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8 Attorneys for Plaintiff,
9 JAMES MEE.

10
11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
12 **FOR THE COUNTY OF LOS ANGELES**
13 **CENTRAL DISTRICT**

14 JAMES MEE,

15 Plaintiff,

16 vs.

17 COUNTY OF LOS ANGELES;
18 and DOES 1 through 50, inclusive,

19 Defendants.

CASE NO.: BC444914

COMPLAINT FOR DAMAGES:

1. FOR VIOLATIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT (DISCRIMINATION ON ACCOUNT OF RELIGION)
2. RETALIATION IN VIOLATION OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT
3. FOR VIOLATIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT (HARRASEMENT / HOSTILE WORK ENVIRONMENT)

DEMAND FOR JURY TRIAL

CHECK: 355.00
CASH:
CHANGE
CARD:

CIT/CASE: BC444914 LEA/MECA
RECEIPT #: CCH477728050
DATE PAID: 09/07/10 12:28:57 PM
PAYMENT: \$355.00
RECEIVED: 0310

1 1. Plaintiff is and at all times relevant was a resident of the County of Los
2 Angeles, State of California.

3 2. Defendant COUNTY OF LOS ANGELES (also referred to herein as
4 "COUNTY") is and was, at all times mentioned herein, a municipal entity organized and existing
5 under the laws of the State of California.

6 3. The true names or capacities, whether individual, corporate, associate or
7 otherwise, of Defendants DOES 1 through 50, inclusive, are unknown to Plaintiff and therefore
8 Plaintiff sues these Defendants by such fictitious names. Plaintiff will amend this complaint to
9 allege their true names and capacities when ascertained. Plaintiff is informed and believes and
10 based thereon alleges that each of these fictitiously named Defendants were responsible in some
11 manner for the occurrences herein alleged, and that plaintiff's damages as herein alleged were
12 proximately caused by their conduct.

13 4. Plaintiff is informed and believes and thereon alleges that, at all times mentioned,
14 each of the Defendants, including the fictitiously named defendants, was the agent and employee
15 of each of the remaining Defendants, and in doing the things hereinafter alleged, was acting
16 within the scope and course of such agency. Plaintiff is further informed and believes and
17 thereupon alleges that at all times relevant hereto, each of the Defendants and the fictitiously
18 named Defendants acted in concert and in furtherance of each other's interest. In fact, there is
19 such a unity of interest and ownership between and among all Defendants that any separateness
20 between them has ceased to exist, such that Defendants, and each of them, are the alter egos of
21 each other. Based on the facts alleged herein, adherence to the legal fiction of the existence of all
22 Defendants separate and apart from each other would sanction their wrongful conduct and
23 promote injustice.

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1 FIRST CAUSE OF ACTION

2 FOR VIOLATIONS OF THE CALIFORNIA FAIR EMPLOYMENT

3 AND HOUSING ACT (RELIGIOUS DISCRIMINATION)

4 AGAINST ALL DEFENDANTS

5

6 5. Plaintiff incorporates the allegations in paragraphs 1 through 4, inclusive,
7 as though fully set forth herein.

8 6. Plaintiff was hired by Defendant COUNTY OF LOS ANGELES as a Sheriff
9 Deputy on May 10, 1989. At all relevant times herein, Plaintiff was, and is, a Jewish male, and
10 at all relevant times herein, Defendants herein knew that Plaintiff is of the Jewish faith. During
11 the course of his employment with Defendants, Plaintiff performed his various responsibilities in
12 an exemplary fashion, received favorable performance reviews, competent employee evaluations,
13 and capably performed each and every condition of the employment agreement.

14
15 7. On July 28, 2006, while assigned to the Lost Hills Sheriff's Station - Malibu
16 Patrol Area, Plaintiff, Los Angeles Sheriff Deputy JAMES MEE, arrested Mel Gibson for
17 Driving Under the Influence of Alcohol ("DUI").

18
19 8. At or around the time of his arrest, Mr. Gibson was a spokesperson for the Los
20 Angeles Sheriff's Star Organization, which is an organization run by, supported and
21 administered, by the Los Angeles Sheriff's Department and Defendant COUNTY OF LOS
22 ANGELES. Mr. Gibson had previously filmed a Public Service Announcement for Sheriff
23 Baca's Relief Committee dressed in Los Angeles Sheriff Uniform, and standing by a Sheriff's
24 patrol vehicle. Additionally, Mr. Gibson was, a close friend of Sheriff Baca, and had close
25 associations with the top administration personnel of the Los Angeles Sheriff's Department. Mr.
26 Gibson and Plaintiff's supervisor Sergeant Finch were also members of the same church.

27
28 ///

1 9. During his arrest by Plaintiff for a "DUI" on July 28, 2006, Mr. Gibson shouted
2 numerous anti-Semitic remarks, asked Plaintiff if he was "a fucking Jew," shouted "the Jews are
3 responsible for all the wars in the world!", and threatened to cause Plaintiff trouble at his work
4 with the Los Angeles Sheriff Department.
5

6 10. In the Early morning hours of July 29, 2006, Plaintiff submitted his report of the
7 arrest of Mr. Gibson. The report described the specific inflammatory and discriminatory religious
8 slurs made by Mel Gibson against Jews and against Deputy JAMES MEE for being Jewish.
9 Shortly after submitting the initial report which included a description of the anti-Semitic slurs of
10 Mel Gibson, Plaintiff was ordered by his Watch Commander Lieutenant Crystal Miranda and his
11 Watch Sergeant Kevin Finch to delete the anti-Semitic slurs that were made by Mr. Gibson, and
12 in addition, to write a Supplemental Report that would describe the anti-Semitic slurs which
13 would then be marked 'confidential' and sealed in a safe. Believing that the anti-Semitic slurs
14 clearly revealed religious discrimination by a known Spokesperson for the Los Angeles Sheriff's
15 Department, as well as show the level of toxicity of Mr. Gibson, Plaintiff protested to erasing the
16 anti-Semitic slurs from his report. Regardless of Plaintiff's protest, Plaintiff received a "direct
17 order" by Commander Lieutenant Miranda and Sergeant Finch to delete the anti-Semitic slurs
18 from the arrest report (effectively participating in covering-up the anti-Semitic posture of Mr.
19 Gibson by sealing the description of the discriminatory remarks secretively in a safe.) *The Order*
20 *to delete the anti-Semitic slurs was discriminatory toward Plaintiff who is Jewish.*
21
22

23 11. Some time around the arrest of Mel Gibson, four pages from Plaintiff's initial
24 arrest report of Mr. Gibson were leaked by an unidentified person(s) to the internet site of Harvey
25 Levin, "TMZ", and were published as "Gibson's Anti-Semitic Tirade - Alleged Cover Up." From
26 early on, Mr. Levin denied that his source was Plaintiff, and there was no evidence whatsoever
27 that Plaintiff was the person who leaked said pages.
28

1 12. On August 1, 2006, Plaintiff was unjustly accused of, investigated for, and
2 interrogated by Internal Affairs Bureau regarding the leakage of the Mel Gibson arrest report
3 which contained the anti-Semitic remarks. *Despite the fact that a number of non-Jewish deputies*
4 *had access to the report and to the copy machines nearby, Defendants only accused Plaintiff of*
5 *leaking the report to "TMZ," and initiated an Internal Affairs investigation only against him.*
6 Defendants only accused Plaintiff and initiated an internal affairs investigation against him
7 because he is Jewish, and because he described anti-Semitic remarks in the arrest report of Mel
8 Gibson, Defendants' Spokesperson and close associate of the Sherrif and the Sheriff Department.
9 Furthermore, Defendants violated Plaintiff's due process rights in that they intentionally took
10 approximately 4 years to complete the investigation, despite the fact that an earlier resolution was
11 procedurally required, and despite the fact that the delay impacted Plaintiff's ability to promote.

12 13. As further religious discrimination and retaliation by Defendants, on August 2,
13 2006, Plaintiff was removed from the prestigious Lost Hills Station - Malibu Patrol Area, where
14 he had been assigned for a long time, and where he was established at and was very familiar
15 with, and *involuntarily* transferred by Defendants to the Agoura Patrol Area. At the Agoura
16 Patrol Area, Plaintiff was forced to re-establish his seniority and contacts with the public.
17 Furthermore, Plaintiff's ability to promote was impacted by said involuntary transfer to the
18 Agoura Patrol Area in that Plaintiff was forced to have a reduced productivity level, and thus, a
19 reduced ability to promote with Defendant COUNTY OF LOS ANGELES.

20 14. On August 23, 2006, Plaintiff was unjustly served with a negative Performance
21 Log report by Sergeant Tracy Palmer who was Plaintiff's supervisor during said arrest of Mel
22 Gibson, and whom Plaintiff accused of erasing a portion of the videotape of the booking of Mel
23 Gibson. Said Performance Log report negatively impacted Plaintiff's ability to promote with
24 Defendant COUNTY OF LOS ANGELES, and was instigated in order to further discriminate

and retaliate against Plaintiff for reporting anti-Semitic remarks by Defendants' Spokesperson and for being Jewish.

15. Around August 31, 2006, and around October 2, 2007, despite the fact that Plaintiff applied for, and was well qualified for the position of a Traffic Investigator, Plaintiff was unjustly denied the position. Plaintiff believes and hereby alleges that the failure to promote him was motivated in whole or in part by his religion and his report of anti-Semitic remarks by Defendants' Spokesperson.

16. On September 13, 2006, Plaintiff was unjustly served by Defendant COUNTY OF LOS ANGELES with a Search Warrant for his bank accounts and home, and his personal computer(s) were removed. No incriminating evidence whatsoever was found in Plaintiff's home or in his bank accounts. The solicitation and service of the search warrant and negative information about Plaintiff constituted further religious discrimination and retaliation within the meaning of *California Government Code* Section 12940, et seq. *None of the homes of the other non-Jewish deputies were searched even though several of them had access to the initial Mel Gibson's arrest report as well.*

17. On October 20, 2006, while Plaintiff was working the Early Morning Shift, Sergeant Tracy Palmer attempted to entice Plaintiff's partner, Rebecca Smith, to leave work early so that Plaintiff's safety would be compromised (since he would have to work the shift by himself without any backup), so as to create the appearance that no other deputy wanted to work with Plaintiff.

18. Defendant COUNTY OF LOS ANGELES and Lt. Stephen actively and affirmatively solicited a citizen's complaint against Plaintiff from Lisa Kellog who had a personal relationship with Sheriff Baca and Mel Gibson, but was not present during the alleged incident described in the citizen's complaint. Plaintiff believes and hereby alleges that the active

1 solicitation of an unfounded complaint against him was motivated in whole or in part by his
2 religion and his report of anti-Semitic remarks by Defendants' Spokesperson.

3 19. As further religious discrimination and retaliation, on December 1, 2006, Lt.
4 Stephens wrongfully initiated an Internal Investigation against Plaintiff in connection with a
5 complaint by an arrestee. There was no sufficient basis whatsoever to initiate the Internal Affairs
6 investigation against Plaintiff.
7

8 20. On December 2, 2006, Sergeant Palmer again retaliated against Plaintiff when she
9 demanded that he return from patrol to the Station to complete a Vehicle Inspection Sheet, which
10 he had already filled-out as he did for many years, and which was already accepted by Sergeant
11 Crooker.
12

13 21. On December 4, 2006, Plaintiff complained to Defendant's ombudsperson that he
14 suffered retaliation by Sgt. Palmer because Plaintiff had disclosed that Sgt. Palmer had erased a
15 videotape involving the arrest of Mel Gibson and the fact that Sergeant Finch told Mr. Gibson
16 they are members of the same Church. Yet, Plaintiff's complaint was ignored.
17

18 22. On September 6, 2007, Plaintiff was served by Defendant COUNTY OF LOS
19 ANGELES with a disciplinary Letter of Intent to suspend him for three (3) days, and was so
20 suspended. The suspension was motivated in whole or in part by Plaintiff's religion and his
21 report of anti-Semitic remarks by Defendants' Spokesperson, Mel Gibson.

22 23. Around October 10, 2006, despite the fact that Plaintiff applied for, and was well
23 qualified for, the position of Station Court Deputy, Plaintiff was unjustly denied the position. A
24 less-qualified deputy was chosen for the position. Again, the failure to promote was the result of
25 religious discrimination and retaliation for Plaintiff's religion and his report of anti-Semitic
26 remarks by Defendants' Spokesperson.
27

28 ///

1 24. Around February 2008, Plaintiff was wrongfully placed by Captain Martin on
2 Unit Level Performance Review/Performance Monitoring, which negatively affected his ability
3 to promote. A Performance Review was rarely used, if at all, by Defendants, and was used in
4 Plaintiff's case for the sole reason of further retaliating against him for reporting Anti-Semitism
5 by Defendant's Spokesperson. There was nothing unusual about Plaintiff's performance in
6 comparison to other deputies serving similar lengths of time. Plaintiff believes, and hereby
7 alleges, that the failure to promote him was motivated in whole or in part by his religion and his
8 report of anti-Semitic remarks by Defendants' Spokesperson.
9

10 25. On June 2, 2008, Defendant conducted a Command Review Hearing regarding
11 Plaintiff's performance review.
12

13 26. On June 7, 2008, despite the fact that Plaintiff applied for, was well qualified for,
14 and was recommended to, the position of Traffic Services Deputy at Risk Management Bureau-
15 Traffic Services Detail, Plaintiff was unjustly denied the position as further retaliation and
16 discrimination. A less-qualified deputy was chosen for the position despite the fact that Plaintiff
17 had a reasonable expectation to be selected for the position under the competitive promotion
18 system.
19

20 27. On August 27, 2008, Plaintiff applied for the position of a Motorcycle Deputy
21 with Transit Services Bureau, with the support of Lt. Lewis. Despite the fact that Plaintiff was
22 placed on a list of qualified candidates, he was, once again overlooked for the position because of
23 his religion and his report of anti-Semitic remarks by Defendants' Spokesperson, Mel Gibson.
24

25 28. On September 18, 2008, Plaintiff again applied for the position of a Motorcycle
26 Deputy with the Lancaster Station, with the support of Lt. Lewis. Despite the fact that Plaintiff
27 was placed on a list of qualified candidates, he was overlooked for the position. A less-qualified
28 deputy was chosen for the position.

1 29. Furthermore, Defendants attempted to cause criminal charges to be filed against
2 Plaintiff, but on July 21, 2009, the Los Angeles County District Attorney's Office rejected any
3 criminal filing against Plaintiff for Defendant's allegations of criminal conduct by Plaintiff in
4 connection with the arrest of Mel Gibson. Nonetheless, the religious discrimination and
5 retaliation against Plaintiff continued.
6

7 30. On August 28, 2009, Plaintiff once again applied for the position of a Motorcycle
8 Deputy with the Lost Hills Station. But once again, despite the fact that Plaintiff was placed on a
9 list of qualified candidates, he was overlooked for the position. The position remained vacant.
10

11 31. On May 27, 2010, in a useless, discriminatory and retaliatory 'fishing-expedition'
12 against Plaintiff, Defendant re-initiated an additional Internal Affairs investigation again against
13 him in connection with the July 28, 2006 Mel Gibson arrest. The investigation concluded as
14 'unresolved' when it should have been concluded as 'unfounded' in light of the fact that there
15 was no evidence whatsoever against Plaintiff.
16

17 32. Defendants discriminated against Plaintiff as described herein because Plaintiff is
18 Jewish, and because Plaintiff complained of anti-Semitic slurs by Mel Gibson, a Spokesperson
19 for, and close associate of, Defendants, and a friend of Sheriff Baca.
20

21 33. The aforementioned unlawful employment practices on the part of defendants, and
22 each of them, were a substantial factor in causing damages and injuries to Plaintiff as set forth
23 below.
24

25 34. Said actions and conduct of defendants, and each of them, consisting of
26 the aforementioned religious discrimination and retaliation against Plaintiff constitute unlawful
27 employment practices under *California Government Code* Sections 12940 et. seq. Further, the
28 failure of defendants and each of them, and or their managing agents to take all reasonable steps
to remedy and/or prevent discrimination in response to the continuing acts and course of conduct

1 of employees and managing agents of defendants, despite having knowledge thereof, constitute,
2 among other things, violations of Sections 12940(h), 12940(i) and 12940(k) of the *California*
3 *Government Code*.

4
5 35. Plaintiff has duly filed administrative complaints with the California Department
6 of Fair Employment and Housing ("DFEH") substantially alleging the acts and conduct of
7 defendants as herein above described. The Department issued a "right-to-sue" notice on or about
8 June 1, 2010. A true and correct copy of said notice is attached hereto as Exhibit "1".

9
10 36. As a result of the aforesaid unlawful acts of defendants, and each of them,
11 Plaintiff has lost and will continue to lose income, in an amount to be proven at time of trial.
12 Plaintiff claims such amount as damages together with prejudgment interest pursuant to
13 *California Civil Code* Section 3287 and/or any other provision of law providing for prejudgment
14 interest.

15 37. As a result of the aforesaid unlawful acts of defendants, and each of them,
16 Plaintiff was personally humiliated and has become mentally upset, distressed and aggravated.
17 Plaintiff claims general damages for such mental distress and aggravation in an amount of be
18 proven at time of trial.
19

20 **SECOND CAUSE OF ACTION FOR RETALIATION IN VIOLATION OF**
21 **THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**
22 **AGAINST ALL DEFENDANTS**

23 38. Plaintiff incorporates by reference the allegations of paragraphs 1 through
24 37 as if set forth in full herein.

25
26 39. The conduct of Defendants and each of them as set forth above constituted
27 retaliation thereby creating a continuing violation actionable under, among other things,
28 *California Government Code* Section 12940 et seq.

1 40. *The retaliatory conduct as described above, was motivated in whole or in part, by*
2 *Plaintiff's report of religious epithets against Jews by Mel Gibson, a Spokesperson for*
3 *Defendant COUNTY OF LOS ANGELES and the Los Angeles Sheriff Department, and Plaintiff*
4 *being a member of the Jewish religion.*

5
6 41. The aforementioned unlawful employment practices on the part of defendants, and
7 each of them, were a substantial factor in causing damages and injuries to Plaintiff as set forth
8 below.

9 42. Said actions and conduct of defendants, and each of them, consisting of
10 the aforementioned religious discrimination and retaliation against Plaintiff constitute unlawful
11 employment practices under *California Government Code* Section 12940 et seq. Further, the
12 failure of defendants and each of them, and or their managing agents to take all reasonable steps
13 to remedy and/or prevent discrimination in response to the
14 continuing acts and course of conduct of employees and managing agents of defendants, despite
15 having knowledge thereof, constitute, among other things, violations of Sections 12940(h),
16 12940(i) and 12940 (k) of the *California Government Code*.

17
18 43. Plaintiff has duly filed administrative complaints with the California Department
19 of Fair Employment and Housing ("DFEH") substantially alleging the acts and conduct of
20 defendants as herein above described. The Department issued a "right-to-sue" notice on or about
21 June 1, 2010. A true and correct copy of said notice is attached hereto as Exhibit "1".

22
23 44. As a result of the aforesaid unlawful acts of defendants, and each of them,
24 Plaintiff has lost and will continue to lose income, in an amount to be proven at time of trial.
25 Plaintiff claims such amount as damages together with prejudgment interest pursuant to
26 *California Civil Code* Section 3287 and/or any other provision of law providing for prejudgment
27 interest.
28

1 45. As a result of the aforesaid unlawful acts of defendants, and each of them,
2 Plaintiff was personally humiliated and has become mentally upset, distressed and aggravated.
3 Plaintiff claims general damages for such mental distress and aggravation in an amount of be
4 proven at time of trial.
5

6 **THIRD CAUSE OF ACTION FOR VIOLATIONS OF THE CALIFORNIA FAIR**
7 **EMPLOYMENT AND HOUSING ACT -HARASSMENT/HOSTILE WORK**
8 **ENVIRONMENT AGAINST ALL DEFENDANTS**

9 46. Plaintiff incorporates by reference the allegations of paragraphs 1 through
10 45 as if set forth in full herein.
11

12 47. The conduct as set forth above constituted harassment/hostile work environment
13 thereby creating a continuing violation actionable under, among other things, *California*
14 *Government Code* Section 12940(j). Moreover, the conduct of Defendants' employees and agents
15 as described herein was outside the scope necessary for the job performance, and made for
16 meanness or bigotry.

17 48. *The retaliatory conduct as described above, was motivated in whole or in part, by*
18 *Plaintiff's report of religious epithets against Jews by Mel Gibson, a Spokesperson for*
19 *Defendant COUNTY OF LOS ANGELES and the Los Angeles Sheriff Department, and Plaintiff*
20 *being a member of the Jewish religion.*

21 49. Plaintiff hereby alleges that Defendants herein failed to protect him from religious
22 discrimination, retaliation and harassment, and allowed a hostile work environment to exist at the
23 Los Angeles Sheriff's Department. Furthermore, Defendant COUNTY OF LOS ANGELES
24 failed to take all reasonable steps necessary to prevent the wrongs alleged herein in this
25 Complaint.
26
27

28 ///

1 50. The aforementioned unlawful employment practices on the part of defendants, and
2 each of them, were a substantial factor in causing damages and injuries to Plaintiff as set forth
3 below.

4 51. Said actions and conduct of defendants, and each of them, consisting of the
5 aforementioned religious harassment, religious discrimination and retaliation against Plaintiff
6 constitute unlawful employment practices under *California Government Code* Section 12940 et
7 seq. Further, the failure of defendants and each of them, and or their managing agents to take all
8 reasonable steps to remedy and/or prevent discrimination in response to the continuing acts and
9 course of conduct of employees and managing agents of defendants, despite having knowledge
10 thereof, constitute, among other things, violations of Sections 12940(h), 12940(i), 12940(j), and
11 12940 (k) of the *California Government Code*.

12 52. Plaintiff has duly filed administrative complaints with the California Department
13 of Fair Employment and Housing ("DFEH") substantially alleging the acts and conduct of
14 defendants as herein above described. The Department issued a "right-to-sue" notice on or about
15 June 1, 2010. A true and correct copy of said notice is attached hereto as Exhibit "1".
16

17 53. As a result of the aforesaid unlawful acts of defendants, and each of them,
18 Plaintiff has lost and will continue to lose income, in an amount to be proven at time of trial.
19 Plaintiff claims such amount as damages together with prejudgment interest pursuant to
20 *California Civil Code* Section 3287 and/or any other provision of law providing for prejudgment
21 interest.
22

23 54. As a result of the aforesaid unlawful acts of defendants, and each of them,
24 Plaintiff was personally humiliated and has become mentally upset, distressed and aggravated.
25 Plaintiff claims general damages for such mental distress and aggravation in an amount of be
26 proven at time of trial.
27
28

1 **WHEREFORE**, Plaintiff, JAMES MEE, seeks judgment against all Defendants, and
2 each of them, on all Causes of Action for:

- 3 1. Actual, consequential and incidental losses, including but not limited to
4 loss of income, benefits and medical expenses, according to proof,
5 together with prejudgment interest;
6
7 2. General damages for emotional distress and mental suffering in a sum
8 according to proof;
9
10 3. Attorneys fees pursuant *California Government Code* Section 12965(b);
11
12 4. Costs of suit herein; and
13
14 5. Such other and further relief as the Court may deem proper.

15 Dated: September 2, 2010

LAW OFFICES OF ETAN Z. LORANT

16 By: 

ETAN Z. LORANT

Yael Trock

Attorneys for Plaintiff, JAMES MEE

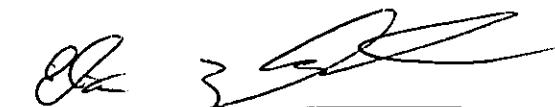
DEMAND FOR JURY

Plaintiff, JAMES MEE, hereby respectfully demand a Jury Trial.

Dated: September 2, 2010

LAW OFFICES OF ETAN Z. LORANT

By:



ETAN Z. LORANT

Yael Trock

Attorneys for Plaintiff, JAMES MEE

TMZ

DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

1055 WEST 7TH STREET, SUITE 1400, LOS ANGELES, CA 90017

(213) 439-6770

www.dfeh.ca.gov



June 01, 2010

RE: E200910R6502-00

MEE/COUNTY OF LOS ANGELES**NOTICE TO COMPLAINANT'S ATTORNEY**

Enclosed is a copy of your client's complaint of discrimination filed with the Department of Fair Employment and Housing (DFEH) pursuant to the California Fair Employment and Housing Act, Government Code section 12900 et seq. Also enclosed is a copy of your client's Notice of Case Closure, which constitutes your client's right-to-sue notice. Pursuant to Government Code section 12962, DFEH will not serve these documents on the employer.

Please refer to the enclosed Notice of Case Closure for information regarding filing a private lawsuit in the State of California.

Sincerely,

Tina Walker
District Administrator

Enclosure: Complaint of Discrimination
Notice of Case Closure

DFEH-200-06 (01/08)

EXH 1

*** EMPLOYMENT ***

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

DFEH #

E200910R6502-00

DFEH USE ONLY

CALIFORNIA DEPARTMENT OF FAIR EMPLOYMENT AND HOUSING

YOUR NAME (indicate Mr. or Ms.)

TELEPHONE NUMBER (INCLUDE AREA CODE)

MEE, JAMES

(818)990-3990

ADDRESS

**C/O LAW OFFICES OF ETAN Z. LORANT, 5850 CANOGA
AVE #400**

CITY/STATE/ZIP

COUNTY

COUNTY CODE

WOODLAND HILLS, CA 91367

LOS ANGELES

037

NAMED IS THE EMPLOYER, PERSON, LABOR ORGANIZATION, EMPLOYMENT AGENCY, APPRENTICESHIP COMMITTEE, OR STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME:

NAME

TELEPHONE NUMBER (Include Area Code)

COUNTY OF LOS ANGELES

(818)878-1808

ADDRESS

DFEH USE ONLY

27050 AGOURA ROAD

CITY/STATE/ZIP

COUNTY

COUNTY CODE

AGOURA, CA 91301

LOS ANGELES

037

NO. OF EMPLOYEES/MEMBERS (if known)

DATE MOST RECENT OR CONTINUING DISCRIMINATION
TOOK PLACE (month, day, and year)

RESPONDENT CODE

100+

06/01/2010

00

THE PARTICULARS ARE:

**I allege that on about or before
06/01/2010, the following
conduct occurred:**

☐ termination

☐ denial of employment

☐ denial of family or medical leave

☐ laid off

☐ denial of promotion

☐ denial of pregnancy leave

☐ demotion

☐ denial of transfer

☐ denial of equal pay

☒ harassment

☐ denial of accommodation

☐ denial of right to wear pants

☐ genetic characteristics testing

☒ failure to prevent discrimination or retaliation

☐ denial of pregnancy accommodation

☐ constructive discharge (forced to quit)

☒ retaliation

☐ impermissible non-job-related inquiry

☒ other (specify) Discrimination based upon religion (Jewish)

by **COUNTY OF LOS ANGELES**

because of :

Name of Person

Job Title (supervisor/manager/personnel director/etc.)

☐ sex

☐ national origin/ancestry

☐ disability (physical or mental)

☒ retaliation for engaging in protected

☐ age

☐ marital status

☐ medical condition (cancer or

activity or requesting a protected

☒ religion

☐ sexual orientation

generic characteristic

leave or accommodation

☐ race/color

☐ association

☐ other (specify)

**State of what you
believe to be the
reason(s) for
discrimination**

I WAS DISCRIMINATED AGAINST BASED UPON MY RELIGION (JEWISH) FOR ARRESTING MEL GIBSON (A KNOWN CHRISTIAN PRODUCER/ACTOR WHO MADE CONTROVERSIAL MOVIES INVOLVING JEWS AND CHRISTIANITY) AND FOR INSISTING ON WRITING A COMPLETE AND ACCURATE POLICE REPORT WHICH INCLUDED ANTI-SEMITIC SLURS MADE BY MR. GIBSON AGAINST ME AND JEWS IN GENERAL.

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

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

By submitting this complaint I am declaring under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge except as to matters stated on my information and belief, and as to those matters I believe it to be true.

Dated **06/01/2010**

At **Los Angeles**

DATE FILED: **06/01/2010**

DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

1055 WEST 7TH STREET, SUITE 1400, LOS ANGELES, CA 90017
(213) 439-6770
www.dfeh.ca.gov



June 01, 2010

MEE, JAMES
C/O LAW OFFICES OF ETAN Z. LORANT, 5850 CANOGA
AVE #400
WOODLAND HILLS, CA 91367

RE: E200910R6502-00
MEE/COUNTY OF LOS ANGELES

Dear MEE, JAMES:

NOTICE OF CASE CLOSURE

This letter informs that the above-referenced complaint that was filed with the Department of Fair Employment and Housing (DFEH) has been closed effective June 01, 2010 because an immediate right-to-sue notice was requested. DFEH will take no further action on the complaint.

~~This letter is also the Right-To-Sue Notice. According to Government Code section 12965, subdivision (b), a civil action may be brought under the provisions of the Fair Employment and Housing Act against the person, employer, labor organization or employment agency named in the above-referenced complaint. The civil action must be filed within one year from the date of this letter.~~

If a federal notice of Right-To-Sue is wanted, the U.S. Equal Employment Opportunity Commission (EEOC) must be visited to file a complaint within 30 days of receipt of this DFEH *Notice of Case Closure* or within 300 days of the alleged discriminatory act, whichever is earlier.

DFEH does not retain case files beyond three years after a complaint is filed, unless the case is still open at the end of the three-year period.

Sincerely,

Tina Walker

Tina Walker
District Administrator

cc: Case File

ETAN LORANT
ATTORNEY
LAW OFFICES OF ETAN Z. LORANT
5850 CANOGA AVE., STE 400
WOODLAND HILLS, CA 91367

SHORT TITLE:

JAMES MEE vs. COUNTY OF LOS ANGELES, et al.

CASE NUMBER

BC444914

**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 7 ☐ HOURS/ ☒ DAYS

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

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

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

Step 3: In Column **C**, circle the reason for the court location choice that applies to the type of action you have checked.
For any exception to the court location, see Los Angeles Superior Court Local Rule 2.0.

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

- | | |
|---|--|
| 1. Class Actions must be filed in the County Courthouse, Central District. | 6. Location of property or permanently garaged vehicle. |
| 2. May be filed in Central (Other county, or no Bodily Injury/Property Damage). | 7. Location where petitioner resides. |
| 3. Location where cause of action arose. | 8. Location wherein defendant/respondent functions wholly. |
| 4. Location where bodily injury, death or damage occurred. | 9. Location where one or more of the parties reside. |
| 5. Location where performance required or defendant resides. | 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	2.
		<input type="checkbox"/> A7221 Asbestos - Personal Injury/Wrongful Death	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	1., 2., 4.
		<input type="checkbox"/> A7240 Other Professional Health Care Malpractice	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 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.

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A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons -See Step 3 Above
Professional Negligence (25)	<input type="checkbox"/> A6017 Legal Malpractice <input type="checkbox"/> A6050 Other Professional Malpractice (not medical or legal)	1., 2., 3. 1., 2., 3.
Other (35)	<input type="checkbox"/> A6025 Other Non-Personal Injury/Property Damage tort	2., 3.
Wrongful Termination (36)	<input type="checkbox"/> A6037 Wrongful Termination	1., 2., 3.
Other Employment (15)	<input checked="" 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"/> A6023 Wrongful Eviction Case	2., 6.
Other Real Property (26)	<input type="checkbox"/> A6018 Mortgage Foreclosure <input type="checkbox"/> A6032 Quiet Title <input type="checkbox"/> A6060 Other Real Property (not eminent domain, landlord/tenant, foreclosure)	2., 6. 2., 6. 2., 6.
Unlawful Detainer- Commercial (31)	<input type="checkbox"/> A6021 Unlawful Detainer-Commercial (not drugs or wrongful eviction)	2., 6.
Unlawful Detainer- Residential (32)	<input type="checkbox"/> A6020 Unlawful Detainer-Residential (not drugs or wrongful eviction)	2., 6.
Unlawful Detainer- Drugs (38)	<input type="checkbox"/> A6022 Unlawful Detainer-Drugs	2., 6.
Asset Forfeiture (05)	<input type="checkbox"/> A6108 Asset Forfeiture Case	2., 6.
Petition re Arbitration (11)	<input type="checkbox"/> A6115 Petition to Compel/Confirm/Vacate Arbitration	2., 5.

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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.

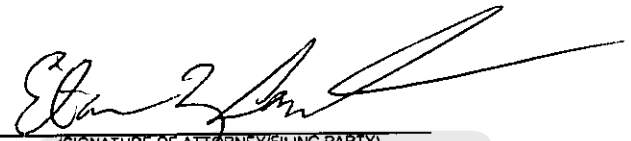
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Item III. Statement of Location: Enter the address of the accident, party's residence or place of business, performance, or other circumstance indicated in Item II., Step 3 on Page 1, as the proper reason for filing in the court location you selected.

REASON: CHECK THE NUMBER UNDER COLUMN C WHICH APPLIES IN THIS CASE <input type="checkbox"/> 1. <input checked="" 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.		ADDRESS: 500 W. Temple, Suite 383
CITY: Los Angeles	STATE: CA	ZIP CODE: 90012

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

Dated: August 30, 2010


(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:
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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 LACIV 109 (Rev. 01/07), LASC Approved 03-04.
5. Payment in full of the filing fee, unless fees have been waived.
6. Signed order appointing the Guardian ad Litem, JC form FL-935, 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.

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Etan Z. Lorant, Esq. (S.B. 108820) Law Offices of Etan Z. Lorant 5850 Canoga Avenue, Suite 400 Woodland Hills, CA 91367 TELEPHONE NO.: (818) 990-3990 FAX NO.: ATTORNEY FOR (Name): Plaintiff, JAMES MEE		FOR COURT USE ONLY FILED SUPERIOR COURT OF CALIFORNIA COUNTY OF LOS ANGELES SEP 07 2010 John A. Clarke, Executive Officer/Clerk By: <u>RUGENA LOPEZ</u> Deputy	
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles STREET ADDRESS: 111 North Hill Street MAILING ADDRESS: (same) CITY AND ZIP CODE: Los Angeles, CA 90012 BRANCH NAME: Stanley Mosk		CASE NAME: JAMES MEE vs. COUNTY OF LOS ANGELES, et al.	
CIVIL CASE COVER SHEET <input checked="" type="checkbox"/> Unlimited (Amount demanded exceeds \$25,000) <input type="checkbox"/> Limited (Amount demanded is \$25,000 or less)		Complex Case Designation <input type="checkbox"/> Counter <input type="checkbox"/> Joinder Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)	
		CASE NUMBER: BC444914 JUDGE: DEPT:	

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:

Auto Tort <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46) Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort <input type="checkbox"/> Asbestos (04) <input type="checkbox"/> Product liability (24) <input type="checkbox"/> Medical malpractice (45) <input type="checkbox"/> Other PI/PD/WD (23) Non-PI/PD/WD (Other) Tort <input type="checkbox"/> Business tort/unfair business practice (07) <input type="checkbox"/> Civil rights (08) <input type="checkbox"/> Defamation (13) <input type="checkbox"/> Fraud (16) <input type="checkbox"/> Intellectual property (19) <input type="checkbox"/> Professional negligence (25) <input type="checkbox"/> Other non-PI/PD/WD tort (35) Employment <input type="checkbox"/> Wrongful termination (36) <input checked="" type="checkbox"/> Other employment (15)	Contract <input type="checkbox"/> Breach of contract/warranty (06) <input type="checkbox"/> Rule 3.740 collections (09) <input type="checkbox"/> Other collections (09) <input type="checkbox"/> Insurance coverage (18) <input type="checkbox"/> Other contract (37) Real Property <input type="checkbox"/> Eminent domain/Inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (26) Unlawful Detainer <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38) Judicial Review <input type="checkbox"/> Asset forfeiture (05) <input type="checkbox"/> Petition re: arbitration award (11) <input type="checkbox"/> Writ of mandate (02) <input type="checkbox"/> Other judicial review (39)	Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403) <input type="checkbox"/> Antitrust/Trade regulation (03) <input type="checkbox"/> Construction defect (10) <input type="checkbox"/> Mass tort (40) <input type="checkbox"/> Securities litigation (28) <input type="checkbox"/> Environmental/Toxic tort (30) <input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41) Enforcement of Judgment <input type="checkbox"/> Enforcement of judgment (20) Miscellaneous Civil Complaint <input type="checkbox"/> RICO (27) <input type="checkbox"/> Other complaint (not specified above) (42) Miscellaneous Civil Petition <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> Other petition (not specified above) (43)
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2. This case ☐ is ☒ is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:
- | | |
|--|--|
| a. <input type="checkbox"/> Large number of separately represented parties | d. <input type="checkbox"/> Large number of witnesses |
| b. <input type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve | e. <input type="checkbox"/> Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court |
| c. <input type="checkbox"/> Substantial amount of documentary evidence | f. <input type="checkbox"/> Substantial postjudgment judicial supervision |
3. Remedies sought (check all that apply): a. ☒ monetary b. ☐ nonmonetary; declaratory or injunctive relief c. ☐ punitive
4. Number of causes of action (specify): 3 : Discrimination, retaliation, harassment
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: August 30, 2010
 ETAN Z. LORANT

(TYPE OR PRINT NAME)

(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.

Page 1 of 2

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

Auto (22)—Personal Injury/Property Damage/Wrongful Death
Uninsured Motorist (46) (*if the case involves an uninsured motorist claim subject to arbitration, check this item instead of Auto*)

Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort

Asbestos (04)
Asbestos Property Damage
Asbestos Personal Injury/Wrongful Death
Product Liability (*not asbestos or toxic/environmental*) (24)
Medical Malpractice (45)
Medical Malpractice—Physicians & Surgeons
Other Professional Health Care Malpractice
Other PI/PD/WD (23)
Premises Liability (e.g., slip and fall)
Intentional Bodily Injury/PD/WD (e.g., assault, vandalism)
Intentional Infliction of Emotional Distress
Negligent Infliction of Emotional Distress
Other PI/PD/WD

Non-PI/PD/WD (Other) Tort

Business Tort/Unfair Business Practice (07)
Civil Rights (e.g., discrimination, false arrest) (*not civil harassment*) (08)
Defamation (e.g., slander, libel) (13)
Fraud (16)
Intellectual Property (19)
Professional Negligence (25)
Legal Malpractice
Other Professional Malpractice (*not medical or legal*)
Other Non-PI/PD/WD Tort (35)

Employment

Wrongful Termination (36)
Other Employment (15)

Contract

Breach of Contract/Warranty (06)
Breach of Rental/Lease
Contract (*not unlawful detainer or wrongful eviction*)
Contract/Warranty Breach—Seller Plaintiff (*not fraud or negligence*)
Negligent Breach of Contract/Warranty
Other Breach of Contract/Warranty
Collections (e.g., money owed, open book accounts) (09)
Collection Case—Seller Plaintiff
Other Promissory Note/Collections Case
Insurance Coverage (*not provisionally complex*) (18)
Auto Subrogation
Other Coverage
Other Contract (37)
Contractual Fraud
Other Contract Dispute

Real Property

Eminent Domain/Inverse Condemnation (14)
Wrongful Eviction (33)
Other Real Property (e.g., quiet title) (26)
Writ of Possession of Real Property
Mortgage Foreclosure
Quiet Title
Other Real Property (*not eminent domain, landlord/tenant, or foreclosure*)

Unlawful Detainer

Commercial (31)
Residential (32)
Drugs (38) (*if the case involves illegal drugs, check this item; otherwise, report as Commercial or Residential*)

Judicial Review

Asset Forfeiture (05)
Petition Re: Arbitration Award (11)
Writ of Mandate (02)
Writ—Administrative Mandamus
Writ—Mandamus on Limited Court Case Matter
Writ—Other Limited Court Case Review
Other Judicial Review (39)
Review of Health Officer Order
Notice of Appeal—Labor
Commissioner Appeals

Provisionally Complex Civil Litigation (Cal. Rules of Court Rules 3.400–3.403)

Antitrust/Trade Regulation (03)
Construction Defect (10)
Claims Involving Mass Tort (40)
Securities Litigation (28)
Environmental/Toxic Tort (30)
Insurance Coverage Claims (*arising from provisionally complex case type listed above*) (41)

Enforcement of Judgment

Enforcement of Judgment (20)
Abstract of Judgment (Out of County)
Confession of Judgment (*non-domestic relations*)
Sister State Judgment
Administrative Agency Award (*not unpaid taxes*)
Petition/Certification of Entry of Judgment on Unpaid Taxes
Other Enforcement of Judgment Case

Miscellaneous Civil Complaint

RICO (27)
Other Complaint (*not specified above*) (42)
Declaratory Relief Only
Injunctive Relief Only (*non-harassment*)
Mechanics Lien
Other Commercial Complaint Case (*non-tort/non-complex*)
Other Civil Complaint (*non-tort/non-complex*)

Miscellaneous Civil Petition

Partnership and Corporate Governance (21)
Other Petition (*not specified above*) (43)
Civil Harassment
Workplace Violence
Elder/Dependent Adult Abuse
Election Contest
Petition for Name Change
Petition for Relief From Late Claim
Other Civil Petition