

ORIGINAL

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FILED
Superior Court of California
County of Los Angeles

MAR 22 2018

Sherri R. Carter, Executive Officer/Clerk
By M. Soto, Deputy
Moses Soto

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 COUNTY OF LOS ANGELES, CENTRAL DISTRICT

FAXED

12 CLARA GRAJEDA, an individual; JESUS
RANGEL, an individual,

13 Plaintiffs,

14 v.

15 CITY OF LOS ANGELES, a government
16 entity; LOS ANGELES FIRE
DEPARTMENT, a public entity; FRANK
17 GOMEZ, an individual and a public entity
employee; ROMAN DE LA TORRE, an
18 individual and a public entity employee;
MARIA ENRIQUEZ, an individual; and
19 DOES 1-10,

20 Defendants.

Case No. **BC 6 9 9 1 1 8**

COMPLAINT FOR DAMAGES

- 1. Negligence
- 2. Premises Liability
- 3. Negligent Infliction of Emotional Distress
- 4. Loss of Consortium

DEMAND FOR JURY TRIAL

22 COMES NOW Plaintiffs CLARA GRAJEDA and JESUS RANGEL, for a cause of action
23 against Defendants CITY OF LOS ANGELES, LOS ANGELES FIRE DEPARTMENT, FRANK
24 GOMEZ, ROMAN DE LA TORRE, MARIA ENRIQUEZ, and DOES 1-10, and each of them,
25 and complains and alleges as follows:

26 ///
27 ///
28 ///

03/22/2018

03/22/2018

CIT/CASE: BC699118
LEA/DEF#:

RECEIPT #: CCH524880055
DATE PAID: 03/22/18 11:37 AM
PAYMENT: \$435.00 310
RECEIVED:

CHECK:	\$435.00
CASH:	\$0.00
CHANGE:	\$0.00
CARD:	\$0.00

D-98
FSC: 09/05/2018 TRAL: 09/23/2019 OSC: 03/22/2021

RECEIVED
 03/22/2018
 11:37 AM
 CCH524880055
 \$435.00

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I.

NATURE OF THE ACTION

1. The instant action arises from a fall that occurred in the County of Los Angeles, State of California on March 2, 2017. Plaintiffs bring this lawsuit for the injuries sustained to CLARA GRAJEDA pursuant to the laws of the State of California.

II.

THE PARTIES

2. Plaintiff CLARA GRAJEDA is an individual residing in the County of Los Angeles, State of California.

3. Plaintiff JESUS RANGEL is an individual residing in the County of Los Angeles, State of California.

4. At all times herein relevant the Plaintiff, CLARA GRAJEDA, and Plaintiff, JESUS RANGEL, were and are now, husband and wife.

5. Plaintiffs allege, upon information and belief, that Defendants CITY OF LOS ANGELES and LOS ANGELES FIRE DEPARTMENT are a public entity of the State of California.

6. Defendants FRANK GOMEZ, ROMAN DE LA TORRE, and DOES 1-5, inclusive, collectively:

- a. Plaintiffs allege, upon information and belief, that Defendants FRANK GOMEZ, ROMAN DE LA TORRE, and DOES 1-5, inclusive, collectively, are individuals and at all times relevant to this action were employed by Defendants CITY OF LOS ANGELES and LOS ANGELES FIRE DEPARTMENT. PLAINTIFF is informed and believes and thereon alleges that at all times relevant to this action, FRANK GOMEZ, ROMAN DE LA TORRE, and DOES 1-5, inclusive, collectively, resided in the above-entitled county and judicial district.
- b. Plaintiff is informed and believes, and thereon alleges that at all times relevant to this action, FRANK GOMEZ, ROMAN DE LA TORRE, and DOES 1-5, inclusive, collectively, were employees of Defendants CITY OF LOS ANGELES and LOS

03/02/2018

03/22/2019

1 ANGELES FIRE DEPARTMENT and each said defendant acted in the course and
2 scope of such employment.

3 7. Plaintiffs allege, upon information and belief, that Defendants MARIA
4 ENRIQUEZ and DOES 6-10, inclusive, and each of them owned, possessed, leased, maintained,
5 operated, supervised, managed and controlled the subject premises near and about 1449 E. 54th St.,
6 Los Angeles, CA 90011, wherein the subject incident occurred.

7 8. That the true names and capacities, whether individual, corporate, associate, or
8 otherwise, of Defendant DOES 1-10, inclusive, are unknown to Plaintiff at this time, who
9 therefore sues said Defendants by such fictitious names and will ask leave of court to amend this
10 complaint to show their true names and capacities when ascertained. Said Defendants are sued as
11 principals, and all of the acts performed by them as agents, servants employees within the course
12 and scope of their authority and employment.

13 9. Whenever PLAINTIFF refers to any act, deed, or conduct of "Defendant," or
14 "CITY OF LOS ANGELES," or "LOS ANGELES FIRE DEPARTMENT," or "THE CITY" or
15 "LAFD," said references mean that Defendants CITY OF LOS ANGELES, LOS ANGELES FIRE
16 DEPARTMENT, and DOES 1-5, inclusive, collectively engaged in the act, deed, or conduct by
17 and through one or more of its officers, directors, agents, employees or representatives who were
18 actively engaged in the management, direction, control or transactions of Defendant THE CITY'S
19 ordinary operations and business affairs.

20 **III.**

21 **JURISDICTION AND VENUE**

22 10. Jurisdiction and venue are proper in this Court on the basis that the accident
23 occurred in the County of Los Angeles, State of California. Furthermore, the amount in
24 controversy exceeds the jurisdictional minimum of this court.

25 11. Furthermore, this Court has jurisdiction over this matter pursuant to, *inter alia*,
26 *Government Code* § 815.2(a).

27 12. Plaintiffs have complied with the Tort Claims Act (*Government Code* § 900, *et seq.*)
28 because as required by *Government Code* § 945.6, Plaintiffs presented a written claim to Defendant

1 CITY OF LOS ANGELES on August 29, 2017 in accordance with *Government Code* § 913. Said
2 claim was rejected by Defendant CITY OF LOS ANGELES on September 22, 2017. Plaintiffs file
3 herewith a timely civil lawsuit, within the statutory six (6) months of said rejection.

4 IV.

5 GENERAL ALLEGATIONS

6 13. On March 3, 2017, Clara Grajeda, 34 years old, and her spouse, Jesus Rangel, were
7 guests at a house located at 1449 E. 54th St., Los Angeles, CA 90011. At approximately 2:00 p.m.,
8 Ms. Grajeda began experiencing pulsating contractions, as if entering labor. A call was placed to
9 9-1-1, and the Los Angeles Fire Department Rescue Ambulance 21 ("RA-21") was dispatched to
10 provide transport to the hospital.

11 14. Upon arriving at the residence where Ms. Grajeda was present, the RA-21
12 personnel, including but not limited to Defendants Frank Gomez and Roman De La Torre
13 (hereinafter, "RA-21 personnel") observed Ms. Grajeda sitting in a tripod position inside of the
14 house. Shortly after arriving, the RA-21 personnel placed Ms. Grajeda on a stretcher and began
15 escorting her out of the residence.

16 15. Located approximately four to five feet away from the front door of the residence
17 was a single step, about eight to nine inches in height. As the RA-21 personnel escorted Ms.
18 Grajeda out of the residence, they neither secured Ms. Grajeda nor the stretcher such that, as they
19 were making their way over the step, the stretcher, along with Ms. Grajeda, fell the full depth of
20 the step and violently, and loudly, made contact with the ground, causing injury to Ms. Grajeda as
21 well as injury and ultimately death to her unborn child. Ms. Grajeda immediately experienced an
22 intense pain in her abdominal area.

23 16. The RA-21 personnel proceeded to place Ms. Grajeda in the ambulance for
24 approximately 10 minutes before beginning transportation to Martin Luther King Jr. Community
25 hospital.

26 17. By failing to secure Ms. Grajeda and/or the stretcher, and by failing to make safe
27 Ms. Grajeda's transportation, e.g. failing to account for the step in the front entrance to the
28 residence, the RA-21 personnel, city employees, were not only negligent, they acted with gross

1 managed and controlled the subject premises, more particularly in, near and about 1449 E. 54th St.,
2 Los Angeles, CA 90011, wherein said Defendants and each of them, invited Plaintiffs onto the
3 property as invitees and/or licensees.

4 22. That on or about March 2, 2017, the Defendants, MARIA ENRIQUEZ and DOES
5 6-10, and each of them, so negligently and carelessly owned, possessed, maintained, operated,
6 supervised, managed and controlled the aforesaid premises and establishment, as to cause or
7 permit the said area to be in a dangerous, defective, unsafe, hazardous and trap condition, thereby
8 causing Plaintiff to fall thereon with great force and violence.

9 23. That as a proximate result of the negligence of the Defendants as aforesaid, and by
10 reason of the fall thereby caused, the Plaintiff sustained the following injuries and damages:

- 11 a. Injuries to the body and limbs, all to damages in a monetary sum;
- 12 b. Necessary medical expenses in an amount not yet fully ascertainable;
- 13 c. Loss of earnings in an amount not yet fully ascertainable.

14 **SECOND CAUSE OF ACTION**

15 **NEGLIGENCE**

16 **(Against CITY OF LOS ANGELES, LOS ANGELES FIRE DEPARTMENT, FRANK**
17 **GOMEZ, ROMAN DE LA TORRE, and DOES 1-5)**

18 24. Plaintiff hereby re-alleges and incorporates by reference each and every allegation
19 contained in the preceding paragraphs as if fully set forth in detail herein.

20 25. That on March 2, 2017 a call was placed to 9-1-1, and the Los Angeles Fire
21 Department Rescue Ambulance 21 ("RA-21"), owned and operated by the CITY OF LOS
22 ANGELES and the LOS ANGELES FIRE DEPARTMENT and its employees, including, but not
23 limited to FRANK GOMEZ and ROMAN DE LA TORRE, was dispatched to provide Plaintiff a
24 transport to the hospital.

25 26. As the RA-21 personnel escorted Ms. Grajeda out of the subject premises, they
26 neither secured Ms. Grajeda nor the stretcher such that, as they were making their way over the
27 step, the stretcher, along with Ms. Grajeda, fell the full depth of the step and violently, and loudly,
28 made contact with the ground, causing injury to Ms. Grajeda as well as injury and ultimately death

1 to her unborn child. Ms. Grajeda immediately experienced an intense pain in her abdominal area.

2 27. As a result and as a direct cause of the negligence, carelessness of the agent of the
3 defendants, the Plaintiff sustained significant and serious injury including but not limited to a
4 uterine rupture causing the unborn child to die and was forced to undergo emergency surgical
5 intervention. As a result of the injury the Plaintiff suffered considerable pain, discomfort and
6 anxiety and as a consequence suffered general damages.

7 28. That by reason of the injuries, the Plaintiff has incurred expenses of physicians,
8 hospitals, medical, ambulance, nursing and incidental care. The exact amount of which at this
9 time is not known. It is likely because of the injuries the Plaintiff will incur damages in the future.

10 29. That by reason of her injuries, the Plaintiff has and will continue to lose earnings in
11 an amount which is not yet fully known.

12 **THIRD CAUSE OF ACTION**

13 **NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS**

14 **(Against ALL DEFENDANTS)**

15 30. Plaintiff hereby re-alleges and incorporates by reference each and every allegation
16 contained in the preceding paragraphs as if fully set forth in detail herein.

17 31. That Defendants were negligent as alleged above.

18 32. That Plaintiff suffered serious emotional distress.

19 33. That Defendant's negligence was a substantial factor in causing Plaintiff's serious
20 emotional distress.

21 **FOURTH CAUSE OF ACTION**

22 **LOSS OF CONSORTIUM**

23 **(Against ALL DEFENDANTS)**

24 34. Plaintiff incorporates by reference herein each of the foregoing paragraphs as
25 though fully set forth herein.

26 24. At all times herein relevant the Plaintiff, CLARA GRAJEDA, and Plaintiff, JESUS
27 RANGEL, were and are now, husband and wife.

28 25. That as a proximate result of the negligence of the Defendants, and each of them, as

1 alleged hereinabove, and by reason of said injuries suffered and sustained by CLARA GRAJEDA,
2 Plaintiff JESUS RANGEL has been deprived of the services, care, comfort, society and
3 companionship of her husband, all to her general damages.

4 VI.

5 **PRAYER FOR RELIEF**

6 WHEREFORE, Plaintiffs pray for judgment against Defendants as hereinafter set forth:

- 7 1. For general damages;
8 2. For medical expenses;
9 3. For loss of earnings according to proof;
10 4. For punitive damages;
11 5. For costs of suit herein incurred; and
12 6. For economic losses, in an amount according to proof at trial;
13 7. For interest upon any judgment entered as provided by law.
14 8. For such other and further relief as the Court may deem proper.

14 VII.


15 **DEMAND FOR JURY TRIAL**

16 Plaintiffs hereby demand a trial by jury on all claims so triable.

17
18 DATED: March 22, 2018

GIRARDI | KEESE

19
20 By:



21 THOMAS V. GIRARDI
22 KENNY S. RAMIREZ
23 Attorneys for CLARA GRAJEDA, an individual;
24 JESUS RANGEL, an individual
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ORIGINAL

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):
 THOMAS V. GIRARDI, SBN 36603
 KENNY S. RAMIREZ, SBN 303062
 Girardi | Keese
 1126 Wilshire Blvd., Los Angeles, CA 90017
 TELEPHONE NO.: 213.977.0211 FAX NO.: 213.481.1554
 ATTORNEY FOR (Name): Plaintiffs, Clara Grajeda and Jesus Rangel

FOR COURT USE ONLY

FILED
 Superior Court of California
 County of Los Angeles

MAR 22 2018

Sherri R. Carter, Executive Officer/Clerk
 By M. Soto, Deputy
 Moses Soto

CASE NUMBER: **BC 699118**

JUDGE:
 DEPT:

SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles

STREET ADDRESS: 111 N Hill St
 MAILING ADDRESS: 111 N Hill St
 CITY AND ZIP CODE: Los Angeles, CA 90012
 BRANCH NAME: Stanley Mosk Courthouse

CASE NAME:
 CLARA GRAJEDA, ET AL. V. CITY OF LOS ANGELES, ET AL.

CIVIL CASE COVER SHEET

Unlimited (Amount demanded exceeds \$25,000) Limited (Amount demanded is \$25,000 or less)

Complex Case Designation

Counter Joinder

Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)

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

1. Check one box below for the case type that best describes this case:
- | | | |
|--|---|---|
| <p>Auto Tort</p> <p><input type="checkbox"/> Auto (22)</p> <p><input type="checkbox"/> Uninsured motorist (46)</p> <p>Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort</p> <p><input type="checkbox"/> Asbestos (04)</p> <p><input type="checkbox"/> Product liability (24)</p> <p><input type="checkbox"/> Medical malpractice (45)</p> <p><input checked="" type="checkbox"/> Other PI/PD/WD (23)</p> <p>Non-PI/PD/WD (Other) Tort</p> <p><input type="checkbox"/> Business tort/unfair business practice (07)</p> <p><input type="checkbox"/> Civil rights (08)</p> <p><input type="checkbox"/> Defamation (13)</p> <p><input type="checkbox"/> Fraud (16)</p> <p><input type="checkbox"/> Intellectual property (19)</p> <p><input type="checkbox"/> Professional negligence (25)</p> <p><input type="checkbox"/> Other non-PI/PD/WD tort (35)</p> <p>Employment</p> <p><input type="checkbox"/> Wrongful termination (36)</p> <p><input type="checkbox"/> Other employment (15)</p> | <p>Contract</p> <p><input type="checkbox"/> Breach of contract/warranty (06)</p> <p><input type="checkbox"/> Rule 3.740 collections (09)</p> <p><input type="checkbox"/> Other collections (09)</p> <p><input type="checkbox"/> Insurance coverage (18)</p> <p><input type="checkbox"/> Other contract (37)</p> <p>Real Property</p> <p><input type="checkbox"/> Eminent domain/Inverse condemnation (14)</p> <p><input type="checkbox"/> Wrongful eviction (33)</p> <p><input type="checkbox"/> Other real property (26)</p> <p>Unlawful Detainer</p> <p><input type="checkbox"/> Commercial (31)</p> <p><input type="checkbox"/> Residential (32)</p> <p><input type="checkbox"/> Drugs (38)</p> <p>Judicial Review</p> <p><input type="checkbox"/> Asset forfeiture (05)</p> <p><input type="checkbox"/> Petition re: arbitration award (11)</p> <p><input type="checkbox"/> Writ of mandate (02)</p> <p><input type="checkbox"/> Other judicial review (39)</p> | <p>Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403)</p> <p><input type="checkbox"/> Antitrust/Trade regulation (03)</p> <p><input type="checkbox"/> Construction defect (10)</p> <p><input type="checkbox"/> Mass tort (40)</p> <p><input type="checkbox"/> Securities litigation (28)</p> <p><input type="checkbox"/> Environmental/Toxic tort (30)</p> <p><input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41)</p> <p>Enforcement of Judgment</p> <p><input type="checkbox"/> Enforcement of judgment (20)</p> <p>Miscellaneous Civil Complaint</p> <p><input type="checkbox"/> RICO (27)</p> <p><input type="checkbox"/> Other complaint (not specified above) (42)</p> <p>Miscellaneous Civil Petition</p> <p><input type="checkbox"/> Partnership and corporate governance (21)</p> <p><input type="checkbox"/> Other petition (not specified above) (43)</p> |
|--|---|---|

2. This case is is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:
- a. Large number of separately represented parties d. Large number of witnesses
- b. Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve e. Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court
- c. Substantial amount of documentary evidence f. Substantial postjudgment judicial supervision
3. Remedies sought (check all that apply): a. monetary b. nonmonetary; declaratory or injunctive relief c. punitive
4. Number of causes of action (specify): Four.
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: March 22, 2018
 Kenny S. Ramirez, Esq.
 (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 collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

03/22/2018

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INSTRUCTIONS ON HOW TO COMPLETE THE COVER SHEET

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

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

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

CASE TYPES AND EXAMPLES

Auto Tort	Contract	Provisionally Complex Civil Litigation (Cal. Rules of Court Rules 3.400-3.403)
Auto (22)—Personal Injury/Property Damage/Wrongful Death	Breach of Contract/Warranty (06)	Antitrust/Trade Regulation (03)
Uninsured Motorist (46) (if the case involves an uninsured motorist claim subject to arbitration, check this item instead of Auto)	Breach of Rental/Lease Contract (not unlawful detainer or wrongful eviction)	Construction Defect (10)
	Contract/Warranty Breach—Seller Plaintiff (not fraud or negligence)	Claims Involving Mass Tort (40)
	Negligent Breach of Contract/Warranty	Securities Litigation (28)
Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort	Other Breach of Contract/Warranty	Environmental/Toxic Tort (30)
Asbestos (04)	Collections (e.g., money owed, open book accounts) (09)	Insurance Coverage Claims (arising from provisionally complex case type listed above) (41)
Asbestos Property Damage	Collection Case—Seller Plaintiff	Enforcement of Judgment
Asbestos Personal Injury/Wrongful Death	Other Promissory Note/Collections Case	Enforcement of Judgment (20)
Product Liability (not asbestos or toxic/environmental) (24)	Insurance Coverage (not provisionally complex) (18)	Abstract of Judgment (Out of County)
Medical Malpractice (45)	Auto Subrogation	Confession of Judgment (non-domestic relations)
Medical Malpractice—Physicians & Surgeons	Other Coverage	Sister State Judgment
Other Professional Health Care Malpractice	Other Contract (37)	Administrative Agency Award (not unpaid taxes)
Other PI/PD/WD (23)	Contractual Fraud	Petition/Certification of Entry of Judgment on Unpaid Taxes
Premises Liability (e.g., slip and fall)	Other Contract Dispute	Other Enforcement of Judgment Case
Intentional Bodily Injury/PD/WD (e.g., assault, vandalism)	Real Property	Miscellaneous Civil Complaint
Intentional Infliction of Emotional Distress	Eminent Domain/Inverse Condemnation (14)	RICO (27)
Negligent Infliction of Emotional Distress	Wrongful Eviction (33)	Other Complaint (not specified above) (42)
Other PI/PD/WD	Other Real Property (e.g., quiet title) (26)	Declaratory Relief Only
Non-PI/PD/WD (Other) Tort	Writ of Possession of Real Property	Injunctive Relief Only (non-harassment)
Business Tort/Unfair Business Practice (07)	Mortgage Foreclosure	Mechanics Lien
Civil Rights (e.g., discrimination, false arrest) (not civil harassment) (08)	Quiet Title	Other Commercial Complaint Case (non-tort/non-complex)
Defamation (e.g., slander, libel) (13)	Other Real Property (not eminent domain, landlord/tenant, or foreclosure)	Other Civil Complaint (non-tort/non-complex)
Fraud (16)	Unlawful Detainer	Miscellaneous Civil Petition
Intellectual Property (19)	Commercial (31)	Partnership and Corporate Governance (21)
Professional Negligence (25)	Residential (32)	Other Petition (not specified above) (43)
Legal Malpractice	Drugs (38) (if the case involves illegal drugs, check this item; otherwise, report as Commercial or Residential)	Civil Harassment
Other Professional Malpractice (not medical or legal)	Judicial Review	Workplace Violence
Other Non-PI/PD/WD Tort (35)	Asset Forfeiture (05)	Elder/Dependent Adult Abuse
Employment	Petition Re: Arbitration Award (11)	Election Contest
Wrongful Termination (36)	Writ of Mandate (02)	Petition for Name Change
Other Employment (15)	Writ—Administrative Mandamus	Petition for Relief From Late Claim
	Writ—Mandamus on Limited Court Case Matter	Other Civil Petition
	Writ—Other Limited Court Case Review	
	Other Judicial Review (39)	
	Review of Health Officer Order	
	Notice of Appeal—Labor Commissioner Appeals	

SHORT TITLE: CLARA GRAJEDA, ET AL. V. CITY OF LOS ANGELES, ET AL.

CASE NUMBER

BC 699118

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

This form is required pursuant to Local Rule 2.3 in all new civil case filings in the Los Angeles Superior Court.

ORIGINAL

03 22 2018

Step 1: After completing the Civil Case Cover Sheet (Judicial Council form CM-010), find the exact case type in Column A that corresponds to the case type indicated in the Civil Case Cover Sheet.

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Step 2: In Column B, check the box for the type of action that best describes the nature of the case.

Step 3: In Column C, circle the number which explains the reason for the court filing location you have chosen.

Applicable Reasons for Choosing Court Filing Location (Column C)

- 1. Class actions must be filed in the Stanley Mosk Courthouse, Central District.
2. Permissive filing in central district.
3. Location where cause of action arose.
4. Mandatory personal injury filing in North District.
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.
11. Mandatory filing location (Hub Cases - unlawful detainer, limited non-collection, limited collection, or personal injury).

Auto Tort
Other Personal Injury/ Property Damage/Wrongful Death Tort

Table with 3 columns: A (Civil Case Cover Sheet Category No.), B (Type of Action (Check only one)), and C (Applicable Reasons - See Step 3 Above). Rows include Auto (22), Uninsured Motorist (46), Asbestos (04), Product Liability (24), Medical Malpractice (45), and Other Personal Injury Property Damage Wrongful Death (23).

SHORT TITLE: CLARA GRAJEDA, ET AL. V. CITY OF LOS ANGELES, ET AL. CASE NUMBER

	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Non-Personal Injury/ Property Damage/Wrongful Death Tort	Business Tort (07)	<input type="checkbox"/> A6029 Other Commercial/Business Tort (not fraud/breach of contract)	1, 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
	Professional Negligence (25)	<input type="checkbox"/> A6017 Legal Malpractice	1, 2, 3
		<input type="checkbox"/> A6050 Other Professional Malpractice (not medical or legal)	1, 2, 3
	Other (35)	<input type="checkbox"/> A6025 Other Non-Personal Injury/Property Damage tort	1, 2, 3
Employment	Wrongful Termination (36)	<input type="checkbox"/> A6037 Wrongful Termination	1, 2, 3
	Other Employment (15)	<input type="checkbox"/> A6024 Other Employment Complaint Case	1, 2, 3
		<input type="checkbox"/> A6109 Labor Commissioner Appeals	10
Contract	Breach of Contract/ Warranty (06) (not insurance)	<input type="checkbox"/> A6004 Breach of Rental/Lease Contract (not unlawful detainer or wrongful eviction)	2, 5
		<input type="checkbox"/> A6008 Contract/Warranty Breach -Seller Plaintiff (no fraud/negligence)	2, 5
		<input type="checkbox"/> A6019 Negligent Breach of Contract/Warranty (no fraud)	1, 2, 5
		<input type="checkbox"/> A6028 Other Breach of Contract/Warranty (not fraud or negligence)	1, 2, 5
	Collections (09)	<input type="checkbox"/> A6002 Collections Case-Seller Plaintiff	5, 6, 11
		<input type="checkbox"/> A6012 Other Promissory Note/Collections Case	5, 11
	<input type="checkbox"/> A6034 Collections Case-Purchased Debt (Charged Off Consumer Debt Purchased on or after January 1, 2014)	5, 6, 11	
Insurance Coverage (18)	<input type="checkbox"/> A6015 Insurance Coverage (not complex)	1, 2, 5, 8	
Other Contract (37)	<input type="checkbox"/> A6009 Contractual Fraud	1, 2, 3, 5	
	<input type="checkbox"/> A6031 Tortious Interference	1, 2, 3, 5	
	<input type="checkbox"/> A6027 Other Contract Dispute(not breach/insurance/fraud/negligence)	1, 2, 3, 8, 9	
Real Property	Eminent Domain/Inverse Condemnation (14)	<input type="checkbox"/> A7300 Eminent Domain/Condemnation Number of parcels _____	2, 6
	Wrongful Eviction (33)	<input type="checkbox"/> A6023 Wrongful Eviction Case	2, 6
	Other Real Property (26)	<input type="checkbox"/> A6018 Mortgage Foreclosure	2, 6
<input type="checkbox"/> A6032 Quiet Title		2, 6	
	<input type="checkbox"/> A6060 Other Real Property (not eminent domain, landlord/tenant, foreclosure)	2, 6	
Unlawful Detainer	Unlawful Detainer-Commercial (31)	<input type="checkbox"/> A6021 Unlawful Detainer-Commercial (not drugs or wrongful eviction)	6, 11
	Unlawful Detainer-Residential (32)	<input type="checkbox"/> A6020 Unlawful Detainer-Residential (not drugs or wrongful eviction)	6, 11
	Unlawful Detainer- Post-Foreclosure (34)	<input type="checkbox"/> A6020F Unlawful Detainer-Post-Foreclosure	2, 6, 11
	Unlawful Detainer-Drugs (38)	<input type="checkbox"/> A6022 Unlawful Detainer-Drugs	2, 6, 11

SHORT TITLE:

CLARA GRAJEDA, ET AL. V. CITY OF LOS ANGELES, ET AL.

CASE NUMBER

	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3, Above
Judicial Review	Asset Forfeiture (05)	<input type="checkbox"/> A6108 Asset Forfeiture Case	2, 3, 6
	Petition re Arbitration (11)	<input type="checkbox"/> A6115 Petition to Compel/Confirm/Vacate Arbitration	2, 5
	Writ of Mandate (02)	<input type="checkbox"/> A6151 Writ - Administrative Mandamus	2, 8
		<input type="checkbox"/> A6152 Writ - Mandamus on Limited Court Case Matter	2
		<input type="checkbox"/> A6153 Writ - Other Limited Court Case Review	2
Other Judicial Review (39)	<input type="checkbox"/> A6150 Other Writ /Judicial Review	2, 8	
Provisionally Complex Litigation	Antitrust/Trade Regulation (03)	<input type="checkbox"/> A6003 Antitrust/Trade Regulation	1, 2, 8
	Construction Defect (10)	<input type="checkbox"/> A6007 Construction Defect	1, 2, 3
	Claims Involving Mass Tort (40)	<input type="checkbox"/> A6006 Claims Involving Mass Tort	1, 2, 8
	Securities Litigation (28)	<input type="checkbox"/> A6035 Securities Litigation Case	1, 2, 8
	Toxic Tort Environmental (30)	<input type="checkbox"/> A6036 Toxic Tort/Environmental	1, 2, 3, 8
	Insurance Coverage Claims from Complex Case (41)	<input type="checkbox"/> A6014 Insurance Coverage/Subrogation (complex case only)	1, 2, 5, 8
Enforcement of Judgment	Enforcement of Judgment (20)	<input type="checkbox"/> A6141 Sister State Judgment	2, 5, 11
		<input type="checkbox"/> A6160 Abstract of Judgment	2, 6
		<input type="checkbox"/> A6107 Confession of Judgment (non-domestic relations)	2, 9
		<input type="checkbox"/> A6140 Administrative Agency Award (not unpaid taxes)	2, 8
		<input type="checkbox"/> A6114 Petition/Certificate for Entry of Judgment on Unpaid Tax	2, 8
		<input type="checkbox"/> A6112 Other Enforcement of Judgment Case	2, 8, 9
Miscellaneous Civil Complaints	RICO (27)	<input type="checkbox"/> A6033 Racketeering (RICO) Case	1, 2, 8
	Other Complaints (Not Specified Above) (42)	<input type="checkbox"/> A6030 Declaratory Relief Only	1, 2, 8
		<input type="checkbox"/> A6040 Injunctive Relief Only (not domestic/harassment)	2, 8
		<input type="checkbox"/> A6011 Other Commercial Complaint Case (non-tort/non-complex)	1, 2, 8
<input type="checkbox"/> A6000 Other Civil Complaint (non-tort/non-complex)		1, 2, 8	
Miscellaneous Civil Petitions	Partnership Corporation Governance (21)	<input type="checkbox"/> A6113 Partnership and Corporate Governance Case	2, 8
	Other Petitions (Not Specified Above) (43)	<input type="checkbox"/> A6121 Civil Harassment	2, 3, 9
		<input type="checkbox"/> A6123 Workplace Harassment	2, 3, 9
		<input type="checkbox"/> A6124 Elder/Dependent Adult Abuse Case	2, 3, 9
		<input type="checkbox"/> A6190 Election Contest	2
		<input type="checkbox"/> A6110 Petition for Change of Name/Change of Gender	2, 7
		<input type="checkbox"/> A6170 Petition for Relief from Late Claim Law	2, 3, 8
<input type="checkbox"/> A6100 Other Civil Petition		2, 9	

SHORT TITLE: CLARA GRAJEDA, ET AL. V. CITY OF LOS ANGELES, ET AL.	CASE NUMBER
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Step 4: Statement of Reason and Address: Check the appropriate boxes for the numbers shown under Column C for the type of action that you have selected. Enter the address which is the basis for the filing location, including zip code. (No address required for class action cases).

REASON: <input type="checkbox"/> 1. <input type="checkbox"/> 2. <input type="checkbox"/> 3. <input type="checkbox"/> 4. <input type="checkbox"/> 5. <input type="checkbox"/> 6. <input type="checkbox"/> 7. <input type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10. <input checked="" type="checkbox"/> 11.			ADDRESS: 1449 E. 54th St., Los Angeles, CA 90011
CITY: Los Angeles	STATE: CA	ZIP CODE: 90011	

03/22/2018

Step 5: Certification of Assignment: I certify that this case is properly filed in the Central District of the Superior Court of California, County of Los Angeles [Code Civ. Proc., §392 et seq., and Local Rule 2.3(a)(1)(E)].

Dated: March 22, 2018


 (SIGNATURE OF ATTORNEY/FILING PARTY)

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

1. Original Complaint or Petition.
2. If filing a Complaint, a completed Summons form for issuance by the Clerk.
3. Civil Case Cover Sheet, Judicial Council form CM-010.
4. Civil Case Cover Sheet Addendum and Statement of Location form, LACIV 109, LASC Approved 03-04 (Rev. 02/16).
5. Payment in full of the filing fee, unless there is court order for waiver, partial or scheduled payments.
6. A signed order appointing the Guardian ad Litem, Judicial Council form CIV-010, if the plaintiff or petitioner is a minor under 18 years of age will be required by Court in order to issue a summons.
7. Additional copies of documents to be conformed by the Clerk. Copies of the cover sheet and this addendum must be served along with the summons and complaint, or other initiating pleading in the case.