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FILED
Superior Court Of California,
Sacramento
05/02/2018
rcaddick
By _____, Deputy
Case Number:
34-2018-00232324

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 COUNTY OF SACRAMENTO

11) Case No:
12)
13) COMPLAINT FOR DAMAGES
14)
15 vs.) 1. Statutory Liability;
16) 2. Battery;
17) 3. Assault;
18) 4. Intentional Infliction of Emotional Distress;
19) 5. False Imprisonment;
20) 6. Invasion of Privacy;
21) • Exemplary Damages Attachment.
22)
23)
24)
25)
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27)
28)
CITY OF SACRAMENTO; JARED
DAVID EVANS; CHAD MORRIS; and
DOES 1 to 100, Inclusive,
Defendants.

19 COMES NOW Plaintiff and complains of Defendants, and
20 each of them, and alleges as follows:

21 JURISDICTION AND VENUE

22 1. This is the Court of proper jurisdiction because the subject matter of this litigation and
23 some or all of the alleged torts and facts, conduct, breaches and/or omissions alleged in this
24 complaint occurred, transpired or were otherwise entered into in the County of Sacramento, State of
25 California, and the residence and/or principal place of business of one or more of Defendants is the
26 County of Sacramento.

27 2. Plaintiff (hereinafter "Plaintiff"), a 19-year-old
28 female at the time of the incidents described in this complaint, is, and was at all times mentioned in

1 this complaint, a resident of the County of Sacramento, State of California.

2 3. Plaintiff is informed and believes, and thereon alleges, that Defendant CITY
3 SACRAMENTO is, and was at all times mentioned in this complaint, a public entity, located in the
4 County of Sacramento and organized and existing under and by virtue of the laws of the State of
5 California and/or the United States.

6 4. Plaintiff is informed and believes, and thereon alleges, that Defendant JARED
7 DAVID EVANS (hereinafter "Defendant EVANS") is, and was at all times mentioned in this
8 complaint, a resident of the County of Sacramento, State of California, and was employed by the
9 CITY OF SACRAMENTO (hereinafter "Defendant CITY") as a Paramedic in the Emergency
10 Medical Services (EMS) Division of the Sacramento Fire Department ("SFD").

11 5. Plaintiff is informed and believes, and thereon alleges, that Defendant CHAD
12 MORRIS (hereinafter "Defendant MORRIS") is, and was at all times mentioned in this complaint, a
13 resident of the County of Sacramento, State of California, and was employed by the CITY as a
14 Paramedic and/or Paramedic intern in the EMS Division of the SFD.

15 6. The true names and capacities, whether individual, corporate, associate, governmental
16 or otherwise, of Defendants DOES to 100, inclusive, are unknown to Plaintiff at this time, who
17 therefore sues said defendants by such fictitious names. Plaintiff will amend this complaint to show
18 the true names, capacities, and/or relationships when the same have been ascertained.

19 7. Plaintiff alleges all or some of said fictitiously-named defendants were the principals,
20 agents, joint venturers, partners, co-conspirators, employers, employees, contractors, subcontractors,
21 independent contractors, predecessors in interest and/or successors in interest to said defendants, and
22 are responsible for the injuries and damages sustained by Plaintiff, as more fully set forth below, and
23 are residents of the State of California, are doing business in California and/or committed acts
24 pursuant to which they are under the jurisdiction of the State of California, and/or partners of each
25 and the other and as such are either joint tortfeasors and/or jointly and severally liable and legally
26 responsible in some manner for the events and happenings herein, and proximately caused the
27 injuries and damages to Plaintiff as set forth herein.

28 ///

1 8. At all times mentioned in this complaint, each of the Defendants was an agent,
2 servant, partner, aider and abettor, co-conspirator and/or joint venturer of each of the other
3 Defendants herein and were at all times operating and acting within the purpose and scope of said
4 agency, service, employment, partnership, conspiracy and/or joint venture and rendered substantial
5 assistance and encouragement to the other defendants, knowing that their conduct constituted a
6 breach of duty owed to Plaintiff.

7 9. Plaintiff has complied with all applicable claims statutes under the laws of the State of
8 California, including Government Code sections 810, *et seq* and 910, *et seq*.

9 **FACTS COMMON TO ALL CAUSES OF ACTION**

10 10. On or about April 1, 2017, Defendants EVANS and MORRIS and SFD Paramedic
11 Jerome Braddock were dispatched to Plaintiff's residence because Plaintiff was suffering from a
12 severe epileptic seizure and required emergency medical services and emergency transport to Kaiser
13 Permanente Hospital in South Sacramento.

14 11. When Defendants EVANS and MORRIS and SFD Paramedic Braddock arrived at
15 Plaintiff's residence, Plaintiff was in extreme distress because the epileptic seizure had just suffered
16 and continued to suffer from.

17 12. Although Plaintiff was physically incapacitated as a result of the epileptic seizure that
18 prompted her relative's telephone call to emergency services, Plaintiff could hear everything going
19 on around her and could feel what was being done to her when the Paramedics arrived at her
20 residence.

21 13. After Defendant EVANS and SFD and SFD Paramedic Braddock arrived at Plaintiff's
22 residence and found her unresponsive, they determined Plaintiff needed to be transported to the
23 hospital. They then secured her firmly to a gurney and placed her in the ambulance.

24 14. As Plaintiff was being transported in the ambulance to the hospital, Defendant
25 EVANS sat in close proximity to Plaintiff's head while SFD Paramedic Morris sat on the left side of
26 Plaintiff.

27 15. While being transported in the ambulance, Plaintiff's eyes were closed and she was
28 still physically incapacitated, which prevented her from moving, but she was fully cognizant of what

1 was happening in the back of the ambulance and could hear and feel everything going on around her
2 and being done to her.

3 16. At some point while transporting Plaintiff in the ambulance, while Plaintiff was still
4 physically incapacitated as a result of her seizure but fully conscious of her surroundings, Plaintiff
5 heard Defendant EVANS make a number of lewd, highly inappropriate, offensive, humiliating,
6 derogatory and intimidating comments about her breasts, including, but not limited to, "She has big
7 tits." At the same time, Defendant EVANS also invited SFD Paramedic Morris to "take a look" at
8 Plaintiff's breasts.

9 17. Immediately after Defendant EVANS' comments regarding Plaintiff's breasts,
10 Plaintiff suddenly felt Defendant EVANS' hands reach down the top of her shirt, pull her right breast
11 out of her shirt and bra and, once exposed, touch, grope and fondle her breast for a period of time.

12 18. While touching, groping and fondling Plaintiff's exposed breast, Defendant EVANS
13 stated, "Those are some big ass nipples."

14 19. After a period of time, Defendant EVANS stopped groping and fondling Plaintiff's
15 exposed breast and placed her breast back into her bra and shirt.

16 20. During the entire time Defendant touched, groped and fondled Plaintiff's breast,
17 Plaintiff remained physically incapacitated while she was strapped to the gurney, but was fully aware
18 that Defendant EVANS had removed her breast from her shirt and bra and touched, groped and
19 fondled her exposed breast, and was fully aware and cognizant of the lewd, highly inappropriate,
20 offensive, humiliating, derogatory and intimidating comments Defendant EVANS made about her
21 breasts as he touched, groped and fondled her exposed breast.

22 21. Because of Plaintiff's physical incapacitation at the time she lay strapped to the
23 gurney, she was entirely helpless and unable to protect herself or otherwise respond in a defensive
24 manner to Defendant EVANS' inappropriate removal, exposure and groping of her breast.

25 22. Despite knowing that EVANS' touching, groping and fondling of Plaintiff's breast
26 would cause physical and emotional harm to Plaintiff, and was sitting no more than one or two feet
27 from Defendant EVANS in the back of the ambulance, Defendant MORRIS passively watched
28 Defendant EVANS engage in those acts, but did nothing to attempt to intervene and stop or prevent

1 Defendant EVANS from causing physical and emotional harm to Plaintiff or further exacerbating her
2 medical and emotional condition, and did nothing to alert SFD Braddock as to what Defendant
3 EVANS was doing so he could attempt to intervene to stop Defendant EVANS from further harming
4 Plaintiff.

5 23. Following an investigation of the matter, Defendant EVANS was arrested and
6 charged by the Sacramento County District Attorney with a violation of section 243.4(e)(1) of the
7 California Penal Code.

8 FIRST CAUSE OF ACTION

9 (Liability Pursuant to California Health and Safety Code §§ 1799.106(a) and 1799.107(b))

10 24. Plaintiff incorporates by reference herein each and every allegation set forth in
11 Paragraphs 1 through 23 of this Complaint as though fully set forth herein. This Cause of Action is
12 alleged against Defendant CITY OF SACRAMENTO, Defendant EVANS and DOES 1-20.

13 25. California Government Code § 820(a) states: "Except as otherwise provided by
14 statute ... a public employee is liable for injury caused by his act or omission to the same extent as a
15 private person."

16 26. California Government Code § 815.2(a) states: "A public entity is liable for injury
17 proximately caused by an act or omission of an employee of the public entity within the scope of his
18 employment if the act or omission would, apart from this section, have given rise to a cause of action
19 against that employee or his personal representative."

20 27. California Health and Safety Code § 1799.106(a) states that firefighters, paramedics
21 and certain other first responders who render emergency medical services at the scene of an
22 emergency or during an emergency transport shall be liable in civil damage for acts and omissions
23 performed in a grossly negligent manner or acts or omissions not performed in good faith.

24 28. California Health and Safety Code § 1799.107(b) states that public entities in the State
25 of California and emergency rescue personnel employed by that public entity, including paramedics,
26 shall be liable for any injury caused by an action taken by the emergency rescue personnel acting
27 within the scope of their employment to provide emergency services when the action taken was
28 performed in bad faith or in a grossly negligent manner.

1 29. At all times mentioned herein, a paramedic performing emergency medical services
2 on a patient has the duty to have and use that degree of learning and skill ordinarily possessed by
3 reputable paramedics practicing in the same or similar locality and under similar circumstances and
4 to use reasonable diligence and his best judgment in the exercise of his professional skill and in the
5 application of his learning in an effort to accomplish the purpose for which he was employed.

6 30. At all times mentioned herein, Defendants EVANS and MORRIS, along with SFD
7 Braddock, employed by and acting within the course and scope of their employment with the CITY,
8 were dispatched to Plaintiff's residence for the purpose of rendering emergency medical services and
9 transporting Plaintiff to a hospital, if necessary, because Plaintiff was suffering from a severe
10 epileptic seizure and in extreme physical distress.

11 31. While Plaintiff was being transported in the SFD ambulance, she was fully cognizant
12 of her surroundings and could hear everything being said by the paramedics and could feel
13 everything being done to her but was physically incapacitated and strapped down securely to a
14 gurney and therefore entirely helpless to protect or defend herself.

15 32. As Plaintiff lay physically incapacitated and strapped to the gurney, Defendant
16 EVANS made several lewd, highly inappropriate, offensive, humiliating, derogatory and
17 intimidating comments about Plaintiff's breasts, took her right breast out of her bra and shirt and
18 proceeded to grope, touch and fondle her exposed breast for a period of time.

19 33. At all times mentioned herein, Defendant EVANS engaged in the forgoing acts and
20 conduct at the same time he was rendering emergency medical services to Plaintiff, in the course and
21 scope of his employment with the CITY, simultaneously with his monitoring of Plaintiff's medical
22 condition and his performance of certain other emergency medical services and procedures during
23 the emergency ambulance transport.

24 34. While rendering emergency medical services and simultaneously groping and
25 fondling Plaintiff's exposed breast and making lewd, inappropriate comments about her breasts,
26 Defendant EVANS took advantage of Plaintiff's state of extreme vulnerability as she was physically
27 incapacitated and strapped securely to a gurney.

28. ///

1 35. Plaintiff is informed and believes, and alleges thereon, that at all times mentioned
2 herein, SFD Paramedic Morris, who was seated no more than one or two feet from Defendant
3 EVANS while in the back of the ambulance, was fully aware of and witnessed all of Defendant
4 EVANS' inappropriate physical touching, groping and fondling of Plaintiff's breast as Plaintiff
5 remained physically incapacitated and strapped securely to a gurney, but did nothing and said
6 nothing at all to attempt to prevent Defendant EVANS from removing, groping or fondling
7 Plaintiff's.

8 36. At all times mentioned herein, the conduct, acts and omissions and emergency
9 medical services described in this cause of action were performed in bad faith and in a grossly
10 negligent manner and demonstrated a lack of any proper or acceptable level of care and engaging in
11 conduct that constituted an extreme departure from the ordinary standard of conduct and care
12 applicable to paramedics rendering emergency medical services.

13 37. Despite knowing that EVANS' touching, groping and fondling of Plaintiff's breast
14 would cause physical and emotional harm to Plaintiff and was neither medically indicated nor
15 medically necessary, and sitting no more than one or two feet from Defendant EVANS in the back of
16 the ambulance, Defendant MORRIS passively sat by and watched Defendant EVANS engage in
17 those acts, but did nothing to attempt to intervene, stop or prevent Defendant EVANS from causing
18 physical and emotional harm to Plaintiff or further exacerbating Plaintiff's medical and emotional
19 condition, and did nothing to alert SFD Braddock, who was driving the ambulance, as to what
20 Defendant EVANS was doing so he could attempt to intervene and stop Defendant EVANS from
21 further harming Plaintiff.

22 38. Defendant MORRIS' conduct and failure to do anything to intervene and/or stop
23 Defendant EVANS from engaging in the aforementioned acts and conduct constituted omissions that
24 were an extreme departure from the ordinary standard of conduct and care applicable to paramedics
25 rendering emergency medical services, who have a duty to render assist and help patients and not
26 cause harm to patients, and done in bad faith and in a grossly negligent manner, since he failed to
27 stop or at least or at least attempt to stop Defendant EVANS from engaging in acts that Defendant
28 MORRIS knew would cause physical and emotional harm to Plaintiff, and did cause physical and

1 emotional harm to Plaintiff, when he had more than ample opportunity and the means to do intervene
2 because of his proximity to Defendant EVANS at the time, and otherwise knowingly allowed and
3 permitted Defendant EVANS to cause harm to Plaintiff while he simply watched.

4 39. In addition, Defendant MORRIS also failed to alert SFD Braddock about what
5 Defendant EVANS was doing, who also could have stopped or attempted to stop Defendant EVANS
6 from harming and/or further harming Plaintiff.

7 40. Neither Defendant MORRIS nor SFD Braddock said anything to Defendant EVANS
8 at any time during or after he engaged in the acts described herein, and did not report any of the
9 events that occurred that in the ambulance as they transported Plaintiff until over two weeks later.

10 41. In so doing, Defendant MORRIS, as well as SFD Paramedic Braddock, who were at
11 all times acting in the course of their employment as Paramedics with Defendant CITY and
12 performing emergency medical services in the course and scope that employment, permitted,
13 approved of, condoned and ratified the foregoing actions and conduct of Defendant EVANS, which
14 they knew would cause, and did cause, severe mental, physical and emotional harm to Plaintiff.

15 42. As a direct and proximate result of the conduct, acts and omission, bad faith and gross
16 negligence while rendering emergency medical services, as herein alleged, Plaintiff suffered and
17 continues to suffer severe injury to her mental, physical and emotional well-being, including, but not
18 limited to, severe depression, anxiety, fright, humiliation, grief, shame, worry, shock, nervousness,
19 anguish, severe inability to sleep, inability to work and/or attend school and other mental and
20 emotional symptoms directly related to the conduct, acts and omissions described herein.

21 **SECOND CAUSE OF ACTION**

22 **(Battery - Defendant EVANS)**

23 43. Plaintiff incorporates by reference herein each and every allegation set forth in
24 Paragraphs 1 through 42 of this Complaint as though fully set forth herein. This Cause of Action is
25 alleged against Defendant JARED DAVID EVANS and DOES 21-40.

26 44. On the aforementioned date, Plaintiff was being transported by Defendant EVANS
27 and two other SFD Paramedics in an ambulance to Kaiser Hospital because she had suffered a severe
28 epileptic seizure and required immediate medical care and hospitalization.

1 alleged against Defendant JARED DAVID EVANS and DOES 41-60.

2 52. On the aforementioned date, Plaintiff was being transported by Defendant EVANS
3 and two other SFD Paramedics in an ambulance to Kaiser Hospital because she had suffered a severe
4 epileptic seizure and required immediate medical care and hospitalization.

5 53. Although Plaintiff was physically incapacitated and securely strapped to a gurney in
6 the back of the ambulance, she was fully cognizant of what was happening in the back of the
7 ambulance and could hear and feel everything going on around her and being done to her.

8 54. As Plaintiff lay physically incapacitated and strapped to the gurney in the back of the
9 ambulance, Defendant EVANS, with intent to cause harmful and offensive contact with Plaintiff,
10 threatened to touch Plaintiff's breasts in a harmful and offensive manner that reasonably appeared to
11 Plaintiff, and put Plaintiff in reasonable apprehension, that Defendant EVANS intended to and would
12 touch, grope and fondle her breasts in a harmful and offensive manner.

13 55. At all times mentioned herein, Defendant EVANS' forgoing conduct and acts
14 offended Plaintiff's personal dignity and would have offended the personal dignity of any reasonable
15 person.

16 56. At no time did Plaintiff consent to Defendant EVANS' intentional conduct and acts as
17 described herein.

18 57. As a direct and proximate result of Defendant EVANS' highly offensive and harmful
19 intentional acts, as herein alleged, Plaintiff suffered and continues to suffer severe injury to her
20 mental, physical and emotional well-being, including, but not limited to, severe depression, anxiety,
21 fright, humiliation, grief, shame, worry, shock, nervousness, anguish, severe inability to sleep,
22 inability to work and/or attend school and other mental and emotional symptoms directly related to
23 the conduct, acts and omissions described herein.

24 58. Defendant EVANS' acts described herein against Plaintiff were despicable and
25 reprehensible, and were committed maliciously, fraudulently, oppressively, in bad faith, with the
26 wrongful intention of injuring Plaintiff, from an improper motive amounting to malice, in conscious
27 disregard for Plaintiff's rights and safety, and Plaintiff should therefore recover, in addition to actual
28 damages, exemplary damages to make an example of and punish said Defendants.

1 **FOURTH CAUSE OF ACTION**

2 **(Intentional Infliction of Emotional Distress - Defendant EVANS)**

3 59. Plaintiff incorporates by reference herein each and every allegation set forth in
4 Paragraphs 1 through 58 of this Complaint as though fully set forth herein. This Cause of Action is
5 alleged against Defendant JARED DAVID EVANS and DOES 61-70.

6 60. On the aforementioned date, Plaintiff was being transported by Defendant EVANS
7 and two other SFD Paramedics in an ambulance to Kaiser Hospital because she had suffered a severe
8 epileptic seizure and required immediate medical care and hospitalization.

9 61. Although Plaintiff was physically incapacitated and securely strapped to a gurney in
10 the back of the ambulance, she was fully cognizant of what was happening in the back of the
11 ambulance and could hear and feel everything going on around her and being done to her.

12 62. While Plaintiff was physically incapacitated and securely strapped to gurney,
13 Defendant EVANS deliberately and with conscious disregard of Plaintiff's rights intended to cause
14 and did cause Plaintiff to suffer extreme mental anguish, emotional distress, anxiety and physical
15 harm.

16 63. At no time did Plaintiff consent to any of Defendant's aforementioned egregious
17 mental, emotional and physical acts against her.

18 64. The intentional conduct set forth herein on the part of Defendant EVANS was
19 extreme, outrageous and callous, was intended to cause severe humiliation, anxiety, mental anguish
20 and emotional distress and was done in conscious disregard for the rights of Plaintiff and the
21 probability of causing such debilitating and permanent emotional distress, anxiety, mental anguish,
22 worry, depression and humiliation.

23 65. As a direct and proximate result of Defendants' and each of their foregoing conduct,
24 as described herein, Plaintiff suffered and continues to debilitating and permanent emotional distress,
25 anxiety, mental anguish, worry, depression, humiliation, anxiety, fright, humiliation, grief, shame,
26 worry, shock, nervousness, anguish, severe inability to sleep, inability to work and/or attend school
27 and other mental and emotional symptoms directly related to the conduct, acts and omissions
28 described herein.

1 mental, physical and emotional well-being, including, but not limited to, severe depression, anxiety,
2 fright, humiliation, grief, shame, worry, shock, nervousness, anguish, severe inability to sleep,
3 inability to work and/or attend school and other mental and emotional symptoms directly related to
4 the conduct, acts and omissions described herein.

5 73. Defendant EVANS' acts described herein against Plaintiff were despicable and
6 reprehensible, and were committed maliciously, fraudulently, oppressively, in bad faith, with the
7 wrongful intention of injuring Plaintiff, from an improper motive amounting to malice, in conscious
8 disregard for Plaintiff's rights and safety, and Plaintiff should therefore recover, in addition to actual
9 damages, exemplary damages to make an example of and punish said Defendants.

10 **SIXTH CAUSE OF ACTION**

11 **(Invasion of Privacy/Intrusion into Private Affairs - Defendant EVANS)**

12 74. Plaintiff incorporates by reference herein each and every allegation set forth in
13 Paragraphs 1 through 73 of this Complaint as though fully set forth herein. This Cause of Action is
14 alleged against Defendant JARED DAVID EVANS and DOES 81-90.

15 75. On the aforementioned date, Plaintiff was being transported by Defendant EVANS
16 and two other SFD Paramedics in an ambulance to Kaiser Hospital because she had suffered a severe
17 epileptic seizure and required immediate medical care and hospitalization.

18 76. At all times mentioned herein, Plaintiff was physically incapacitated and securely
19 strapped to a gurney in the back of the ambulance but was fully cognizant of what was happening in
20 the back of the ambulance and could hear and feel everything going on around her and being done to
21 her.

22 77. At all times mentioned herein, Plaintiff had a reasonable expectation of privacy while
23 she was being treated and transported by SFD Paramedics to not have her breasts touched and/or
24 exposed unless such acts were medically indicated and/or medically necessary, and at all times had a
25 reasonable expectation that her breasts would never be touched, groped or fondled in a sexual
26 manner by Defendant EVANS or any other SFD Paramedic who was summoned to render
27 emergency medical services.

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1 83. The foregoing wrongful acts, omissions, misrepresentations and breaches of duty by
2 Defendant EVANS, as herein alleged, including, but not limited to, harassing, intimidating, mentally
3 and physically abusing, assaulting, battering and flagrantly violating Plaintiff's right to privacy as
4 she lay helpless and in need of medical care strapped to gurney and incapacitated in the back of an
5 ambulance, were committed maliciously, fraudulently, and oppressively, in bad faith, with the
6 wrongful intention of injuring Plaintiff, from an improper motive amounting to malice, in conscious
7 disregard of Plaintiff's rights.

8 84. Defendant EVANS is guilty of oppression, fraud and/or malice, and Plaintiff therefore
9 should recover damages for the sake of example and by way of punishing said Defendants pursuant
10 to California Civil Code section 3294.

11 85. Defendant EVANS' conduct was despicable and reprehensible and done with a
12 willful and knowing disregard of the rights of Plaintiff and committed with knowing disregard at a
13 time when they were clearly aware of the probable dangerous consequences of their conduct and not
14 only deliberately failed to avoid those consequences, but committed the acts for the express purpose
15 of harming Plaintiff.

16 86. Defendant EVANS' acts described herein against Plaintiff were committed with
17 absolute conscious disregard for the rights, safety and well-being of Plaintiff, and were committed
18 maliciously, fraudulently, oppressively, in bad faith, with the wrongful intention of injuring Plaintiff,
19 from an improper motive amounting to malice. Plaintiff should therefore recover, in addition to
20 actual damages, exemplary damages to make an example of and punish said Defendant.

21 WHEREFORE, Plaintiff prays for judgment against Defendants, and each of them, as
22 follows:

- 23 1. For special and economic damages, including any and all monetary relief according to
24 proof;
- 25 2. For general damages and non-economic damages according to proof;
- 26 3. For prejudgment interest, as is allowed by the State of California, at the prevailing
27 legal rate;
- 28 4. For costs of the suit herein;

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- 5. For exemplary damages against Defendant EVANS, in an amount according to proof;
- 6. For such other and further relief as the Court deems just and proper.

Dated: April 16, 2018

LAW OFFICE OF MINER & KELLY, LLP



Michael R. Kelly
Attorneys for Plaintiff.

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DOMINION COURTHOUSE
SUPERIOR COURT OF CALIFORNIA
COUNTY OF SACRAMENTO