

FILED
LOS ANGELES SUPERIOR COURT

OCT 25 2006

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

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4 Berkeley, CA 94704
5 Phone: (510) 540-1992
6 Facsimile: (510) 540-5543
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8 Attorney for Plaintiff
9 Center for Environmental Health

Case assigned
to Judge

JON M MAYEDA

D-72

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 COUNTY OF LOS ANGELES

BC360876

13 CENTER FOR ENVIRONMENTAL HEALTH,
14 a California non-profit corporation

CASE NO.

15 Plaintiff

COMPLAINT FOR INJUNCTIVE
AND DECLARATORY RELIEF
AND CIVIL PENALTIES

17 vs.

[Health & Safety Code §§ 25249.6
et seq.]

18 MARVIN ENGINEERING COMPANY, INC.
19 and DOES I-X,

20 Defendants.

22 Plaintiff, Center for Environmental Health ("CEH") hereby alleges:

23 I

24 INTRODUCTION

25 1. CEH brings this action as a private attorney general on behalf of the People

1 of the State of California and in the public interest pursuant to Health Safety Code section 25249.7
2 (d). Based on the Safe Drinking Water and Toxic Enforcement Act of 1986 (Health and Safety
3 Code section 25249.5 et seq) also known as "Proposition 65," this complaint seeks injunctive and
4 declaratory relief and civil penalties based on Marvin Engineering, Inc.'s ("Marvin Engineering")
5 failure to warn residents and workers in and around Inglewood, California, that they have been and
6 continue to be exposed to perchloroethylene (PCE), a chemical known to the State of California to
7 cause cancer, from its facility. Pursuant to Proposition 65, businesses with ten or more employees
8 must provide persons with a "clear and reasonable warning" prior to exposing them to chemicals
9 listed by the State to cause cancer in excess of the no significant risk level for that chemical.
10
11

12 II

13 PARTIES

14 2. Plaintiff CEH is a non-profit California corporation dedicated to environmental
15 protection and enhancement. One of CEH's objectives is to prevent and reduce toxic hazards to
16 human health and the environment, specifically from pollution of air, water and land throughout
17 California. Through CEH's activities, numerous carcinogenic and reproductive chemicals listed
18 pursuant to Proposition 65 that have been present in consumer products and emitted into the air,
19 have been eliminated.
20
21

22 3. Marvin Engineering is a corporation licensed to do business in the State of California.
23 Marvin Engineering manufactures missile launchers, ejector racks, test equipment, and other
24 hardware for military customers and companies in the aerospace and defense industries. Marvin
25 Engineering operates its facility at 251-260 West Beach Ave in Inglewood, California 90302.
26

27 4. Defendants DOES I-X, are named herein under fictitious names, as their true names and
28 capacities are unknown to Plaintiff. CEH is informed and believes, and thereon alleges, that each of

1 said DOES is responsible, in some actionable manner, for the events and happenings hereinafter
2 referred to, either through said Marvin Engineering 's conduct, or through the conduct of its agents,
3 servants or employees, or in some other manner, causing the harms alleged by Plaintiff in this
4 complaint. When said true names and capacities of DOES are ascertained, CEH will seek leave to
5 amend this complaint to set forth the same.
6

7 III

8 JURISDICTION AND VENUE

9 5. This Court has jurisdiction pursuant to California Constitution Article VI, section 10.
10

11 6. CEH has performed any and all conditions precedent to the filing of a legal action
12 pursuant to Proposition 65 by mailing a Notice of Violation, dated July 28, 2006, to the Attorney
13 General of the State of California, the Los Angeles County District Attorney, and Marvin
14 Engineering. A true and correct copy of this Notice is attached herein as Exhibit A. More than
15 60 days have passed since CEH mailed its Notice and no public enforcement entity has filed a
16 complaint in this case.
17

18 7. This Court is the proper venue for the action because the causes of action have arisen in
19 Los Angeles County. Furthermore, this Court is the proper venue under Code of Civil Procedure
20 section 395 and Health and Safety Code section 25249.7.
21

22 IV

23 STATUTORY BACKGROUND

24 A. PROPOSITION 65

25 8. The Safe Drinking Water and Toxic Enforcement Act of 1986 is an initiative statute
26 passed as "Proposition 65" by an overwhelming majority vote of the people in November of 1986.
27
28

1 9. The warning requirement of Proposition 65 is contained in Health and Safety Code
2 section 25249.6, which provides:

3 No person in the course of doing business shall knowingly and intentionally expose any
4 individual to a chemical known to the state to cause cancer or reproductive toxicity without first
5 giving clear and reasonable warning to such individual, except as provided in Section 25249.10.

6 10. Implementing regulations for Proposition 65 provide that warnings are required for
7 environmental exposures. Environmental exposures are those which may foreseeably occur as a
8 result of contact with an environmental medium, including ambient air, "through inhalation,
9 ingestion, skin contact or otherwise." 22 CCR section 12601 (d).

10 11. Warnings for environmental exposures must be "provided in a conspicuous manner and
11 under such conditions as to make it likely to be read, seen, or heard and understood by an ordinary
12 individual in the course of normal daily activity." 22 CCR section 12601 (d) (2). The warnings
13 must also be "reasonably associated with the location and source of the exposure." Id.

14 12. Proposition 65 establishes a procedure by which the state is to develop a list of
15 chemicals "known to the State to cause cancer or reproductive toxicity." Marvin Engineering had
16 a duty to provide clear and reasonable warning to those persons exposed to PCE at significant risk
17 levels 12-months after the chemical was published on the state list. PCE was listed as a carcinogen
18 by the State of California on April 1, 1988.

19 13. Proposition 65 may be enforced by any person in the public interest who provides notice
20 sixty days before filing suit to both the violator and designated law enforcement officials. The
21 failure of law enforcement officials to file a timely complaint enables a citizen suit to be filed
22 pursuant to Health and Safety Code section 25249.7 (c).

1 14. Proposition 65 provides for injunctive relief and a civil fine of up to \$2,500 per day for
2 each violation. Health and Safety Code section 25249.7(a) (b). Each individual exposure without
3 warning is a separate violation.
4

5 V

6 **STATEMENT OF FACTS**

7 15. Marvin Engineering conducts manufacturing operations that uses of PCE at its Inglewood
8 facility. During the course of operations, PCE is emitted into the air and surrounding community as
9 a fugitive emission.
10

11 16. PCE has been identified as a hazardous air pollutant pursuant to section 112 of the
12 federal Clean Air Act (42 U.S.C. section 7412(b)) and has been designated as a toxic air
13 contaminant pursuant to Health and Safety Code section 39657. Sufficient exposure to PCE can
14 cause also significant adverse health effects, including central nervous system depression, headache,
15 slurred speech, drowsiness, dizziness, nausea, loss of coordination and equilibrium, irritation to
16 eyes, nose and throat, and cancer.
17

18 17. Marvin Engineering reported 4,330 pounds of PCE emissions for the 2004-2005 period
19 to the South Coast Air Quality Management District. Other than dry cleaning facilities, Marvin
20 Engineering is one of the few companies remaining within the District that uses PCE and is one of
21 the higher emitters of PCE in the South Coast Air Basin.
22

23 18. Despite the availability and feasibility of safer solvents, Marvin Engineering has failed to
24 eliminate PCE by substituting a less toxic solvent. Marvin Engineering has also failed to install
25 emission control technology at its facility that would obviate the need to provide a warning to the
26 surrounding community.
27
28

1 19. Marvin Engineering 's facility is located close to residents and workers from other
2 businesses. The company is situated across the street from apartments about 30 meters away.
3 Furthermore, a community center which contains a pre-school, is located 30 meters away. Nearby
4 residents, Marvin Engineering 's workers and workers from other businesses have been and
5 continue to be exposed to Marvin Engineering 's PCE emissions.
6

7 20. The Proposition 65 standard to require a warning in California is 10 excess cancer
8 risks per one-million persons. Air dispersion modeling using the most sophisticated
9 Environmental Protection Agency model ISCST3, demonstrates that numerous residents and
10 workers have been exposed to levels of PCE above the Proposition 65 warning threshold.
11

12 21. Marvin Engineering has not provided clear and reasonable warnings to those
13 residents and workers in the surrounding community who are exposed to PCE from its facility as
14 required by Proposition 65.
15

16 22. Marvin Engineering has knowingly and intentionally exposed residents, including
17 children, situated nearby, as well as workers in the surrounding neighborhood to PCE without
18 providing a clear and reasonable Proposition 65 warning. Marvin Engineering has at all times
19 relevant hereto been aware that its operations use a large amount of PCE, that the chemical escapes
20 into the air as a fugitive emission, that safer solvents are feasible and available, and that improved
21 emission control technology exists. Marvin Engineering has always been aware that a residential
22 community, a community center with a pre-school program and other workers are situated close by.
23 Marvin Engineering has operated its facility with knowledge that exposures to these chemicals have
24 occurred.
25
26
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1 **FIRST CAUSE OF ACTION**

2
3 **(Violation of section 25249.6 of the Health and Safety Code, Failure to Provide Clear and Reasonable Warning under Proposition 65)**

4 23. CEH refers to paragraphs 1-22, inclusive, and incorporates them herein by this reference.

5
6 24. Marvin Engineering operates a business, which employs ten or more persons.

7 25. By committing the acts alleged above, Marvin Engineering has, in the course of doing
8 business, knowingly and intentionally exposed individuals to a chemical known to the State of
9 California to cause cancer without first giving clear and reasonable warning to such individuals,
10 within the meaning of Health and Safety Code section 25249.6.

11
12 26. Said violations render Marvin Engineering liable for civil fines up to \$2,500 (two
13 thousand, five hundred dollars) per day, for each such violation.

14 27. Marvin Engineering's continued violation of the law will irreparably harm CEH and
15 the public interest in whose behalf Plaintiff brings this action, for which there is no adequate
16 remedy at law.

17
18 **SECOND CAUSE OF ACTION**

19 **(Declaratory Relief)**

20 28. CEH refers to paragraphs 1-27, inclusive, and incorporates them herein by this reference.

21 29. There exists an actual controversy relating to the legal rights and duties of the parties,
22 within the meaning of Code of Civil Procedure section 1060, between Plaintiff and Marvin
23 Engineering concerning:
24

25 a) whether Marvin Engineering has exposed individuals to a chemical known to the State of
26 California to cause cancer without providing clear and reasonable warning; and
27
28

1 VI

2 JURY DEMAND

3 30. CEH demands a jury trial.
4

5 VII

6 PRAYER

7 WHEREFORE, CEH prays for relief against Marvin Engineering as follows:
8

9 1. On the First Cause of Action, for civil penalties for each and every violation according to
10 proof;

11 2. On the First Cause of Action, and pursuant to Health and Safety Code section 25249.7 (a), for
12 such temporary restraining orders, preliminary and permanent injunctive orders, or other orders,
13 prohibiting Marvin Engineering from exposing persons to PCE without providing clear and
14 reasonable warnings;
15

16 3. On the Second Cause of Action, for a declaratory judgment pursuant to Code of Civil
17 Procedure section 1060 declaring:

18 a. that Marvin Engineering has exposed individuals to a chemical known to the State of
19 California to cause cancer without providing clear and reasonable warning; and
20

21 4. On all Causes of Action, for reasonable attorneys' fees pursuant to section 1021.5 of the Code
22 of Civil Procedure or the substantial benefit theory;

23 5. For costs of suit herein; and
24

25 /// /// ///

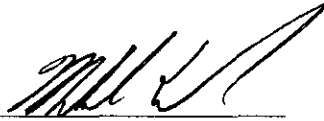
26 /// /// ///

27 /// /// ///

1 6. For such other relief as the Court may deem just and proper.

2 Dated: October 20, 2006

3
4 By



5 Michael Freund
6 Attorney for Center for Environmental Health
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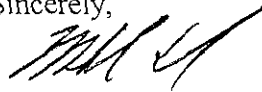
Moreover, based on the exposure involved, we believe the method of warning should be "... a notice mailed or otherwise delivered to each occupant in the affected area. Such notice shall be provided at least once in any three-month period." (22 C.C.R. section 12601 (d) (1) (B)).

Proposition 65 requires that notice and intent to sue be given to a violator 60-days before the suit is filed. With this letter, CEH gives notice of the alleged violation to the noticed party and the appropriate governmental authorities. This notice covers all violations of Proposition 65 that are currently known to CEH from information now available to us. CEH is continuing its investigation that may reveal further violations. A summary of Proposition 65, prepared by the Office of Environmental Health Hazard Assessment, and referenced as Appendix A, has been provided to the noticed party.

The address of the noticing party Center for Environmental Health is 528 61st Street, Oakland, CA 94609. CEH can be contacted through my office at 1915 Addison Street, Berkeley, CA 94704. Telephone: (510) 540-1992.

If you have any questions, please contact my office at your earliest convenience.

Sincerely,



Michael Freund

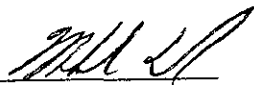
cc: Michael Green, Director CEH

2025/07/15/03:14

6. Based on my consultation with an experienced consultant in this field and especially the results of the exposure assessment, it is clear that there is sufficient evidence that human exposures exist from the emission of perchloroethylene from the noticed party's facility. Furthermore, as a result of the above, I have concluded that there is a reasonable and meritorious case for the private action. I understand that "reasonable and meritorious case for the private action" means that the information provides a credible basis that all elements of the plaintiff's case can be established and the information did not prove that the alleged violator will be able to establish any of the affirmative defenses set forth in the statute.

7. The copy of this Certificate of Merit served on the California Attorney General attaches to it factual information sufficient to establish the basis for this certificate, including the information identified in Health & Safety Code Section 25249.7 (h) (2), i.e., (1) the identity of the persons consulted with and relied on by the certifier, and (2) the facts, studies or other data reviewed by those persons.

Dated: July 28, 2006


Michael Freund
Attorney for Center for Environmental
Health

075007420000

CERTIFICATE OF SERVICE

I am a citizen of the United States and a resident of the County of Alameda. I am over the age of eighteen years and not a party to the within entitled action; my business address is 1915 Addison Street, Berkeley, California 94704. On July 28, 2006 I served the within:

Notice of Violation and Certificate of Merit (Supporting documentation pursuant to 11 CCR section 3102 sent to Attorney General only)

on the parties in said action, by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, in the United States Post Office mail box in Berkeley, California and/or by hand delivery to said parties addressed as follows:

Attorney General's Office
Attn: Prop 65 Coordinator
1515 Clay Street, Suite 2000
Oakland, CA 94612

Steve Cooley, District Attorney
Los Angeles District Attorney's Office
210 West Temple Street
Room 18-709
Los Angeles, CA 90012

Robert Crandell
Marvin Engineering Company, Inc.
260 W. Beach Ave.
Inglewood, CA 90302

I, Michael Freund, declare under penalty of perjury that the foregoing is true and correct.

Executed on July 28, 2006 at Berkeley, California.



Michael Freund

07/28/06 10:58 AM

CERTIFICATE OF SERVICE

I am a citizen of the United States and a resident of the County of Alameda. I am over the age of eighteen years and not a party to the within entitled action; my business address is 1915 Addison Street, Berkeley, California 94704. On October 20, 2006 I served the within:

Complaint for Injunctive and Declaratory Relief and Civil Penalties (Center for Environmental Health v. Marvin Engineering Company, Inc.)

on the parties in said action, by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, in the United States Post Office mail box in Berkeley, California and/or by hand delivery to said parties addressed as follows:

State of California-Dept. of Justice
Attorney General's Office
Attn: Prop 65 Coordinator
1515 Clay Street, Suite 2000
Oakland, CA 94612

I, Michael Freund, declare under penalty of perjury that the foregoing is true and correct.

Executed on October 20, 2006 at Berkeley, California.



Michael Freund

CP 022 000 0170 000 000 000

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, Bar number, and address):
Michael Freund SBN 99687
1915 Addison Street
Berkeley, CA 94704
TELEPHONE NO.: 510-540-1992 FAX NO.: 510-540-5543
ATTORNEY FOR (Name): Center for Environmental Health

FOR COURT USE ONLY
FILED
LOS ANGELES SUPERIOR COURT
OCT 25 2006
John A. Clark, Executive Officer/Clerk
By D. Garcia, Deputy

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES
STREET ADDRESS: 111 North Hill Street
MAILING ADDRESS:
CITY AND ZIP CODE: Los Angeles, CA 90012
BRANCH NAME:

CASE NAME: Center for Environmental Health v. Marvin Engineering Company, Inc.

CIVIL CASE COVER SHEET
 Unlimited (Amount demanded exceeds \$25,000) **Limited** (Amount demanded is \$25,000 or less)
Complex Case Designation
 Counter **Joinder**
Filed with first appearance by defendant (Cal. Rules of Court, rule 1811)

CASE NUMBER: BC360876
JUDGE:
DEPT:

Items 1-5 below must be completed (see instructions on page 2).

1. Check one box below for the case type that best describes this case:
- Auto Tort**
 Auto (22)
 Uninsured motorist (46)
 - Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort**
 Asbestos (04)
 Product liability (24)
 Medical malpractice (45)
 Other PI/PD/WD (23)
 - Non-PI/PD/WD (Other) Tort**
 Business tort/unfair business practice (07)
 Civil rights (08)
 Defamation (13)
 Fraud (16)
 Intellectual property (19)
 Professional negligence (25)
 Other non-PI/PD/WD tort (35)
 - Employment**
 Wrongful termination (36)
 Other employment (15)
 - Contract**
 Breach of contract/warranty (06)
 Collections (09)
 Insurance coverage (18)
 Other contract (37)
 - Real Property**
 Eminent domain/Inverse condemnation (14)
 Wrongful eviction (33)
 Other real property (26)
 - Unlawful Detainer**
 Commercial (31)
 Residential (32)
 Drugs (38)
 - Judicial Review**
 Asset forfeiture (05)
 Petition re: arbitration award (11)
 Writ of mandate (02)
 Other judicial review (39)
 - Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 1800-1812)**
 Antitrust/Trade regulation (03)
 Construction defect (10)
 Mass tort (40)
 Securities litigation (28)
 Environmental/Toxic tort (30)
 Insurance coverage claims arising from the above listed provisionally complex case types (41)
 - Enforcement of Judgment**
 Enforcement of judgment (20)
 - Miscellaneous Civil Complaint**
 RICO (27)
 Other complaint (not specified above) (42)
 - Miscellaneous Civil Petition**
 Partnership and corporate governance (21)
 Other petition (not specified above) (43)

2. This case is is not complex under rule 1800 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:
- a. Large number of separately represented parties
 - b. Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve
 - c. Substantial amount of documentary evidence
 - d. Large number of witnesses
 - e. Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court
 - f. Substantial postjudgment judicial supervision

3. Type of remedies sought (check all that apply):
a. monetary b. nonmonetary; declaratory or injunctive relief c. punitive

4. Number of causes of action (specify): 2

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: 10/20/06

Michael Freund (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 201.8.) Failure to file may result in sanctions.
• File this cover sheet in addition to any cover sheet required by local court rule.
• If this case is complex under rule 1800 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
• Unless this is a complex case, this cover sheet will be used for statistical purposes only.

**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 4 HOURS/ DAYS.

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

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

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

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

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

- | | |
|---|--|
| <ol style="list-style-type: none"> 1. Class Actions must be filed in the County Courthouse, Central District. 2. May be filed in Central (Other county, or no Bodily Injury/Property Damage). 3. Location where cause of action arose. 4. Location where bodily injury, death or damage occurred. 5. Location where performance required or defendant resides. | <ol style="list-style-type: none"> 6. Location of property or permanently garaged vehicle. 7. Location where petitioner resides. 8. Location wherein defendant/respondent functions wholly. 9. Location where one or more of the parties reside. 10. Location of Labor Commissioner Office. |
|---|--|

Step 4: Fill in the information requested on page 4 in Item III; complete Item IV. Sign the declaration.

	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Auto Tort	Auto (22)	<input type="checkbox"/> A7100 Motor Vehicle - Personal Injury/Property Damage/Wrongful Death	1., 2., 4.
	Uninsured Motorist (46)	<input type="checkbox"/> A7110 Personal Injury/Property Damage/Wrongful Death – Uninsured Motorist	1., 2., 4.
Other Personal Injury/Property Damage/Wrongful Death Tort	Asbestos (04)	<input type="checkbox"/> A6070 Asbestos Property Damage <input type="checkbox"/> A7221 Asbestos - Personal Injury/Wrongful Death	2. 2.
	Product Liability (24)	<input type="checkbox"/> A7260 Product Liability (not asbestos or toxic/environmental)	1., 2., 3., 4., 8.
	Medical Malpractice (45)	<input type="checkbox"/> A7210 Medical Malpractice - Physicians & Surgeons <input type="checkbox"/> A7240 Other Professional Health Care Malpractice	1., 2., 4. 1., 2., 4.
	Other Personal Injury Property Damage Wrongful Death (23)	<input type="checkbox"/> A7250 Premises Liability (e.g., slip and fall)	1., 2., 4.
		<input type="checkbox"/> A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.)	1., 2., 4.
<input type="checkbox"/> A7270 Intentional Infliction of Emotional Distress		1., 2., 3.	
<input type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death		1., 2., 4.	
Non-Personal Injury/Property Damage/Wrongful Death	Business Tort (07)	<input type="checkbox"/> A6029 Other Commercial/Business Tort (not fraud/breach of contract)	1., 2., 3.
	Civil Rights (08)	<input type="checkbox"/> A6005 Civil Rights/Discrimination	1., 2., 3.
	Defamation (13)	<input type="checkbox"/> A6010 Defamation (slander/libel)	1., 2., 3.
	Fraud (16)	<input type="checkbox"/> A6013 Fraud (no contract)	1., 2., 3.
	Intellectual Property (19)	<input type="checkbox"/> A6016 Intellectual Property	2., 3.

Non-Personal Injury/Property Damage/
 Wrongful Death Tort (Cont'd.)
 Employment
 Contract
 Real Property
 Judicial Review Unlawful Detainer

SHORT TITLE:	CASE NUMBER
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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	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	2.,3.
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.
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	2., 5., 6.
	<input type="checkbox"/> A6012 Other Promissory Note/Collections Case	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	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.
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	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-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.

SHORT TITLE:	CASE NUMBER
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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	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.
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	2., 9.
	<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.
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 checked="" type="checkbox"/> A6000 Other Civil Complaint (non-tort/non-complex)	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	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	2., 7.
	<input type="checkbox"/> A6170 Petition for Relief from Late Claim Law	2., 3., 4., 8.
	<input type="checkbox"/> A6100 Other Civil Petition	2., 9.

SHORT TITLE:	CASE NUMBER
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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 type="checkbox"/> 2. <input type="checkbox"/> 3. <input type="checkbox"/> 4. <input type="checkbox"/> 5. <input type="checkbox"/> 6. <input type="checkbox"/> 7. <input checked="" type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10.	ADDRESS: 251 West Beach Ave. Inglewood, CA 90302	
CITY:	STATE:	ZIP CODE:

Item IV. Declaration of Assignment: I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that the above-entitled matter is properly filed for assignment to the Los Angeles 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: 10/20/06


 (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 form CM-010.
4. Complete Addendum to Civil Case Cover Sheet form LASC Approved CIV 109 03-04 (Rev. 03/06).
5. Payment in full of the filing fee, unless fees have been waived.
6. Signed order appointing the Guardian ad Litem, JC form 982(a)(27), if the plaintiff or petitioner is a minor under 18 years of age, or if required by Court.
7. Additional copies of documents to be conformed by the Clerk. Copies of the cover sheet and this addendum must be served along with the summons and complaint, or other initiating pleading in the case.

CIVIL CASE COVER SHEET ADDENDUM AND STATEMENT OF LOCATION