

FOR COURT USE ONLY

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, state bar number, and address):
JACK M. SCHULER, ESQ. (SBN 90899)

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ATTORNEY FOR (Name): DAVID ENRIQUEZ, et al.

NAME OF COURT: SUPERIOR COURT OF CALIFORNIA
STREET ADDRESS: 111 NORTH HILL STREET
MAILING ADDRESS:
CITY AND ZIP CODE: LOS ANGELES, CA 90012
BRANCH NAME: CENTRAL DISTRICT

PLAINTIFF: DAVID ENRIQUEZ; FRANK ANTHONY ENRIQUEZ AND
FABIAN FERNANDO ENRIQUEZ, MINORS BY AND THROUGH THEIR
GUARDIAN AD LITEM, DAVID ENRIQUEZ

DEFENDANT: PLANNED PARENTHOOD; MARK MALTZER, M.D.

FILED

LOS ANGELES SUPERIOR COURT

FEB 26 2003

JOHN A. CLARKE, CLERK

C. L. Coleman
BY 6: E. COLEMAN, DEPUTY

DOES 1 TO 50, inclusive

COMPLAINT — Personal Injury, Property Damage, Wrongful Death

AMENDED (Number):

Type (check all that apply):

- MOTOR VEHICLE
- Property Damage
- Personal Injury
- OTHER (specify): MEDICAL MALPRACTICE
- Wrongful Death
- Other Damages (specify): GENERAL

NEGLIGENCE

Jurisdiction (check all that apply):

- ACTION IS A LIMITED CIVIL CASE
Amount demanded does not exceed \$10,000
 exceeds \$10,000, but does not exceed \$25,000
- ACTION IS AN UNLIMITED CIVIL CASE (exceeds \$25,000)
- ACTION IS RECLASSIFIED by this amended complaint
 from limited to unlimited
 from unlimited to limited

Case assigned to Judge

Furuko
Wasserman

CASE NUMBER:

80291065

1. PLAINTIFF (name): DAVID ENRIQUEZ; FRANK ANTHONY ENRIQUEZ and FABIAN FERNANDO ENRIQUEZ, MINORS by and through their Guardian ad Litem alleges causes of action against DEFENDANT (name): PLANNED PARENTHOOD and MARK MALTZER, MD
2. This pleading, including attachments and exhibits, consists of the following number of pages: SIX
3. Each plaintiff named above is a competent adult

- a. except plaintiff (name): FRANK ANTHONY ENRIQUEZ
 - (1) a corporation qualified to do business in California
 - (2) an unincorporated entity (describe):
 - (3) a public entity (describe):
 - (4) a minor an adult
 - (a) for whom a guardian or conservator of the estate or a guardian ad litem has been appointed
 - (b) other (specify):
 - (5) other (specify):

- b. except plaintiff (name): FABIAN FERNANDO ENRIQUEZ
 - (1) a corporation qualified to do business in California
 - (2) an unincorporated entity (describe):
 - (3) a public entity (describe):
 - (4) a minor an adult
 - (a) for whom a guardian or conservator of the estate or a guardian ad litem has been appointed
 - (b) other (specify):
 - (5) other (specify):

Information about additional plaintiffs who are not competent adults is shown in Complaint — Attachment 3.

CIT/CASE: RC291065 LEA/REF#: 0310
 RECEIPT #: CR29111067
 DATE PAID: 02/26/03 03:51:00 PM
 PAYMENT: \$224.50
 RECEIVED: 0310
 CHECK: 224.50
 CASH:
 CHANGE:
 CARD:

4. Plaintiff (name):

is doing business under the fictitious name (specify):

and has complied with the fictitious business name laws.

5. Each defendant named above is a natural person

a. except defendant (name): PLANNED PARENTHOOD(1) a business organization, form unknown(2) a corporation(3) an unincorporated entity (describe):(4) a public entity (describe):(5) other (specify):c. except defendant (name):(1) a business organization, form unknown(2) a corporation(3) an unincorporated entity (describe):(4) a public entity (describe):(5) other (specify):b. except defendant (name):(1) a business organization, form unknown(2) a corporation(3) an unincorporated entity (describe):(4) a public entity (describe):(5) other (specify):d. except defendant (name):(1) a business organization, form unknown(2) a corporation(3) an unincorporated entity (describe):(4) a public entity (describe):(5) other (specify): Information about additional defendants who are not natural persons is contained in Complaint — Attachment 5.

6. The true names and capacities of defendants sued as Does are unknown to plaintiff.

7. Defendants who are joined pursuant to Code of Civil Procedure section 382 are (names):

8. This court is the proper court because

a. at least one defendant now resides in its jurisdictional area.b. the principal place of business of a defendant corporation or unincorporated association is in its jurisdictional area.c. injury to person or damage to personal property occurred in its jurisdictional area.d. other (specify):9. Plaintiff is required to comply with a claims statute, anda. plaintiff has complied with applicable claims statutes, orb. plaintiff is excused from complying because (specify):

10. The following causes of action are attached and the statements above apply to each (*each complaint must have one or more causes of action attached*):

- a. Motor Vehicle
- b. General Negligence
- c. Intentional Tort
- d. Products Liability
- e. Premises Liability
- f. Other (*specify*):

11. Plaintiff has suffered

- a. wage loss
- b. loss of use of property
- c. hospital and medical expenses
- d. general damage
- e. property damage
- f. loss of earning capacity
- g. other damage (*specify*): AS SET FORTH IN PARAGRAPH 12a, BELOW

12. The damages claimed for wrongful death and the relationships of plaintiff to the deceased are

- a. listed in Complaint — Attachment 12.
- b. as follows:

13. The relief sought in this complaint is within the jurisdiction of this court.

14. PLAINTIFF PRAYS for judgment for costs of suit; for such relief as is fair, just, and equitable; and for

- a. (1) compensatory damages
- (2) punitive damages
- b. The amount of damages is (*you must check (1) in cases for personal injury or wrongful death*):
 - (1) according to proof
 - (2) in the amount of: \$

15. The paragraphs of this complaint alleged on information and belief are as follows (*specify paragraph numbers*):

Date: FEBRUARY 26, 2003

JACK M. SCHULER

(TYPE OR PRINT NAME)

(SIGNATURE OF PLAINTIFF OR ATTORNEY)

SHORT TITLE: ENRIQUEZ v. PLANNED PARENTHOOD

CASE NUMBER:

ATTACHMENT (Number): 12

Page 4 of 6

(This Attachment may be used with any Judicial Council form.)

(Add pages as required)

- 1
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DAVID ENRIQUEZ IS THE SURVIVING SPOUSE OF DIANA LOPEZ. AS A RESULT OF THE WRONGFUL DEATH OF DIANA LOPEZ, PLAINTIFF, DAVID ENRIQUEZ, HAS INCURRED ECONOMIC AND NONECONOMIC DAMAGES, INCLUDING THOSE ITEMS OF DAMAGES SET FORTH IN BAJI 14.50, IN AN AMOUNT ACCORDING TO PROOF; FRANK ANTHONY ENRIQUEZ AND FABIAN FERNANDO ENRIQUEZ, ARE MINOR CHILDREN OF DIANA LOPEZ, HAVE INCURRED ECONOMIC AND NONECONOMIC DAMAGES IN AN AMOUNT ACCORDING TO PROOF.

(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)

SHORT TITLE:

ENRIQUEZ v. PLANNED PARENTHOOD

CASE NUMBER:

FIRST

(number)

CAUSE OF ACTION - General Negligence

Page FIVE

ATTACHMENT TO Complaint Cross-Complaint

(Use a separate cause of action form for each cause of action.)

GN-1. Plaintiff (name): DAVID ENRIQUEZ; FRANK ANTHONY ENRIQUEZ and FABIAN FERNANDO ENRIQUEZ, minors by and through their Guardian ad Litem, DAVID ENRIQUEZ alleges that defendant (name): PLANNED PARENTHOOD LOS ANGELES, BIXBY CENTER; MARK MALTZER, MD and

Does 1 to 50

was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant negligently caused the damage to plaintiff

on (date): FEBRUARY 28, 2002

at (place): PLANNED PARENTHOOD LOS ANGELES, BIXBY CENTER, 1057 KINGSTON AVE., LOS ANGELES, CALIFORNIA 90033

(description of reasons for liability):

THE DEFENDANTS, AND EACH OF THEM, FAILED TO COMPLY WITH THE APPLICABLE STANDARDS OF MEDICAL PRACTICE IN THE CARE AND TREATMENT OF DIANA LIZZETT LOPEZ, A 25 YEAR OLD WIFE AND MOTHER OF TWO MINOR SONS. AS A PROXIMATE RESULT OF DEFENDANTS' ACTIONS AND INACTIONS, DIANA L. LOPEZ DIED ON FEBRUARY 28, 2002 FOLLOWING DEFENDANTS' NEGLIGENT PERFORMANCE OF PREGNANCY TERMINATION PROCEDURE AND DEFENDANTS' FAILURE TO TAKE CORRECTIVE ACTIONS TO PREVENT DIANA LOPEZ' DEATH. AS A RESULT OF THE WRONGFUL DEATH OF DECEDENT, DIANA L. LOPEZ, PLAINTIFFS, DAVID ENRIQUEZ (SURVIVING SPOUSE), FRANK ANTHONY ENRIQUEZ AND FABIAN FERNANDO ENRIQUEZ (SURVIVING MINOR CHILDREN) INCURRED ECONOMIC AND NONECONOMIC DAMAGES ALL ACCORDING TO PROOF.

THE DEFENDANTS, AND EACH OF THEM, AS A RESULT OF THEIR FAILURE TO EXERCISE THE STANDARD OF CARE REQUIRED OF MEDICAL PROFESSIONALS WERE A SUBSTANTIAL FACTOR IN DEPRIVING PLAINTIFFS, A HUSBAND AND TWO YOUNG SONS, OF THE LOVE, COMPANIONSHIP, AFFECTION, SOLACE, SOCIETY, COMFORT, MORAL AND FINANCIAL SUPPORT PROVIDED BY DECEDENT, DIANA LOPEZ, ALL TO THEIR DAMAGE IN A SUM WITHIN THE JURISDICTION OF THIS COURT.

THE DEFENDANTS, AND EACH OF THEM, FAILED TO OBTAIN A VALID INFORMED CONSENT. MARK C. MALTZER, M.D., IS A PHYSICIAN WHO ACTUALLY WORKS AND LIVES IN SACRAMENTO, CALIFORNIA, BUT WAS WORKING AT PLANNED PARENTHOOD LOS ANGELES AT THE TIME OF THE SURGERY. ON FEBRUARY 28, 2002, MARK MALTZER, M.D. FAILED TO EXAMINE DIANA LOPEZ PRIOR TO SURGERY, FAILED TO HEED THE WRITTEN WARNING OF A LOWER HEMOGLOBIN TEST RESULT, FAILED TO HEED THE WRITTEN WARNING OF A SMALL OPENING OF THE CERVICAL OS AND FAILED TO ADEQUATELY PREPARE THE CERVIX, AND THEN COMPLETED THE COMPLEX PROCEDURE OF A "D&E" (DISMEMBERMENT AND EXTRACTION OR DILATION AND EVACUATION) IN A GROSSLY INADEQUATE 6 MINUTE PERIOD OF TIME.

(CONTINUED ON PAGE 6)

PETITIONER/PLAINTIFF: DAVID ENRIQUEZ, et al.
RESPONDENT/DEFENDANT: PLANNED PARENTHOOD; MARK MALTZER, M.D.

CASE NUMBER:

PAGE SIX

MARK MALTZER, M.D. WORKED SO QUICKLY, RECKLESSLY AND NEGLIGENTLY PULLING OUT SHARP BODY PARTS OF DIANA LOPEZ' 19-20 WEEK UNBORN INFANT THAT SEVERE, IRREPARABLE DAMAGE WAS DONE TO THE CERVIX CAUSING MASSIVE, IMMEDIATE HEMORRHAGE FROM A "TRAUMATIC CERVICAL PERFORATION" (LOS ANGELES CORONER CASE NO. 2002-01721) THAT CAUSED THE DEATH OF DIANA LOPEZ.

DIANA LOPEZ' BLOOD LOSS WAS SO GREAT THAT SHE WAS NEAR DEATH ON ARRIVAL AT WOMEN'S HOSPITAL. AS A CONSEQUENCE OF THE DEFENDANTS' NEGLIGENCE, SHE WAS IMMEDIATELY IDENTIFIED AS A "RED BLANKET" AND UNDERWENT A COMPLETE HYSTERECTOMY AND A TRANSFUSION OF FIVE UNITS OF BLOOD AND A FUTILE ATTEMPT AT RESUSCITATION.

MARK C. MALTZER, M.D. DEMONSTRATED CALLOUS INDIFFERENCE TO HIS PATIENT WHO WAS NEAR TOTAL EXSANGUINATION. HE FAILED TO ACCOMPANY DIANA LOPEZ IN THE AMBULANCE, FAILED TO FOLLOW THE PATIENT TO THE EMERGENCY ROOM AT LAC-USC WOMEN'S HOSPITAL, AND FAILED TO PERSONALLY CONSULT WITH THE SURGICAL TEAM THAT ATTEMPTED TO REVIVE DIANA LOPEZ. MARK MALTZER, M.D. FAILED TO CONTACT OR CONSOLE THE FAMILY OF DIANA LOPEZ AT OR NEAR THE TIME OF HER DEATH.

MARK MALTZER, M.D. FAILED TO PLACE HIS NAME ON THE TRANSFER FORM AS REQUIRED BY THE CALIFORNIA MEDICAL BOARD AND THE NAME OF ANOTHER PHYSICIAN, MARY GATTER, M.D., WAS SUBSTITUTED FOR HIS NAME.

MARK MALTZER, M.D. FAILED TO SUBMIT AN "OUTPATIENT SURGERY--PATIENT DEATH REPORTING FORM" AS REQUIRED BY CALIFORNIA LAW.

MARK MALTZER, M.D., AND EACH OF THE DEFENDANTS, FAILED TO EVALUATE OR EXAMINE THE FETAL TISSUE AND BODY PARTS EXTRACTED FROM DIANA LOPEZ. THEY FAILED TO WEIGH AND MEASURE AND CONFIRM FETAL AGE WHICH IS A STANDARD OF CARE.

PLANNED PARENTHOOD RETAINED MARK MALTZER, M.D. TO PERFORM SURGICAL PROCEDURES ON ITS PATIENTS WITH THE ADVANCE KNOWLEDGE THAT HE DISREGARDED HIGH RISK WARNINGS INCLUDING LOW HEMOGLOBIN BLOOD LEVEL AND AN INADEQUATELY DILATED CERVIX AS PRE-SURGICAL CONDITIONS FOR DIANA LOPEZ.

FOR COURT USE ONLY

FILED

LOS ANGELES SUPERIOR COURT

FEB 26 2003

JOHN A. CLARKE, CLERK

C. L. Coleman
BY G. L. COLEMAN, DEPUTY

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, state bar number, and address):

JACK M. SCHULER, ESQ. (SBN 90899)
SCHULER & BROWN
7100 HAYVENHURST AVENUE, SUITE 310

VAN NUYS, CA 91406
TELEPHONE NO.: (818) 756-0999 FAX NO.: (818) 756-0998

ATTORNEY FOR (Name) DAVID ENRIQUEZ, et al.

INSERT NAME OF COURT, JUDICIAL DISTRICT, AND BRANCH COURT, IF ANY:
SUPERIOR COURT OF CALIFORNIA
CENTRAL DISTRICT

CASE NAME: DAVID ENRIQUEZ, et al. vs. PLANNED
PARENTHOOD; MARK MALTZER, M.D.; and DOES 1-50

CIVIL CASE COVER SHEET

Limited Unlimited

Complex Case Designation

Counter Joinder

Filed with first appearance by defendant
(Cal. Rules of Court, rule 1811)

CASE NUMBER:

BC291065

ASSIGNED JUDGE:

Please complete all five (5) items below.

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

Auto Tort

Auto (22)

Other P/DPD/W (Personal Injury/Property Damage/Wrongful Death) Tort

- Asbestos (04)
- Product liability (24)
- Medical malpractice (45)
- Other P/DPD/W (23)

Non-P/DPD/W (Other) Tort

- Business tort/unfair business practice (07)
- Civil rights (e.g., discrimination, false arrest) (08)
- Defamation (e.g., slander, libel) (13)
- Fraud (16)
- Intellectual property (19)
- Professional negligence (e.g., legal malpractice) (25)
- Other non-P/DPD/W tort (35)

Employment

Wrongful termination (36)

Other employment (15)

Contract

- Breach of contract/warranty (06)
- Collections (e.g., money owed, open book accounts) (09)
- Insurance coverage (18)
- Other contract (37)

Real Property

- Eminent domain/Inverse condemnation (14)
- Wrongful eviction (33)
- Other real property (e.g., quiet title) (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 1800 -1812)

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

Enforcement of Judgment

Enforcement of judgment (e.g., sister state, foreign, out-of-county abstracts) (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 1800 of the California Rules of Court. If 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 and related actions pending in one or more courts in other counties, states or countries, or in a federal court
- f. Substantial post-disposition judicial disposition

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.

Date: 1-26-03

JACK M. SCHULER, ESQ. (SBN 90899)

(TYPE OR PRINT NAME)

J. M. Schuler

(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, Family, or Welfare and Institutions Code). (Cal. Rules of Court, rule 982.2.)
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 1800 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 shall 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 in all new civil case filings in the Los Angeles Superior Court

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

JURY TRIAL? YES CLASS ACTION? YES LIMITED CASE? YES TIME ESTIMATED FOR TRIAL 7-10 HOURS/ DAYS.

II. Select the correct district and courthouse location (4 steps - If you checked "Limited Case", skip to No. III, Pg. 4):

- 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 1, the Civil Case Cover Sheet case type you selected.
- 2 Check one Superior Court type of action in Column 2 which best describes the nature of this case.
- 3 In Column 3, circle the reason for the court location choice that applies to the type of action you have checked.

Applicable Reasons for Choosing Courthouse Location (See Column 3 below)

1. Class Actions must be filed in the County Courthouse, Central District
2. May be filed in Central (Other county, or no Bodily Inj/Prop.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.

4 Fill in the information requested on page 4 in item III; complete item IV. Sign the certificate.

	-1- Civil Case Cover Sheet Category No.	-2- Type of Action (Check only one)	-3- Applicable Reasons - See Step 3 Above
Auto Tort	Auto (22)	<input type="checkbox"/> A7100 Motor Vehicle - Personal Injury/Property Dam./Wrongful Death Is this an uninsured motorist case? <input type="checkbox"/> Yes <input type="checkbox"/> No	1., 2., 4.
	Asbestos (04)	<input type="checkbox"/> A6070 Asbestos Property Damage <input type="checkbox"/> A7221 Asbestosis - Personal Injury/Wrongful Death	2. 2.
Other PI/PD/WD Tort	Product Liability (24)	<input type="checkbox"/> A7260 Product Liability (not asbestos or toxic/environmental)	1., 2., 3., 4., 8.
	Medical Malpractice (45)	<input checked="" type="checkbox"/> A7210 Medical Malpractice - Physicians & Surgeons <input type="checkbox"/> A7240 Other Professional Health Care Malpractice	1., 2., 4. 1., 2., 4.
	Other PI/PD/WD (23)	<input type="checkbox"/> A7250 Premises Liability (e.g., slip and fall) <input type="checkbox"/> A7230 Intentional Bodily Injury/PD/WD (e.g., assault, vandalism, etc.) <input type="checkbox"/> A7270 Intentional Infliction of Emotional Distress <input type="checkbox"/> A7271 Negligent Infliction of Emotional Distress <input type="checkbox"/> A7220 Other Personal Injury/Property Dam./Wrongful Death	1., 2., 4. 1., 2., 4. 1., 2., 3. 1., 2., 3. 1., 2., 4.
Non-PI/PD/WD Tort	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.

SHORT TITLE: ENRIQUEZ vs. PLANNED PARENTHOOD, et al.

CASE NUMBER

Non-PI/P/D/W/D Tort (Contd)

Employment

Contract

Real Property

Unlawful Detainer

Judicial Review

-1- Civil Case Cover Sheet Category No.	-2- Type of Action (Check only one)	-3- Applicable Reasons - See Step 3 Above
Prof. 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.
Wrongful Termination (35)	<input 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 UD 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.
Emnt Dom/Inv. Cond. (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 em. 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 Award (11)	<input type="checkbox"/> A6115 Petition to Compel/Confirm Arbitration	2., 5.

SHORT TITLE: ENRIQUEZ vs. PLANNED PARENTHOOD, et al.

CASE NUMBER

Judicial Review (continued)

Provisionally Complex Litig.

Enforcement of Judgment

Misc. Civ. Cmplts

Misc. Civil Petitions

-1- Civil Case Cover Sheet Category No.	-2- Type of Action (Check only one)	-3- Applicable Reasons - See Step 3 Above
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.
Oth. Jud. Review (39)	<input type="checkbox"/> A6150 Other Writ / Judicial Review	2., 8.
Antitrust/Trade Reg. (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 Litig. (28)	<input type="checkbox"/> A6035 Securities Litigation Case	1., 2., 8.
Tox. Tort/Environm (30)	<input type="checkbox"/> A6036 Toxic Tort/Environmental	1., 2., 3., 8.
Ins Coverage Clms 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/Corp. 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.

CIVIL CASE COVER SHEET ADDENDUM AND STATEMENT OF LOCATION

LASC Rule 2.0

CIV 109 04-02

Page 3 of 4

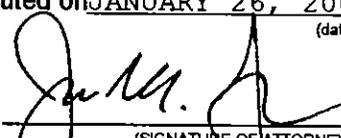
SHORT TITLE: ENRIQUEZ vs. PLANNED PARENTHOOD, et al.	CASE NUMBER
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-4-

III. Statement of Location: Enter the address of the accident, party residence or place of business, performance, or other circumstance indicated in No. II, item 3 on Page 1 as the proper reason for filing in the court location you selected.

REASON: CHECK THE NUMBER UNDER ITEM 3 WHICH APPLIES IN THIS CASE		ADDRESS:	
<input type="checkbox"/> 1. <input type="checkbox"/> 2. <input type="checkbox"/> 3. <input checked="" 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.		1057 KINGSTON AVENUE	
CITY: LOS ANGELES	STATE: CA	ZIP CODE: 90033	

IV. Certificate/Declaration of Assignment: The undersigned hereby certifies and declares that the above entitled matter is properly filed for assignment to the SUPERIOR courthouse in the CENTRAL District of the Los Angeles Superior Court under Section 392 et seq., Code of Civil Procedure and Rule 2(b), (c) and (d) of this court for the reason checked above. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and this declaration was executed on JANUARY 26, 2003 at VAN NUYS California.


 (SIGNATURE OF ATTORNEY/FILING PARTY)
 JACK M. SCHULER, ESQ.

New Civil Case Filing Instructions

This addendum form is required so that the court can assign your case to the correct courthouse location in the proper district for filing and hearing. It satisfies the requirement for a certificate as to reasons for authorizing filing in the courthouse location, as set forth in Los Angeles Superior Court Local Rule 2.0. It must be completed and submitted to the court along with the Civil Case Cover Sheet and the original Complaint or Petition in ALL civil cases filed in any district (including the Central District) of the Los Angeles County Superior Court. Copies of the cover sheet and this addendum must be served along with the summons and complaint, or other initiating pleading in the case.

PLEASE HAVE THE FOLLOWING DOCUMENTS 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 (Summons forms available at the Forms Counter).
3. Civil Case Cover Sheet form required by California Rule of Court 982.2(b)(1), completely filled out (Cover Sheet forms available at the Forms Counter).
4. This "Addendum to Civil Case Cover Sheet" form [Superior Court Form Number 982.2(b)(1)A, revised 7/99], completely filled out (Item II. does not apply in limited civil cases) and submitted with the Civil Case Cover Sheet.*
5. Payment in full of the filing fee (unless filing on behalf of state or local government or no fee is due for the type of case being filed) or an Order of the Court waiving payment of filing fees in forma pauperis (fee waiver application forms available at the Filing Window)
6. In case of a plaintiff or petitioner who is a minor under 18 years of age, an Order of the Court appointing an adult as a guardian ad litem to act on behalf of the minor (Guardian ad Litem Application and Order forms available at the Forms Counter).
7. Additional copies of documents presented for endorsement by the Clerk and return to you.

* With the exception of limited civil and any civil cases concerning bodily injury (including wrongful death) and property damage occurring in this County, Labor Commissioner Appeals, and those types of actions required to be filed in the Central District by Local Court Rule 2(b), all civil actions may be optionally filed either in the Central District or in whichever other court location the rule would allow them to be filed. When a party elects to file a general or unlimited jurisdiction civil action in Central District that would also be eligible for filing in one or more of the other court locations, this form must still be submitted with location and assignment information completed.