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CAROLIN SHERF

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FILED
Superior Court of California
County of Los Angeles

SEP 02 2015

Sherri R. Carter, Executive Officer/Clerk
By Judi Lara, Deputy

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF LOS ANGELES - CENTRAL DISTRICT

11 CAROLIN SHERF,)
12)
13 Plaintiff,)
14 v.)
15)
16 PLANNED PARENTHOOD LOS ANGELES,)
17 a California corporation; and DOES 1 through)
18 100, Inclusive)
19 Defendants.)

CASE NO.: **BC 593264**

COMPLAINT FOR:

- (1) EMPLOYMENT DISCRIMINATION BECAUSE OF PHYSICAL DISABILITY;
- (2) FAILURE TO REASONABLY ACCOMMODATE PHYSICAL DISABILITY;
- (3) FAILURE TO ENGAGE IN A TIMELY, GOOD FAITH, INTERACTIVE PROCESS WITH EMPLOYEE WITH A PHYSICAL DISABILITY;
- (4) RETALIATION;
- (5) WRONGFUL TERMINATION; and
- (6) WRONGFUL TERMINATION IN VIOLATION OF PUBLIC POLICY

DEMAND FOR JURY TRIAL

25 COMES NOW plaintiff CAROLIN SHERF (hereinafter "SHERF" or "Plaintiff") who
26 complains and alleges as follows:

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28 ///

RECEIPT #: CCH520872089
DATE PAID: 09/02/15 02:50 PM
PAYMENT: \$435.00
RECEIVED:
CASH: \$435.00
CHECK: \$0.00
CHARGE CARD: \$0.00
CARD: \$0.00

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ALLEGATIONS COMMON TO ALL CAUSES OF ACTION

1
2 1. Plaintiff, SHERF is and was, at all times relevant hereto, an individual residing in
3 the State of California.

4 2. Plaintiff, SHERF is a twenty-nine year old Caucasian female who suffered from
5 tumor in her kidney. Due to her physical disability, SHERF is entitled to protection under
6 California Department Fair Employment and Housing Act under California Government Code
7 §12900 et seq. (hereinafter "FEHA") and California common law.

8 3. Plaintiff is informed and believes, and thereon alleges that, at all times herein
9 mentioned, defendant PLANNED PARENTHOOD LOS ANGELES (hereinafter "PPLA" or
10 "Defendants"), is and was a California corporation duly organized, authorized, and licensed to do
11 business in the State of California. Defendant PPLA regularly employs five or more employees
12 and falls within the requirement of FEHA and California Government Code §12900 et seq.

13 4. The true names and capacities, whether individual, corporate, associate, or
14 otherwise, of the Defendants named herein as DOES 1 through 100, inclusive, are unknown to
15 Plaintiff, who therefore sue said Defendants by such fictitious names pursuant to California Code
16 of Civil Procedure §474, and Plaintiff will amend this complaint to show their true names and
17 capacities when the same have been ascertained. Plaintiff is informed and believes and based
18 upon such information and belief alleges that all defendants sued herein as DOES are in some
19 manner responsible for the acts herein alleged and that Plaintiff's damages were proximately
20 caused by their conduct.

21 5. Plaintiff is informed and believes, and based thereon alleges, that at all times
22 mentioned herein, each of the Defendants was the agent, principal, employee, employer,
23 representative, joint venturer or co-conspirator of each of the other Defendants, either actually or
24 ostensibly, and in doing the things alleged herein acted within the course and scope of such
25 agency, employment, joint venture and conspiracy.

26 6. All of the acts and conduct herein and below described of each and every corporate
27 defendant was duly authorized, ordered, and directed by the respective and collective defendant
28 corporate employers and the officers and management-level employees of said corporate

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1 employers. In addition thereto, said corporate employers participated in the aforementioned acts
2 and conduct of their said employees, agents and representatives, and each of them; and upon
3 completion of the aforesaid acts and conduct of said corporate employees, agents and
4 representatives, the defendant corporation respectively and collectively ratified, accepted the
5 benefits of, condoned, lauded, acquiesced, authorized, and otherwise approved of each and all of
6 the said acts and conduct of the aforementioned corporate employees, agents, and representatives.

7 7. Plaintiff was hired by Defendants in or about April 2013 as a Physician's Assistant.
8 At all times herein mentioned SHERF was qualified for and was able to perform her essential
9 duties as a Physician's Assistant.

10 8. In or about September 2013, Plaintiff was taken off work by her doctor to undergo
11 surgery on her kidney. Plaintiff's doctor took her off work for six to eight weeks. Plaintiff was
12 released to go back to work in November 2013. In response to Plaintiff's request for time off to
13 undergo kidney surgery, Defendants terminated her employment effective September 12, 2013.

14 9. Plaintiff filed a complaint with the Department of Fair Employment and Housing
15 against Defendants and obtained the Notice of Right to Sue.

16 **FIRST CAUSE OF ACTION**
17 **(EMPLOYMENT DISCRIMINATION BECAUSE OF PHYSICAL DISABILITY**
18 **AGAINST PPLA AND DOES)**

19 10. Plaintiff realleges and incorporates by reference all of the allegations contained in
20 the preceding paragraphs of this Complaint as though fully set forth herein.

21 11. Defendants, and each of them, discriminated against Plaintiff by treating her
22 differently and terminating her employment because of her physical disability. Defendants'
23 actions were in violation of the FEHA, California Government Code §12900, et seq.

24 12. At all times Plaintiff was an employee within the meaning of California
25 Government Code §12926 and at all times during her employment she performed in a competent,
26 satisfactory manner.

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1 13. Plaintiff is informed and believes and based thereon alleges that in addition to the
2 practices enumerated above, Defendants may have engaged in other discriminatory practices
3 against her which are not yet fully known. At such time as such discriminatory practices become
4 known to her, Plaintiff will seek leave of Court to amend this Complaint in that regard.

5 14. Plaintiff filed Charges of Discrimination with the California Department of Fair
6 Employment and Housing (hereinafter "DFEH"). Plaintiff has exhausted her administrative
7 remedies, received her Notice of Right to Sue letter, and timely files this action.

8 15. As a direct and proximate result of Defendants' willful, knowing, and intentional
9 discrimination against her, Plaintiff has sustained, and continues to sustain, loss of earnings, the
10 full nature and extent of which are presently unknown to Plaintiff, who therefore, will seek leave
11 of court to amend her complaint at such time as these damages are fully ascertained.

12 16. As a further direct and proximate result of Defendants' discriminatory conduct and
13 actions against her in violation of California Government Code § 12900 et. seq. as heretofore
14 described, Plaintiff has been damaged and deprived of the security, solace, and piece of mind for
15 which she entered the employment relationship with Defendants, and each of them, thereby
16 causing her to suffer emotional and mental distress, anguish, embarrassment, and humiliation, all
17 to her general damages in an amount according to proof at trial, but in excess of the jurisdictional
18 amount of this court.

19 17. Plaintiff further requests attorneys' fees be awarded to her pursuant to California
20 Government Code §12965.

21 18. Plaintiff is informed and believes and based thereon alleges that the outrageous
22 conduct of Defendants described above was done with malice, fraud, and oppression and with
23 conscious disregard for her rights, and with the intent, design, and purpose of injuring her.
24 Defendants, through their officers, managing agents, and/or its supervisors, authorized, condoned,
25 and/or ratified the unlawful conduct of all of the other Defendants named in this action. By reason
26 thereof, Plaintiff is entitled to punitive or exemplary damages from all Defendants in a sum
27 according to proof at trial.

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1 amount of this court.

2 26. Plaintiff further requests attorneys' fees be awarded to her pursuant to California
3 Government Code §12965.

4 27. Plaintiff is informed and believes and based thereon alleges that the outrageous
5 conduct of Defendants described above was done with malice, fraud, and oppression and with
6 conscious disregard for her rights and with the intent, design, and purpose of injuring her.
7 Defendants, through its officers, managing agents, and/or its supervisors, authorized, condoned,
8 and/or ratified the unlawful conduct of all of the other Defendants named in this action. By reason
9 thereof, Plaintiff is entitled to punitive or exemplary damages from all Defendants in a sum
10 according to proof at trial.

11 **THIRD CAUSE OF ACTION**

12 **(FAILURE TO ENGAGE IN A TIMELY, GOOD FATH, INTERACTIVE PROCESS**

13 **WITH AN EMPLOYEE WITH A PHYSICAL DISABILITY**

14 **AGAINST PPLA AND DOES)**

15 28. Plaintiff realleges and incorporates by reference all of the allegations contained in
16 the preceding paragraphs of this Complaint as though fully set forth herein.

17 29. Defendants, and each of them, discriminated against Plaintiff by failing to engage
18 in a timely, good faith, interactive process with Plaintiff to determine reasonable accommodations
19 in response to Plaintiff's request in violation of California Government Code §12940(n).

20 30. At all times Plaintiff was an employee within the meaning of California
21 Government Code §12926 and at all times during her employment she performed in a competent,
22 satisfactory manner.

23 31. Plaintiff is informed and believes and based thereon alleges that in addition to the
24 practices enumerated above, Defendants may have engaged in other discriminatory practices
25 against her which are not yet fully known. At such time as such discriminatory practices become
26 known to her, Plaintiff will seek leave of Court to amend this Complaint in that regard.

27 32. Plaintiff filed Charges of Discrimination with the DFEH. Plaintiff has exhausted
28 her administrative remedies, received her Notice of Right to Sue letter, and timely files this action.

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1 39. Plaintiff is informed and believes, and based thereon alleges, that in addition to the
2 practices enumerated above, Defendants, and each of them, have engaged in other discriminatory
3 practices against her which are not yet fully known. At such time as said discriminatory practices
4 become known to her, Plaintiff will seek leave of Court to amend this complaint in that regard.

5 40. Plaintiff filed Charges of Discrimination with the DFEH. Plaintiff has exhausted
6 her administrative remedies, received her Notice of Right to Sue letter, and timely files this action.

7 41. As a direct and proximate result of Defendants' willful, knowing, and intentional
8 discrimination against her, Plaintiff has sustained, and continues to sustain, loss of earnings, the
9 full nature and extent of which are presently unknown to Plaintiff, who therefore, will seek leave
10 of court to amend her complaint at such time as these damages are fully ascertained.

11 42. As a direct and proximate result of Defendants' willful, knowing, and intentional
12 discrimination against her, Plaintiff has suffered and will continue to suffer pain and suffering and
13 extreme and severe mental anguish and emotional distress, and she has suffered and will continue
14 to suffer a loss of earnings and other employment benefits and job opportunities. Plaintiff is
15 hereby entitled to general and compensatory damages in amounts to be proven at trial.

16 43. Plaintiff further requests attorneys' fees be awarded to her pursuant to California
17 Government Code §12965.

18 44. Plaintiff is informed and believes, and based thereon alleges, that the outrageous
19 conduct of Defendants described above was done with fraud, oppression, and malice, and with a
20 conscious disregard for her right to be free of retaliation, and with the intent, design, and purpose
21 of injuring her. Plaintiff is further informed and believe that Defendants, through their officers,
22 managing agents, and/or supervisors, authorized, condoned, and/or ratified the unlawful conduct
23 of all of the other Defendants named in this action. By reason thereof, Plaintiff is entitled to
24 punitive or exemplary damages from all Defendants in a sum according to proof at trial.

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1 FIFTH CAUSE OF ACTION
2 (WRONGFUL TERMINATION IN VIOLATION OF
3 CALIFORNIA GOVERNMENT CODE SECTION 12900 ET SEQ.
4 AGAINST PPLA AND DOES)

5 45. Plaintiff realleges and incorporates by reference all of the allegations contained in
6 the preceding paragraphs of this Complaint as though fully set forth herein.

7 46. Plaintiff is informed and believes that her employment was terminated as a result of
8 her physical disability in violation of California Government Code §12900, et seq.

9 47. At all times Plaintiff was an employee within the meaning of California
10 Government Code §12926 and at all times during her employment she performed in a competent,
11 satisfactory manner.

12 48. Plaintiff filed Charges of Discrimination with the DFEH. Plaintiff has exhausted
13 her administrative remedies, received her Notice of Right to Sue letter, and timely files this action.

14 49. As a direct and proximate result of Defendants' termination of Plaintiff in violation
15 of California Government Code §12900, et seq., Plaintiff has suffered and will continue to suffer
16 pain and suffering and extreme and severe mental anguish and emotional distress, and has suffered
17 and will continue to suffer a loss of earnings and other employment benefits and job opportunities.
18 Plaintiff is thereby entitled to general and compensatory damages in amounts to be proven at trial.

19 50. As a further direct and proximate result of Defendants' discriminatory conduct and
20 actions against her in violation of California Government Code § 12900 et. seq. as heretofore
21 described, Plaintiff has been damaged and deprived of the security, solace, and piece of mind for
22 which she entered the employment relationship with Defendants, and each of them, thereby
23 causing her to suffer emotional and mental distress, anguish, embarrassment, and humiliation, all
24 to her general damages in an amount according to proof at trial, but in excess of the jurisdictional
25 amount of this court.

26 51. Plaintiff further requests attorneys' fees be awarded to her pursuant to California
27 Government Code §12965.

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1 52. Plaintiff is informed and believes and based thereon alleges that the outrageous
2 conduct of Defendants described above was done with malice, fraud, and oppression and with
3 conscious disregard for her rights and with the intent, design, and purpose of injuring her.
4 Defendants, through its officers, managing agents, and/or its supervisors, authorized, condoned,
5 and/or ratified the unlawful conduct of all of the other Defendants named in this action. By reason
6 thereof, Plaintiff is entitled to punitive or exemplary damages from all Defendants in a sum
7 according to proof at trial.

8 **SIXTH CAUSE OF ACTION**
9 **(WRONGFUL TERMINATION IN VIOLATION**
10 **OF PUBLIC POLICY AGAINST PPLA AND DOES)**

11 53. Plaintiff realleges and incorporates by reference all of the allegations contained in
12 the preceding paragraphs of this Complaint as though fully set forth herein.

13 54. Plaintiff is informed and believes that her employment was terminated as a result of
14 her physical disability.

15 55. It is the public policy of the State of California as expressed in the Americans with
16 Disabilities Act, Federal Statute, California Fair Employment and Housing Act, and the Federal
17 and California Constitution that individuals shall not be terminated from their employment on the
18 basis of their physical disability.

19 56. As a direct and proximate result of Defendants' termination of Plaintiff in violation
20 of the public policy of the State of California, Plaintiff has suffered and will continue to suffer
21 pain and suffering and extreme and severe mental anguish and emotional distress, and has suffered
22 and will continue to suffer a loss of earnings and other employment benefits and job opportunities.
23 Plaintiff is thereby entitled to general and compensatory damages in amounts to be proven at trial.

24 57. As a direct and proximate result of Defendants' willful, knowing, and intentional
25 discrimination against her, Plaintiff has sustained, and continues to sustain, loss of earnings, the
26 full nature and extent of which are presently unknown to Plaintiff, who therefore, will seek leave
27 of court to amend her complaint at such time as these damages are fully ascertained.

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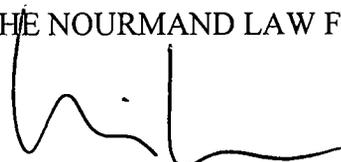
1 58. Plaintiff is informed and believes and based thereon alleges that the outrageous
2 conduct of Defendants described above was done with malice, fraud, and oppression and with
3 conscious disregard for her rights, and with the intent, design, and purpose of injuring her.
4 Defendants, through its officers, managing agents, and/or its supervisors, authorized, condoned,
5 and/or ratified the unlawful conduct of all of the other Defendants named in this action. By reason
6 thereof, Plaintiff is entitled to punitive or exemplary damages from all Defendants in a sum
7 according to proof at trial.

8 WHEREFORE, Plaintiff prays for Judgment against Defendants as follows :

- 9 1. For general and compensatory damages according to proof;
- 10 2. For lost salary, both front and back pay, bonuses, benefits, and any other benefits to
11 which Plaintiff would have been entitled to by reason of her employment with
12 Defendants, according to proof;
- 13 3. Punitive and exemplary and punitive damages against Defendants;
- 14 4. For prejudgment interest at the maximum rate allowed by law;
- 15 5. For attorneys' fees pursuant to California Government Code §12965(b) (on the 1st,
16 2nd, 3rd, 4th, and 5th Cause of Action);
- 17 6. For costs of suit incurred herein; and
- 18 7. For such other and further relief as the Court deems just and proper.

19
20 DATED: September 1, 2015

THE NOURMAND LAW FIRM, APC

21
22 By: 

23 Michael Nourmand, Esq.
24 Attorneys for Plaintiff

09/02/2015

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):

Michael Nourmand, Esq. (SBN 198439)
THE NOURMAND LAW FIRM, APC
8822 West Olympic Boulevard

Beverly Hills, California 90211

TELEPHONE NO.: (310) 553-3600 FAX NO.:

ATTORNEY FOR (Name): Plaintiff

SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles

STREET ADDRESS: 111 North Hill Street

MAILING ADDRESS:

CITY AND ZIP CODE: Los Angeles, California 90012

BRANCH NAME: Central District

CASE NAME: Sherf v. Planned Parenthood Los Angeles, et al.

FOR COURT USE ONLY

FILED

Superior Court of California
County of Los Angeles

SEP 02 2015

Sherri R. Carter, Executive Officer/Clerk

By Judi Lara, Deputy

CASE NUMBER:

BC 593264

JUDGE:

DEPT:

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)

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

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

Auto Tort

Auto (22)
 Uninsured motorist (46)

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

Asbestos (04)
 Product liability (24)
 Medical malpractice (45)
 Other PI/PD/WD (23)

Non-PI/PD/WD (Other) Tort

Business tort/unfair business practice (07)
 Civil rights (08)
 Defamation (13)
 Fraud (16)
 Intellectual property (19)
 Professional negligence (25)
 Other non-PI/PD/WD tort (35)

Employment

Wrongful termination (36)
 Other employment (15)

Contract

Breach of contract/warranty (06)
 Rule 3.740 collections (09)
 Other collections (09)
 Insurance coverage (18)
 Other contract (37)

Real Property

Eminent domain/Inverse condemnation (14)
 Wrongful eviction (33)
 Other real property (26)

Unlawful Detainer

Commercial (31)
 Residential (32)
 Drugs (38)

Judicial Review

Asset forfeiture (05)
 Petition re: arbitration award (11)
 Writ of mandate (02)
 Other judicial review (39)

Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403)

Antitrust/Trade regulation (03)
 Construction defect (10)
 Mass tort (40)
 Securities litigation (28)
 Environmental/Toxic tort (30)
 Insurance coverage claims arising from the above listed provisionally complex case types (41)

Enforcement of Judgment

Enforcement of judgment (20)

Miscellaneous Civil Complaint

RICO (27)
 Other complaint (not specified above) (42)

Miscellaneous Civil Petition

Partnership and corporate governance (21)
 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
- b. Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve
- c. Substantial amount of documentary evidence
- d. Large number of witnesses
- e. Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court
- 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): 6

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: September 1, 2015

Michael Nourmand, Esq. (SBN 198439)

(TYPE OR PRINT NAME)

(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

NOTICE

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

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

This form is required pursuant to Local Rule 2.0 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 5-7 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)

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

SHORT TITLE: Sherf v. Planned Parenthood Los Angeles, et al.

CASE NUMBER

Non-Personal Injury/Property
Damage/Wrongful Death Tort

Employment

Contract

Real Property

Unlawful Detainer

A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Business Tort (07)	<input type="checkbox"/> A6029 Other Commercial/Business Tort (not fraud/breach of contract)	1., 3.
Civil Rights (08)	<input type="checkbox"/> A6005 Civil Rights/Discrimination	1., 2., 3.
Defamation (13)	<input type="checkbox"/> A6010 Defamation (slander/libel)	1., 2., 3.
Fraud (16)	<input type="checkbox"/> A6013 Fraud (no contract)	1., 2., 3.
Professional Negligence (25)	<input type="checkbox"/> A6017 Legal Malpractice <input type="checkbox"/> A6050 Other Professional Malpractice (not medical or legal)	1., 2., 3. 1., 2., 3.
Other (35)	<input type="checkbox"/> A6025 Other Non-Personal Injury/Property Damage tort	2., 3.
Wrongful Termination (36)	<input checked="" type="checkbox"/> A6037 Wrongful Termination	1., 2., 3.
Other Employment (15)	<input type="checkbox"/> A6024 Other Employment Complaint Case <input type="checkbox"/> A6109 Labor Commissioner Appeals	1., 2., 3. 10.
Breach of Contract/ Warranty (06) (not insurance)	<input type="checkbox"/> A6004 Breach of Rental/Lease Contract (not unlawful detainer or wrongful eviction) <input type="checkbox"/> A6008 Contract/Warranty Breach -Seller Plaintiff (no fraud/negligence) <input type="checkbox"/> A6019 Negligent Breach of Contract/Warranty (no fraud) <input type="checkbox"/> A6028 Other Breach of Contract/Warranty (not fraud or negligence)	2., 5. 2., 5. 1., 2., 5. 1., 2., 5.
Collections (09)	<input type="checkbox"/> A6002 Collections Case-Seller Plaintiff <input type="checkbox"/> A6012 Other Promissory Note/Collections Case	2., 5., 6. 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 <input type="checkbox"/> A6031 Tortious Interference <input type="checkbox"/> A6027 Other Contract Dispute(not breach/insurance/fraud/negligence)	1., 2., 3., 5. 1., 2., 3., 5. 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 <input type="checkbox"/> A6032 Quiet Title <input type="checkbox"/> A6060 Other Real Property (not eminent domain, landlord/tenant, foreclosure)	2., 6. 2., 6. 2., 6.
Unlawful Detainer-Commercial (31)	<input type="checkbox"/> A6021 Unlawful Detainer-Commercial (not drugs or wrongful eviction)	2., 6.
Unlawful Detainer-Residential (32)	<input type="checkbox"/> A6020 Unlawful Detainer-Residential (not drugs or wrongful eviction)	2., 6.
Unlawful Detainer- Post-Foreclosure (34)	<input type="checkbox"/> A6020F Unlawful Detainer-Post-Foreclosure	2., 6.
Unlawful Detainer-Drugs (38)	<input type="checkbox"/> A6022 Unlawful Detainer-Drugs	2., 6.

SHORT TITLE: Sherf v. Planned Parenthood Los Angeles, et al.

CASE NUMBER

A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
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.
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 (20)	<input type="checkbox"/> A6141 Sister State Judgment <input type="checkbox"/> A6160 Abstract of Judgment <input type="checkbox"/> A6107 Confession of Judgment (non-domestic relations) <input type="checkbox"/> A6140 Administrative Agency Award (not unpaid taxes) <input type="checkbox"/> A6114 Petition/Certificate for Entry of Judgment on Unpaid Tax <input type="checkbox"/> A6112 Other Enforcement of Judgment Case	2., 9. 2., 6. 2., 9. 2., 8. 2., 8. 2., 8., 9.
RICO (27)	<input type="checkbox"/> A6033 Racketeering (RICO) Case	1., 2., 8.
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.
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.

Judicial Review

Provisionally Complex Litigation

Enforcement of Judgment

Miscellaneous Civil Complaints

Miscellaneous Civil Petitions

SHORT TITLE: Sherf v. Planned Parenthood Los Angeles, et al.

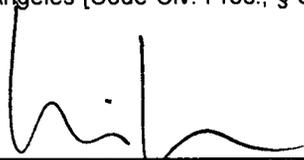
CASE NUMBER

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 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.			ADDRESS: 400 West 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, subds. (b), (c) and (d)].

Dated: 9/1/15


 (SIGNATURE OF ATTORNEY/FILING PARTY)
 Michael Nourmand, Esq.

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.

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