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FILED
 LOS ANGELES SUPERIOR COURT

JUL 01 2008

JOHN A. CLARKE, CLERK
 BY D.M. SWAIN, DEPUTY

Case assigned to Judge Roloff McMan

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
 FOR THE COUNTY OF LOS ANGELES**

BC 393642

11 ROLAND CANO, an Individual,
 12 Plaintiff,
 13 vs.
 14 Defendant USA NETWORKS, a Corporation;
 15 Defendant NBC UNIVERSAL, a Corporation;
 16 Defendant STEPHEN GLOVER, a.k.a.
 17 "Steve-O", an Individual; and Defendant
 18 REGGIE PACE, an Individual; and DOES 1
 19 through 100, inclusive
 20 Defendants.

COMPLAINT FOR DAMAGES:
 1. ASSAULT & BATTERY;
 2. NEGLIGENCE;
 3. NEGLIGENT HIRING AND
 RETENTION;
 4. NEGLIGENT INFLICTION
 OF EMOTIONAL
 DISTRESS;
 5. INTENTIONAL
 INFLICTION OF
 EMOTIONAL DISTRESS.

DEMAND FOR JURY TRIAL

COMES NOW Plaintiff ROLAND CANO, for causes of action against
 Defendant USA NETWORKS, Defendant NBC UNIVERSAL, Defendant STEPHEN
 GLOVER (a.k.a. "Steve-O"), Defendant REGGIE PACE (a.k.a. "Big Regg"), and DOES
 1 through 100, inclusive, as follows:

CIT/CASE: 20080642 LFN/BEF:
 RECEIPT #: 0011070000
 DATE PAID: 07/01/08 03:45:09 PM
 PAYMENT: 320.00
 RECEIVED: 07/01/08 10:10
 CHECKS: 320.00
 CASH: 0.00
 CHANGE: 0.00
 CASH ON HAND: 0.00

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GENERAL ALLEGATIONS

General Allegations about Venue

1. The conduct giving rise to this lawsuit occurred Kitson Boutique ("Kitson") located at 115 S. Robertson Blvd, in Los Angeles, California 90048, and within the judicial district of the Superior Court of California for the County of Los Angeles.

General Allegations about the Parties

2. Plaintiff ROLAND CANO ("Plaintiff CANO" or "Plaintiff") is a male person residing within the City of Whittier, County of Los Angeles and State of California.

3. Plaintiff is informed, believes, and alleges, that Defendant USA NETWORKS ("Defendant USA") is now, and at all times mentioned, was an entity of an unknown form organized under the laws of the State of California, and doing business at 12400 Ventura Blvd, in Studio City, within the County of Los Angeles, and State of California.

4. Plaintiff is informed, believes, and alleges, that Defendant NBC UNIVERSAL, INC. ("Defendant NBC") is now, and at all times mentioned, was a corporation organized under the laws of the State of California, and doing business at 12400 Ventura Blvd, in Studio City, within the County of Los Angeles, and State of California.

5. Defendant Stephen Glover, a.k.a "Steve-O" or "Dr. Steve-O" ("Defendant STEVE-O") is an adult male and a resident of the State of California. At all times mentioned Defendant STEVE-O was employed as an on-air personality on the show "Dr. Steve-O" for Defendant USA NETWORKS, Defendant NBC UNIVERSAL, and/or DOE Defendants 1 through 100, inclusive, and each of them.

6. Defendant Reggie "Big Regg" Pace ("Defendant BIG REGG") is an adult male and a resident of the State of California. At all times mentioned Defendant BIG REGG was employed as security personnel for Defendant STEVE-O, Defendant USA

1 NETWORKS, Defendant NBC UNIVERSAL, and/or DOE Defendants 1 through 100,
2 inclusive, and each of them.

3 7. Plaintiff is informed, believes, and alleges, that at all times mentioned,
4 Defendant NBC is the parent company of Defendant USA.

5 8. Plaintiff is informed, believes, and alleges, that at all times mentioned,,
6 Defendant NBC, Defendant USA, and DOE Defendants 1 through 100, inclusive, and
7 each of them, were the alter egos of one another, and that such relationship as alleged
8 evidences a unity of interest. Plaintiff alleges that Defendant NBC, Defendant USA, and
9 DOE Defendants 1 through 100, inclusive, and each of them, pursued a single enterprise,
10 used common directors, officers, supervisors and employees, used common facilities
11 (including one central principal place of business), controlled the day-to-day operations
12 of one another, and lacked any independent business. Plaintiff alleges that all parties
13 would be exposed to a substantial risk of multiple liability or otherwise inconsistent
14 obligations if non-joinder of all named parties results. Plaintiff further alleges that the
15 adherence to the fiction of the separate existence of Defendant NBC, Defendant USA,
16 and DOE Defendants 1 through 100, inclusive, and each of them, would permit abuse of
17 the corporate privilege and would sanction fraud, all for the purpose of avoiding and
18 preventing attachment and execution by creditors.

19 9. Plaintiff is informed, believes, and alleges, that each of the defendants
20 designated as a DOE is consciously, willfully, intentionally, knowingly, recklessly,
21 negligently, and/or is otherwise tortiously or legally responsible in some manner for the
22 events and happenings referred to and consciously, willfully, intentionally, knowingly,
23 recklessly, negligently and/or otherwise tortiously caused the injuries and damages
24 proximately thereby to Plaintiffs, and each of them, as hereinafter alleged, either through
25 each said defendant's own conduct, or through the conduct of each of their agents,
26 servants or employees. Plaintiff is informed, believes, and alleges, that each of these
27 fictitiously named Defendants is responsible in some manner for the acts, omissions
28 and/or occurrences alleged, and that Plaintiffs' injuries were also proximately caused by

1 these fictitiously named Defendants. The true names or capacities, whether individual,
 2 corporate, associate or otherwise, of Defendants DOES 1 through 100, inclusive, and
 3 each of them, are unknown to Plaintiffs, who therefore sue said Defendants by such
 4 fictitious names. Plaintiffs will seek leave of court to insert their true names or capacities
 5 when they are ascertained.

6 10. Plaintiff is informed, believes, and alleges, that, at all relevant times
 7 mentioned, each of the Defendants was an agent, servant and/or employee of each of the
 8 remaining defendants, and each of the defendants was at all times mentioned acting
 9 within the time, purpose and/or scope of said agency and/or employment, and acting with
 10 the express and/or implied knowledge, permission and/or consent of each of the
 11 remaining defendants, and each of the defendants approved and/or ratified the
 12 discriminatory acts and/or omissions and/or conduct alleged. Each of the defendants,
 13 either by themselves, or at their direction through the actions or omissions of their agents,
 14 servants and/or employees, either participated in the discriminatory acts and/or omissions
 15 and/or conduct alleged herein, and/or knew of the discriminatory acts and/or omissions
 16 and/or conduct alleged herein, and failed to take corrective action.

17 **General Allegations about the Incident**

18 11. Plaintiff incorporates paragraphs 1 through 10 above by this reference.

19 12. Kitson is a Los Angeles-based fashion retail store well-known for its
 20 celebrity clientele. Kitson is in the business of, among other things, producing celebrity-
 21 hosted promotional events.

22 13. On or about August 16, 2007, Kitson held a promotional event for the launch
 23 of Paris Hilton's clothing line ("the event"). The event was hosted by Paris Hilton, and
 24 featured both celebrity, and non-celebrity invited guests, including children from The
 25 Children's Hospital.

26 14. Kitson hired Plaintiff as a doorman/security guard for the event. Plaintiff's
 27 duties included providing access control for the main entrance of Kitson.

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1 15. On August 16, 2007, at or around the same time as the event, Defendants
2 STEVE-O, BIG REGG, USA, NBC, and/or DOES 1 through 100, inclusive, were filming
3 an episode of the "Dr. Steve-O" reality television show.

4 16. During the time that Plaintiff was acting as a doorman/security guard for the
5 event, Defendants STEVE-O, USA, NBC, and/or DOES 1 through 100, inclusive,
6 approached Plaintiff and demanded entry into Kitson Boutique. When Plaintiff refused to
7 allow Defendant STEVE-O to enter the event, Defendant STEVE-O announced that he
8 would "...go over everyone's head here in a moment."

9 17. Indeed, moments later, Defendant STEVE-O, USA, NBC, and/or DOES 1
10 through 100, returned with a member of his entourage, Defendant BIG REGG (a former
11 football player standing approximately 6-feet-9 inches tall and weighing approximately
12 375 pounds), and once again demanded entry.

13 18. Defendants BIG REGG and STEVE-O grabbed Plaintiff, causing him to shift
14 to the side of the entrance. Defendant STEVE-O immediately ran past Plaintiff, and
15 entered the Kitson sales floor.

16 19. Plaintiff followed Defendant STEVE-O into the store, and began to escort
17 him back to Kitson's main entrance.

18 20. Before Plaintiff and Defendant STEVE-O exited the sales floor, Defendant
19 BIG REGG leaned into Plaintiff, and without provocation, violently punched Plaintiff's
20 face and head repeatedly.

21 21. After Defendant BIG REGG struck Plaintiff's face and head, Defendant
22 STEVE-O proclaimed, "I just had my dude rip that security guard's face...It was
23 awesome...I just needed to see my security guard rough everyone the fuck up!"
24 Defendant STEVE-O then hugged Defendant BIG REGG, stating, "Nice work man. You
25 made me so proud of you...We won!"
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FIRST CAUSE OF ACTION

**Assault & Battery
(Against all Defendants)**

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22. Plaintiff incorporates paragraphs 1 through 21 above by this reference.

23. On or about August 16, 2007, while at the event, Plaintiff was intentionally, violently, wrongfully, and maliciously assaulted and battered by Defendant BIG REGG when Defendant BIG REGG violently punched Plaintiff in the face and head repeatedly without provocation.

24. Defendant BIG REGG intended to, and in fact did, cause harmful and/or offensive bodily contact upon Plaintiff, and the apprehension of such harmful and/or offensive bodily contact was without excuse of justification under the law.

25. Plaintiff did not consent to Defendant BIG REGG'S violent conduct, and Defendant BIG REGG's conduct was a substantial factor in bringing about Plaintiff's harm.

26. Defendant STEVE-O, USA, NBC, and/or DOES 1 through 100, and each of them, aided, abetted, counseled, and/or otherwise encourage the violent assault and battery upon Plaintiff.

27. By reason of the Defendant BIG REGG'S violent conduct, Plaintiff suffered extreme and severe mental anguish, and physical pain, and was placed in great fear of his life and physical well-being. He suffered and will continue to suffer pain, mental anguish, loss of normal life, and disability to his mind and body.

28. As a further result of the conduct of Defendant BIG REGG, Plaintiff lost past and future earnings in an amount to be determined according to proof at trial.

29. Defendant BIG REGG and Defendant STEVE-O acted knowingly and willfully, and with the specific intent to injure and harm Plaintiff. Therefore, Defendant BIG REGG and Defendant STEVE-O acted with malice, fraud, oppression, and with deliberate indifference of Plaintiff's rights. Plaintiff is therefore entitled to punitive damages, in addition to actual damages, pursuant to Cal. Civ. Code § 3294(a), against Defendant BIG REGG and Defendant STEVE-O.

1 48. On or about August 16, 2007, while at the event, Plaintiff was intentionally,
 2 violently, wrongfully, and maliciously assaulted and battered by Defendant BIG REGG
 3 when Defendant BIG REGG violently punched Plaintiff in the face and head repeatedly
 4 without provocation. Defendant STEVE-O, USA, NBC, and/or DOES 1 through 100,
 5 and each of them, aided, abetted, counseled, and/or otherwise encourage the violent
 6 assault and battery upon Plaintiff. Defendant BIG REGG was an employee of Defendant
 7 STEVE-O, USA, NBC, and/or DOES 1 through 100, and each of them, at the time of the
 8 violent assault and battery upon Plaintiff on or about August 16, 2007.

9 49. After Defendant BIG REGG struck Plaintiff in the head and face, Defendant
 10 STEVE-O announced, "I just had my dude rip that security guard's [Plaintiff] face...It
 11 was awesome...I just needed to see my security guard rough everyone the fuck up."
 12 Defendant STEVE-O then hugged Defendant BIG REGG, stating, "Nice work man. You
 13 made me so proud of you...We won!"

14 50. Defendants' conduct was outrageous, oppressive, malicious, and intentional,
 15 extreme, and beyond the common decency expected of civilized person in the
 16 community.

17 51. The negligent and unlawful conduct of Defendants USA, NBC, STEVE-O,
 18 and DOES 1 through 100, and each of them, was a substantial factor in bringing about
 19 Plaintiff's severe emotional distress.

20 52. By reason of the Defendants' conduct, Plaintiff suffered extreme and severe
 21 mental anguish, and physical pain, and was placed in great fear of his life and physical
 22 well-being. He suffered and will continue to suffer pain, mental anguish, loss of normal
 23 life, and disability to his mind and body. As a further result of the conduct of
 24 Defendants' conduct, Plaintiff lost past and future earnings in an amount to be
 25 determined according to proof at trial.

26 53. The foregoing conduct and omissions of defendants, in the manner set forth
 27 above, were despicable and outrageous, and were done oppressively and maliciously,
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with the intent to injure and annoy Plaintiff, and in conscious disregard of Plaintiff's rights.

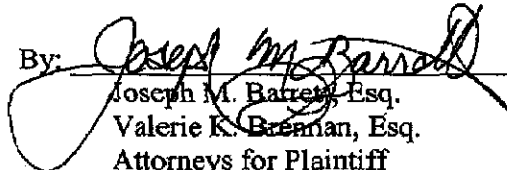
PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray judgment against all Defendants, and each of them, as follows:

- (a) For general damages according to proof;
- (b) For special damages according to proof;
- (c) For punitive damages according to proof;
- (d) For Plaintiffs' attorneys' fees incurred;
- (e) For Plaintiffs' costs incurred; and
- (f) For such further relief that the Court deems proper.

Dated: June 30, 2008

THE COCHRAN FIRM – LOS ANGELES

By: 
 Joseph M. Barrett, Esq.
 Valerie K. Brennan, Esq.
 Attorneys for Plaintiff

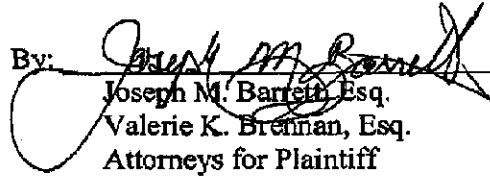
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DEMAND FOR JURY TRIAL

Plaintiffs request a trial by jury in the above-entitled action.

Dated: June 30, 2008

THE COCHRAN FIRM - LOS ANGELES

By: 
Joseph M. Barrett, Esq.
Valerie K. Brennan, Esq.
Attorneys for Plaintiff