

ORIGINAL

1 SCHULER & BROWN
2 DANIEL E. HOFFMAN, State Bar Number 105841
3 7100 Hayvenhurst Avenue, Suite 310
4 Van Nuys, California 91406
5 Telephone: (818) 756-0999

FILED
LOS ANGELES SUPERIOR COURT

SEP 21 2008

John A. Clark, Executive Officer/Clerk
By D. Garcia, Deputy

6 Attorneys for Plaintiff NNAMDI NWUDA

**Case assigned
to Judge** *Helen I Bendix*

D-18

7 SUPERIOR COURT OF THE STATE OF CALIFORNIA
8 FOR THE COUNTY OF LOS ANGELES
9 UNLIMITED CIVIL

10
11 NNAMDI NWUDA, an individual,,
12 Plaintiff,

13 vs.

14 PLANNED PARENTHOOD -LOS
15 ANGELES; a business entity, form unknown;
16 DOES 1 to 100, Inclusive,
17 Defendants.

CASE NO.: BC358987

COMPLAINT FOR MONETARY
DAMAGES AND PUNITIVE
DAMAGES FOR

- 1) VIOLATION OF CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT GOVERNMENT CODE §§12920 AND 12940, ET SEQ.
- 2) WRONGFUL TERMINATION DUE TO RACIAL DISCRIMINATION IN VIOLATION OF PUBLIC POLICY IN VIOLATION OF CALIFORNIA COMMON LAW
- 3) BREACH OF IMPLIED CONTRACT NOT TO TERMINATE EXCEPT FOR GOOD CAUSE
- 4) HARASSMENT IN VIOLATION OF CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT GOVERNMENT CODE §§12920 AND 12940, ET SEQ.

26 COMES NOW THE Plaintiff, NNAMDI NWUDA, by and through his attorneys of
27 record and, upon information and belief, alleges as follows:
28

RECEIVED AS
STATE OF CALIFORNIA
DATE FILED 09/21/08 02:11:39 PM
FILING OFFICE
LOS ANGELES COUNTY
CLERK OF SUPERIOR COURT
300.00
300.00

1 5. At all times relevant herein, Defendants, and each of them, were the agents and
2 employees of each and every other Defendant in doing the things complained of herein, and
3 furthermore, each Defendant conspired and acted in concert with each and every other
4 Defendant in order to accomplish the wrongs against Plaintiff which form the basis of this
5 lawsuit. In doing the conduct alleged herein, each Defendant was acting within the course and
6 scope of his or her authority with each of the other Defendants. Furthermore, each of the
7 wrongful acts alleged herein was adopted and/or ratified by the managerial employees
8 employed by Defendant PPLA.

9 6. Plaintiff has exhausted his administrative remedies, having filed complaints with
10 the California Department of Fair Employment and Housing, and obtaining a "Right to Sue"
11 letter for each Defendant.

12
13 **FIRST CAUSE OF ACTION FOR WRONGFUL**
14 **TERMINATION AND/OR DISCRIMINATION BASED UPON RACE**
15 **AND/OR COLOR IN VIOLATION OF PUBLIC POLICY AND THE CALIFORNIA**
16 **FAIR EMPLOYMENT AND HOUSING ACT - GOVERNMENT CODE §12940 ET**

17
18 **SEQ.**

19 (Against PPLA, and Does 1 – 100.)

20 7. Plaintiff incorporates paragraphs 1 through 6 above as though set forth herein in
21 full.

22 8. Plaintiff was hired as a full-time employee by Defendants on or about June 23,
23 2003 at which time Defendants agreed to pay Plaintiff on a salary basis.

24 9. Plaintiff was personally hired by Victor Gonzalez to assist PPLA's senior
25 accountant. He came to PPLA with a significant background in health care accounting
26 experience. He was familiar with billing and general accounting practices within the California
27 health care industry. Plaintiff possesses a Masters degree in Business Administration.
28

1 10. About the time that the Plaintiff was hired, Mr. Gonzalez also hired one
2 Rebecca Cassamajor to implement Great Plains, an advanced accounting software system that
3 would have been capable of adequately tracking PPLA's income and expenses for purposes of
4 auditing, day-to-day management, and for reporting to donors and grant sources.

5 11. Plaintiff and other accounting staff were jammed closely together in an area
6 approximately 15 x 10 in a massive cubicle with no partitions due to PPLA's lack of space.
7 After being hired by PPLA, their certified public accountancy firm trained plaintiff on PPLA's
8 bank reconciliations. He was responsible for bank reconciliations, banking, filing statements,
9 and financial analysis of all accounts pertaining to banking. As such, Plaintiff has intimate
10 knowledge of the banking and accounting activities of PPLA.

11 12. Around January 2004, PPLA hired one Fatima Dhalla for consideration as the
12 Controller. Upon her hiring by PPLA, Ms. Dhalla immediately began to get into verbal
13 altercations with plaintiff and others. She constantly used profanity and created a very hostile
14 work environment. This culminated in an incident where she used the word "nigger" directed
15 at plaintiff. Plaintiff immediately placed his concerns in writing and requested disciplinary
16 action with the human resources department at PPLA. Nothing ever happened to correct this
17 wrong. In fact, plaintiff was later put on probation by a female supervisor and then was forced
18 to quit on March 6, 2004 due to a hostile environment.

19 13. On or about January 2004, plaintiff complained about the derogatory racial
20 terms and slurs and profanity used by CASSAMAJOR, Operations Account. All the
21 accounting staff was in close quarters and these terms were heard by everyone. On February
22 5, 2004, plaintiff complained in an electronic mail sent to Nancy Young, COO. He informed
23 her of the insults and verbal confrontations with CASAMAJOR. Nothing was done to prevent
24 further racial harassment and an increasing hostility in the work place environment by
25 management.

26 14. On March 6, 2004 plaintiff was told that there were too many problems and
27 that he had to be placed on probation after having completed his probation eight months
28 earlier. Plaintiff believes this adverse employment action was in retaliation for his complaints

1 about the racial harassment he was being subjected to. Therefore the working environment
2 was intolerable and plaintiff had to quit.

3 15. Plaintiff was wrongfully terminated by Defendants, and each of them, in
4 violation of *California Government Code* §§ 12920 and 12940, as well as other statutes and
5 constitutional provisions which, inter alia, prohibit an employer from taking any adverse
6 employment action due to discrimination based on race and/or color.

7 16. As a proximate cause of the wrongful conduct by Defendants, Plaintiff has
8 suffered and will continue to suffer the following damages:

- 9 i. Loss of wages ("back pay");
10 ii. Work related benefits;
11 iii. Future earning capacity ("front pay");
12 iv. Severe emotional distress including mental anguish, humiliation,
13 embarrassment, fright, shock, pain, discomfort and anxiety;
14 v. Severe emotional distress which culminated in physical injury and bodily injury
15 such as loss of appetite, anxiety, sleeping problems, headaches, trouble
16 sleeping, and physical stress;
17 vi. Physical injury and bodily injury;
18 vii. Pain and suffering.

19 17. Plaintiff's compensatory damages exceed the jurisdictional limits of this Court.

20 18. The acts of the Defendants, and each of them, were malicious, oppressive and/or
21 fraudulent as defined in *California Civil Code* §3294 and, as a consequence, the Plaintiff is
22 entitled to punitive damages against the Defendants, and each of them, in order to punish them
23 for having engaged in wrongful conduct, and to deter future wrongful conduct. The exact
24 amount of punitive damages to be awarded is to be determined by a trier of fact. The actions
25 of Defendants were engaged in by employees and/or agents of Defendants in managerial
26 position(s), and said actions were authorized and/or ratified by managerial agents of
27 Defendants.
28

1 punitive damages against the Defendants and each of them, in order to punish them for having
2 engaged in wrongful conduct, and to deter future wrongful conduct. The exact amount of
3 punitive damages to be awarded is to be determined by a trier of fact. The actions of
4 Defendants, which resulted in the wrongful termination of Plaintiff due to racial discrimination,
5 were engaged in by Defendants' employees and agents that were in managerial position(s) and
6 said wrongful conduct was authorized and/or ratified by Defendants.

7
8 **THIRD CAUSE OF ACTION**

9 **FOR BREACH OF IMPLIED CONTRACT**

10 **NOT TO TERMINATE EXCEPT FOR GOOD CAUSE**

11 (Against PPLA, and Does 1 – 100.)

12
13 25. Plaintiff refers to paragraphs 1 to 24 hereinabove and incorporates the same
14 herein as though fully set forth herein.

15 26. Implied by law in Plaintiff's employment contract was an agreement that Plaintiff
16 would not be terminated except for good cause.

17 27. Defendants breached the implied contract not to terminate Plaintiff except for
18 good cause. Discrimination based upon national origin, race and/or color does not constitute
19 good cause as a matter of law, and represents a violation of statutory and/or common law
20 public policy.
21

22 **FOURTH CAUSE OF ACTION FOR HARASSMENT**

23 (Against All Defendants)

24
25 28. Plaintiff refers to paragraphs 1 to 27 hereinabove and incorporates the same
26 herein as though fully set forth herein.

27 29. Plaintiff was unlawfully harassed due to her race and/or color by CASSAMAJOR
28 and FATIMA DHALIA, controller of PPLA.

1 30. Plaintiff is also informed and believes that management of PPLA participated in,
2 directed, authorized, ratified and/or condoned the unlawful harassment of plaintiff due to his
3 race and/or color and gender.

4 31. The harassment of Plaintiff included Defendants to fabricate an excuse to
5 terminate Plaintiff, when the real reason plaintiff was forced to leave his employment was
6 because he was "black".

7 32. The harassment of Plaintiff by Defendants and each of them, was malicious,
8 oppressive and/or fraudulent as defined in *California Civil Code* §3294 and, as a consequence,
9 the Plaintiff is entitled to punitive damages against the Defendants, and each of them, in order
10 to punish them for having engaged in wrongful conduct, and to deter future wrongful conduct.
11 The exact amount of punitive damages to be awarded is to be determined by a trier of fact.
12 The actions of Defendants were engaged in by employees and/or agents of Defendants in
13 managerial position(s), and said actions were authorized and/or ratified by managerial agents of
14 Defendants.
15 Defendants.

16 WHEREFORE, Plaintiff prays for judgment against the Defendants, and each of them,
17 as follows:
18

- 19
- 20 1) For general damages.
 - 21 2) For special damages according to proof.
 - 22 3) For all front and/or back pay to which Plaintiff is entitled, plus raises and cost of
23 living increases.
 - 24 4) For attorneys' fees and costs pursuant to statutes, including but not limited to
25 *Government Code* §12965(b) and for calculation of attorneys' fees in
26 accordance with the "Lodestar" multiplier method (See, *Weeks v. Baker &*
27 *McKenzie* (1998) 63 Cal. App. 4th 1128, 1171-1172).
28

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

DANIEL E. HOFFMAN
SCHULER & BROWN
7100 HAYVENHURST AVENUE, SUITE 310

VAN NUYS, CALIFORNIA 91406

TELEPHONE NO.: (818) 756-0999 FAX NO.: (818) 756-0998

ATTORNEY FOR (Name): NNAMDI NWUDA

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

STREET ADDRESS: 111 NORTH HILL STREET

MAILING ADDRESS: SAME

CITY AND ZIP CODE: LOS ANGELES, CALIFORNIA 90012

BRANCH NAME: CENTRAL DISTRICT

CASE NAME: NWUDA v. PLANNED PARENTHOOD.

FOR COURT USE ONLY

FILED

LOS ANGELES SUPERIOR COURT

SEP 21 2006

John A. Clark, Executive Officer/Clerk

By D. Garcia, Deputy

ORIGINAL

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 1811)

CASE NUMBER: **BC358987**

JUDGE:

DEPT:

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:

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)
 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 1800-1812)

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 1800 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. 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): 4

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 21, 2006

DANIEL E. HOFFMAN

(TYPE OR PRINT NAME)

Bella Yanovsky

(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 201.8.) 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 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 will be used for statistical purposes only.

SHORT TITLE: NWUDA v. PLANNED PARENTHOOD

CASE NUMBER

BC358987

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 HOURS/ DAYS.

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

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

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

Step 3: In Column C, circle the reason for the court location choice that applies to the type of action you have checked.

For any exception to the court location, see Los Angeles Superior Court Local Rule 2.0.

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

- | | |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ol style="list-style-type: none"> 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. | <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 <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)	1., 2., 4.
		<input type="checkbox"/> A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.)	1., 2., 4.
		<input type="checkbox"/> A7270 Intentional Infliction of Emotional Distress	1., 2., 3.
<input type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death		1., 2., 4.	
Non-Personal Injury/Property	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: NWUDA V. PLANNED PARENTHOOD		CASE NUMBER
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"/> 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"/> A6009 Wrongful Eviction	2., 5.
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.

Judicial Review (Cont'd.)

Provisionally Complex Litigation

Enforcement of Judgment

Miscellaneous Civil Complaints

Miscellaneous Civil Petitions

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 <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.

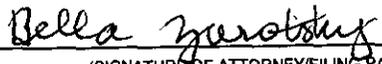
SHORT TITLE: NWUDA v. PLANNED PARENTHOOD	CASE NUMBER
------------------------------------------	-------------

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 NUMBER UNDER COLUMN C WHICH APPLIES IN THIS CASE			ADDRESS:
<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.			1920 Marengo Street
CITY: Los Angeles	STATE: CA	ZIP CODE: 90033	

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

Dated: September 21, 2006



 (SIGNATURE OF ATTORNEY/FILING PARTY)
 Bella Zarotsky

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.

03/06/06