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D-30M AMY D. HOEVE

FILED
Superior Court of California
County of Los Angeles

FEB 17 2015

Sherri R. Carter, Executive Officer/Clerk
By *Myrna Beltran* Deputy
Myrna Beltran

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

BC 5 7 2 7 6 6

CRISTINA CRISTOBAL, an individual and on
behalf of herself and all others similarly situated,

Plaintiff,

vs.

PLANNED PARENTHOOD ADVOCACY
PROJECT LOS ANGELES COUNTY, a
California corporation; PLANNED
PARENTHOOD LOS ANGELES, a California
corporation; PLANNED PARENTHOOD
FEDERATION OF AMERICA, INC., a New
York Corporation; PLANNED PARENTHOOD
AFFILIATES OF CALIFORNIA,
INCORPORATED, a California corporation; and
DOES 1 through 100,

Defendants.

CASE NO.

CLASS ACTION COMPLAINT:

- (1) **FAILURE TO PAY ALL OVERTIME WAGES (LABOR CODE §§ 204, 510, 558, 1194, 1198);**
- (2) **MINIMUM WAGE VIOLATIONS (LABOR CODE §§ 1182.12, 1194, 1194.2, 1197);**
- (3) **MEAL PERIOD VIOLATIONS (LABOR CODE §§ 226.7, 512, 558);**
- (4) **WAGE STATEMENT VIOLATIONS (LABOR CODE § 226 et seq.);**
- (5) **UNFAIR COMPETITION (BUS & PROF CODE § 17200 et seq.);**

**DEMAND FOR JURY TRIAL
UNLIMITED CIVIL CASE**

RECEIPT #: CCH280197082
DATE PAID: 02/17/15 01:49 PM
PAYMENT: \$1,435.00 310
RECEIVED:
CHECK: \$1,435.00
CASH: \$0.00
CHANGE: \$0.00
DRE: \$0.00

CIT/CASE: BC572766
LER/DEF#:

1 Plaintiff CRISTINA CRISTOBAL (hereinafter "Plaintiff") on behalf of herself and all
2 others similarly situated, hereby brings this Class Action Complaint against Defendants
3 PLANNED PARENTHOOD ADVOCACY PROJECT LOS ANGELES COUNTY, a California
4 corporation; PLANNED PARENTHOOD LOS ANGELES, a California corporation; PLANNED
5 PARENTHOOD FEDERATION OF AMERICA, INC., a New York corporation; PLANNED
6 PARENTHOOD AFFILIATES OF CALIFORNIA, INCORPORATED, a California corporation,
7 and DOES 1 to 100 (collectively "Defendants"), inclusive, and on information and belief alleges
8 as follows:

9 **JURISDICTION AND VENUE**

10 1. Plaintiff, on behalf of himself and all others similarly situated, hereby brings this
11 class action for recovery of unpaid wages and penalties under California Business and
12 Professions Code §17200 *et. seq.*, California Labor Code §§ 210, 216, 226, 226.3, 226.7, 510,
13 512, 516, 558, 1174, 1182.12, 1194, 1194.2, 1197, 1198, and Industrial Welfare Commission
14 Wage Order No. 4 ("IWC Wage Order"), in addition to seeking injunctive relief, declaratory
15 relief, and restitution. This Court has jurisdiction over Defendants' violations of these California
16 Labor Code and Business and Professions Code sections because the amounts in controversy
17 exceed this Court's jurisdictional minimum.

18 2. Venue is proper under Code of Civil Procedure §§ 395(a) and 395.5 because
19 Defendants does business in Los Angeles County and the acts alleged herein took place within
20 Los Angeles County. Further, Plaintiff does now, and at all times relevant herein did, reside in
21 Los Angeles County and was employed by Defendants and DOES 1 – 100 within Los Angeles
22 County.

23 **PARTIES**

24 3. Plaintiff is an individual over the age of eighteen (18). At all relevant times
25 herein, Plaintiff was and currently is a California resident, residing in the county of Los Angeles.
26 During the four years immediately preceding the filing of the Complaint in this action and within
27

1 the statute of limitations periods applicable to each cause of action pled therein, Plaintiff was
2 employed by Defendants as hourly non-exempt employee. Plaintiff was, and is, a victim of
3 Defendants' policies and/or practices complained, lost money and/or property, and has been
4 deprived of the rights guaranteed to him by the California Labor Code §§ 210, 216, 226, 226.3,
5 226.7, 510, 512, 516, 558, 1174, 1194, 1197, 1198, California Business and Professions Code §
6 17200 *et seq.* (Unfair Competition), and IWC Wage Order 4-2001, which sets employment
7 standards for the manufacturing industry.

8 4. Plaintiff is informed, and believes, and thereon alleges, that at all times mentioned
9 herein, Defendant PLANNED PARENTHOOD ADVOCACY PROJECT LOS ANGELES
10 COUNTY, a California corporation, is licensed to do business in California and the County of
11 Los Angeles;

12 5. Plaintiff is informed, and believes, and thereon alleges, that at all times mentioned
13 herein, Defendant PLANNED PARENTHOOD LOS ANGELES, a California corporation, is
14 licensed to do business in California and the County of Los Angeles;

15 6. Plaintiff is informed, and believes, and thereon alleges, that at all times mentioned
16 herein, Defendant PLANNED PARENTHOOD FEDERATION OF AMERICA, INC., a New
17 York corporation, is licensed to do business in California and the County of Los Angeles;

18 7. Plaintiff is informed, and believes, and thereon alleges, that at all times mentioned
19 herein, Defendant PLANNED PARENTHOOD AFFILIATES OF CALIFORNIA,
20 INCORPORATED, a California corporation, is licensed to do business in California and the
21 County of Los Angeles;

22 8. Plaintiff is informed, and believes, and thereon alleges, that Defendants control
23 and operate businesses and establishments in locations within the State of California, County of
24 Los Angeles, which focus on reproductive health care, sex education, and information.

1 e. **Numerosity/Ascertainability:** The members of the Classes are so numerous that
2 joinder of all members would be unfeasible and not practicable. The membership of the classes
3 and subclasses are unknown to Plaintiffs, at this time; however, it is estimated that the Classes
4 number greater than one thousand (1000) individuals. The identity of such membership is readily
5 ascertainable via inspection of Defendants' employment records.

6 16. **Common Questions of Law and Fact Predominate/Well Defined Community**
7 **of Interest:** There are common questions of law and fact as to Plaintiff and all other similarly
8 situated employees, which predominate over questions affecting only individual members
9 including, without limitation to:

10 i. Whether Defendants violated the applicable Labor Code provisions including, but
11 not limited to §§510 and 1194, by requiring overtime work and not paying for said work
12 according to the overtime laws of the State of California;

13 ii. Whether Defendants' policies and/or practices for rounding hours worked
14 resulted, over a period of time, in the failure to properly compensate members of the Overtime
15 and Minimum Wage Classes;

16 iii. Whether Defendants failed to keep legally compliant records for the members of
17 the Wage Statement Class pursuant to Labor Code 226;

18 iv. Whether Defendants' meal period policy for paying meal premium payments
19 under Labor Code section 226.7 in increments of one half of one hour is unlawful;

20 17. **Predominance of Common Questions:** Common questions of law and fact
21 predominate over questions that affect only individual members of the Classes. The common
22 questions of law set forth above are numerous and substantial and stem from Defendants' policies
23 and/or practices applicable to each individual class member, such as their rounding policies and
24 practices, and their policy of paying meal period premium payments in increments of one half of
25 one hour is unlawful. As such, these common questions predominate over individual questions
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1 concerning each individual class member's showing as to his or her eligibility for recovery or as
2 to the amount of his or her damages.

3 18. **Typicality:** The claims of Plaintiff are typical of the claims of the Classes
4 because Plaintiff is and was employed by Defendants as an hourly non-exempt employee in
5 California during the statutes of limitation applicable to each cause of action pled in the
6 Complaint in this action. As alleged herein, Plaintiff, like the members of the Classes, was
7 deprived of all overtime and minimum wages, was not provided with all meal period premium
8 payments, and was furnished with inaccurate and incomplete wage statements.

9 19. **Adequacy of Representation:** Plaintiff is fully prepared to take all necessary
10 steps to represent fairly and adequately the interests of the members of the Classes. Moreover,
11 Plaintiff's attorneys are ready, willing and able to fully and adequately represent the members of
12 the Classes and Plaintiff. Plaintiff's attorneys have prosecuted and defended numerous wage-
13 and-hour class actions in state and federal courts in the past and are committed to vigorously
14 prosecuting this action on behalf of the members of the classes.

15 20. **Superiority:** The California Labor Code and applicable wage orders are broadly
16 remedial in nature and serves an important public interest in establishing minimum working
17 conditions and standards in California. These laws and labor standards protect the average
18 working employee from exploitation by employers who have the responsibility to follow the
19 laws and who may seek to take advantage of superior economic and bargaining power in setting
20 onerous terms and conditions of employment. The nature of this action and the format of laws
21 available to Plaintiff and members of the Classes make the class action format a particularly
22 efficient and appropriate procedure to redress the violations alleged herein. If each employee
23 were required to file an individual lawsuit, Defendants would necessarily gain an
24 unconscionable advantage since they would be able to exploit and overwhelm the limited
25 resources of each individual plaintiff with their vastly superior financial and legal resources.
26 Moreover, requiring each member of the Classes to pursue an individual remedy would also

1 discourage the assertion of lawful claims by employees who would be disinclined to file an
2 action against their former and/or current employer for real and justifiable fear of retaliation and
3 permanent damages to their careers at subsequent employment. Further, the prosecution of
4 separate actions by the individual class members, even if possible, would create a substantial
5 risk of inconsistent or varying verdicts or adjudications with respect to the individual class
6 members against Defendants herein; and which would establish potentially incompatible
7 standards of conduct for Defendants; and/or legal determinations with respect to individual class
8 members which would, as a practical matter, be dispositive of the interest of the other class
9 members not parties to adjudications or which would substantially impair or impede the ability
10 of the class members to protect their interests. Further, the claims of the individual members of
11 the class are not sufficiently large to warrant vigorous individual prosecution considering all of
12 the concomitant costs and expenses attending thereto.

13 21. As such, the Classes identified in Paragraph 15 are maintainable as a Class under
14 California Code of Civil Procedure §382.

15 **FIRST CAUSE OF ACTION**

16 **FAILURE TO PAY OVERTIME WAGES**

17 **(AGAINST ALL DEFENDANTS)**

18 22. Plaintiff re-alleges and incorporates by reference paragraphs 1 through 21 as
19 though fully set forth herein.

20 23. This cause of action is brought on behalf of the Overtime Class pursuant to Labor
21 Code §§ 204, 510, 558, 1194, and 1198, which provide that non-exempt employees are entitled
22 to all overtime wages and compensation for hours worked, and provide a private right of action
23 for the failure to pay all overtime compensation for overtime work performed.

24 24. Plaintiffs and members of the Overtime Class worked more than 8 hours and/or 40
25 hours per week, thereby entitling them to overtime compensation. However, Defendants failed
26 to pay Plaintiff and members of the Overtime Class overtime wages by regularly, systematically,

1 and impermissibly rounding their hours worked which resulted, over a period of time, in the
2 failure to properly compensate them with all required overtime wages. Accordingly, Plaintiff
3 and members of the Overtime Class were not compensated at the appropriate rates of overtime
4 pay for all hours worked.

5 25. Defendants' policy and practice of requiring overtime work and not paying at the
6 proper overtime rates for said work violates California Labor Code §§ 204, 210, 216, 510, 558,
7 1194, and 1198, and IWC Wage Order 4-2001.

8 26. The foregoing policies and practices are unlawful and create an entitlement to
9 recovery by Plaintiff and members of the Overtime Class in a civil action for the unpaid amount
10 of overtime premiums owing, including interest thereon, statutory penalties, civil penalties,
11 attorney's fees, and costs of suit according to California Labor Code §§ 204, 210, 216, 510, 558,
12 1194, 1198, 2698 *et seq.*, and Code of Civil Procedure § 1021.5.

13 **SECOND CAUSE OF ACTION**

14 **MINIMUM WAGE VIOLATIONS**

15 **(AGAINST ALL DEFENDANTS)**

16 27. Plaintiff re-alleges and incorporates by reference paragraphs 1 through 26 as
17 though fully set forth herein.

18 28. Wage Order 4-2001, § 4 and California Labor Code §§ 1197 and 1182.12
19 establish the right of employees to be paid minimum wages for all hours worked, in amounts set
20 by state law. Labor Code §§ 1194(a) and 1194.2(a) provide that an employee who has not been
21 paid the legal minimum wage as required by Labor Code § 1197 may recover the unpaid balance
22 together with attorneys' fees and costs of suit, as well as liquidated damages in an amount equal
23 to the unpaid wages and interest accrued thereon.

24 29. At all relevant times herein, Defendants failed to conform its pay practices to the
25 requirements of the law. This unlawful conduct includes, but is not limited to, regularly and
26 systematically, as a policy and practice, impermissibly rounding the hours worked by Plaintiff
27

1 and members of the Minimum Wage Class such that, over a period of time, resulted in the
2 failure to compensate them for all hours actually worked. Accordingly, Plaintiff and members
3 of the Minimum Wage Class were not compensated for all hours worked including, but not
4 limited to, all hours they were subject to the control of Defendants and/or suffered or permitted
5 to work under the California Labor Code and applicable Industrial Welfare Commission wage
6 order(s).

7 30. Defendants' policy and practice of not paying all minimum wages violates
8 California Labor Code §§ 204, 210, 216, 558, 1182.12, 1197.1, 1198, 2698 *et seq.*, and the
9 applicable Industrial Welfare Commission wage order(s).

10 31. Such a practice and uniform administration of corporate policy regarding illegal
11 employee compensation is unlawful and creates an entitlement to recovery by Plaintiff and
12 members of the Minimum Wage Class in a civil action for the unpaid amount of minimum
13 wages, liquidated damages, including interest thereon, statutory penalties, civil penalties,
14 attorney's fees, and costs of suit according to California Labor Code §§ 204, 210, 216, 558,
15 1194, 1198, 2698 *et seq.*, and Code of Civil Procedure § 1021.5.

16 32. As a consequence of Defendants' non-payment of minimum wages, Plaintiff and
17 members of the Minimum Wage Class seek penalties pursuant to the IWC Wage Order No. 4, §
18 20(A) and California Labor Code § 1199; interest pursuant to California Labor Code §§ 218.6
19 and 1194 and Civil Code §§ 3287 and 3289; liquidated damages pursuant to California Labor
20 Code § 1194.2; attorneys' fees and costs of suit pursuant to California Labor Code § 1194 *et*
21 *seq.*; and damages and/or penalties pursuant to California Labor Code § 558(a).

22 **THIRD CAUSE OF ACTION**

23 **MEAL PERIOD VIOLATIONS**

24 **(AGAINST ALL DEFENDANTS)**

25 33. Plaintiff re-alleges and incorporates by reference paragraphs 1 through 32 as
26 though fully set forth herein.

1 led to, among other things, the non-payment of all their overtime and minimum wages, meal
2 period premiums, and deprived them of the information necessary to identify the discrepancies
3 in Defendants' reported data.

4 39. Defendants' failures creates an entitlement to recovery by Plaintiff and members
5 of the Wage Statement Class in a civil action for all damages and/or penalties pursuant to Labor
6 Code § 226, including statutory penalties, civil penalties, reasonable attorney's fees, and costs of
7 suit according to California Labor Code §§ 226 and 226.3.

8 **FIFTH CAUSE OF ACTION**

9 **UNFAIR COMPETITION**

10 **(AGAINST ALL DEFENDANTS)**

11 40. Plaintiff re-alleges and incorporates by reference paragraphs 1 through 39 as
12 though fully set forth herein.

13 41. Defendants has engaged and continues to engage in unfair and/or unlawful
14 business practices in California in violation of California Business and Professions Code §
15 17200 et seq., by: (a) failing to pay Plaintiff and members of the Overtime Class all overtime
16 wages owed; (b) failing to pay Plaintiff and members of the Minimum Wage Class all minimum
17 wages owed due to unlawfully rounding hours worked; (c) knowingly failing to furnish Plaintiff
18 and members of the Wage Statement Class with accurate and complete wage statements in
19 violation of Labor Code § 226; (d) failing to provide Plaintiff and members of the Meal Period
20 Class with all meal periods premium payments at the correct rate of pay.

21 42. Defendants' utilization of these unfair and/or unlawful business practices
22 deprived Plaintiff and continues to deprive members of the classes of compensation to which
23 they are legally entitled, constitutes unfair and/or unlawful competition, and provides an unfair
24 advantage over Defendants' competitors who have been and/or are currently employing workers
25 and attempting to do so in honest compliance with applicable wage and hour laws.

1 7. Upon the Fourth Cause of Action, for statutory penalties pursuant to Labor Code §
2 226;

3 8. Upon the Fifth Cause of Action, for injunctive relief and restitution to Plaintiff and
4 members of the Classes of all money and/or property unlawfully acquired by Defendants by
5 means of any acts or practices declared by this Court to be in violation of Business and
6 Professions Code § 17200 *et seq.*;

7 9. Prejudgment interest on all due and unpaid wages pursuant to California Labor
8 Code § 218.6 and Civil Code §§ 3287 and 3289;

9 10. On all causes of action, for attorneys' fees and costs as provided by Labor Code
10 §§ 226, 1194 *et seq.*, 2698 *et seq.*, and Code of Civil Procedure § 1021.5.

11 11. For such other and further relief the Court may deem just and proper.

12
13 Dated: February 17, 2015

Respectfully submitted,
BOREN OSHER & LUFTMAN

14
15 By:



Paul K. Haines
Attorneys for Plaintiff, the Classes and Aggrieved
Employees

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17
18 **DEMAND FOR JURY TRIAL**

19 Plaintiff hereby demands a jury trial with respect to all issues triable by jury.

20 Dated: February 17, 2015

BOREN OSHER & LUFTMAN

21
22 By:



Paul K. Haines
Attorneys for Plaintiffs, the Classes and
Aggrieved Employees

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):
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TELEPHONE NO.: 310-322-2220 FAX NO.: 310-322-2228
ATTORNEY FOR (Name): Plaintiff Cristina Cristobal

FOR COURT USE ONLY
FILED
Superior Court of California
County of Los Angeles
FEB 17 2015
Sherri R. Carter, Executive Officer/Clerk
By Myrna Beltran Deputy
Myrna Beltran

SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles
STREET ADDRESS: 111 N. Hill Street
MAILING ADDRESS: same
CITY AND ZIP CODE: Los Angeles, 90012
BRANCH NAME: Central

CASE NAME:
Cristobal v Planned Parenthood Advocacy Project Los Angeles County

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: **BC 572766**

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>Auto Tort</p> <input type="checkbox"/> Auto (22)
<input type="checkbox"/> Uninsured motorist (46) <p>Other PI/PD/W/D (Personal Injury/Property Damage/Wrongful Death) Tort</p> <input type="checkbox"/> Asbestos (04)
<input type="checkbox"/> Product liability (24)
<input type="checkbox"/> Medical malpractice (45)
<input type="checkbox"/> Other PI/PD/W/D (23) <p>Non-PI/PD/W/D (Other) Tort</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-PI/PD/W/D tort (35) <p>Employment</p> <input type="checkbox"/> Wrongful termination (36)
<input checked="" type="checkbox"/> Other employment (15) | <p>Contract</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>Real Property</p> <input type="checkbox"/> Eminent domain/Inverse condemnation (14)
<input type="checkbox"/> Wrongful eviction (33)
<input type="checkbox"/> Other real property (26) <p>Unlawful Detainer</p> <input type="checkbox"/> Commercial (31)
<input type="checkbox"/> Residential (32)
<input type="checkbox"/> Drugs (38) <p>Judicial Review</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>Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403)</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>Enforcement of Judgment</p> <input type="checkbox"/> Enforcement of judgment (20) <p>Miscellaneous Civil Complaint</p> <input type="checkbox"/> RICO (27)
<input type="checkbox"/> Other complaint (not specified above) (42) <p>Miscellaneous Civil Petition</p> <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. 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: Failure to Pay All Overtime Wages, Minimum Wage Violations, etc.
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: February 17, 2015
Paul K. Haines
(TYPE OR PRINT NAME)


(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

NOTICE

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
- Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

INSTRUCTIONS ON HOW TO COMPLETE THE COVER SHEET

To Plaintiffs and Others Filing First Papers. If you are filing a first paper (for example, a complaint) in a civil case, you must complete and file, along with your first paper, the *Civil Case Cover Sheet* contained on page 1. This information will be used to compile statistics about the types and numbers of cases filed. You must complete items 1 through 6 on the sheet. In item 1, you must check **one** box for the case type that best describes the case. If the case fits both a general and a more specific type of case listed in item 1, check the more specific one. If the case has multiple causes of action, check the box that best indicates the **primary** cause of action. To assist you in completing the sheet, examples of the cases that belong under each case type in item 1 are provided below. A cover sheet must be filed only with your initial paper. Failure to file a cover sheet with the first paper filed in a civil case may subject a party, its counsel, or both to sanctions under rules 2.30 and 3.220 of the California Rules of Court.

To Parties in Rule 3.740 Collections Cases. A "collections case" under rule 3.740 is defined as an action for recovery of money owed in a sum stated to be certain that is not more than \$25,000, exclusive of interest and attorney's fees, arising from a transaction in which property, services, or money was acquired on credit. A collections case does not include an action seeking the following: (1) tort damages, (2) punitive damages, (3) recovery of real property, (4) recovery of personal property, or (5) a prejudgment writ of attachment. The identification of a case as a rule 3.740 collections case on this form means that it will be exempt from the general time-for-service requirements and case management rules, unless a defendant files a responsive pleading. A rule 3.740 collections case will be subject to the requirements for service and obtaining a judgment in rule 3.740.

To Parties in Complex Cases. In complex cases only, parties must also use the *Civil Case Cover Sheet* to designate whether the case is complex. If a plaintiff believes the case is complex under rule 3.400 of the California Rules of Court, this must be indicated by completing the appropriate boxes in items 1 and 2. If a plaintiff designates a case as complex, the cover sheet must be served with the complaint on all parties to the action. A defendant may file and serve no later than the time of its first appearance a joinder in the plaintiff's designation, a counter-designation that the case is not complex, or, if the plaintiff has made no designation, a designation that the case is complex.

CASE TYPES AND EXAMPLES

Auto Tort

Auto (22)—Personal Injury/Property Damage/Wrongful Death
Uninsured Motorist (46) (*if the case involves an uninsured motorist claim subject to arbitration, check this item instead of Auto*)

Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort

Asbestos (04)
Asbestos Property Damage
Asbestos Personal Injury/Wrongful Death
Product Liability (*not asbestos or toxic/environmental*) (24)
Medical Malpractice (45)
Medical Malpractice—
Physicians & Surgeons
Other Professional Health Care Malpractice
Other PI/PD/WD (23)
Premises Liability (e.g., slip and fall)
Intentional Bodily Injury/PD/WD (e.g., assault, vandalism)
Intentional Infliction of Emotional Distress
Negligent Infliction of Emotional Distress
Other PI/PD/WD

Non-PI/PD/WD (Other) Tort

Business Tort/Unfair Business Practice (07)
Civil Rights (e.g., discrimination, false arrest) (*not civil harassment*) (08)
Defamation (e.g., slander, libel) (13)
Fraud (16)
Intellectual Property (19)
Professional Negligence (25)
Legal Malpractice
Other Professional Malpractice (*not medical or legal*)
Other Non-PI/PD/WD Tort (35)

Employment

Wrongful Termination (36)
Other Employment (15)

Contract

Breach of Contract/Warranty (06)
Breach of Rental/Lease
Contract (*not unlawful detainer or wrongful eviction*)
Contract/Warranty Breach—Seller Plaintiff (*not fraud or negligence*)
Negligent Breach of Contract/Warranty
Other Breach of Contract/Warranty
Collections (e.g., money owed, open book accounts) (09)
Collection Case—Seller Plaintiff
Other Promissory Note/Collections Case
Insurance Coverage (*not provisionally complex*) (18)
Auto Subrogation
Other Coverage
Other Contract (37)
Contractual Fraud
Other Contract Dispute

Real Property

Eminent Domain/Inverse Condemnation (14)
Wrongful Eviction (33)
Other Real Property (e.g., quiet title) (26)
Writ of Possession of Real Property
Mortgage Foreclosure
Quiet Title
Other Real Property (*not eminent domain, landlord/tenant, or foreclosure*)

Unlawful Detainer

Commercial (31)
Residential (32)
Drugs (38) (*if the case involves illegal drugs, check this item; otherwise, report as Commercial or Residential*)

Judicial Review

Asset Forfeiture (05)
Petition Re: Arbitration Award (11)
Writ of Mandate (02)
Writ—Administrative Mandamus
Writ—Mandamus on Limited Court Case Matter
Writ—Other Limited Court Case Review
Other Judicial Review (39)
Review of Health Officer Order
Notice of Appeal—Labor
Commissioner Appeals

Provisionally Complex Civil Litigation (Cal. Rules of Court Rules 3.400–3.403)

Antitrust/Trade Regulation (03)
Construction Defect (10)
Claims Involving Mass Tort (40)
Securities Litigation (28)
Environmental/Toxic Tort (30)
Insurance Coverage Claims (*arising from provisionally complex case type listed above*) (41)

Enforcement of Judgment

Enforcement of Judgment (20)
Abstract of Judgment (Out of County)
Confession of Judgment (*non-domestic relations*)
Sister State Judgment
Administrative Agency Award (*not unpaid taxes*)
Petition/Certification of Entry of Judgment on Unpaid Taxes
Other Enforcement of Judgment Case

Miscellaneous Civil Complaint

RICO (27)
Other Complaint (*not specified above*) (42)
Declaratory Relief Only
Injunctive Relief Only (*non-harassment*)
Mechanics Lien
Other Commercial Complaint Case (*non-tort/non-complex*)
Other Civil Complaint (*non-tort/non-complex*)

Miscellaneous Civil Petition

Partnership and Corporate Governance (21)
Other Petition (*not specified above*) (43)
Civil Harassment
Workplace Violence
Elder/Dependent Adult Abuse
Election Contest
Petition for Name Change
Petition for Relief From Late Claim
Other Civil Petition

SHORT TITLE: Cristobal v Planned Parenthood Advocacy Project	CASE NUMBER
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BC572766

**CIVIL CASE COVER SHEET ADDENDUM AND
STATEMENT OF LOCATION
(CERTIFICATE OF GROUNDS FOR ASSIGNMENT TO COURTHOUSE LOCATION)**

This form is required pursuant to Local Rule 2.0 in all new civil case filings in the Los Angeles Superior Court.

Item I. Check the types of hearing and fill in the estimated length of hearing expected for this case:

JURY TRIAL? YES CLASS ACTION? YES LIMITED CASE? YES TIME ESTIMATED FOR TRIAL 5 HOURS/ DAYS

Item II. Indicate the correct district and courthouse location (4 steps – If you checked "Limited Case", skip to Item III, Pg. 4):

Step 1: After first completing the Civil Case Cover Sheet form, find the main Civil Case Cover Sheet heading for your case in the left margin below, and, to the right in Column **A**, the Civil Case Cover Sheet case type you selected.

Step 2: Check one Superior Court type of action in Column **B** below which best describes the nature of this case.

Step 3: In Column **C**, circle the reason for the court location choice that applies to the type of action you have checked. For any exception to the court location, see Local Rule 2.0.

Applicable Reasons for Choosing Courthouse Location (see Column C below)

- | | |
|---|---|
| <ul style="list-style-type: none"> 1. Class actions must be filed in the Stanley Mosk Courthouse, central district. 2. May be filed in central (other county, or no bodily injury/property damage). 3. Location where cause of action arose. 4. Location where bodily injury, death or damage occurred. 5. Location where performance required or defendant resides. | <ul style="list-style-type: none"> 6. Location of property or permanently garaged vehicle. 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 |
|---|---|

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 <input type="checkbox"/> A7221 Asbestos - Personal Injury/Wrongful Death	2. 2.
	Product Liability (24)	<input type="checkbox"/> A7260 Product Liability (not asbestos or toxic/environmental)	1., 2., 3., 4., 8.
	Medical Malpractice (45)	<input type="checkbox"/> A7210 Medical Malpractice - Physicians & Surgeons	1., 4.
		<input type="checkbox"/> A7240 Other Professional Health Care Malpractice	1., 4.
	Other Personal Injury Property Damage Wrongful Death (23)	<input type="checkbox"/> A7250 Premises Liability (e.g., slip and fall) <input type="checkbox"/> A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.) <input type="checkbox"/> A7270 Intentional Infliction of Emotional Distress <input type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death	1., 4. 1., 4. 1., 3. 1., 4.

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	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Non-Personal Injury/ Property Damage/ Wrongful Death Tort	Business Tort (07)	<input type="checkbox"/> A6029 Other Commercial/Business Tort (not fraud/breach of contract)	1., 3.
	Civil Rights (08)	<input type="checkbox"/> A6005 Civil Rights/Discrimination	1., 2., 3.
	Defamation (13)	<input type="checkbox"/> A6010 Defamation (slander/libel)	1., 2., 3.
	Fraud (16)	<input type="checkbox"/> A6013 Fraud (no contract)	1., 2., 3.
	Professional Negligence (25)	<input type="checkbox"/> A6017 Legal Malpractice	1., 2., 3.
		<input type="checkbox"/> A6050 Other Professional Malpractice (not medical or legal)	1., 2., 3.
Other (35)	<input type="checkbox"/> A6025 Other Non-Personal Injury/Property Damage tort	2.,3.	
Employment	Wrongful Termination (36)	<input type="checkbox"/> A6037 Wrongful Termination	1., 2., 3.
	Other Employment (15)	<input checked="" 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	2., 5., 6.
		<input type="checkbox"/> A6012 Other Promissory Note/Collections Case	2., 5.
Insurance Coverage (18)	<input type="checkbox"/> A6015 Insurance Coverage (not complex)	1., 2., 5., 8.	
Other Contract (37)	<input type="checkbox"/> A6009 Contractual Fraud	1., 2., 3., 5.	
	<input type="checkbox"/> A6031 Tortious Interference	1., 2., 3., 5.	
	<input type="checkbox"/> A6027 Other Contract Dispute(not breach/insurance/fraud/negligence)	1., 2., 3., 8.	
Real Property	Eminent Domain/Inverse Condemnation (14)	<input type="checkbox"/> A7300 Eminent Domain/Condemnation Number of parcels _____	2.
	Wrongful Eviction (33)	<input type="checkbox"/> A6023 Wrongful Eviction Case	2., 6.
	Other Real Property (26)	<input type="checkbox"/> A6018 Mortgage Foreclosure	2., 6.
<input type="checkbox"/> A6032 Quiet Title		2., 6.	
<input type="checkbox"/> A6060 Other Real Property (not eminent domain, landlord/tenant, foreclosure)		2., 6.	
Unlawful Detainer	Unlawful Detainer-Commercial (31)	<input type="checkbox"/> A6021 Unlawful Detainer-Commercial (not drugs or wrongful eviction)	2., 6.
	Unlawful Detainer-Residential (32)	<input type="checkbox"/> A6020 Unlawful Detainer-Residential (not drugs or wrongful eviction)	2., 6.
	Unlawful Detainer- Post-Foreclosure (34)	<input type="checkbox"/> A6020F Unlawful Detainer-Post-Foreclosure	2., 6.
	Unlawful Detainer-Drugs (38)	<input type="checkbox"/> A6022 Unlawful Detainer-Drugs	2., 6.

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	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., 6.
	Petition re Arbitration (11)	<input type="checkbox"/> A6115 Petition to Compel/Confirm/Vacate Arbitration	2., 5.
	Writ of Mandate (02)	<input type="checkbox"/> A6151 Writ - Administrative Mandamus <input type="checkbox"/> A6152 Writ - Mandamus on Limited Court Case Matter <input type="checkbox"/> A6153 Writ - Other Limited Court Case Review	2., 8. 2. 2.
	Other Judicial Review (39)	<input type="checkbox"/> A6150 Other Writ /Judicial Review	2., 8.
Provisionally Complex Litigation	Antitrust/Trade Regulation (03)	<input type="checkbox"/> A6003 Antitrust/Trade Regulation	1., 2., 8.
	Construction Defect (10)	<input type="checkbox"/> A6007 Construction Defect	1., 2., 3.
	Claims Involving Mass Tort (40)	<input type="checkbox"/> A6006 Claims Involving Mass Tort	1., 2., 8.
	Securities Litigation (28)	<input type="checkbox"/> A6035 Securities Litigation Case	1., 2., 8.
	Toxic Tort Environmental (30)	<input type="checkbox"/> A6036 Toxic Tort/Environmental	1., 2., 3., 8.
	Insurance Coverage Claims from Complex Case (41)	<input type="checkbox"/> A6014 Insurance Coverage/Subrogation (complex case only)	1., 2., 5., 8.
Enforcement of Judgment	Enforcement of Judgment (20)	<input type="checkbox"/> A6141 Sister State Judgment	2., 9.
		<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	2., 7.
		<input type="checkbox"/> A6170 Petition for Relief from Late Claim Law	2., 3., 4., 8.
<input type="checkbox"/> A6100 Other Civil Petition		2., 9.	

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Item III. Statement of Location: Enter the address of the accident, party's residence or place of business, performance, or other circumstance indicated in Item II., Step 3 on Page 1, as the proper reason for filing in the court location you selected.

REASON: Check the appropriate boxes for the numbers shown under Column C for the type of action that you have selected for this case. <input checked="" type="checkbox"/> 1. <input type="checkbox"/> 2. <input type="checkbox"/> 3. <input type="checkbox"/> 4. <input type="checkbox"/> 5. <input type="checkbox"/> 6. <input type="checkbox"/> 7. <input type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10.		ADDRESS: 400 W. 30th Street
CITY: Los Angeles	STATE: CA	ZIP CODE: 90007

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

Dated: February 17, 2015



(SIGNATURE OF ATTORNEY/FILING PARTY)

PLEASE HAVE THE FOLLOWING ITEMS COMPLETED AND READY TO BE FILED IN ORDER TO PROPERLY COMMENCE YOUR NEW COURT CASE:

1. Original Complaint or Petition.
2. If filing a Complaint, a completed Summons form for issuance by the Clerk.
3. Civil Case Cover Sheet, Judicial Council form CM-010.
4. Civil Case Cover Sheet Addendum and Statement of Location form, LACIV 109, LASC Approved 03-04 (Rev. 03/11).
5. Payment in full of the filing fee, unless fees have been waived.
6. A signed order appointing the Guardian ad Litem, Judicial Council form CIV-010, if the plaintiff or petitioner is a minor under 18 years of age will be required by Court in order to issue a summons.
7. Additional copies of documents to be conformed by the Clerk. Copies of the cover sheet and this addendum must be served along with the summons and complaint, or other initiating pleading in the case.

02/17/2015