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**LAW OFFICES OF LISA L. MAKI**  
ATTORNEYS AT LAW  
1520 2nd Street, Penthouse  
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TELEPHONE (310) 376-0400  
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**FILED**  
LOS ANGELES SUPERIOR COURT

DEC 24 2007

Lisa L. Maki (State Bar No. 158987)  
Christina M. Coleman (State Bar No. 192578)  
Attorney for Plaintiff  
BLANCA HERNANDEZ

JOHN A. CLARKE, CLERK  
BY MARY GARCIA, DEPUTY

Case assigned to  
Judge *D-50*

*John Shephard Wiley, Jr.*

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

BLANCA HERNANDEZ, an individual;

Plaintiff,

v.

JON PETERS, an individual; PETERS 1990 TRUST, a business entity unknown; PETERS ENTERTAINMENT, INC., a corporation; J.P. ORGANIZATION, a business entity unknown; RONALD GRIGG, an individual; and DOES 1-100, inclusive,

Defendants.

) CASE NO.:

BC382863

) COMPLAINT FOR DAMAGES

- ) 1. SEXUAL HARASSMENT - VIOLATION OF GOV'T CODE §§12940 ET SEQ.;
- ) 2. RETALIATION - VIOLATION OF GOV'T CODE §§12940 ET SEQ.;
- ) 3. FAILURE TO PREVENT DISCRIMINATION & HARASSMENT - VIOLATION OF GOV'T CODE §12940(k);
- ) 4. WRONGFUL TERMINATION IN VIOLATION OF PUBLIC POLICY; AND
- ) 5. DEFAMATION;

**JURY TRIAL DEMANDED**

**COMES NOW PLAINTIFF, BLANCA HERNANDEZ, and for causes of action against the Defendants and each of them, alleges as follows:**

**GENERAL ALLEGATIONS**

1. Plaintiff BLANCA HERNANDEZ is a female and resident of the County of Los Angeles, State of California.

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1           2.     Plaintiff is informed and believe and thereon allege that the unlawful actions set  
2 forth hereinbelow occurred in Los Angeles County, California.

3           3.     At all times material to this complaint, Plaintiff is informed and believes, and  
4 thereon alleges that the individual Defendant JON PETERS is a resident of the County of Los  
5 Angeles, State of California.

6           4.     Plaintiff are further informed and believe and thereon allege that Defendant  
7 PETERS 1990 TRUST, is a business entity unknown, issued Plaintiff's paychecks, and is doing  
8 business in the County of Los Angeles, State of California.

9           5.     Plaintiff is further informed and believe and thereon allege that Defendant PETERS  
10 ENTERTAINMENT, INC., is a California Corporation, authorized to do and doing business in the  
11 County of Los Angeles, State of California.

12          6.     Plaintiff is further informed and believe and thereon allege that Defendant J.P.  
13 ORGANIZATION is a business entity unknown, and is doing business in the County of Los  
14 Angeles, State of California.

15          7.     Defendants JON PETERS, PETERS 1990 TRUST, PETERS ENTERTAINMENT,  
16 INC., and J.P. ORGANIZATION, are hereinafter collectively referred to as "PETERS".

17          8.     At all times material to this complaint, Plaintiff is informed and believes, and  
18 thereon alleges that the individual Defendant RONALD GRIGG (hereinafter referred to as  
19 "GRIGG") was employed by Defendant JON PETERS as the President of PETERS  
20 ENTERTAINMENT, INC. in the County of Los Angeles, State of California. GRIGG supervised  
21 Plaintiff and other of PETERS' employees. PETERS employed GRIGGS with a conscious  
22 disregard of the rights of others and authorized and ratified his conduct alleged herein.

23          9.     Plaintiff is unaware of the true names or capacities of the Defendants sued herein as  
24 DOES 1-100, inclusive, and therefore sues said Defendants by fictitious names. Plaintiff will seek  
25 leave to amend this Complaint when their true identities are discovered. At all times mentioned,  
26 each named Defendant and DOES 1-100, inclusive, were the managing agents, employees, agents  
27 or representatives of each other Defendants and were acting with the knowledge and consent of  
28 each other Defendants and within the purpose and scope of such employment, agency or

1 representation in doing or failing to do the acts alleged in this Complaint.

2 10. Plaintiff is informed and believes and thereon alleges that at all times relevant  
3 hereto, each of the individuals named herein was functioning as the agent, servant, partner,  
4 employee, and/or joint venturer of, or working in concert with his, her or its co-Defendants and  
5 was acting within the course and scope of such agency, partnership, employment and/or joint  
6 venture or concerted activity. To the extent that said conduct and omissions were perpetrated by  
7 certain Defendants and their agents, the remaining Defendants condoned, authorized, confirmed  
8 and ratified said acts, conduct and omissions of the co-Defendants, and in doing the actions  
9 mentioned below was acting within the course and scope of his, her or its authority as such agent,  
10 servant, partner, joint venturer and/or employee with the permission, consent and ratification of  
11 the co-Defendants.

12 11. Plaintiff is informed and believes and thereon alleges that, at all times material  
13 herein, each Defendant was completely dominated and controlled by his, her or its co-Defendant  
14 and/or co-Defendants, and each was the alter ego of the other, excluding Defendant GRIGG.

15 12. Whenever and wherever reference is made in this Complaint to any act by a  
16 Defendant or Defendants, such allegations and reference shall also be deemed to mean the acts and  
17 failures to act of each Defendant acting individually, jointly, and severally. Whenever and  
18 wherever reference is made to individuals who are not named as Plaintiff or Defendants in this  
19 Complaint but who were employees/agents of PETERS, such individuals at all relevant times  
20 acted on behalf of PETERS within the course and scope of their employment.

21 13. Plaintiff is informed and believes and thereon alleges that, at all times material  
22 herein, Defendants, and/or their agents/employees knew or reasonably should have known that  
23 unless they intervened to protect Plaintiffs, and to adequately supervise, prohibit, control, regulate,  
24 discipline, and/or otherwise penalize the conduct of partners, members, employees, agents of  
25 PETERS, set forth hereinabove, the remaining Defendants and employees, partners, members,  
26 and/or agents of PETERS perceived the conduct and omissions as being ratified and condoned.

27 ///

28 ///

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**FACTUAL ALLEGATIONS RELEVANT TO ALL CAUSES OF ACTION**

1  
2 14. Plaintiff was employed by PETERS to help maintain the home and offices of  
3 PETERS in an area of Los Angeles County called the Malibu Colony. PETERS rented up to two  
4 beach houses where PETERS conducted business operations.

5 15. Plaintiff began to work for PETERS in or around July 2005 and was terminated on  
6 or about July 25, 2006.

7 16. Defendant JON PETERS systematically sexually harassed Plaintiff on nearly a  
8 daily basis. The harassment was severe, pervasive, and unwelcome and Plaintiff protested the  
9 harassment at first to JON PETERS, and also to Defendant RONALD GRIGG. Some of the  
10 incidents of sexual harassment include but is not limited to frequent, unwanted touchings of the  
11 breasts and buttocks and waist, hugging, attempting to push Plaintiff in bed while JON PETERS  
12 was naked, calling Plaintiff's breasts "pillows" and attempting to kiss Plaintiff's breasts. Kissing  
13 Plaintiff, and asking her to have sex in exchange for money.

14 17. Defendant JON PETERS also sexually harassed other employees in the presence of  
15 Plaintiff creating a hostile work environment.

16 18. Plaintiff complained about the harassment to Defendant JON PETERS but the  
17 harassment did not stop. Plaintiff complained about the harassment and the request that Plaintiff  
18 have sex with JON PETERS to Defendant RONALD GRIGG and RONALD GRIGG told Plaintiff  
19 that she should comply with JON PETERS' request because he was a powerful person and that  
20 she would keep her job if she complied with his requests or words to that effect.

21 19. Plaintiff was afraid to complaint to any outside authorities because she was aware  
22 of PETERS' practice of falsely accusing staff of stealing after they quit or were terminated from  
23 their positions of employment. Further RONALD GRIGG attempted to have Plaintiff sign papers  
24 stating that another employee had stolen when Plaintiff knew that the person had not stolen  
25 anything and that RONALD GRIGG or PETERS were making these allegations up.

26 20. On or about July 25, 2006 RONALD GRIGG terminated Plaintiff from her  
27 employment. RONALD GRIGG told Plaintiff that it was what JON PETERS wanted, and that if  
28 Plaintiff attempted to report them, her and her daughter would be murdered.

1 21. After Defendants were served with the DFEH complaints in this case, they falsely  
2 accused Plaintiff of stealing a \$10,000.00 lamp to third persons.

3 22. As a proximate result of the aforesaid acts of Defendants and each of them,  
4 Plaintiff has lost, and will continue to lose, earnings and fringe benefits and has suffered and/or  
5 will suffer other actual, consequential and incidental financial losses, in an amount to be proven at  
6 trial in excess of the jurisdictional minimum of this court. Plaintiff claims such amounts as  
7 damages together with prejudgment interest pursuant to California Civil Code Section 3287 and/or  
8 3288 and/or any other provision of law providing for prejudgment interest.

9 23. As a proximate result of Defendants' conduct toward Plaintiff, she has sustained  
10 and continues to sustain humiliation, embarrassment, and extreme and severe mental anguish.  
11 Plaintiff claims general damages for mental and physical distress and aggravation in a sum in  
12 excess of the jurisdictional minimum of this court.

13 24. Defendants herein acted in a deliberate, cold, callous, cruel and intentional manner,  
14 in conscious disregard of Plaintiffs' rights and in order to injure and damage her. Therefore,  
15 Plaintiffs request that punitive damages be levied against Defendants and each of them, in sums in  
16 excess of the jurisdictional minimum of this court.

17 25. Within the time provided by law, Plaintiff filed complaints of discrimination,  
18 harassment and retaliation with the California Department of Fair Employment and Housing  
19 against the Defendants. Plaintiff have received their right to sue letters and said right to sue letters  
20 were served on all of the Defendants by her attorney.

21 **FIRST CAUSE OF ACTION**  
22 **BY PLAINTIFF**  
23 **FOR SEXUAL HARASSMENT**  
24 **IN VIOLATION OF GOV'T CODE §§12940 ET SEQ.**  
25 **AGAINST JON PETERS, PETERS 1990 TRUST, PETERS ENTERTAINMENT, INC.,**  
26 **J.P. ORGANIZATION, AND DOES 1-100, INCLUSIVE**

27 26. Plaintiff realleges and incorporates by reference Paragraphs 1 through 25, inclusive,  
28 as though set forth in full herein.

AND OFFICES OF LISA L. MAO  
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1330 Red Street, Pomona  
Pomona, CA 91768  
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1 27. At all times hereto, California Government Code §§12940 *et seq.* (California Fair  
2 Housing and Employment Act "FEHA") was in full force and effect and was binding upon  
3 Defendants and each of them.

4 28. These laws set forth in the preceding paragraph require Defendants to refrain from  
5 discriminating against or harassing an employee on the basis of her sex. These laws also require  
6 Defendants from creating and maintaining a hostile work environment.

7 29. Defendants violated the FEHA and the public policy of the State of California  
8 which is embodied in the FEHA by creating by harassing Plaintiff because of her sex and by  
9 creating and maintaining a hostile work environment.

10 30. The above said acts of Defendants constitute violations of the FEHA and violations  
11 of the public policy of the State of California. Such violations were a proximate cause in  
12 Plaintiff's damage as stated below.

13 31. The damage allegations of paragraphs 22-24, inclusive, are herein incorporated by  
14 reference.

15 32. Pursuant to California Government Code §12965(b), Plaintiff requests a reasonable  
16 award of attorneys' fees and costs.

17 **SECOND CAUSE OF ACTION**

18 **BY PLAINTIFF**

19 **FOR RETALIATION IN VIOLATION OF GOV'T CODE §§12940 ET SEQ. & THE**

20 **PUBLIC POLICY OF THE STATE OF CALIFORNIA**

21 **AGAINST ALL DEFENDANTS AND DOES 1-100, INCLUSIVE**

22 33. Plaintiffs reallege and incorporates by reference Paragraphs 1 through 25,  
23 inclusive, as though set forth in full herein.

24 34. At all times hereto, California Government Code §§12940 *et seq.* (California Fair  
25 Housing and Employment Act "FEHA") were in full force and effect and were binding upon  
26 Defendants and each of them.

27 35. These laws set forth in the preceding paragraph require Defendants to refrain from  
28 retaliating against an employee for protesting an employer or individual's violation of the FEHA.

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1 36. Defendants violated the FEHA and the public policy of the State of California  
2 which is embodied in the FEHA, by retaliating against Plaintiff and terminating her for  
3 complaining about sexual harassment and a hostile work environment.

4 37. The above-said acts of Defendants constitute violations of the FEHA and violations  
5 of the public policy of the State of California. Such violations were a proximate cause in  
6 Plaintiff's damage as stated below.

7 38. The damage allegations of Paragraphs 22-24, inclusive, are herein incorporated by  
8 reference.

9 39. Pursuant to California Government Code §12965(b), Plaintiff's request a reasonable  
10 award of attorneys' fees and costs.

11 **THIRD CAUSE OF ACTION**  
12 **BY PLAINTIFF**  
13 **FOR FAILURE TO PREVENT DISCRIMINATION AND HARASSMENT**  
14 **IN VIOLATION OF**  
15 **GOV'T CODE §12940(k)**  
16 **AGAINST DEFENDANTS JON PETERS, PETERS 1990 TRUST, PETERS**  
17 **ENTERTAINMENT, INC., J.P. ORGANIZATION,**  
18 **AND DOES 1-100, INCLUSIVE**

19 40. Plaintiff's reallege and incorporates by reference Paragraphs 1 through 25, inclusive,  
20 as though set forth in full herein.

21 41. At all times mentioned in this complaint, Government Code §12940(k) was in full  
22 force and effect and was binding on Defendants. This subsection imposes a duty on Defendants to  
23 take all reasonable steps necessary to prevent discrimination, harassment and retaliation from  
24 occurring. As alleged above, Defendants violated this subsection and breached their duty by  
25 failing to take all reasonable steps necessary to prevent discrimination, harassment and retaliation  
26 from occurring.

27 42. The above said acts of Defendants constitute violations of the FEHA and violations  
28 of the public policy of the State of California. Such violations were a proximate cause in

1 Plaintiff's damage as stated below.

2 43. The damage allegations of Paragraphs 22-24, inclusive, are herein incorporated by  
3 reference.

4 44. Pursuant to California Government Code §12965(b), Plaintiff requests a reasonable  
5 award of attorneys' fees and costs.

6 **FOURTH CAUSE OF ACTION**

7 **BY PLAINTIFFS**

8 **FOR WRONGFUL TERMINATION IN VIOLATION OF PUBLIC POLICY**

9 **AGAINST DEFENDANTS JON PETERS, PETERS 1990 TRUST, PETERS**

10 **ENTERTAINMENT, INC., J.P. ORGANIZATION,**

11 **AND DOES 1-100, INCLUSIVE**

12 45. Plaintiff realleges and incorporates by reference Paragraphs 1 through 25, inclusive,  
13 as though set forth in full herein.

14 46. At all relevant times mentioned in this complaint, California's Fair Employment  
15 and Housing Act, California Government Code §§12900 et seq. was in full force and effect and  
16 was binding on Defendants. This law requires Defendants to refrain, among other things, from  
17 harassing or discriminating against any employee on the basis of their sex and from retaliating  
18 against any employee who protests harassment and/or engages in otherwise protected activity.

19 47. At all times mentioned in this complaint, Article I, Section 8 of the California  
20 Constitution was in full force and effect and binding on Defendants. This law requires Defendants  
21 to refrain, among other things, from disqualifying a person from pursuing employment on the  
22 basis of sex, among other things.

23 48. At all times mentioned in this complaint, it was a fundamental policy of the State of  
24 California that Defendants cannot discriminate and/or retaliate against any employee on the basis  
25 their sex.

26 49. Plaintiff believes that her complaints about the above alleged conduct were factors  
27 in Defendants' conduct as alleged hereinabove or that she was terminated because of her protected  
28 status.

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1 50. The damage allegations of Paragraphs 22-24, inclusive, are herein incorporated by  
2 reference.

3 51. Pursuant to California Government Code §12965(b), Plaintiff requests a reasonable  
4 award of attorneys' fees and costs.

5 **FIFTH CAUSE OF ACTION**  
6 **(FOR DEFAMATION)**  
7 **AGAINST ALL DEFENDANTS**  
8 **AND DOES 1-100, INCLUSIVE)**

9 52. Plaintiff realleges and incorporates by reference Paragraphs 1 through 25, inclusive,  
10 as though set forth in full herein.

11 53. The Defendants caused to be published false and unprivileged communications  
12 tending to directly injure Plaintiff in her respective business and professional reputation. Upon  
13 information and belief, the Defendants made untrue statements to third parties about Plaintiff's  
14 characteristics at work, specifically that Plaintiff was a thief or words to that effect. The exact  
15 date that the defamatory statements were made is not currently know by Plaintiff, however,  
16 Plaintiff is informed and believes that the defamatory statements were made after the Defendants'  
17 received Plaintiff's DFEH complaints, and were thereafter repeated with malice, and continue to  
18 the present date. Plaintiff has been forced to republish such defamatory statements up to and  
19 including the present date.

20 54. Such statements were patently false, and known to be false at the time they were  
21 made; Defendants had no reasonable basis for believing the defamatory statements to be true.

22 55. The parties hearing such statements understood them, and believed them to be true  
23 because of the authoritative credibility of Defendants and because of Plaintiff's status as an  
24 employee who was supervised by the Defendants.

25 56. The statements set forth above were published with express and implied malice on  
26 the part of the Defendants with the designed intent to injure the Plaintiff and her good name. The  
27 Corporate/Entity Defendants, by maintaining the individual Defendants in their employ, in  
28

1 conscious disregard of the rights of Plaintiff, allowed the Defendants to make the statements that  
2 constitute defamation of Plaintiff.

3 57. The published statements were slanderous *per se* pursuant to California Civil Code  
4 §§ 46(a) and 46(3). Further, Plaintiff is informed and believes that the third-party recipients of the  
5 defamatory statements unwittingly republished the defamatory statements of Defendants to other  
6 third persons.

7 58. The damage allegations of Paragraphs 22-24 are herein incorporated by reference  
8 against all Defendants.

9 **PRAYER FOR RELIEF**

10 **WHEREFORE**, Plaintiff seeks judgment against Defendants, and each of them:

- 11 1. For a money judgment for loss of employability, mental pain and anguish, and  
12 emotional distress, according to proof;
- 13 2. For a money judgment representing compensatory damages including lost past and  
14 future wages, and all other sums of money, including wages not paid, including employment  
15 benefits, together with interest on said amounts, and any other economic injury to Plaintiff,  
16 according to proof;
- 17 3. For an award of punitive damages;
- 18 4. For prejudgment interest under Civil Code §3288 and Code of Civil Procedure  
19 §998, and any other applicable statutory or contractual basis;
- 20 5. For attorneys' fees under the Government Code or any other contractual or  
21 statutory basis, along with statutory penalties and costs as set forth above;
- 22 6. For costs of suit according to statute; and
- 23 7. For any other relief that is just and proper.

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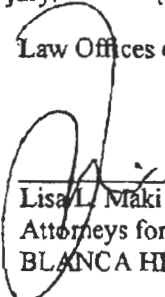
**JURY TRIAL DEMANDED**

Plaintiff demands trial of all issues by jury.

Date: December 15, 2007

Law Offices of Lisa L. Maki

By:

  
\_\_\_\_\_  
Lisa L. Maki  
Attorneys for Plaintiff  
BLANCA HERNANDEZ

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CM-010

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):  
 Lisa L. Maki, State Bar #158987  
 Law Offices of Lisa L. Maki  
 1520 2nd Street - Penthouse  
 Santa Monica, CA 90401

TELEPHONE NO.: 310-576-0400 FAX NO.: 310-576-0440  
 ATTORNEY FOR (Name): Blanca Hernandez

**FILED**  
 LOS ANGELES SUPERIOR COURT  
 DEC 24 2007  
 JOHN A. CLARKE, CLERK  
 BY MARY GARCIA, 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, CA 90012  
 BRANCH NAME: CENTRAL

CASE NAME: HERNANDEZ V. PETERS

**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: **BC382863**  
 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:

<p><b>Auto Tort</b></p> <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46) <p><b>Other P/VPD/W/D (Personal Injury/Property Damage/Wrongful Death) Tort</b></p> <input type="checkbox"/> Asbestos (04) <input type="checkbox"/> Product liability (24) <input type="checkbox"/> Medical malpractice (45) <input type="checkbox"/> Other P/VPD/W/D (23) <p><b>Non-P/VPD/W/D (Other) Tort</b></p> <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-P/VPD/W/D tort (35) <p><b>Employment</b></p> <input type="checkbox"/> Wrongful termination (36) <input checked="" type="checkbox"/> Other employment (15)	<p><b>Contract</b></p> <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) <p><b>Real Property</b></p> <input type="checkbox"/> Eminent domain/inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (26) <p><b>Unlawful Detainer</b></p> <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38) <p><b>Judicial Review</b></p> <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)	<p><b>Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403)</b></p> <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) <p><b>Enforcement of Judgment</b></p> <input type="checkbox"/> Enforcement of judgment (20) <p><b>Miscellaneous Civil Complaint</b></p> <input type="checkbox"/> RICO (27) <input type="checkbox"/> Other complaint (not specified above) (42) <p><b>Miscellaneous Civil Petition</b></p> <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> Other petition (not specified above) (43)
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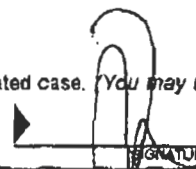
2. This case  is  is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:

a.  Large number of separately represented parties d.  Large number of witnesses  
 b.  Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve e.  Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court  
 c.  Substantial amount of documentary evidence f.  Substantial postjudgment judicial supervision

3. Remedies sought (check all that apply): a.  monetary b.  nonmonetary, declaratory or injunctive relief c.  punitive

4. Number of causes of action (specify): 5

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: December 15, 2007  
 Lisa L. Maki, State Bar #158987 (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.

Page 1 of 2

SHORT TITLE: <b>HERNANDEZ V. PETERS</b>	CASE NUMBER: <b>BC382863</b>
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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 LASC 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 7  HOURS/  DAYS

Item II. Select 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 Los Angeles Superior Court Local Rule 2.0.

**Applicable Reasons for Choosing Courthouse Location (See Column C below)**

- |   |  |
|---|--|
| <ol style="list-style-type: none"> <li>1. Class Actions must be filed in the County Courthouse, Central District.</li> <li>2. May be filed in Central (Other county, or no Bodily Injury/Property Damage).</li> <li>3. Location where cause of action arose.</li> <li>4. Location where bodily injury, death or damage occurred.</li> <li>5. Location where performance required or defendant resides.</li> </ol> | <ol style="list-style-type: none"> <li>6. Location of property or permanently garaged vehicle.</li> <li>7. Location where petitioner resides.</li> <li>8. Location wherein defendant/respondent functions wholly.</li> <li>9. Location where one or more of the parties reside.</li> <li>10. Location of Labor Commissioner Office.</li> </ol> |
|---|--|

**Step 4:** Fill in the information requested on page 4 in Item III; complete Item IV. Sign the declaration.

	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Auto 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., 2., 4.
		<input type="checkbox"/> A7240 Other Professional Health Care Malpractice	1., 2., 4.
	Other Personal Injury Property Damage Wrongful Death (23)	<input type="checkbox"/> A7250 Premises Liability (e.g., slip and fall)	1., 2., 4.
<input type="checkbox"/> A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.)		1., 2., 4.	
<input type="checkbox"/> A7270 Intentional Infliction of Emotional Distress		1., 2., 3.	
<input type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death		1., 2., 4.	
Non-Personal Injury/Property Damage/Wrongful Death Tort	Business Tort (07)	<input type="checkbox"/> A6020 Other Commercial/Business Tort (not fraud/breach of contract)	1., 2., 3.
	Civil Rights (08)	<input type="checkbox"/> A6005 Civil Rights/Discrimination	1., 2., 3.
	Defamation (13)	<input type="checkbox"/> A6010 Defamation (slander/libel)	1., 2., 3.
	Fraud (16)	<input type="checkbox"/> A6013 Fraud (no contract)	1., 2., 3.

Non-Personal Injury/Property Damage/  
Wrongful Death Tort (Cont'd.)

Employment

Contract

Real Property

Unlawful Detainer

Judicial Review

SHORT TITLE: HERNANDEZ V. PETERS		CASE NUMBER
A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step J Above
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.
Wrongful Termination (36)	<input type="checkbox"/> A6037 Wrongful Termination	1., 2., 3.
	<input checked="" type="checkbox"/> A6024 Other Employment Complaint Case	1., 2., 3.
Other Employment (15)	<input type="checkbox"/> A6109 Labor Commissioner Appeals	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., 6., 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"/> A6050 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 - Drugs (38)	<input type="checkbox"/> A6022 Unlawful Detainer-Drugs	2., 6.
Asset Forfeiture (06)	<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.

SHORT TITLE: <b>HERNANDEZ V. PETERS</b>	CASE NUMBER
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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 (Cont'd.)	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
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.

SHORT TITLE: HERNANDEZ V. PETERS	CASE NUMBER
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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.

REASON: CHECK THE NUMBER UNDER COLUMN C WHICH APPLIES IN THIS CASE			ADDRESS:
<input type="checkbox"/> 1. <input checked="" type="checkbox"/> 2. <input type="checkbox"/> 3. <input type="checkbox"/> 4. <input type="checkbox"/> 5. <input type="checkbox"/> 6. <input type="checkbox"/> 7. <input type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10.			67 MALIBU COLONY
CITY:	STATE:	ZIP CODE:	
MALIBU	CA	90265	

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 LOS ANGELES SUPERIOR COURT courthouse in the CENTRAL District of the Los Angeles Superior Court (Code Civ. Proc., § 392 et seq., and LASC Local Rule 2.0, subs. (b), (c) and (d)).

Dated: DECEMBER 15, 2007

  
LISA MAFFI

(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 form CM-010.
4. Complete Addendum to Civil Case Cover Sheet form LACIV 109 (Rev 01/07), LASC Approved 03-04.
5. Payment in full of the filing fee, unless fees have been waived.
6. Signed order appointing the Guardian ad Litem, JC form FL-935, if the plaintiff or petitioner is a minor under 18 years of age, or if required by Court.
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.