCP 416.20 (defunct corporation) CCP 416.70 (conservatee)
 CCP 416.40 (association or partnership) CCP 416.90 (authorized person)
 other (specify):
 - by personal delivery on (date):

CONFORM

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GLORIA ALLRED SBN 65033
NATHAN GOLDBERG SBN 62192
CHRISTINA CHEUNG, SBN 280148
LAW OFFICES
ALLRED, MAROKO & GOLDBERG
SUITE 1500
6300 WILSHIRE BOULEVARD
LOS ANGELES, CALIFORNIA 90048-5217
Telephone No. (323) 653-6530
Fax No. (323) 653-1660

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ORIGINAL FILED
Superior Court of California
County of Los Angeles

MAY 09 2018

Sherri R. Carter, Executive Officer/Clerk
By Nancy Alvarez, Deputy

Attorneys for Plaintiff, JANE DOE

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

JANE DOE, an individual,

Plaintiff,

vs.

CHRISTOPHER BROWN, an individual;
LOWELL GRISSOM JR., an individual;
DOE X, an individual; and DOES 1 through
50, inclusive,

Defendants.

CASE NO:

BC 7 0 5 6 8 3

COMPLAINT FOR DAMAGES

1. SEXUAL BATTERY IN VIOLATION OF CAL. CIV. CODE § 1708.5
2. GENDER VIOLENCE IN VIOLATION OF CAL. CIV. CODE § 52.4
3. RALPHS CIVIL RIGHTS ACT (VIOLATION OF CAL. CIV. CODE § 51.7)
4. BATTERY
5. ASSAULT
6. INTERFERENCE WITH EXERCISE OF CIVIL RIGHTS (CAL. CIV. CODE § 52.1)
7. INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
8. NEGLIGENCE (PREMISE LIABILITY)

JURY TRIAL DEMAND

1 Plaintiff hereby alleges as follows:

2 **GENERAL ALLEGATIONS**

3 1. Plaintiff **JANE DOE** ("Plaintiff" or "Jane Doe"), at all relevant times mentioned
4 herein and currently, resides in the County of Los Angeles, State of California. Doe is suing
5 under a pseudonym in order to protect her privacy.

6 2. Plaintiff is informed and believes, and based thereon alleges that Defendant
7 **CHRISTOPHER BROWN** (hereinafter "Brown") is an individual who at all relevant times
8 mentioned herein and currently, resides in the County of Los Angeles, State of California, and/or
9 who caused injuries and damages to the Plaintiff in the County of Los Angeles, State of
10 California.

11 4. Plaintiff is informed and believes, and based thereon alleges that Defendant
12 **LOWELL GRISSOM JR aka "Young Lo"** (hereinafter "Grissom") is an individual who at all
13 relevant times mentioned herein and currently, resides in the County of Los Angeles, State of
14 California, and/or who caused injuries and damages to the Plaintiff in the County of Los
15 Angeles, State of California.

16 5. Plaintiff is informed and believes, and based thereon alleges, that Grissom is a
17 recording artist who is close friends with Brown and has frequently collaborated with Brown
18 over the years to write and record music.

19 6. Plaintiff is informed and believes, and based thereon alleges that Defendant **DOE**
20 **X**, whose name is presently unknown to Plaintiff, is an individual who at all relevant times
21 mentioned herein and currently, resides in the County of Los Angeles, State of California, and/or
22 who caused injuries and damages to the Plaintiff in the County of Los Angeles, State of
23 California.

24 7. Venue properly lies in this county in that all Defendants reside in this county and
25 that the conduct described herein was committed in this county.

26 8. The true names and capacities, whether individual, corporate, partnership,
27 associate or otherwise, of Defendants sued herein as DOES 1 through 50, inclusive, are currently
28 unknown to Plaintiff, who therefore sues said Defendants by such fictitious names. Plaintiff is

1 informed and believes, and based thereon alleges, that each of the Defendants designated herein
2 as a DOE is legally responsible in some manner for the events and happenings referred to herein,
3 and caused injury and damage proximately thereby to Plaintiff as hereinafter alleged. Plaintiff
4 will seek leave of court to amend this Complaint to show the true names and capacities of the
5 Defendants designated herein as DOES when the same have been ascertained. Whenever in this
6 complaint reference is made to "Defendants," such allegation shall be deemed to mean the acts of
7 Defendants acting individually, jointly, and/or severally.

8 9. Except as hereinafter specifically described, Defendants and each of them, are and
9 were the co-conspirators, aiders, abettors, agents, and/or employees of the other Defendants, and
10 in acting as described herein were acting within the conspiracy or the scope of their authority or
11 employment as agents and/or employees thereof, and with the permission and consent of the
12 other Defendants.

13 10. This case arises out of injuries suffered by Plaintiff after she was lured to Brown's
14 residence and repeatedly sexually assaulted while falsely imprisoned in one of the bedrooms of
15 Brown's house.

16 11. Plaintiff believes and based thereon alleges that Defendants have been successful
17 in using Brown's celebrity status in the past prior to the events alleged herein to lure young
18 women from night clubs to Brown's residence, where they were deprived of their cell phones,
19 prevented from leaving the residence, and supplied with a copious amount of drugs and/or
20 alcohol to reduce their inhibitions all for the purpose of sexual conquests, either voluntary or
21 regardless of the will of the women.

22 12. On or about the night of February 23, 2017 into the early morning hours of
23 February 24, 2017, Plaintiff and her then-roommate attended a concert at a Los Angeles venue
24 called One Oak. Plaintiff's then-roommate met Defendant Grissom there and the two of them
25 exchanged phone numbers. Grissom invited Plaintiff's then-roommate to attend an "after party"
26 later that night at a recording studio.

27 13. Plaintiff's then-roommate requested Plaintiff to accompany her to meet Defendant
28 Grissom and Defendant Brown at the address Grissom had provided, which was a recording

1 studio. Plaintiff agreed to do so.

2 14. When Plaintiff and her then-roommate arrived at the studio, Grissom took away
3 both Plaintiff and her then-roommate's phones before allowing them to enter the studio.
4 Grissom indicated that Brown did not want anyone to have their phones in the studio.

5 15. At the studio, Plaintiff observed the guests drinking alcohol and consuming drugs.
6 Plaintiff, who was not comfortable in the setting, wanted to leave and asked Grissom to return
7 Plaintiff's phone to her. Grissom refused to return Plaintiff's phone and told her that she did not
8 need her phone because the group was moving to Brown's home.

9 16. Grissom continued to refuse to return Plaintiff's phone and that of her then-
10 roommate. Grissom and Brown left the studio and each drove to Brown's home. Plaintiff was
11 forced to go to Brown's home with others because she perceived that she would only be able to
12 retrieve her phone there.

13 17. Once at Brown's house, Brown and Grissom continued to refuse to give Plaintiff
14 back her phone and did not allow Plaintiff to leave. Defendants kept Plaintiff's phone from her
15 for hours. Brown's residence is enclosed by a gate and a fence surrounding the perimeter. It
16 reasonably appeared to Plaintiff that a code was required to open the gate, and that she could not
17 leave unless she obtained it. Plaintiff did not have the code.

18 18. At Brown's house, Brown continued to furnish alcohol and illicit drugs to his
19 guests and/or the guests consumed drugs that they carried onto the premises. Plaintiff believes
20 that the drugs Brown provided to his guests or that were brought by his guests were or included
21 cocaine, "Molly," and marijuana.

22 19. Brown handed each female guest, including Plaintiff, a clear pill filled with white
23 powder and instructed them to take it to have a "good time." Plaintiff reasonably interpreted
24 Brown's instruction to have a "good time" at his house to mean that he expected his female
25 guests to later perform sexual acts with him and others while under the influence of these
26 substances. Plaintiff, who wanted to remain alert and who did not want to perform sexual acts
27 with anyone, did not follow these instructions and declined to consume the pill(s).

28 20. While hardcore "partying" took place elsewhere in Brown's house, Plaintiff sat in

1 a room near the dining area/kitchen, isolating herself from other guests and partiers, hoping that
2 Brown and the other partiers would leave her alone. Plaintiff became scared and intimidated
3 when she saw Brown and Grissom in possession of multiple guns in the house. Plaintiff also felt
4 intimidated by the aggressive behavior of some of Brown's guests and the general atmosphere at
5 Brown's house.

6 21. Meanwhile, Plaintiff's mother, who had lost contact with Plaintiff due to the
7 confiscation of Plaintiff's phone by Defendants, grew increasingly concerned for the Plaintiff's
8 well-being. She used software to track Plaintiff's phone to Brown's home and called the police
9 to go to that location to search for her daughter.

10 22. Plaintiff observed that when the police arrived at Brown's house, Brown refused
11 to open the gate and denied the police access onto his property. Brown also ordered Grissom and
12 others to hide a duffel bag filled with guns. When Plaintiff saw that Brown was defiant to even
13 the police, Plaintiff became even more afraid of Brown and reluctant to protest his actions.

14 23. After the police left the area, Brown continued to supply his guests with drugs and
15 alcohol. Plaintiff observed him carrying one gun in his waistband and brandishing it openly.
16 She saw him wave it in the air, which further frightened and intimidated Plaintiff. Whenever
17 Plaintiff asked Grissom to return her phone, he was evasive and failed to return it to her.

18 24. At some point, Plaintiff is informed and believes, and based thereon alleges, that
19 Defendants Brown, Grissom, and/or Doe X entered into a conspiracy, the primary objects of
20 which were to combine efforts in order to (1) use drugs, alcohol, threats (actual or implied), and
21 the presence of guns to intimidate, coerce, and force unwilling female guests to perform sexual
22 acts for Defendants and others; (2) lure the female guests into one of the bedrooms at Brown's
23 home; (3) falsely imprison female guests unwilling to voluntarily engage in sexual activity in
24 that bedroom by, among other things, continuing to deprive them of their cell phones,
25 barricading the door to the bedroom, and preventing them from leaving the otherwise sealed
26 bedroom; and (4) once the females guests were trapped in the blocked room, coerce, intimidate,
27 and sexually harass the unwilling female guests to commit sexual acts for Defendants and others.
28 The acts and omissions alleged herein were performed in furtherance of that conspiracy or to aid

1 and abet one another in sexually assaulting Plaintiff and others.

2 25. Pursuant to the above alleged conspiracy, Grissom lured Plaintiff's then-
3 roommate upstairs to one of the bedrooms under the guise of allowing her to use her phone.
4 Plaintiff remained downstairs. Grissom returned to the lower level of the house and told Plaintiff
5 that her then-roommate was waiting for her upstairs in one of the bedrooms.

6 26. When Plaintiff went upstairs, she walked into the bedroom where Grissom had
7 left her then-roommate. The bedroom contained four large beds. Plaintiff's then-roommate
8 informed her that Grissom and Brown wanted to be alone with the two of them in order to
9 engage in sexual activity with them. Plaintiff indicated that she did not want to engage in any
10 sexual activity.

11 27. Before Plaintiff could leave the bedroom, Grissom and Brown entered and closed
12 the door behind them. They sat across from Plaintiff. Plaintiff spoke to Brown and Grissom,
13 both of whom appeared to be under the influence of drugs. Plaintiff feared that they were out of
14 control and that they would force themselves upon her in some manner against her will.

15 28. Doe X, who Plaintiff believes is friends with Grissom and Brown and who has
16 toured with them, then entered the same bedroom with several other women. Pursuant to the
17 above conspiracy, Brown ordered Grissom to push a couch in front of the bedroom door to
18 prevent anyone from exiting the otherwise sealed room.

19 29. Doe X then ordered the women in the room to take off their clothes and to "hook
20 up" with Brown and Grissom.

21 30. Pursuant to the above conspiracy, Brown began to play music loudly and he
22 turned on the television in the bedroom to cover up the sounds of any resistance. He also played
23 pornography loudly to create a hyper-sexualized environment in the sealed bedroom. He was
24 visibly excited by the pornography and he and Grissom took off their clothes.

25 31. Some of the women removed their clothes and began to engage in sexual activity
26 with Grissom and Brown.

27 32. As a result of Brown playing pornography loudly on his large-size television,
28 Plaintiff was subjected to repulsive pornographic images and sounds and was also forced to see

1 and hear persons in the room engage in pornographic acts for some time.

2 33. Plaintiff and another woman stated out loud that they did not want to participate
3 and wanted to leave. Plaintiff refused to undress and made it clear that she did not want to
4 engage in any sexual activity with anyone. Plaintiff sat on the corner of a bed away from the
5 other guests who were participating in the sexual activity and she fervently hoped that she would
6 be left alone.

7 34. Doe X found Plaintiff and demanded that she perform sexual acts on Grissom.
8 When Plaintiff stated that she did not want to do so, Doe X violently grabbed Plaintiff by the
9 throat and forced Plaintiff to perform oral sex on Grissom.

10 35. Thereafter, Doe X, who was naked, pushed Plaintiff down on to one of the beds in
11 the room, and literally sat on top of Plaintiff's face, using her legs to pin Plaintiff down while
12 forcing Plaintiff to perform oral sex on her. To compound Plaintiff's horror, Doe X was
13 menstruating at the time. While Doe X was forcing Plaintiff to perform oral sex on her, Grissom
14 molested the lower half of Plaintiff's body using his mouth and hands. Thus, Plaintiff found
15 herself being sexually battered by two people at the same time.

16 36. Doe X finally released Plaintiff. Plaintiff was in a state of shock and horror. Doe
17 X again demanded that Plaintiff engage in sexual intercourse with Grissom. Plaintiff continued
18 to refuse.

19 37. Pursuant to the above conspiracy, Doe X decided to isolate Plaintiff from the rest
20 of the guests. Doe X instructed Grissom to move the couch so that she could move the Plaintiff
21 to another room. Grissom obliged. Doe X led Plaintiff to another bedroom and told her to take a
22 shower in that room. Plaintiff looked in the mirror and was horrified to see that she was covered
23 in Doe X's blood because Doe X had been menstruating.

24 38. When Plaintiff realized that Doe X had menstruated on her face, Plaintiff decided
25 that for health reasons, she needed to wash herself immediately. Grissom entered the bathroom
26 while Plaintiff was in the shower, and began to molest her. Plaintiff fled the bathroom, but
27 Grissom pursued her, and pushed her down onto the bed and raped her.

28 39. Plaintiff, still horrified, demanded that Grissom return her phone to her. He told

1 her that if he returned the phone, she could only use it in the “laundry room.” The “laundry
2 room” was in a remote area of the house downstairs away from the other guests. Plaintiff
3 thought she would be safe there because Grissom had already attacked her. Plaintiff followed
4 Grissom to the “laundry room” and he returned her phone to her there. Plaintiff used her phone
5 to call a rideshare company to pick her up from Brown’s home.

6 40. While Plaintiff was waiting for the rideshare she requested, Grissom held Plaintiff
7 down against the washing machine and forcibly raped her again. After Grissom was done, he
8 opened the gate and finally released Plaintiff from Brown’s home.

9 41. Plaintiff went to a rape treatment center and to the police where she reported the
10 aforementioned events.

11 42. As a direct and proximate result of Defendants’ unlawful conduct as alleged
12 hereinabove, Plaintiff has suffered physical injury, severe emotional distress, humiliation,
13 embarrassment, mental and emotional distress and anxiety, and economic harm, all in an amount
14 exceeding the jurisdictional minimum of the Superior Court according to proof at trial.

15 43. The aforementioned conduct by Defendants was willful, wanton, and malicious.
16 At all relevant times, each Defendant acted with conscious disregard of the Plaintiff’s rights and
17 feelings. Each Defendant also acted with the knowledge of or with reckless disregard for the fact
18 that his or her conduct was certain to cause injury and/or humiliation to the Plaintiff. Plaintiff is
19 further informed and believes that Defendants intended to cause fear, physical injury and/or pain
20 and suffering to the Plaintiff. By virtue of the foregoing, the Plaintiff is entitled to recover
21 punitive and exemplary damages from Defendants according to proof.

22 FIRST CAUSE OF ACTION

23 **(Sexual Battery in Violation of Cal. Civ. Code § 1708.5 Against all Defendants)**

24 44. Plaintiff repeats and realleges by reference each and every allegation contained
25 hereinabove and incorporates the same herein as though fully set forth herein.

26 45. Cal. Civ. Code Section 1708.5(a) provides: A person commits a sexual battery
27 who does any of the following: (1) acts with the intent to cause a harmful or offensive contact
28 with an intimate part of another, and a sexually offensive contact with that person directly or

1 indirectly results. (2) Acts with the intent to cause a harmful or offensive contact with another by
2 use of his or her intimate part, and a sexually offensive contact with that person directly or
3 indirectly results. (3) Acts to cause an imminent apprehension of the conduct described in
4 paragraph (1) or (2), and a sexually offensive contact with that person directly or indirectly
5 results.

6 46. Cal. Civ. Code Section 1708.5(d) defines “intimate part” as the sexual organ,
7 anus, groin, or buttocks of any person, or the breast of a female.

8 47. Cal. Civ. Code Section 1708.5(f) defines “offensive contact” to mean contact that
9 offends a reasonable sense of personal dignity.

10 48. Each Defendant conspired and/or aided and abetted the other to hold Plaintiff at
11 Brown’s residence against her will by, amongst many things, depriving her of her phone,
12 attempting to supply her with alcohol and drugs in an attempt to lower her inhibitions, displaying
13 guns to intimidate her from protesting, demanding that she perform sexual acts, and restraining
14 Plaintiff, all in furtherance of sexually battering and sexually assaulting her at Brown’s
15 residence.

16 49. Plaintiff alleges that pursuant to the above conspiracy, Defendant Grissom and
17 Doe X each committed acts of civil sexual battery in violation of Cal. Civ. Code Section 1708.5,
18 when on or about February 24, 2017, Defendant Grissom and Doe X each willfully, maliciously,
19 intentionally, and without the consent of Plaintiff subjected her to the forceful, harmful and/or
20 offensive touching of Plaintiff’s breasts, buttocks, and/or vagina, including viciously raping her
21 by way of vaginal penetration and forcing her to perform oral sex against her will, without her
22 consent, and in spite of her express objection.

23 50. As a direct and/or proximate result of Defendants’ unlawful conduct as alleged
24 hereinabove, Plaintiff has suffered physical injury, severe emotional distress, humiliation,
25 embarrassment, mental and emotional distress and anxiety, all in an amount exceeding the
26 jurisdictional minimum of the Superior Court according to proof at trial.

27 51. As a direct and proximate result of Defendants’ unlawful conduct as alleged
28 hereinabove, Plaintiff has suffered economic harm, loss of earnings, and other damages, all in an

1 amount that exceeds the jurisdictional minimum of the Superior Court, according to proof at
2 trial.

3 52. The aforementioned conduct by Defendants was willful, wanton, and malicious.
4 At all relevant times, Defendants acted with conscious disregard of the Plaintiff's rights and
5 feelings. Defendants also acted with the knowledge of or with reckless disregard for the fact that
6 their conduct was certain to cause injury and/or humiliation to the Plaintiff. Plaintiff is further
7 informed and believes that Defendants intended to cause fear, physical injury and/or pain and
8 suffering to the Plaintiff. By virtue of the foregoing, the Plaintiff is entitled to recover punitive
9 and exemplary damages from Defendants according to proof at trial.

10 **SECOND CAUSE OF ACTION**

11 **(Gender Violence in Violation of Cal. Civ. Code § 52.4 Against All Defendants)**

12 53. Plaintiff repeats and realleges by reference each and every allegation contained
13 hereinabove and incorporates the same herein as though fully set forth herein.

14 54. Cal. Civ. Code Section 52.4(c) defines "gender violence" as: (1) one or more acts
15 that would constitute a criminal offense under state law that has as an element the use, attempted
16 use, or threatened use of physical force against the person or property of another, committed at
17 least in part based on the gender of the victim, whether or not those acts have resulted in criminal
18 complaints, charges, prosecution, or conviction. (2) A physical intrusion or physical invasion of
19 a sexual nature under coercive conditions, whether or not those acts have resulted in criminal
20 charges, complaints, charges, prosecution, or conviction.

21 55. As alleged hereinabove, on or about February 24, 2017, each Defendant acted to
22 aid, abet, and/or conspire with the other to violate Cal. Civ. Code Section 52.4. The Defendants
23 committed acts of gender violence upon the Plaintiff through the use, attempted use, or
24 threatened use of physical force against her person, committed at least in part based on Plaintiff's
25 gender.

26 56. As alleged hereinabove, on or about February 24, 2017, each Defendant acted to
27 aid, abet, and/or conspire with the other to violate Cal. Civ. Code Section 52.4 so that he or she
28 engaged in a physical intrusion or physical invasion of a sexual nature under coercive conditions.

1 64. As alleged hereinabove, each Defendant subjected Plaintiff to violence, and/or
2 intimidation by threats of violence, against her person on account of her sex and/or acted to aid,
3 incite and/or conspire with the other Defendant(s) to deny Plaintiff her right to be free from any
4 violence, or intimidation by threat of violence, committed against her person on the account of
5 her sex.

6 65. In doing so, each Defendant violated the civil rights of Plaintiff, as set forth in the
7 Ralph Civil Rights Act, which is codified in Cal. Civ. Code Section 51.7.

8 66. As a direct and proximate result of Defendants' unlawful conduct as alleged
9 hereinabove, Plaintiff has suffered physical injury, severe emotional distress, humiliation,
10 embarrassment, mental and emotional distress and anxiety, all in an amount exceeding the
11 jurisdictional minimum of the Superior Court according to proof at trial.

12 67. As a direct and proximate result of Defendants' unlawful conduct as alleged
13 hereinabove, Plaintiff has suffered economic harm and other consequential damages, all in an
14 amount according to proof at trial.

15 68. The aforementioned conduct by Defendants were willful, wanton, and malicious.
16 At all relevant times, each Defendant acted with conscious disregard of Plaintiff's rights and
17 feelings. Each Defendant also acted with the knowledge of or with reckless disregard for the fact
18 that his or her conduct was certain to cause injury and/or humiliation to the Plaintiff. Plaintiff is
19 further informed and believes that each Defendant intended to cause fear, physical injury and/or
20 pain and suffering to the Plaintiff. By virtue of the foregoing, the Plaintiff is entitled to recover
21 punitive and exemplary damages from Defendants according to proof at trial.

22 69. In addition to and/or in lieu of Plaintiff's election, Plaintiff is entitled to receive
23 and hereby seeks statutory damages pursuant to Cal. Civ. Code § 52(b), including actual and
24 exemplary damages.

25 70. Pursuant to Cal. Civ. Code § 52(b)(3), Plaintiff has incurred, and will continue to
26 incur, attorneys' fees in the prosecution of this action and therefore demands such reasonable
27 attorneys' fees and costs as set by the Court.

28

1 **FOURTH CAUSE OF ACTION**

2 **(For Battery Against All Defendants)**

3 71. Plaintiff repeats and realleges by reference each and every allegation contained
4 hereinabove and incorporates the same herein as though fully set forth herein.

5 72. As alleged hereinabove, each Defendant aided, abetted and/or conspired to
6 sexually batter Plaintiff. In performing the acts described herein, Defendants acted with the
7 intent to make a harmful and offensive contact with Plaintiff's person.

8 73. Pursuant to the above conspiracy and/or Defendant Brown acting to aid and abet
9 the other Defendants, Defendants Grissom and Doe X did, in fact, bring themselves into
10 offensive and unwelcome contact with Plaintiff as described hereinabove.

11 74. At all relevant times, Plaintiff found the contact by Defendant Grissom and Doe X
12 to be offensive to her person and dignity. At no time did Plaintiff consent to any of the acts by
13 Grissom or Doe X alleged hereinabove.

14 75. As a result of Defendants' acts as hereinabove alleged, Plaintiff was physically
15 harmed and/or experienced offensive contact with her person.

16 76. As a direct and proximate result of Defendants' unlawful conduct as alleged
17 hereinabove, Plaintiff has suffered physical injury, severe emotional distress, humiliation,
18 embarrassment, mental and emotional distress and anxiety, economic harm and other
19 consequential damages, all in an amount exceeding the jurisdictional minimum of the Superior
20 Court according to proof at trial.

21 77. The aforementioned conduct by Defendants was willful, wanton, and malicious.
22 At all relevant times, Defendants acted with conscious disregard of the Plaintiff's rights and
23 feelings. Defendants also acted with the knowledge of or with reckless disregard for the fact that
24 their conduct was certain to cause injury and/or humiliation to the Plaintiff. Plaintiff is further
25 informed and believes that Defendants intended to cause fear, physical injury and/or pain and
26 suffering to the Plaintiff. By virtue of the foregoing, the Plaintiff is entitled to recover punitive
27 and exemplary damages from Defendants according to proof at trial.

28 ///

1 FIFTH CAUSE OF ACTION

2 (Assault Against All Defendants)

3 78. Plaintiff repeats and realleges by reference each and every allegation contained
4 hereinabove and incorporates the same herein as though fully set forth herein.

5 79. As alleged hereinabove, each Defendant conspired and/or aided and abetted the
6 other to assault Plaintiff. Specifically, by forcing Plaintiff to remain at Defendant Brown's
7 residence, denying her access to her phone, falsely imprisoning her in one of the bedrooms,
8 demanding she engage in sexual activity with Defendants, and displaying guns to intimidate her,
9 Defendants intended to cause Plaintiff apprehension of an imminent harmful and offensive
10 contact with her person.

11 80. As a result of Defendants' acts, Plaintiff was in fact, placed in great apprehension
12 of imminent harmful and offensive contact with her person.

13 81. In performing the acts alleged hereinabove, Defendants acted with the intent of
14 making contact with Plaintiff's person.

15 82. At no time did Plaintiff consent to any of the acts by Defendants as alleged
16 hereinabove.

17 83. Defendants' conduct as described above, caused Plaintiff to be apprehensive that
18 Defendants would subject her to further intentional invasions of her right to be free from
19 offensive and harmful contact and demonstrated that at all times material herein, Defendants had
20 a present ability to subject her to an intentional offensive and harmful touching.

21 84. As a direct and proximate result of Defendants' unlawful conduct as alleged
22 hereinabove, Plaintiff has suffered physical injury, severe emotional distress, humiliation,
23 embarrassment, mental and emotional distress and anxiety, and economic harm, all in an amount
24 exceeding the jurisdictional minimum of the Superior Court according to proof at trial.

25 85. The aforementioned conduct by Defendants was willful, wanton, and malicious.
26 At all relevant times, Defendants acted with conscious disregard of the Plaintiff's rights and
27 feelings. Defendants also acted with the knowledge of or with reckless disregard for the fact that
28 their conduct was certain to cause injury and/or humiliation to the Plaintiff. Plaintiff is further

1 informed and believes that Defendants intended to cause fear, physical injury and/or pain and
2 suffering to the Plaintiff. By virtue of the foregoing, Plaintiff is entitled to recover punitive and
3 exemplary damages from Defendants according to proof at trial.

4 **SIXTH CAUSE OF ACTION**

5 **(Interference with Exercise of Civil Rights--Violation of**
6 **Cal. Civ. Code § 52.1 Against All Defendants)**

7 86. Plaintiff repeats and realleges by reference each and every allegation contained
8 hereinabove and incorporates the same herein as though fully set forth herein.

9 87. Civ. Code § 52.1, the Bane Act, provides that it is unlawful to interfere with the
10 exercise or enjoyment of any rights under the Constitution and laws of this state and the United
11 states by use or attempted use of threats, intimidation or coercion.

12 88. Cal. Civ. Code §§ 51.7 and 52.4 guarantee the rights to persons in California to be
13 free from assault, battery, and/or violence or threats of violence based on his or her sex.

14 89. Cal. Civ. Code § 43 guarantees the right of every person the right of protection
15 from bodily restraint or harm and personal insult.

16 90. As alleged hereinabove, Defendants intentionally interfered with or attempted to
17 interfere with Plaintiff's clearly established rights guaranteed under United States and California
18 laws, including but not limited to Plaintiff's right of protection from battery, assault, false
19 imprisonment, gender violence, and rape by threats, intimidation, and coercion.

20 91. Defendants conspired, aided or incited each other to threaten, intimidate and
21 coerce Plaintiff by, among many things, holding Plaintiff at Brown's residence against her will,
22 depriving her of her phone, attempting to supply her with alcohol and drugs in an attempt to
23 lower her inhibitions, displaying guns to intimidate her from protesting, demanding that she
24 perform sexual acts, and restraining Plaintiff, all in furtherance of repeatedly sexually battering
25 and sexually assaulting her at Brown's residence.

26 92. As a direct and proximate result of Defendants' unlawful conduct as alleged
27 hereinabove, Plaintiff has suffered physical injury, severe emotional distress, humiliation,
28 embarrassment, mental and emotional distress and anxiety, all in an amount exceeding the

1 jurisdictional minimum of the Superior Court according to proof at trial.

2 93. As a direct and proximate result of Defendants' unlawful conduct as alleged
3 hereinabove, Plaintiff has suffered economic harm and other consequential damages, all in an
4 amount according to proof at trial.

5 94. The aforementioned conduct by Defendants were willful, wanton, and malicious.
6 At all relevant times, each Defendant acted with conscious disregard of Plaintiff's rights and
7 feelings. Each Defendant also acted with the knowledge of or with reckless disregard for the fact
8 that his or her conduct was certain to cause injury and/or humiliation to the Plaintiff. Plaintiff is
9 further informed and believes that each Defendant intended to cause fear, physical injury and/or
10 pain and suffering to the Plaintiff. By virtue of the foregoing, the Plaintiff is entitled to recover
11 punitive and exemplary damages from Defendants according to proof at trial.

12 95. In addition to and/or in lieu of Plaintiff's election, Plaintiff is entitled to receive
13 and hereby seeks statutory damages pursuant to Cal. Civ. Code § 52(b), including actual and
14 exemplary damages.

15 96. Pursuant to Cal. Civ. Code § 52(b)(3), Plaintiff has incurred, and will continue to
16 incur, attorneys' fees in the prosecution of this action and therefore demands such reasonable
17 attorneys' fees and costs as set by the Court.

18 **SEVENTH CAUSE OF ACTION**

19 **(Intentional Infliction of Emotional Distress against all Defendants)**

20 97. Plaintiff repeats and realleges by reference each and every allegation contained
21 hereinabove and incorporates the same herein as though fully set forth herein.

22 98. Defendants knew or should have known that Plaintiff did not want to engage in
23 any sexual activity with them. Each Defendant conspired and/or aided and abetted the other to
24 hold her at Brown's residence against her will by, amongst many things, depriving her of her
25 phone, supplying her with alcohol and drugs in an attempt to lower her inhibitions, displaying
26 guns to intimidate her from protesting, barricading her in a room with Defendants, in order to
27 sexually batter and sexually assault her prior to permitting her to leave Brown's residence.

28 99. Defendants' knowing disregard for the safety of Plaintiff and deliberate failure to

1 monitor or control their behavior caused Plaintiff to be repeatedly sexually battered and
2 assaulted.

3 100. Defendants' conduct was extreme and outrageous. Defendants acted with
4 reckless disregard for Plaintiff's rights and feelings, and with deliberate indifference to the
5 certainty that Plaintiff would suffer emotional distress.

6 101. As a direct and proximate result of Defendants' actions, Plaintiff has suffered and
7 will continue to suffer severe mental anguish, humiliation, pain, severe emotional distress and
8 physical distress. The general and special damages suffered by Plaintiff as a proximate result of
9 the wrongful actions of the Defendants exceed the jurisdictional minimum of the Superior Court.

10 102. Plaintiff is informed and believes, and based upon such information and belief
11 alleges, that the outrageous conduct of the Defendants described above was performed with
12 conscious disregard for her rights and feelings. As a result, Plaintiff is entitled to punitive or
13 exemplary damages from all defendants in a sum according to proof at trial.

14 EIGHTH CAUSE OF ACTION

15 **(For Premises Liability (Negligence) against Defendant Brown and DOES 1-50)**

16 103. Plaintiff repeats and realleges by reference each and every allegation contained
17 hereinabove and incorporates the same herein as though fully set forth herein.

18 104. In the alternative, Plaintiff alleges that Defendant Brown was negligent in the use
19 and/or maintenance of the property as alleged hereinabove.

20 105. Defendant Brown owned or controlled the property on which Plaintiff was
21 harmed. As the owner or occupier of the property, Brown was under a duty to manage and act
22 reasonably to control his property and guests to prevent injury from, among other things,
23 foreseeable sexual assault by Doe X and Grissom.

24 106. Based on information and belief, Plaintiff alleges that Defendant Brown has a
25 history of hosting events and/or parties that erupted in violence, gun play, and rampant sexual
26 activity. Defendant Brown was aware or should have been aware of the risk of sexual assault
27 and/or battery to his guests which arose out of Grissom, Doe X or others associated with Brown
28 or his friends providing or tolerating illegal substances, alcohol, and guns or previously allowing

1 Doe X and Grissom to sexually harass the female guests in his home.

2 107. Defendant Brown also created the risk that Grissom and Doe X would sexually
3 assault Plaintiff and others by creating an alcohol-and-drug-fueled sexualized environment in his
4 home, allowing Grissom and Doe X to impede the ability of Plaintiff and other guests from
5 leaving the house, displaying guns to intimidate Plaintiff and other guests, barricading the female
6 guests in a bedroom, playing loud music to drown out the sound of any resistance, and allowing
7 Grissom and Doe X to sexually harass Plaintiff and others and allowing Grissom and Doe X to
8 engage in open acts of sexual assault, sexual harassment or sexual activity in his presence.

9 108. By virtue of the information Brown knew or should have known as alleged herein,
10 Defendant owed Plaintiff a duty to prevent sexual assault and the kinds of injuries she sustained.

11 109. Defendant breached this duty of care by way of his own conduct as alleged
12 herein. Defendant failed to take reasonable steps to protect Plaintiff. Among other things,
13 Defendant failed to exclude guests who behaved inappropriately, to return Plaintiff's phone so
14 that she could leave the premises, to control Doe X and Grissom's aggressive behavior, to
15 prevent the blocking of the bedroom door, or to provide security, thereby breaching his duty to
16 ensure the safety of guests on the premises such as Plaintiff, who was repeatedly sexually
17 assaulted by Defendant Grissom and Doe X as a result of Brown's breach of duty.

18 110. As a direct and proximate result of Defendant's illegal conduct, Plaintiff has
19 suffered emotional distress, humiliation, and embarrassment, economic harm, all in amount
20 exceeding the jurisdictional minimum of the Superior Court according to proof at trial.

21 **WHEREFORE**, Plaintiff prays judgment be entered in her favor against Defendants, and
22 each of them, as follows:

23 **AS TO THE FIRST CAUSE OF ACTION:**

- 24 1. For general and special damages according to proof;
- 25 2. For punitive and exemplary damages according to proof;
- 26 3. For costs of suit incurred in this action;
- 27 4. For such other and further relief as the Court may deem just and proper.

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AS TO THE SECOND CAUSE OF ACTION:

- 1. For general and special damages according to proof;
- 2. For punitive and exemplary damages according to proof;
- 3. For attorneys' fees and costs of suit incurred in this action;
- 4. For injunctive relief;
- 5. For such other and further relief as the Court may deem just and proper.

AS TO THE THIRD CAUSE OF ACTION:

- 1. For general and special damages according to proof;
- 2. For punitive and exemplary damages according to proof;
- 3. For attorneys' fees and costs of suit incurred in this action;
- 4. For additional statutory civil penalty in the sum of \$25,000 pursuant to Civ. Code Section 52(b);
- 5. For injunctive relief;
- 6. For such other and further relief as the Court may deem just and proper.

AS TO THE FOURTH CAUSE OF ACTION:

- 1. For general and special damages according to proof;
- 2. For punitive and exemplary damages according to proof;
- 3. For costs of suit incurred in this action;
- 4. For such other and further relief as the Court may deem just and proper.

AS TO THE FIFTH CAUSE OF ACTION:

- 1. For general and special damages according to proof;
- 2. For punitive and exemplary damages according to proof;
- 3. For costs of suit incurred in this action;
- 4. For such other and further relief as the Court may deem just and proper.

AS TO THE SIXTH CAUSE OF ACTION:

- 1. For general and special damages according to proof;
- 2. For punitive and exemplary damages according to proof;
- 3. For attorneys' fees and costs of suit incurred in this action;

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- 4. For additional statutory civil penalty in the sum of \$25,000 pursuant to Civ. Code Section 52.1(b);
- 5. For injunctive relief;
- 6. For such other and further relief as the Court may deem just and proper.

AS TO THE SEVENTH CAUSE OF ACTION:

- 1. For general and special damages according to proof;
- 2. For punitive and exemplary damages according to proof;
- 3. For costs of suit incurred in this action;
- 4. For such other and further relief as the Court may deem just and proper.

AS TO THE EIGHTH CAUSE OF ACTION:


- 1. For general and special damages according to proof;
- 2. For costs of suit incurred in this action;
- 3. For such other and further relief as the Court may deem just and proper.

JURY TRIAL DEMANDED

Plaintiff JANE DOE demands trial of all issues by jury.

DATED: May 9, 2018

ALLRED, MAROKO & GOLDBERG

By: 
 GLORIA ALLRED
 NATHAN GOLDBERG
 CHRISTINA CHEUNG
 Attorneys for Plaintiff,
JANE DOE

CONFORM

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):
Gloria Allred, SBN: 65033 Nathan Goldberg, SBN: 62192
ALLRED MAROKO & GOLDBERG PC
6300 Wilshire Boulevard, Suite 1500, LOS ANGELES, CA 90048
TELEPHONE NO.: 323-653-6530 FAX NO.: 323-653-1660
ATTORNEY FOR (Name): Jane Doe

FOR COURT USE ONLY

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ORIGINAL FILED
Superior Court of California
County of Los Angeles

MAY 09 2018

Sherri R. Carter, Executive Officer/Clerk
By Nancy Alvarez, Deputy

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES
STREET ADDRESS: 111 North Hill Street
MAILING ADDRESS: 111 North Hill Street
CITY AND ZIP CODE: Los Angeles, 90012
BRANCH NAME: Stanley Mosk Courthouse on Hill St.

CASE NAME: Jane Doe v. Christopher Brown, Lowell Grissom Jr., and Doe X

CIVIL CASE COVER SHEET
 Unlimited (Amount demanded exceeds \$25,000)
 Limited (Amount demanded is \$25,000 or less)

Complex Case Designation
 Counter **Joinder**
Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)

CASE NUMBER:

JUDGE: **BC 7 0 5 6 8 3**
DEPT:

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

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

Auto Tort <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46)	Contract <input type="checkbox"/> Breach of contract/warranty (06) <input type="checkbox"/> Rule 3.740 collections (09) <input type="checkbox"/> Other collections (09) <input type="checkbox"/> Insurance coverage (18) <input type="checkbox"/> Other contract (37)	Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403) <input type="checkbox"/> Antitrust/Trade regulation (03) <input type="checkbox"/> Construction defect (10) <input type="checkbox"/> Mass tort (40) <input type="checkbox"/> Securities litigation (28) <input type="checkbox"/> Environmental/Toxic tort (30) <input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41)
Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort <input type="checkbox"/> Asbestos (04) <input type="checkbox"/> Product liability (24) <input type="checkbox"/> Medical malpractice (45) <input type="checkbox"/> Other PI/PD/WD (23)	Real Property <input type="checkbox"/> Eminent domain/Inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (26)	Enforcement of Judgment <input type="checkbox"/> Enforcement of judgment (20)
Non-PI/PD/WD (Other) Tort <input type="checkbox"/> Business tort/unfair business practice (07) <input checked="" type="checkbox"/> Civil rights (08) <input type="checkbox"/> Defamation (13) <input type="checkbox"/> Fraud (16) <input type="checkbox"/> Intellectual property (19) <input type="checkbox"/> Professional negligence (25) <input type="checkbox"/> Other non-PI/PD/WD tort (35)	Unlawful Detainer <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38)	Miscellaneous Civil Complaint <input type="checkbox"/> RICO (27) <input type="checkbox"/> Other complaint (not specified above) (42)
Employment <input type="checkbox"/> Wrongful termination (36) <input type="checkbox"/> Other employment (15)	Judicial Review <input type="checkbox"/> Asset forfeiture (05) <input type="checkbox"/> Petition re: arbitration award (11) <input type="checkbox"/> Writ of mandate (02) <input type="checkbox"/> Other judicial review (39)	Miscellaneous Civil Petition <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> Other petition (not specified above) (43)

2. This case is is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:
- | | |
|--|--|
| a. <input type="checkbox"/> Large number of separately represented parties | d. <input type="checkbox"/> Large number of witnesses |
| b. <input type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve | e. <input type="checkbox"/> Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court |
| c. <input type="checkbox"/> Substantial amount of documentary evidence | f. <input type="checkbox"/> Substantial postjudgment judicial supervision |
3. Remedies sought (check all that apply): a. monetary b. nonmonetary; declaratory or injunctive relief c. punitive
4. Number of causes of action (specify):
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: May 9, 2018
Gloria Allred, 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.

**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.

CONFORM

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

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	1, 11
	<input type="checkbox"/> A7221 Asbestos - Personal Injury/Wrongful Death	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	1, 4, 11
	<input type="checkbox"/> A7240 Other Professional Health Care Malpractice	1, 4, 11
Other Personal Injury Property Damage Wrongful Death (23)	<input type="checkbox"/> A7250 Premises Liability (e.g., slip and fall)	1, 4, 11
	<input type="checkbox"/> A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.)	1, 4, 11
	<input type="checkbox"/> A7270 Intentional Infliction of Emotional Distress	1, 4, 11
	<input type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death	1, 4, 11

	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Non-Personal Injury/ Property Damage/Wrongful Death Tort	Business Tort (07)	<input type="checkbox"/> A6029 Other Commercial/Business Tort (not fraud/breach of contract)	1, 2, 3
	Civil Rights (08)	<input checked="" 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	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	1, 2, 3
		<input type="checkbox"/> A6109 Labor Commissioner Appeals	10
Contract	Breach of Contract/ Warranty (06) (not insurance)	<input type="checkbox"/> A6004 Breach of Rental/Lease Contract (not unlawful detainer or wrongful eviction)	2, 5
		<input type="checkbox"/> A6008 Contract/Warranty Breach -Seller Plaintiff (no fraud/negligence)	2, 5
		<input type="checkbox"/> A6019 Negligent Breach of Contract/Warranty (no fraud)	1, 2, 5
		<input type="checkbox"/> A6028 Other Breach of Contract/Warranty (not fraud or negligence)	1, 2, 5
	Collections (09)	<input type="checkbox"/> A6002 Collections Case-Seller Plaintiff	5, 6, 11
		<input type="checkbox"/> A6012 Other Promissory Note/Collections Case	5, 11
<input type="checkbox"/> A6034 Collections Case-Purchased Debt (Charged Off Consumer Debt Purchased on or after January 1, 2014)		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	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, 9	
Real Property	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
	Other Real Property (26)	<input type="checkbox"/> A6018 Mortgage Foreclosure	2, 6
		<input type="checkbox"/> A6032 Quiet Title	2, 6
	<input type="checkbox"/> A6060 Other Real Property (not eminent domain, landlord/tenant, foreclosure)	2, 6	
Unlawful Detainer	Unlawful Detainer-Commercial (31)	<input type="checkbox"/> A6021 Unlawful Detainer-Commercial (not drugs or wrongful eviction)	6, 11
	Unlawful Detainer-Residential (32)	<input type="checkbox"/> A6020 Unlawful Detainer-Residential (not drugs or wrongful eviction)	6, 11
	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

	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		

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 checked="" type="checkbox"/> 3. <input type="checkbox"/> 4. <input type="checkbox"/> 5. <input type="checkbox"/> 6. <input type="checkbox"/> 7. <input type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10. <input type="checkbox"/> 11.		ADDRESS: 19600-19698 Citrus Ridge Drive	
CITY: Tarzana	STATE: CA	ZIP CODE: 91356	

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: May 9, 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. 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.