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KAMALA D. HARRIS
Attorney General of California
MICHAEL E. ELISOFON
Supervising Deputy Attorney General
JEFFREY STEELE (State Bar No. 124688)
Deputy Attorney General
1300 I Street, Suite 125
P.O. Box 944255
Sacramento, CA 94244-2550
Telephone: (916) 323-1937
Fax: (916) 322-2368
E-mail: Jeff.Steele@doj.ca.gov

[EXEMPT FROM FILING FEES
UNDER GOVT. CODE SEC. 6103]

FILED
ALAMEDA COUNTY

SEP 17 2013

CLERK OF THE SUPERIOR COURT
By:  Deputy

AROCLES AGUILAR
General Counsel
CHRISTOPHER P. WITTEMAN (State Bar No. 115314)
HIEN VO WINTER
Public Utility Staff Counsel
California Public Utilities Commission
505 Van Ness Avenue, Room 5028
San Francisco, CA 94102
Telephone: (415) 355-5524
Fax: (415) 703-2262
E-mail: wit@cpuc.ca.gov

*Attorneys for Plaintiff
The People of the State of California*

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF ALAMEDA

THE PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff,

vs.

**COMCAST CABLE COMMUNICATIONS
MANAGEMENT, LLC; COMCAST
PHONE, LLC; COMCAST PHONE OF
CALIFORNIA, LLC; COMCAST IP
PHONE II, LLC,**

Defendants.

RG 15786197
Case No. 34-2013-00155578

**COMPLAINT FOR INJUNCTION,
CIVIL PENALTIES AND OTHER
EQUITABLE RELIEF**

(BUS. & PROF. CODE, §§ 17200, 17500;
PUB. UTIL. CODE, §§ 451, 2891.1)

1 Plaintiff, the People of the State of California, by and through Kamala D. Harris, Attorney
2 General of the State of California, and through the California Public Utilities Commission, by its
3 attorneys Christopher P. Witteman and Hien Vo Winter (collectively, "Plaintiff"), allege on
4 information and belief:

5 DEFENDANT AND VENUE

6 1. Defendant Comcast Cable Communications Management, LLC ("Comcast Cable") is
7 the cable division of Comcast Corporation, organized under the laws of the state of Delaware
8 with its principal place of business located at 1701 JFK Boulevard, Philadelphia, PA 19103.

9 2. Defendant Comcast Phone, LLC is a wholly-owned subsidiary of Comcast Cable
10 organized under the laws of the state of Delaware with its principal place of business located at
11 1701 JFK Boulevard, Philadelphia, PA 19103.

12 3. Defendant Comcast Phone of California, LLC, is a wholly-owned subsidiary of
13 Comcast Cable, organized under the laws of the state of Delaware with its principal place of
14 business located at 12647 Alcosta Boulevard, Suite 200, San Ramon, CA 94588.

15 4. Defendant Comcast IP Phone II, LLC is a wholly-owned subsidiary of Comcast
16 Cable, organized under the laws of the state of Delaware with its principal place of business
17 located at One-Comcast Center, Philadelphia, PA 19103.

18 5. At all relevant times, Defendants Comcast Cable, Comcast Phone, LLC, Comcast
19 Phone of California, LLC, and Comcast IP Phone II, LLC (collectively, "Defendants" or
20 "Comcast") have transacted business in the County of Alameda and elsewhere within the State of
21 California. The violations of law described herein occurred in the County of Alameda and
22 elsewhere in the State of California.

23 DEFENDANTS' BUSINESS ACTS AND PRACTICES

24 Background

25 6. Comcast provides telephone services to residential subscribers in California through a
26 product known as XFINITY Voice.

27 7. XFINITY Voice is a Voice over Internet Protocol (VoIP) service.
28

1 3. That under Public Utilities Code section 2107 and other relevant law, Defendants be
2 ordered to pay \$1,000 for each violation of Public Utilities Code sections 2891.1 and 451 as
3 proved at trial;

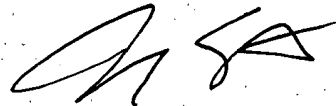
4 4. That Plaintiff recover its costs of suit herein, including costs of investigation; and

5 5. For such other and further relief as the Court may deem just and proper.

6
7 Dated: September 17, 2015

Respectfully Submitted,

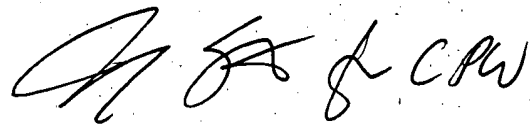
8 KAMALA D. HARRIS
9 Attorney General of California
10 MICHAEL E. ELISOFON
11 Supervising Deputy Attorney General

12 

13 JEFFREY STEELE
14 Deputy Attorney General
15 *Attorneys for Plaintiff*
16 *The People of the State of California*

17 Dated: September 17, 2015

18 AROCLES AGUILAR
19 General Counsel
20 California Public Utilities Commission

21 

22 CHRISTOPHER P. WITTEMAN
23 HIEN VO WINTER
24 Public Utility Staff Counsel

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DECLARATION OF PERSONAL SERVICE

Case Name: The People of the State of California v. Comcast Cable Communications Management, LLC, et al.

No.:

I declare:

I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar, at which member's direction this service is made. I am 18 years of age or older and not a party to this matter; my business address is: 1300 I Street, Suite 125, P.O. Box 944255, Sacramento, CA 94244-2550.

On September 17, 2015, I served the attached **COMPLAINT FOR INJUNCTION, CIVIL PENALTIES AND OTHER EQUITABLE RELIEF** by personally delivering a true copy thereof to the following person(s) as follows:

Suzanne Toller
Davis Wright Tremaine LLP
*Attorneys for Comcast Cable
Communications, LLC, et al.*

I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct and that this declaration was executed on September 17, 2015, at Sacramento, California.

Jeffrey Steele
Declarant



Signature