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FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

SEP 27 2013

Attorney for Plaintiff,
Kristine Wallace

John A. [Signature], Executive Officer/Clerk

BY [Signature] Deputy
Wancy Alvatez

(Faxed Filed)

D. J. Kwine - Branch

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

KRISTINE WALLACE, an individual,
Plaintiff,

Case No.:

BC 522 42 4

vs.

COMPLAINT FOR DAMAGES

PLANNED PARENTHOOD LOS ANGELES,
a corporation doing business in California; and
DOES 1 through 50, inclusive,

- 1. AGE DISCRIMINATION IN VIOLATION OF GOVERNMENT CODE § 12940(A)**
- 2. WRONGFUL TERMINATION IN VIOLATION OF PUBLIC POLICY**
- 3. FAILURE TO TAKE REMEDIAL ACTION IN VIOLATION OF GOVERNMENT CODE § 12940(K)**
- 4. SLANDER**
- 5. LIBEL**

Defendants.

PRELIMINARY STATEMENT

1. Plaintiff Kristine Wallace brings this action due to the fact that her former employer, Defendant Planned Parenthood Los Angeles ("Defendant" or "PPLA"), and certain of its administrators, supervisors and/or employees, subjected her to a violation of her rights under California Fair Employment and Housing Act ("FEHA"), as well as her rights guaranteed under the California constitution, in that PPLA discriminated against her due to her age. Plaintiff further alleges that Defendants, for the sake of expediency, and for no other purpose other than to cause injury to Plaintiff's

RECEIPT # 10045103300
DATE PAID: 10/01/13
PAYMENT: \$435.00
RECEIVED: 10/01/13 2:22 PM
LEA/DEF#: 80522424
CIT/PASE: 80522424
CHECK: \$0.00
DASH: \$0.00
CHARGE: \$0.00
CARP: \$0.00

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1 reputation and character, did so maliciously publish defamatory statements concerning Plaintiff,
 2 verbally in writing, knowing or having reason to know that such statements were false. Plaintiff has
 3 suffered general and special damages as a consequence defendants' actions, and she will continue to
 4 suffer damages until this Court affords the appropriate relief that she seeks.

5 **PARTIES**

6 2. Plaintiff Kristine Wallace ("Plaintiff" or "Ms. Wallace") is an individual and resident
 7 of the County of Los Angeles, within the State of California. She is a citizen of the United States and
 8 was 53 years of age at the time of the termination and discriminatory conduct which is the subject of
 9 this lawsuit. At all relevant times during the occurrence of the operative facts set forth herein, Plaintiff
 10 was an employee of Defendant Planned Parenthood Los Angeles.

11 3. Defendant Planned Parenthood Los Angeles is, under information and belief, a non-profit
 12 organization authorized to do business in the City of Los Angeles, County of Los Angeles, within the
 13 State of California. Planned Parenthood Los Angeles ("PPLA") employs over 500 or more persons and
 14 is an "employer" within the meaning of Government Code section 12900, *et. seq.*, and as defined in
 15 Government Code section 12926(c). At all relevant times, PPLA operated facilities providing
 16 reproductive healthcare in communities throughout the United States. Defendant PPLA acted through
 17 its officers, directors, managing agents, servants, supervisory employees and/or representatives.

18 4. Plaintiff is ignorant of the true names and capacities of those persons sued herein as
 19 "DOES 1 through 50, inclusive," and therefore sues these defendants by such fictitious names. Plaintiff
 20 will amend this Complaint for Damages to allege these defendants' true names and capacities when
 21 ascertained. Plaintiff is informed and believes, and on such basis alleges, that each of the fictitiously
 22 named defendants is responsible in some manner for the occurrences alleged herein and that Plaintiff's
 23 damages were directly caused by such defendants.

24 5. Plaintiff is informed and believes that, at all times mentioned herein, that each defendant
 25 was the agent, servant, employee, co-venturer, co-conspirator, or representative of the others and was
 26 acting within the course, scope, purpose, consent, knowledge, ratification or authorization of such
 27 agency, employment, joint venture or conspiracy.
 28

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FACTUAL ALLEGATIONS

6. Defendant PPLA hired Plaintiff in approximately March 2012. From her date of hire until the time of her termination, Plaintiff worked as a Senior Accountant.

7. Throughout the tenure of her employment Plaintiff consistently fulfilled her responsibilities in a competent and excellent manner. She was, in that regard, recognized for her good work with a raise in her salary in or about January 2013, prior to completing even a year of employment with PPLA.

8. In approximately 2013, Defendant PPLA underwent a change in management whereby it sought to employ employees much younger than Plaintiff in its accounting department, and/or otherwise made employment decisions affecting employees in the accounting department because of their age.

9. On or about March 26, 2013, PPLA falsely accused Plaintiff of defacing the outside of a window of its office building with sexually graphic graffiti the previous day (March 25, 2013), and thereby sexually harassing the employee who used the affected office. In an attempt to substantiate this false and absurd allegation, PPLA produced a security camera video showing Plaintiff walking on the sidewalk outside the building in the general vicinity of said wall, during her daily morning break. (PPLA was already well aware that Ms. Wallace took her required morning break around the same time each day, and would exit the building and walk to the end of the block and back for fresh air. Thus, in leaving the building, she was essentially forced to pass by the window on which the graffiti was found, as would anyone else who happened to exit or enter the building, arriving from that direction.) However, that is all the video showed. Plaintiff was not carrying a spray can nor did her arm gestures at any time suggest that she was engaged in graffiti; in fact, she only stopped walking to reply to a text message on her cell phone. Furthermore, the video does not provide any evidence of the time period during which the graffiti could have been placed on the building.

10. The security camera footage showed numerous other Planned Parenthood employees as well as other, unknown individuals, walking by the subject window on March 25, 2013, during the time frame when the graffiti may have been applied. The employees were questioned as to whether they had seen the graffiti; some said they had noticed it while others said they had not. However, they were all

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1 taken at their word and presumed to have no knowledge of how the graffiti got there; PPLA neither
 2 accused anyone else of defacing the building nor fired anyone else other than Ms. Wallace.
 3 Furthermore, the video showed a PPLA maintenance employee, Carlos Plascencia, working to remove
 4 other graffiti from the same wall, 25 feet over from the window in question; as well as a couple with
 5 a small child walking by; the couple stopped and asked Mr. Plascencia about the effectiveness of the
 6 anti-graffiti wipes he was using to remove the paint.

7 11. Thus PPLA ignored the many other potential "suspects" who had engaged in the same
 8 activity as Ms. Wallace, namely walking on the sidewalk outside PPLA's building (to go to lunch or
 9 for some other reason), and ignored the fact that it had an ongoing problem with graffiti, with the
 10 culprit(s) potentially being neighborhood teenagers (who may have been entertaining themselves
 11 without regard to the occupant of the building they defaced); members of "Operation Rescue" or some
 12 other terrorist group known for blockading and bombing women's health clinics and shooting doctors
 13 who perform abortions; Mitt Romney, who famously said "Planned Parenthood, we're going to get rid
 14 of that," when he was running for president in 2012; Senator Todd Akin or another politician at war
 15 with women, or who otherwise prefers the alternative of "unplanned parenthood" as a policy goal; or
 16 anyone else on the planet who may or may not believe that women's reproductive health care is
 17 somehow morally wrong. Or perhaps the perpetrator was someone who actually knew the woman who
 18 used the office with the affected window and was out to get her or sought to terrorize her due to some
 19 personal conflict.

20 12. Despite the complete lack of evidence implicating Ms. Wallace, nor any reason at all to
 21 suspect her of such conduct, PPLA terminated Plaintiff immediately without any further investigation.
 22 This was also despite the fact that Plaintiff emphatically denied having anything to do with it, and the
 23 utter absurdity of the idea that a 53-year-old female accountant, working for a non-profit organization
 24 devoted to women's health care, who had no conflicts whatsoever with PPLA nor any other members
 25 of the staff, and who barely even knew the woman who used the affected office (as Ms. Wallace's job
 26 duties did not bring her in contact with that individual), would deface the building where she worked
 27 with a drawing of a penis, in broad daylight no less. This absurd accusation was made despite the lack
 28 of any reason or motive for Ms. Wallace to engage in such anti-social, misogynist behavior, and despite

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1 her being an upstanding member of her profession who always exhibited a professional attitude and was
 2 dedicated to her work for the very organization that suffered the vandalism, and which provided her
 3 with her livelihood. In short, the accusation made no sense and was based on no evidence whatsoever -
 4 the video of Ms. Wallace's walking past the building to take her daily break simply showed her going
 5 about her daily routine as she always did.

6 13. Notably, PPLA's abrupt notice of termination was given on Plaintiff's one-year
 7 anniversary of employment with PPLA, when she was due to become vested in the organization's
 8 403(b) retirement plan, which is equivalent to a 401(k) plan in private enterprise, but for a non-profit
 9 organization.

10 14. PPLA's justification and explanation for terminating Plaintiff were false. The true facts
 11 are that PPLA terminated Plaintiff because of (i) Plaintiff's age; and/or (ii) a personal dislike of
 12 Plaintiff; and/or (iii) a fear that the woman whose office window was defaced might herself interpret
 13 the drawing of a man's penis on her office window as emanating from PPLA and bring a lawsuit herself
 14 against the organization, unless it chose a scapegoat and expediently fired that person. Whether it be
 15 as a result of Plaintiff's age, and/or personal dislike of Plaintiff, and/or wanting to ward off a lawsuit
 16 from another front, and/or for any other reason not yet known or discovered, PPLA did so knowingly
 17 decide to publish verbal and written statements regarding Plaintiff knowing and/or having reason to
 18 know such statements were false, and in so doing, did so maliciously, callously, fraudulently and/or
 19 wantonly decide to unlawfully injure Plaintiff's reputation and character for their own self-interest.

20 15. Plaintiff, at all times throughout, was qualified to hold the position of Senior Accountant.
 21 On information and belief, the only other employee in the accounting department who was also over
 22 40 years of age had already been targeted for termination prior to the date Plaintiff was terminated.

23 16. Moreover, PPLA caused damage to Ms. Wallace's reputation and career by
 24 communicating false information that she had committed a crime and engaged in conduct of a
 25 despicable nature, and was therefore unfit to continue her employment with PPLA, to many individuals
 26 including, but not limited to: PPLA employees Yadira Diaz, Christine Dean, Leslie Jordan, Nick
 27 Scinocia, Abbey Williams, the PPLA Executive Team, and on information and belief, all other PPLA
 28 employees; and employees of Enterprise Security Engineering department and Bosch Security Systems.

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1 17. PPLA caused further damage to Ms. Wallace by creating a document entitled "Planned
 2 Parenthood Los Angeles/Security Incident Report Form" dated March 25, 2013 ("Incident Report
 3 Form"), in which it falsely accused her of defacing its building with sexually explicit graffiti that same
 4 day, and claimed she was potentially unfit to continue in her employment with PPLA as a result thereof.
 5 Said document was placed and maintained in her personnel file (along with other documents noting that
 6 she was in fact terminated from her employment with PPLA). PPLA, at the time of its preparation of
 7 this Incident Report Form, and its placement in Plaintiff's personnel file, knew and/or had reason to
 8 know that its statements, findings and conclusions were false and did so proceed to publish such false
 9 statements, findings and conclusions with evil motive and malice, wilfully and wrongfully, and with
 10 intent to injure, disgrace and defame Plaintiff, and with wanton and reckless disregard for the truth or
 11 falsity of statements, finding and conclusions made.

12 **EXHAUSTION OF ADMINISTRATIVE PROCEEDINGS**

13 18. In compliance with her rights under the Fair Employment and Housing Act (hereinafter
 14 "FEHA"), Government Code section 12900, *et seq.*, Plaintiff timely filed a Charge of Discrimination
 15 with the Department of Fair Employment and Housing (hereinafter "DFEH"), alleging age
 16 discrimination. Plaintiff received "Notice of Case Closure" and "Right to Sue" letters regarding her age
 17 and gender discrimination charges on June 25, 2013. Thus, Plaintiff has completely exhausted her
 18 administrative remedies. (A copy of Plaintiff's Right to Sue is attached as Exhibit "A".)

19 **FIRST CAUSE OF ACTION**

20 **(For Age Discrimination in Violation of Government Code §12940(a))**

21 **[Against All Defendants and DOES 1 through 50]**

22 19. Plaintiff repeats and realleges the allegations contained in paragraphs 1 through 18,
 23 inclusive, as if fully set forth herein.

24 20. On or about March 26, 2013, Plaintiff was informed by Defendant that she was being
 25 terminated because of applying graffiti to the outside of the building. The justification given by PPLA
 26 for terminating Plaintiff was false and a pretext for the true unlawful motivation behind her termination,
 27 in that Plaintiff's termination was part of an effort by PPLA to establish a younger workforce in its
 28 accounting department.

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1 21. California Government Code section 12941, et. seq., provides that it is an unlawful
 2 employment practice for an employer to discriminate in the terms and conditions of employment on the
 3 basis of age, for any worker over the age of 40.

4 22. Defendants violated Government Code section 12941, et. seq., with regard to Plaintiff
 5 when it discriminated against her on the basis of age, and terminated her employment due to her age;
 6 informed Plaintiff not to bother looking for a new position with the organization after her termination
 7 as none were available when, if fact, others were; and/or took other adverse employment actions against
 8 Plaintiff while providing more favorable treatment to substantially younger workers under the age of
 9 40.

10 23. Defendants' conduct toward Plaintiff as alleged above constitutes an unlawful
 11 employment practice in violation of California Government Code section 12941.

12 24. As a direct and proximate result of Defendants' conduct, Plaintiff has suffered loss of
 13 employment, indignity, severe humiliation, and emotional distress manifesting in physical symptoms
 14 including but not limited to headaches, loss of sleep, and anxiety.

15 25. Defendants' actions have caused and continue to cause Plaintiff substantial losses of
 16 earnings, significant reputation and professional injury, loss of promotional opportunities and other
 17 employment benefits, lost wages, future earnings and benefits, and costs of suit. In addition,
 18 Defendants' actions have caused Plaintiff to experience humiliation, embarrassment, anguish, and
 19 physical symptoms as referenced above, all to her damage in an amount according to proof.

20 26. Defendants, by their actions as set forth above, have engaged in despicable conduct,
 21 exposing Plaintiff to cruel and unjust hardship, with the intention to cause injury to Plaintiff and with
 22 conscious disregard of her rights. Defendants occupied a position of trust which gave them power to
 23 avoid damaging Plaintiff's ability to earn her livelihood. Defendants abused that position of trust by
 24 maliciously, fraudulently and oppressively subjecting Plaintiff to the circumstances described herein.
 25 To the extent that these damages stem from the behavior of any individual Defendant, Plaintiff is
 26 therefore entitled to punitive damages, in an amount to be proven at trial. Plaintiff has been compelled
 27 to seek legal services to redress the discriminatory actions taken by Defendants and, therefore, seeks
 28 reasonable attorneys' fees in an amount according to proof at trial, pursuant to Government Code

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1 section 12965.

2 27. As a direct and proximate result of Defendants' acts and omissions as described above,
3 Plaintiff has suffered and continues to suffer damages, according to proof at trial. Moreover, at all times
4 mentioned in this complaint, Government Code section 12965(b) was in full force and effect. This
5 subsection authorizes an award of costs and attorney's fees to a prevailing party. Plaintiff has incurred
6 and continues to incur legal expenses and attorney's fees. Plaintiff is presently unaware of the precise
7 amount of these expenses and fees, but intends to seek an award of attorney's fees in the event that she
8 prevails at trial.

9 **SECOND CAUSE OF ACTION**

10 **(For Wrongful Termination in Violation of Public Policy)**

11 **[Against All Defendants and DOES 1 through 50]**

12 28. Plaintiff restates and re-alleges each and every allegation contained in paragraphs 1
13 through 27, inclusive, and incorporates the same as though fully set forth herein.

14 29. Plaintiff further alleges a cause of action for wrongful termination in violation of public
15 policy on the grounds that Defendants violated various laws and statutes described below.

16 30. Article I, Section 8, of the California Constitution prohibits Defendants from interfering
17 with the right of persons to lawfully pursue their profession without waving their constitutional rights.
18 The Fair Employment and Housing Act (*i.e.* Government Code §12940 *et. al.*), prohibits Defendants
19 from terminating the employment of any person whose age and/or gender is the motivating reason for
20 such adverse employment action.

21 31. At all times mentioned in this complaint, the aforementioned laws and statutes were in
22 full force and effect, and such laws inured to the benefit of the public, including Plaintiff.

23 32. Defendants violated these laws by interfering with Plaintiff's right to pursue her
24 profession and as set forth herein.

25 33. As a direct and proximate result of the violation of public policy, Plaintiff sustained and
26 continues to suffer: (1) loss of past and future income and other valuable employee benefits; (2) loss
27 of employment-related opportunities for growth; (3) damage to her professional reputation; and (4)
28 emotional distress, anxiety and injury to her psyche as well as physical symptoms, all to her damage

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1 according to proof at trial. Plaintiff claims such amounts as damages together with prejudgment interest
2 pursuant to Civil Code sections 3287 and 3288, and/or any other provision of law providing for
3 prejudgment interest.

4 34. The acts taken toward Plaintiff by Defendants were deliberate, cold, callous, and
5 fraudulent; and carried out in an intentional manner in order to injure and damage Plaintiff. Defendants
6 acted in conscious disregard of Plaintiff's rights such that their conduct was despicable. As such,
7 Plaintiff seeks punitive damages against Defendants in an amount to be proven at time of trial.

8 **THIRD CAUSE OF ACTION**

9 **(For Failure to Take Remedial Action in Violation of Government Code § 12940(k))**

10 **[Against All Defendants and DOES 1 through 50]**

11 35. Plaintiff restates and re-alleges each and every allegation contained in paragraphs 1
12 through 34, inclusive, and incorporates the same as though fully set forth herein.

13 36. At all times mentioned herein, Government Code section 12940(k) was in full force and
14 effect and was binding on Defendants. This subsection requires PPLA to take all reasonable steps
15 necessary to prevent discrimination, harassment, and retaliation from occurring in the workplace. As
16 alleged above, PPLA violated this subsection by failing to take all reasonable steps necessary to prevent
17 harassment and retaliation from continuing to occur against the plaintiff.

18 37. PPLA provided Plaintiff with an employee handbook which at least, on its face, indicated
19 PPLA's intent to adhere to the legal requirement of taking remedial action in the event of discriminatory
20 conduct of the kind alleged herein.

21 38. However, Defendant PPLA violated its own policies, as set forth in its "Employee
22 Handbook Policies and Guidelines" ("Handbook") as follows:

23 a) "Equal Opportunity/Affirmative Action Policy Statement" as set forth on page 10 of
24 the Handbook, providing in relevant part:

25 Planned Parenthood, locally and nationally, makes every effort to maintain a policy of
26 non-discrimination with respect to its hiring practices, and to maintain a diverse and
27 well-balanced team of professionals that will ensure fair and equitable treatment of its
28 community members as well as with its employees.

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1 PPLA is an Equal Opportunity and Affirmative Action employer. As such, the Agency
 2 is committed to providing a work environment free from all forms of unlawful
 3 discrimination and harassment. Equal Employment Opportunity will be afforded to all
 4 employees and applicants without regard to age, race, color, national origin, religion,
 5 sex, disability, or being a qualified disabled veteran or qualified veteran of the Vietnam
 6 era or any other category protected by law.

7 PPLA, as an Affirmative Action employer, takes proactive steps to employ and promote
 8 qualified minority and female employees. In addition, PPLA complies with all
 9 applicable Equal Employment Opportunity and Affirmative Action laws and regulations.

10 Each clinic and department must take all action possible to maintain an environment that
 11 promotes PPLA's commitment to Equal Employment Opportunity and Affirmative
 12 Action. Any act of discrimination is to be reported to the Human Resources Department
 13 immediately....;

14 b) "Open Door and Fair Treatment Policy" listed on page 19 of the Handbook, which
 15 provides:

16 PPLA believes that any work-related conflict can be directly resolved by working
 17 together. Our Open Door and Fair Treatment Policy, (*sic*) promotes sound and healthy
 18 employee relations.

19 The Open Door and Fair Treatment Policies apply to all employees, regardless of length
 20 of service or status, and covers all disputes relating to or arising out of an employee's
 21 employment with PPLA or the termination of employment... PPLA will attempt to
 22 resolve the problem in the best manner for all concerned parties;

23 c) "Employee Dispute Resolution" listed on pages 19-20 of the Handbook, providing:

24 The Employee Dispute Resolution below is designed to enhance agency loyalty and
 25 morale while providing staff with a voice in the resolution of problems and issues (*sic*)
 26 PPLA strives to assure that issues, problems and/or complaints are addressed in a fair
 27 and ethical manner...

28 The VP of Human Resources is responsible for ensuring that fairness prevails and a
 good faith attempt is made to resolve differences between parties to the issue.

If necessary, the VP of Human Resources will bring the matter to the attention of the
 President/CEO for final disposition....

The VP of Human Resources will make every effort to facilitate a resolution within ten
 (10) working days from the time the employee brought the issue to the attention of the
 Human Resources Department.

Regardless of the issue, PPLA firmly believes that any work-related conflict can be
 directly resolved by working together. The open door nature of this policy promotes
 sound, healthy employee relations and applies directly to all employees.;

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1 d) "Standards of Conduct" as set forth on page 28 of the Handbook, including:

2 2. Ensure Compliance with the Law through...

3 b. Supporting PPLA to extend equal employment opportunity and conditions for
4 qualified people regardless of their race, sex, age, religion, sexual orientation, or any
5 other class protected by federal or state law;

6 and

7 e) "Examples of Prohibited Conduct" listed on page 37 of the Handbook including:

8 Discrimination or harassment of any kind. This includes, but is not limited to, sexual,
9 racial, religious, age, discrimination, discrimination based on national origin or
10 disability.

11 39. PPLA's conduct in subjecting Ms. Wallace to immediate dismissal for discriminatory
12 reasons while providing her with a manufactured excuse that it had found her guilty of defacing the
13 building with obscene graffiti based on no evidence whatsoever blatantly violated its own numerous
14 policies enacted to prevent such things from occurring. Its conduct is especially shocking and egregious
15 considering that its Mission Statement (set forth on p. 8 of the Handbook) of providing "easy, affordable
16 access to a full range of quality reproductive health care and health information," and its statement on
17 p. 7 of the Handbook that its "policies... are designed... to promote the fair and ethical treatment of our
18 employees."

19 40. Defendants' unlawful employment practices were a substantial factor in causing damages
20 and injuries to Plaintiff as set forth herein.

21 **FOURTH CAUSE OF ACTION**

22 (For Slander)

23 [Against All Defendants and DOES 1 through 50]

24 41. Plaintiff restates and re-alleges each and every allegation contained in paragraphs 1
25 through 40, inclusive, and incorporates the same as though fully set forth herein.

26 42. Defendants made false and unprivileged verbal statements that Ms. Wallace had engaged
27 in despicable conduct, and thereby implicated her in a crime, injured her in her profession, and caused
28 damage to her reputation, as well as financial, emotional, and physical harm. At the time these verbal
statements were communicated and/or published by Defendants, Defendants knew and/or had reason
to know that they were false statements and yet proceeded to so publish such false, misleading and

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1 baseless statements against Plaintiff with evil motive and malice, wilfully and wrongfully, and with
2 intent to injure, disgrace and defame Plaintiff, and with wanton and reckless disregard for the truth or
3 falsity of statements made.

4 43. As a direct and proximate result of Defendants' conduct, Plaintiff has suffered loss of
5 employment, indignity, severe humiliation, and emotional distress manifesting itself in physical
6 symptoms.

7 44. Defendants' actions have caused and continue to cause Plaintiff substantial losses of
8 earnings, significant reputation and professional injury, loss of promotional opportunities and other
9 employment benefits, lost wages, future earnings and benefits, and costs of suit. In addition,
10 Defendants' actions have caused Plaintiff to experience humiliation, embarrassment, anguish, and
11 physical symptoms, all to her damage in an amount according to proof.

12 45. Defendants, by their actions as set forth above, have engaged in despicable conduct,
13 exposing Plaintiff to cruel and unjust hardship, with the intention to cause injury to Plaintiff and with
14 conscious disregard of her rights. Defendants occupied a position of trust which gave them power to
15 avoid damaging Plaintiff's ability to earn her livelihood. Defendants abused that position of trust by
16 maliciously, fraudulently and oppressively subjecting Plaintiff to the circumstances described herein.
17 To the extent that these damages stem from the behavior of any individual Defendant, Plaintiff is
18 therefore entitled to punitive damages, in an amount to be proven at trial.

19 **FIFTH CAUSE OF ACTION**

20 **(For Libel)**

21 **[Against All Defendants and DOES 1 through 50]**

22 46. Plaintiff restates and re-alleges each and every allegation contained in paragraphs 1
23 through 45, inclusive, and incorporates the same as though fully set forth herein.

24 47. Defendants created false and unprivileged writings accusing Ms. Wallace of despicable
25 conduct and thereby implicating her in a crime, which writings expose her to hatred, contempt, ridicule,
26 or disgrace; which would also cause her to be shunned and avoided, and which have injured her in her
27 profession. At the time these written statements were made by Defendants, Defendants knew and/or
28 had reason to know that they were false and yet proceeded to so publish such false, misleading and

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1 baseless statements against Plaintiff with evil motive and malice, wilfully and wrongfully, and with
 2 intent to injure, disgrace and defame Plaintiff, and with wanton and reckless disregard for the truth or
 3 falsity of the statements made and/or published.

4 48. As a direct and proximate result of Defendants' conduct, Plaintiff has suffered loss of
 5 employment, indignity, severe humiliation, and emotional distress manifesting itself in physical
 6 symptoms.

7 49. Defendants' actions have caused and continue to cause Plaintiff substantial losses of
 8 earnings, significant reputation and professional injury, loss of promotional opportunities and other
 9 employment benefits, lost wages, future earnings and benefits, and costs of suit. In addition,
 10 Defendants' actions have caused Plaintiff to experience humiliation, embarrassment, anguish, and
 11 physical symptoms, all to her damage in an amount according to proof.

12 50. Defendants, by their actions as set forth above, have engaged in despicable conduct,
 13 exposing Plaintiff to cruel and unjust hardship, with the intention to cause injury to Plaintiff and with
 14 conscious disregard of her rights. Defendants occupied a position of trust which gave them power to
 15 avoid damaging Plaintiff's ability to earn her livelihood. Defendants abused that position of trust by
 16 maliciously, fraudulently and oppressively subjecting Plaintiff to the circumstances described herein.
 17 To the extent that these damages stem from the behavior of any individual Defendant, Plaintiff is
 18 therefore entitled to punitive damages, in an amount to be proven at trial.

19 **PRAYER FOR RELIEF**

20 THEREFORE, Plaintiff prays for judgment against Defendants, and each of them, as follows:

- 21 A. For economic damages according to proof;
- 22 B. For punitive damages in an amount appropriate to punish Defendants;
- 23 C. For prejudgment interest and interest on the sum of damages awarded to the maximum
 24 extent permitted by law;
- 25 D. For reasonable attorney's fees pursuant to Code of Civil Procedure section 1021.5,
 26 and any and all other applicable laws and statutes;
- 27 E. For costs of suit herein incurred; and,
- 28

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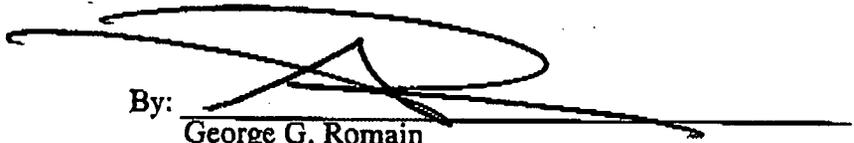
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F. For such other and further relief as the Court deems proper.

Dated: September 27, 2013

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By: George G. Romain
Attorney for Plaintiff, Kristine Wallace

LAW OFFICE OF
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12123 WILSHIRE BLVD., SUITE 600
LOS ANGELES, CALIFORNIA 90025
(310) 681-6761

10/01/2013

SEP-27-2013 14:06 From:

To:2136253244

Page:17/27

10/01/2013

Exhibit "A"



STATE OF CALIFORNIA | State and Consumer Services Agency

DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
800-884-1684 | Videophone: 916-226-5285 | TDD 800-700-2320
www.dfeh.ca.gov | email: contact_center@dfeh.ca.gov

GOVERNOR EDMUND G. BROWN JR.
DIRECTOR PHYLLIS W. CHENG

June 25, 2013

RE: Notice of Filing of Discrimination Complaint
DFEH Matter Number: 133735-57530
Right to Sue: Wallace / Planned Parenthood Los Angeles

To All Respondent(s):

Enclosed is a copy of a complaint of discrimination that has been filed with the Department of Fair Employment and Housing (DFEH) in accordance with Government Code section 12960. This constitutes service of the complaint pursuant to Government Code section 12962. The complainant has requested an authorization to file a lawsuit. This case is not being investigated by the DFEH and is being closed immediately. A copy of the Notice of Case Closure and Right to Sue is enclosed for your records.

Please refer to the attached complaint for a list of all respondent(s) and their contact information.

No response to DFEH is requested or required.

Sincerely,

Department of Fair Employment and Housing

10/01/2013



STATE OF CALIFORNIA Department of Fair Employment and Housing

EMPLOYMENT RIGHT TO SUE

COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

DFEH MATTER NUMBER
133735-57530

COMPLAINANT
Kristine Wallace

NAMED IS THE EMPLOYER, PERSON, AGENCY, ORGANIZATION OR GOVERNMENT ENTITY WHO DISCRIMINATED AGAINST ME

RESPONDENT	ADDRESS	PHONE
Planned Parenthood Los Angeles,	400 West 30th Street Los Angeles CA 90007	(213) 284-3200

AGENT FOR SERVICE	ADDRESS	PHONE
Michael Bernstein, Planned Parenthood of Los Angeles	400 W. 30th Street Los Angeles CA 90007	(213) 284-3200

NO OF EMPLOYEES	MOST RECENT DISCRIMINATION TOOK PLACE	TYPE OF EMPLOYER
20	Mar 26, 2013	Private Employer

CO-RESPONDENT(S)	ADDRESS
------------------	---------

10/01/2013



STATE OF CALIFORNIA Department of Fair Employment and Housing

EMPLOYMENT RIGHT TO SUE

COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

DFEH MATTER NUMBER 133735-57530

I ALLEGE THAT I EXPERIENCED Discrimination, Harassment
ON OR BEFORE Mar 26, 2013
BECAUSE OF MY Age - 40 and over, Sex- Gender
AS A RESULT, I WAS Terminated

STATEMENT OF FACTS

Planned Parenthood Los Angeles ["PPLA"] hired me in approximately March 2012. From my date of hire until the time of my termination, I worked for PPLA as a senior accountant. I consistently fulfilled my responsibilities in a competent and excellent manner. On or about March 26, 2013, PPLA falsely accused me of defacing the outside of a window of its office building with sexually graphic graffiti, and thereby sexually harassing the employee who used the affected office. This accusation was patently false, and PPLA knew that it was. PPLA's abrupt notice of termination was given on my one-year anniversary of employment with PPLA, when I was due to become vested in the organization's 403(b) retirement plan, which is equivalent to a 401(k) plan in private enterprise, but for a non-profit organization. The decision to terminate me also coincides with other decisions made by PPLA on the basis of age and gender, at or about the date of my termination, which had an adverse impact on other members within the accounting department in which I worked. PPLA's justification and explanation for terminating me was false. The true facts are that PPLA terminated me because of PPLA's intent to create a younger workforce. As a direct result of PPLA's treatment, I have sustained headaches, loss of sleep, embarrassment, humiliation, loss of dignity and anxiety, as well as special damages in the form of future lost income and reduced SSI benefits, and, other general and special damages.

10/01/2013

DATE FILED Jun 25, 2013
MODIFIED Jun 25, 2013

REVISED APRIL 2013
PAGE 2/3

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STATE OF CALIFORNIA | Department of Fair Employment and Housing

EMPLOYMENT RIGHT TO SUE

COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

DFEH MATTER NUMBER
133735-57530

SIGNED UNDER PENALTY OF PERJURY

I wish to pursue this matter in court. I hereby request that the Department of Fair Employment and Housing provide a right to sue. I understand that if I want a federal right to sue notice, I must visit the U.S. Equal Employment Opportunity Commission (EEOC) to file a complaint within 30 days of receipt of the DFEH "Notice of Case Closure and Right to Sue," or within 300 days of the alleged discriminatory act, whichever is earlier.

I have not been coerced into making this request, nor do I make it based on fear of retaliation if I do not do so. I understand it is the Department of Fair Employment and Housing's policy to not process or reopen a complaint once the complaint has been closed on the basis of "Complainant Elected Court Action."

By submitting this complaint, I am declaring under penalty of perjury under the laws of the State of California that, to the best of my knowledge, all information contained in this complaint is true and correct, except matters stated on my information and belief, and I declare that those matters I believe to be true.

Verified by George G. Romain, Attorney for Complainant, and dated on June 25, 2013 at Sylmar, CA.

10/01/2013

CM-010

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):
George G. Romain, SBN 141743
LAW OFFICE OF GEORGE G. ROMAIN
 12121 Wilshire Blvd., Suite 600
 Los Angeles, CA 90025
 TELEPHONE NO. (310) 481-6761 FAX NO: (310) 481-6720
 ATTORNEY FOR (Name): **Plaintiff Denise Winter**

FOR COURT USE ONLY

FILED

SUPERIOR COURT OF CALIFORNIA
 COUNTY OF LOS ANGELES

SEP 27 2013

SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles, CA 90401
 STREET ADDRESS: 111 North Hill Street
 MAILING ADDRESS:
 CITY AND ZIP CODE: Los Angeles, CA 90012
 BRANCH NAME: Stanley Mosk Courthouse

CASE NAME:
Denise Winter v. Loma Linda University Medical Center

John A. Clarke, Executive Officer/Clerk
 BY *[Signature]*, Deputy
 Wally Alvarez

CASE NUMBER
 JUDGE **BC 522 424**
 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 1-5 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/WD (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/WD (23) <p>Non-PI/PD/WD (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/WD tort (35) <p>Employment</p> <input checked="" type="checkbox"/> Wrongful termination (36) <input type="checkbox"/> Other employment (15)	<p>Contract</p> <input type="checkbox"/> Breach of contract/warranty (06) <input type="checkbox"/> 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 (28) <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)
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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. <input type="checkbox"/> Large number of separately represented parties	d. <input type="checkbox"/> Large number of witnesses
b. <input type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve	e. <input type="checkbox"/> Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court
c. <input type="checkbox"/> Substantial amount of documentary evidence	f. <input type="checkbox"/> Substantial postjudgment judicial supervision

3. Type of remedies sought (check all that apply):
 a. monetary b. nonmonetary; declaratory or injunctive relief c. punitive

4. Number of causes of action (specify):

5. This case is is not a class action suit.

6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-045.)

Date: September 27, 2013
 George G. Romain
 (TYPE OR PRINT NAME)

[Signature]
 (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 complex case, this cover sheet will be used for statistical purposes only.

20130927

INSTRUCTIONS ON HOW TO COMPLETE THE COVER SHEET

CM-010

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 5 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. You do not need to submit a cover sheet with amended papers. 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 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 (48) (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 (18)
- 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

10/01/2013

SHORT TITLE Wallace v. Planned Parenthood Los Angeles	CASE NUMBER BC 522 424
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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 5-7 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)

- | | |
|---|--|
| 1. Class Actions must be filed in the County 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. | 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 <input type="checkbox"/> A7240 Other Professional Health Care Malpractice	1., 2., 4. 1., 2., 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., 2., 4. 1., 2., 4. 1., 2., 3. 1., 2., 4.
Non-Personal Injury/Property	Business Tort (07)	<input type="checkbox"/> A6029 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.
	Intellectual Property (19)	<input type="checkbox"/> A6016 Intellectual Property	2., 3.

Non-Personal Injury/Property Damage/
 Wrongful Death Tort (Cont'd.)
 Employment
 Contract
 Real Property
 Judicial Review Unlawful Detainer

SHORT TITLE Wallace v. Planned Parenthood Los Angeles	CASE NUMBER
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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
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"/> A6026 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-Drugs (38)	<input type="checkbox"/> A6022 Unlawful Detainer-Drugs	2., 6.
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.

SHORT TITLE Wallace v. Planned Parenthood Los Angeles		CASE NUMBER
A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Writ of Mandate (02)	<input type="checkbox"/> A6151 Writ - Administrative Mandamus	2., 8.
	<input type="checkbox"/> A6152 Writ - Mandamus on Limited Court Case Matter	2.
Other Judicial Review (39)	<input type="checkbox"/> A6153 Writ - Other Limited Court Case Review	2.
	<input type="checkbox"/> A6160 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"/> A6008 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	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.
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.
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.

Judicial Review (Cont'd.)

Provisionally Complex
LitigationEnforcement
of JudgmentMiscellaneous Civil
ComplaintsMiscellaneous Civil
Petitions

SHORT TITLE Wallace v. Planned Parenthood Los Angeles	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: 400 West 30th Street Los Angeles, CA 90007	
<input type="checkbox"/> 1. <input type="checkbox"/> 2. <input checked="" type="checkbox"/> 3. <input type="checkbox"/> 4. <input type="checkbox"/> 5. <input type="checkbox"/> 6. <input type="checkbox"/> 7. <input type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10.			
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 Los Angeles Superior Court (Code Civ. Proc., § 392 et seq., and LASC Local Rule 2.0, subds. (b), (c) and (d)).

Dated: September 27, 2013

(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 LASC Approved CIV 109 03-04 (Rev. 03/06).
5. Payment in full of the filing fee, unless fees have been waived.
6. Signed order appointing the Guardian ad Litem, JC form 982(a)(27), 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.

10/01/2013