

**SUMMONS
(CITACION JUDICIAL)**

FOR COURT USE ONLY
(SOLO PARA USO DE LA CORTE)

NOTICE TO DEFENDANT:

(AVISO AL DEMANDADO): DEL LABORATORIES, INC., AVON

PRODUCTS, INC., a Delaware corporation; AMERICAN INTERNATIONAL, INDUSTRIES, unknown business entity; CCA INDUSTRIES, INC., a Delaware corporation, CHANEL, INC., a New York corporation;

YOU ARE BEING SUED BY PLAINTIFF:

(LO ESTÁ DEMANDANDO EL DEMANDANTE):

CHRISTINE DEUBLER,

ORIGINAL FILED

AUG 15 2007

**LOS ANGELES
SUPERIOR COURT**

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), or by contacting your local court or county bar association.

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una Carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.courtinfo.ca.gov/selfhelp/espanol/), en la biblioteca de leyes de su condado o en la Corte que le queda más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California, (www.courtinfo.ca.gov/selfhelp/espanol/) o poniéndose en contacto con la corte o el colegio de abogados locales.

The name and address of the court is:

(El nombre y dirección de la corte es):

Superior Court of California, County of Los Angeles, Central District
Stanley Mosk Courthouse, 111 North Hill Street
Los Angeles, CA 90012

CASE NUMBER:
(Número del Caso):

BC376033

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is:

(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):

John H. Donbolli (SBN:205218)

322 Elghth Street, Ste. 101

JL Sean Slattery (SBN:210965)

Del Mar, CA 92014

DEL MAR LAW GROUP, LLP

858.793.6244

M. GARCIA

DATE:

(Fecha)

AUG 15 2007

John A. Clarke

Clerk, by

(Secretario)

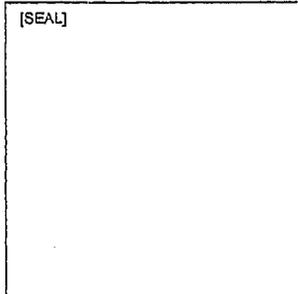
Deputy

(Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010))

(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010)).

NOTICE TO THE PERSON SERVED: You are served



1. as an individual defendant.
2. as the person sued under the fictitious name of *(specify)*:

3. on behalf of *(specify)*:

- under:
- | | |
|--|---|
| <input type="checkbox"/> CCP 416.10 (corporation) | <input type="checkbox"/> CCP 416.60 (minor) |
| <input type="checkbox"/> CCP 416.20 (defunct corporation) | <input type="checkbox"/> CCP 416.70 (conservatee) |
| <input type="checkbox"/> CCP 416.40 (association or partnership) | <input type="checkbox"/> CCP 416.90 (authorized person) |
| <input type="checkbox"/> other <i>(specify)</i> : | |

4. by personal delivery on *(date)*:

SHORT TITLE: DEUBLER v. DEL LABORATORIES, et al.	CASE NUMBER:
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INSTRUCTIONS FOR USE

- This form may be used as an attachment to any summons if space does not permit the listing of all parties on the summons.
- If this attachment is used, insert the following statement in the plaintiff or defendant box on the summons: "Additional Parties Attachment form is attached."

List additional parties (Check only one box. Use a separate page for each type of party.):

- Plaintiff
 Defendant
 Cross-Complainant
 Cross-Defendant

CHRISTIAN DIOR, INC., a New York corporation; CLUB MONACO COSMETICS, a Canadian company; COSMAR CORPORATION, a Delaware corporation; CUSTOM NAILS/MANICURE PLUS, INC., a Florida corporation; DEL LABORATORIES, INC., SALLY HANSEN DIVISION, a Delaware corporation; ELEGANT TOUCH/ELEGANT GLASS PRODUCTS, unknown business entity; URBAN DECAY COSMETICS LLC DBA URBAN DECAY, a Delaware limited liability company; MARKWINS BEAUTY PRODUCTS, INC., a California Corporation DBA AM COSMETICS, INC.; MAYBELLINE, LLC, an unknown business entity; N.Y.C. NEW YORK COLOR, unknown business entity; NEW MILANI GROUP, INC., a California corporation; PROFESSIONAL MAKEUP COMPANY, unknown business entity; TONY & TINA COSMETICS, an unknown business entity; TRIPOD LABS, INC., a New York corporation; ULTA SALON, COSMETICS & FRAGRANCES, INC., a Delaware corporation; and DOES 1 through 1,000, inclusive,

ORIGINAL FILED

AUG 15 2007

**LOS ANGELES
SUPERIOR COURT**

1 JL SEAN SLATTERY (SBN: 210965)
JOHN H. DONBOLI (SBN: 205218)
2 DEL MAR LAW GROUP, LLP
322 Eighth Street, Suite 101
3 Del Mar, CA 92014
Telephone: (858) 793-6244
4 Facsimile: (858) 793-6005

5 Attorneys for Plaintiff: CHRISTINE DEUBLER

6
7 SUPERIOR COURT OF CALIFORNIA - COUNTY OF LOS ANGELES

8 CHRISTINE DEUBLER,

9 Plaintiff,

10 vs.

11 DEL LABORATORIES, INC., AVON
PRODUCTS, INC., a Delaware corporation;
12 AMERICAN INTERNATIONAL
INDUSTRIES, unknown business entity; CCA
13 INDUSTRIES, INC., a Delaware corporation;
CHANEL, INC., a New York corporation;
14 CHRISTIAN DIOR, INC., a New York
corporation; CLUB MONACO COSMETICS, a
15 Canadian company; COSMAR
CORPORATION, a Delaware corporation;
16 CUSTOM NAILS/MANICURE PLUS, INC., a
Florida corporation; DEL LABORATORIES,
17 INC., SALLY HANSEN DIVISION, a
Delaware corporation; ELEGANT
18 TOUCH/ELEGANT GLASS PRODUCTS,
unknown business entity; URBAN DECA Y
19 COSMETICS LLC DBA URBAN DECA Y, a
Delaware limited liability company;
20 MARKWINS BEAUTY PRODUCTS, INC., a
California Corporation DBA AM
21 COSMETICS, INC.; MAYBELLINE, LLC, an
unknown business entity; N.Y.C. NEW YORK
22 COLOR, unknown business entity; NEW
MILANI GROUP, INC., a California
23 corporation; PROFESSIONAL MAKEUP
COMPANY, unknown business entity; TONY
24 & TINA COSMETICS, an unknown business
entity; TRIPOD LABS, INC., a New York
25 corporation; ULTA SALON, COSMETICS &
FRAGRANCES, INC., a Delaware corporation;
26 and DOES 1 through 1,000, inclusive,

27 Defendants.
28

CASE NO.

BC 376033

**COMPLAINT FOR INJUNCTIVE
RELIEF AND CIVIL PENALTIES**

(Violations of California Health & Safety
Code § 25249.5 *et seq.*)

BY FAX

ORIGINAL

1 Plaintiff CHRISTINE DEUBLER (“Plaintiff”) alleges as follows:

2 **INTRODUCTION**

3 1. This complaint seeks civil penalties and an injunction to remedy the continuing
4 failure of defendants DEL LABORATORIES, INC., AVON PRODUCTS, INC.; AMERICAN
5 INTERNATIONAL INDUSTRIES; CCA INDUSTRIES, INC.; CHANEL, INC.; CHRISTIAN
6 DIOR, INC.; CLUB MONACO COSMETICS; COSMAR CORPORATION; CUSTOM
7 NAILS/MANICURE PLUS, INC.; DEL LABORATORIES, INC., SALLY HANSEN
8 DIVISION; ELEGANT TOUCH/ELEGANT GLASS PRODUCTS; HARD CANDY, INC.
9 DBA URBAN DECAY; MARKWINS BEAUTY PRODUCTS, AM COSMETICS, INC.;
10 MAYBELLINE, LLC; N.Y.C. NEW YORK COLOR; NEW MILANI GROUP, INC.;
11 INTERNATIONAL INC.; PROFESSIONAL MAKEUP COMPANY; TONY & TINA
12 COSMETICS; TRIPOD LABS, INC.; ULTA SALON, COSMETICS & FRAGRANCES, INC;
13 and DOES 1 through 1,000, inclusive (hereinafter collectively referred to as “Defendants”), to
14 provide “clear and reasonable warning” to California persons who use nail products containing
15 Di-*n*-butyl Phthalate (“DBP”) (nail products containing DBP hereinafter referred to as “Nail
16 Products”), that using Nail Products exposes them to DBP, which is a substance known to the
17 State of California to cause birth defects and other reproductive harm. Defendants manufacture,
18 distribute, sell, and/or market Nail Products for use in California.

19 2. Plaintiff seeks injunctive relief pursuant to Health and Safety (“H&S”) Code §
20 25249.7 to compel Defendants to bring their business practices into compliance with Section
21 25249.5 *et seq.* by providing a “clear and reasonable warning” to each individual who has been
22 and who in the future may be exposed to the above mentioned toxic chemical from the use of
23 Defendants’ products.¹

24 3. Plaintiff also seeks civil penalties against each Defendant for its violations of
25 Proposition 65, as provided for by H&S Code section 25249.7.

26 **STATEMENT OF FACTS**

27 4. Defendants are manufacturers, distributors and/or sellers of Nail Products. At all
28

¹ All statutory references herein are to California Codes unless otherwise indicated.

1 times material to this complaint, Defendants knew that thousands of Nail Products are purchased
2 and used by individual men and women, including pregnant women and women of childbearing
3 age, each year in California.

4 5. The Nail Products contain DBP, which is listed as a reproductive toxin pursuant
5 to the Safe Drinking Water and Toxic Enforcement Act of 1986 (“Proposition 65” – California
6 H&S Code § 25249.5 *et seq.*).

7 6. Each Defendant has failed to give each individual that purchases a Nail Product a
8 “clear and reasonable warning” that DBP in the Nail Products is a chemical known to the State
9 of Chemical to be a reproductive toxin in violation to California H&S Code § 25249.6.

10 7. Defendants’ Nail Products are distributed to and for the use of California
11 consumers, amongst others. Defendants have each sold and distributed their respective Nail
12 Products in California.

13 8. The Nail Products contain DBP, which comes into contact with a consumers’ skin
14 and/or nails when the Nail Products are applied by the consumer as recommended by the
15 directions supplied by Defendants.

16 9. At all times material to this complaint, Defendants know that their respective Nail
17 Products contain DBP and that individuals are exposed to DBP through the intended and
18 foreseeable use of their respective Nail Products.

19 10. The Nail Products’ directions for use state the manner in which each Defendant
20 intends its respective Nail Products be applied. The use of the Nail Products in this manner
21 results in exposing California consumers to DBP contained in each of the Nail Products.

22 11. Since December 2, 2006, each Defendant has failed to provide a “clear and
23 reasonable warning” regarding the reproductive toxicity caused by exposure to DBP from use of
24 its Nail Products sold after that date.

25 **JURISDICTION**

26 12. This Court has jurisdiction over this action pursuant to H&S Code § 25249.7(a),
27 which individually and collectively allows enforcement in any court of competent jurisdiction.
28 The California Superior Court has jurisdiction over this action pursuant to California

1 Constitution Article VI, section 10, which grants the Superior Court “original jurisdiction in all
2 cases except those given by statute to other trial courts.” The statutes under which this action is
3 brought do not grant jurisdiction to any other trial court.

4 13. This Court has jurisdiction over each Defendant because, based on information
5 and belief, each Defendant is a corporation or business entity that does sufficient business, has
6 sufficient minimum contacts in California, is a citizen of California, or otherwise intentionally
7 avails itself of the California market either through the distribution or sale of its Nail Products in
8 the State of California or by having a manufacturing, distribution or other facility located in
9 California so as to render the exercise of jurisdiction over it by the California courts consistent
10 with traditional notions of fair play and substantial justice.

11 14. Venue is proper in this Court because the cause of action, or part thereof, arises in
12 Los Angeles County because Defendants’ Nail Products are sold and used by consumers in this
13 county.

14 **PARTIES**

15 15. Plaintiff is a citizen of the state of California and is compelled to protect the
16 health of California citizens, including the elimination or reduction of toxic exposures, and
17 brings this action on behalf of the general public pursuant to H&S Code section 25249.7.

18 16. Defendant American International Industries is a person doing business within the
19 meaning of H&S Code § 25249.11.

20 17. Defendant American International Industries manufactures, distributes and/or
21 offers the Nail Products for sale or use in the state of California or implies by its conduct that it
22 manufactures, distributes and/or offers the Nail Products for sale or use in the state of California.

23 18. Defendant CCA Industries, Inc. is a person doing business within the meaning of
24 H&S Code § 25249.11.

25 19. Defendant CCA Industries, Inc. manufactures, distributes and/or offers the Nail
26 Products for sale or use in the state of California or implies by its conduct that it manufactures,
27 distributes and/or offers the Nail Products for sale or use in the state of California.

28 20. Defendant Chanel, Inc. is a person doing business within the meaning of H&S

1 Code § 25249.11.

2 21. Defendant Chanel, Inc. manufactures, distributes and/or offers the Nail Products
3 for sale or use in the state of California or implies by its conduct that it manufactures, distributes
4 and/or offers the Nail Products for sale or use in the state of California.

5 22. Defendant Christian Dior, Inc. is a person doing business within the meaning of
6 H&S Code § 25249.11.

7 23. Defendant Christian Dior, Inc. manufactures, distributes and/or offers the Nail
8 Products for sale or use in the state of California or implies by its conduct that it manufactures,
9 distributes and/or offers the Nail Products for sale or use in the state of California.

10 24. Defendant Club Monaco Cosmetics is a person doing business within the meaning
11 of H&S Code § 25249.11.

12 25. Defendant Club Monaco Cosmetics manufactures, distributes and/or offers the
13 Nail Products for sale or use in the state of California or implies by its conduct that it
14 manufactures, distributes and/or offers the Nail Products for sale or use in the state of California.

15 26. Defendant Cosmar Corporation is a person doing business within the meaning of
16 H&S Code § 25249.11.

17 27. Defendant Cosmar Corporation manufactures, distributes and/or offers the Nail
18 Products for sale or use in the state of California or implies by its conduct that it manufactures,
19 distributes and/or offers the Nail Products for sale or use in the state of California.

20 28. Defendant Custom Nails/Manicure Plus, Inc. is a person doing business within the
21 meaning of H&S Code § 25249.11.

22 29. Defendant Custom Nails/Manicure Plus, Inc. manufactures, distributes and/or
23 offers the Nail Products for sale or use in the state of California or implies by its conduct that it
24 manufactures, distributes and/or offers the Nail Products for sale or use in the state of California.

25 30. Defendant Del Laboratories, Inc., Avon Products, Inc. is a person doing business
26 within the meaning of H&S Code § 25249.11.

27 31. Defendant Del Laboratories, Inc., Avon Products, Inc. manufactures, distributes
28 and/or offers the Nail Products for sale or use in the state of California or implies by its conduct

1 that it manufactures, distributes and/or offers the Nail Products for sale or use in the state of
2 California.

3 32. Defendant Del Laboratories, Inc., Sally Hansen Division is a person doing
4 business within the meaning of H&S Code § 25249.11.

5 33. Defendant Del Laboratories, Inc., Sally Hansen Division manufactures, distributes
6 and/or offers the Nail Products for sale or use in the state of California or implies by its conduct
7 that it manufactures, distributes and/or offers the Nail Products for sale or use in the state of
8 California.

9 34. Defendant Elegant Touch/Elegant Glass Products is a person doing business
10 within the meaning of H&S Code § 25249.11.

11 35. Defendant Elegant Touch/Elegant Glass Products manufactures, distributes and/or
12 offers the Nail Products for sale or use in the state of California or implies by its conduct that it
13 manufactures, distributes and/or offers the Nail Products for sale or use in the state of California.

14 36. Defendant Hard Candy, Inc. dba Urban Decay is a person doing business within
15 the meaning of H&S Code § 25249.11.

16 37. Defendant Hard Candy, Inc. dba Urban Decay manufactures, distributes and/or
17 offers the Nail Products for sale or use in the state of California or implies by its conduct that it
18 manufactures, distributes and/or offers the Nail Products for sale or use in the state of California.

19 38. Defendant Markwins Beauty Products, AM Cosmetics, Inc. is a person doing
20 business within the meaning of H&S Code § 25249.11.

21 39. Defendant Markwins Beauty Products, AM Cosmetics, Inc. manufactures,
22 distributes and/or offers the Nail Products for sale or use in the state of California or implies by
23 its conduct that it manufactures, distributes and/or offers the Nail Products for sale or use in the
24 state of California.

25 40. Defendant Maybelline, LLC is a person doing business within the meaning of
26 H&S Code § 25249.11.

27 41. Defendant Maybelline, LLC manufactures, distributes and/or offers the Nail
28 Products for sale or use in the state of California or implies by its conduct that it manufactures,

1 distributes and/or offers the Nail Products for sale or use in the state of California.

2 42. Defendant N.Y.C. New York Color is a person doing business within the meaning
3 of H&S Code § 25249.11.

4 43. Defendant N.Y.C. New York Color manufactures, distributes and/or offers the
5 Nail Products for sale or use in the state of California or implies by its conduct that it
6 manufactures, distributes and/or offers the Nail Products for sale or use in the state of California.

7 44. Defendant New Milani Group, Inc. is a person doing business within the meaning
8 of H&S Code § 25249.11.

9 45. Defendant New Milani Group, Inc. manufactures, distributes and/or offers the
10 Nail Products for sale or use in the state of California or implies by its conduct that it
11 manufactures, distributes and/or offers the Nail Products for sale or use in the state of California.

12 46. Defendant Professional Makeup Company is a person doing business within the
13 meaning of H&S Code § 25249.11.

14 47. Defendant Professional Makeup Company manufactures, distributes and/or offers
15 the Nail Products for sale or use in the state of California or implies by its conduct that it
16 manufactures, distributes and/or offers the Nail Products for sale or use in the state of California.

17 48. Defendant Tony & Tina, Inc. is a person doing business within the meaning of
18 H&S Code § 25249.11.

19 49. Defendant Tony & Tina, Inc. manufactures, distributes and/or offers the Nail
20 Products for sale or use in the state of California or implies by its conduct that it manufactures,
21 distributes and/or offers the Nail Products for sale or use in the state of California.

22 50. Defendant Tripod Labs, Inc. is a person doing business within the meaning of
23 H&S Code § 25249.11.

24 51. Defendant Tripod Labs, Inc. manufactures, distributes and/or offers the Nail
25 Products for sale or use in the state of California or implies by its conduct that it manufactures,
26 distributes and/or offers the Nail Products for sale or use in the state of California.

27 52. Defendant ULTA Salon, Cosmetics & Fragrances, Inc. is a person doing business
28 within the meaning of H&S Code § 25249.11.

1 53. Defendant ULTA Salon, Cosmetics & Fragrances, Inc. manufactures, distributes
2 and/or offers the Nail Products for sale or use in the state of California or implies by its conduct
3 that it manufactures, distributes and/or offers the Nail Products for sale or use in the state of
4 California.

5 54. DOES 1 through 1,000 are each persons doing business within the meaning of
6 H&S Code § 25249.11. Plaintiff is unaware of the true names and capacities sued herein under
7 the fictitious names DOES 1 through 1,000, inclusive, who are therefore sued herein pursuant to
8 California Code of Civil Procedure § 474. Plaintiff is informed and believes, and on that basis
9 alleges, that each of the fictitiously named defendants is responsible for the acts and occurrences
10 herein alleged. When Plaintiff learns their identities, she will amend this Complaint.

11 55. Any person, including Plaintiff, has standing to enforce violations of Proposition
12 65, provided that such person has supplied the requisite public enforcers with a Sixty-Day Notice
13 of Violation and such public enforcers are not diligently prosecuting the action within their
14 respective jurisdictions within such time. H&S Code § 25249.7(d). On or about December 7,
15 2006 and February 8, 2007, Plaintiff mail-served two separate 60-Day "Notice of Violation of
16 Proposition 65" (the "Notices") on the California Attorney General, the District Attorneys of
17 every county in California, the City Attorneys of every California city with a population greater
18 than 750,000, and at least one of these specific Notices was served on each Named Defendant on
19 or about one of the dates specified above, alleging that each Defendant was in violation of the
20 Safe Drinking Water and Toxic Enforcement Act of 1986, H&S Code § 25249.5 *et seq.*
21 ("Proposition 65") for failing to warn purchasers of the Defendants' Nail Products sold in
22 California that use of these Nail Products expose users to DBP. The Notices were specific and
23 adequate as they detailed the: (a) specific products manufactured, sold, or marketed by
24 Defendants; (b) listed chemicals (i.e., Di-n-butyl phthalate (DBP), also known as dibutyl
25 phthalate); (c) routes of exposure (through both dermal contact and inhalation); and (d) types of
26 harms caused by exposure (birth defects and other reproductive harm).

27 56. No public prosecutor has commenced an action regarding the matters raised in
28 any of the Notices. Each of Plaintiff's Notices was sent at least sixty-days prior to the filing of

1 this Complaint. Plaintiff also fully complied with H&S Code § 25249.7 as amended, in that
2 Plaintiff provided the required certificates of merit for each of its Notices to each of the alleged
3 violators and to the California Attorney General.

4 57. On information and belief, Defendants are all businesses that employ more than
5 ten persons.

6 **STATUTORY & REGULATORY BACKGROUND PROPOSITION 65**

7 58. The People of the State of California declared, in adopting Proposition 65 in 1986
8 as an initiative statute their right “[t]o be informed about exposures to chemicals that cause
9 cancer, birth defects and other reproductive harm.” Proposition 65, §1(b)(uncodified).

10 59. To effectuate this goal, Proposition 65 requires that individuals be provided with a
11 clear and reasonable warning before being exposed to chemicals listed by the State of California
12 as causing cancer or birth defects and other reproductive harm, unless the person (including
13 businesses) responsible for the exposure can prove that such exposure is otherwise lawful, as
14 follows:

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

18 H&S Code § 25249.6.

19 60. An exposure to a chemical in a consumer product is one “which results from a
20 person’s acquisition, purchase, storage, consumption, or other reasonably foreseeable use of a
21 consumer good, or any exposure that results from receiving a consumer service.” Cal. Code
22 Regs., tit. 22, § 12601, subd. (b)).

23 61. Proposition 65 establishes a procedure by which the state is to develop a list of
24 chemicals “known to the State to cause cancer or reproductive toxicity.” H&S Code § 25249.8.
25 No warning need to be given concerning a listed chemical until one year after the chemical first
26 appears on the list. H&S Code § 25249.10(b).

27 62. On or about December 2, 2005, the State of California officially listed DBP as a
28 chemical known to cause reproductive toxicity. DBP became subject to the Proposition 65

1 “clear and reasonable” warning requirement one year later, beginning on December 2, 2006. 22
2 California Code of Regulations (“CCR”) § 12000; H&S Code § 25249.5 *et seq.*

3 **FIRST CAUSE OF ACTION**

4 **(Violations of California Health & Safety Code § 25249.5 *et seq.*)**

5 63. Plaintiff realleges and incorporates by reference into this first claim for relief, as if
6 specifically set forth herein, paragraphs 1 through 62, inclusive.

7 64. From December 2, 2006, and continuing to the present, Defendants have engaged
8 in conduct that violates H&S Code § 25249.6 *et seq.* This conduct includes knowingly and
9 intentionally exposing to DBP, those California residents who use Nail Products. The normally
10 intended use of Nail Products causes exposures to DBP, which is a chemical known to the State
11 of California to cause birth defects and other reproductive harm. Defendants have not provided
12 “clear and reasonable warnings,” within the meaning of H&S Code §§ 25249.6 and 25249.11.

13 65. At all times relevant to this action, Defendants knew that the Nail Products they
14 manufactured, distributed or marketed were causing exposures to DBP. Defendants intended
15 that residents of California use Nail Products in such ways as would lead to significant exposures
16 to this chemical.

17 66. By the above described acts, Defendants are liable and should be liable pursuant
18 to H&S Code § 25249.7(b), for a civil penalty of \$2,500 per day for each individual exposed to
19 DBP from the use of Defendants’ Nail Products.

20 **PRAYER FOR RELIEF**

21 WHEREFORE, Plaintiff prays for judgment against Defendants as follows:

22 1. That Defendants be assessed a civil penalty in an amount equal to \$2,500 per day
23 per individual exposed to DBP as a result of Defendants’ manufacturing, distributing or
24 marketing of Nail Products in violation of H&S Code § 25249.6;

25 2. That the Court, pursuant to H&S Code § 25249.7(a), preliminarily and
26 permanently enjoin each Defendant from offering its respective Nail Products for sale without
27 disclosing the presence of DBP in its respective Nail Products in a manner that complies with the
28 Proposition 65 statutory disclosure requirements, as Christine Deubler shall specify in further

1 application to the Court;

2 3. That the court grant Plaintiff her reasonable attorney's fees and costs of suit; and

3 4. That the court grant such other and further relief as may be just and proper.

4 Dated: August 13, 2007

Respectfully submitted,

5 DEL MAR LAW GROUP, LLP

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by 
JL SEAN SLATTERY
JOHN H. DONBOLI
Attorneys for Plaintiff CHRISTINE DEUBLER

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ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):
 JL SEAN SLATTERY (SBN: 210965)
 JOHN H. DONBOLI (SBN: 205218)
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 TELEPHONE NO.: 858.793.6244 FAX NO.: 858.793.6005
 ATTORNEY FOR (Name): Plaintiff Christine Deubler

FOR COURT USE ONLY

ORIGINAL FILED

AUG 15 2007

LOS ANGELES SUPERIOR COURT

SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles
 STREET ADDRESS: 111 North Hill Street
 MAILING ADDRESS: 111 North Hill Street
 CITY AND ZIP CODE: Los Angeles 90012
 BRANCH NAME: Central District - Stanley Mosk Courthouse

CASE NAME:
 Deubler v. Del Laboratories, Inc., Avon Products, Inc. et al.

CIVIL CASE COVER SHEET

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

Complex Case Designation
 Counter **Joinder**
 Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)

CASE NUMBER:
BC376033

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:
- | | | |
|--|---|--|
| <p>Auto Tort</p> <p><input type="checkbox"/> Auto (22)
 <input type="checkbox"/> Uninsured motorist (46)</p> <p>Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort</p> <p><input type="checkbox"/> Asbestos (04)
 <input checked="" type="checkbox"/> Product liability (24)
 <input type="checkbox"/> Medical malpractice (45)
 <input type="checkbox"/> Other PI/PD/WD (23)</p> <p>Non-PI/PD/WD (Other) Tort</p> <p><input type="checkbox"/> Business tort/unfair business practice (07)
 <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)</p> <p>Employment</p> <p><input type="checkbox"/> Wrongful termination (36)
 <input type="checkbox"/> Other employment (15)</p> | <p>Contract</p> <p><input type="checkbox"/> Breach of contract/warranty (06)
 <input type="checkbox"/> Collections (09)
 <input type="checkbox"/> Insurance coverage (18)
 <input type="checkbox"/> Other contract (37)</p> <p>Real Property</p> <p><input type="checkbox"/> Eminent domain/Inverse condemnation (14)
 <input type="checkbox"/> Wrongful eviction (33)
 <input type="checkbox"/> Other real property (26)</p> <p>Unlawful Detainer</p> <p><input type="checkbox"/> Commercial (31)
 <input type="checkbox"/> Residential (32)
 <input type="checkbox"/> Drugs (38)</p> <p>Judicial Review</p> <p><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)</p> | <p>Provisionally Complex Civil Litigation
 (Cal. Rules of Court, rules 3.400-3.403)</p> <p><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)</p> <p>Enforcement of Judgment</p> <p><input type="checkbox"/> Enforcement of judgment (20)</p> <p>Miscellaneous Civil Complaint</p> <p><input type="checkbox"/> RICO (27)
 <input type="checkbox"/> Other complaint (not specified above) (42)</p> <p>Miscellaneous Civil Petition</p> <p><input type="checkbox"/> Partnership and corporate governance (21)
 <input type="checkbox"/> Other petition (not specified above) (43)</p> |
|--|---|--|

2. This case is is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:
- | | |
|--|--|
| a. <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. 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): **One**
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 14, 2007
 JL Sean Slattery, Esq.


 (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 complex case, this cover sheet will be used for statistical purposes only.

NOTICE OF CASE ASSIGNMENT - UNLIMITED CIVIL CASE

Case Number _____

BC376033

THIS FORM IS TO BE SERVED WITH THE SUMMONS AND COMPLAINT

Your case is assigned for all purposes to the judicial officer indicated below. There is additional information on the reverse side of this form.

ASSIGNED JUDGE	DEPT	ROOM	ASSIGNED JUDGE	DEPT	ROOM
Hon. Gregory Alarcon	36	410	Hon. William F. Highberger	32	406
Hon. Alice E. Altoon	28	318	Hon. Ernest M. Hiroshige	54	512
Hon. Conrad Aragon	49	509	Hon. Jane L. Johnson	56	514
Hon. Helen I. Bendix	18	308	Hon. Elizabeth Allen White	48	506
Hon. Elihu M. Berle	42	416	Hon. Malcolm H. Mackey	55	515
Hon. Tricia Ann Bigelow	23	315	Hon. Ruth Ann Kwan	72	731
Hon. Soussan G. Bruguera	71	729	Hon. Rita Miller	16	306
Hon. Susan Bryant-Deason	52	510	Hon. David L. Minning	61	632
Hon. James C. Chalfant	13	630	Hon. Aurelio Munoz	47	507
Hon. Victoria Chaney*	324	CCW	Hon. Mary Ann Murphy	25	317
Hon. Judith C. Chirlin	19	311	Hon. Joanne O'Donnell	37	413
Hon. Ralph W. Dau	57	517	Hon. Michael C. Solner	39	415
Hon. Maureen Duffy-Lewis	38	412	Hon. Mel Red Recana	45	529
Hon. James R. Dunn	26	316	Hon. Andria K. Richey	31	407
Hon. Mark Mooney	68	617	Hon. Teresa Sanchez-Gordon	74	735
Hon. William F. Fahey	78	730	Hon. Ann I. Jones	40	414
Hon. Irving S. Felfer	51	511	Hon. John P. Shook	53	513
Hon. Edward A. Ferns	69	621	Hon. Ronald M. Sohigian	41	417
Hon. Kenneth R. Freeman	64	601	Hon. Michael L. Stern	62	600
Hon. Haley J. Fromholz	20	310	Hon. Mary Thornton House	17	309
Hon. Richard Fruin	15	307	Hon. Rolf M. Treu	58	516
Hon. Terry A. Green	14	300	Hon. John Shepard Wiley Jr.	50	508
Hon. Elizabeth A. Grimes	30	400	Hon. Charles C. Lee	33	409
Hon. Paul Gutman	34	408		35	411
Hon. Robert L. Hess	24	314			
	3	224	Other		

*Class Actions

Given to the Plaintiff/Cross-Complainant/Attorney of Record on _____ JOHN A. CLARKE, Executive Officer/Clerk

By _____, Deputy Clerk

INSTRUCTIONS FOR HANDLING UNLIMITED CIVIL CASES

The following critical provisions of the Chapter Seven Rules, as applicable in the Central District, are summarized for your assistance.

APPLICATION

The Chapter Seven Rules were effective January 1, 1994. They apply to all general civil cases.

PRIORITY OVER OTHER RULES

The Chapter Seven Rules shall have priority over all other Local Rules to the extent the others are inconsistent.

CHALLENGE TO ASSIGNED JUDGE

A challenge under Code of Civil Procedure section 170.6 must be made within 15 days after notice of assignment for all purposes to a judge, or if a party has not yet appeared, within 15 days of the first appearance.

TIME STANDARDS

Cases assigned to the Individual Calendaring Court will be subject to processing under the following time standards:

COMPLAINTS: All complaints shall be served within 60 days of filing and proof of service shall be filed within 90 days of filing.

CROSS-COMPLAINTS: Without leave of court first being obtained, no cross-complaint may be filed by any party after their answer is filed. Cross-complaints shall be served within 30 days of the filing date and a proof of service filed within 60 days of the filing date.

A Status Conference will be scheduled by the assigned Independent Calendar Judge no later than 270 days after the filing of the complaint. Counsel must be fully prepared to discuss the following issues: alternative dispute resolution, bifurcation, settlement, trial date, and expert witnesses.

FINAL STATUS CONFERENCE

The Court will require the parties at a status conference not more than 10 days before the trial to have timely filed and served all motions in limine, bifurcation motions, statements of major evidentiary issues, dispositive motions, requested jury instructions, and special jury instructions and special jury verdicts. These matters may be heard and resolved at this conference. At least 5 days before this conference, counsel must also have exchanged lists of exhibits and witnesses and have submitted to the court a brief statement of the case to be read to the jury panel as required by Chapter Eight of the Los Angeles Superior Court Rules.

SANCTIONS

The court will impose appropriate sanctions for the failure or refusal to comply with Chapter Seven Rules, orders made by the Court, and time standards or deadlines established by the Court or by the Chapter Seven Rules. Such sanctions may be on a party or if appropriate on counsel for the party.

This is not a complete delineation of the Chapter Seven Rules, and adherence only to the above provisions is therefore not a guarantee against the imposition of sanctions under Trial Court Delay Reduction. Careful reading and compliance with the actual Chapter Rules is absolutely imperative.

*Class Actions

All class actions are initially assigned to Judge Victoria Chaney in Department 324 of the Central Civil West courthouse (600 S. Commonwealth Ave., Los Angeles 90005). This assignment is for pretrial purposes and for the purpose of assessing whether or not the case is complex within the meaning of California Rules of Court, rule 3.400. Depending on the outcome of that assessment, the class action case may be reassigned to one of the judges of the Complex Litigation Program or reassigned randomly to a court in the Central District.

NAME, ADDRESS, AND TELEPHONE NUMBER OF ATTORNEY OR PARTY WITHOUT ATTORNEY:		STATE BAR NUMBER	<i>Reserved for Clerk's File Stamp</i>
ATTORNEY FOR (Name):			
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES			
COURTHOUSE ADDRESS:			
PLAINTIFF:			
DEFENDANT:			
STIPULATION TO PARTICIPATE IN ALTERNATIVE DISPUTE RESOLUTION (ADR)			CASE NUMBER:

The undersigned parties stipulate to participate in an Alternative Dispute Resolution (ADR) process in the above-entitled action, as follows:

- Mediation
- Non-Binding Arbitration
- Binding Arbitration
- Early Neutral Evaluation
- Settlement Conference
- Other ADR Process (*describe*): _____

Dated: _____

 Name of Stipulating Party
 Plaintiff Defendant Cross-defendant

 Name of Party or Attorney Executing Stipulation

 Signature of Party or Attorney

 Name of Stipulating Party
 Plaintiff Defendant Cross-defendant

 Name of Party or Attorney Executing Stipulation

 Signature of Party or Attorney

 Name of Stipulating Party
 Plaintiff Defendant Cross-defendant

 Name of Party or Attorney Executing Stipulation

 Signature of Party or Attorney

 Name of Stipulating Party
 Plaintiff Defendant Cross-defendant

 Name of Party or Attorney Executing Stipulation

 Signature of Party or Attorney

Additional signature(s) on reverse

Short Title	Case Number
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 Name of Stipulating Party
 Plaintiff Defendant Cross-defendant

 Name of Party or Attorney Executing Stipulation

 Signature of Party or Attorney

 Name of Stipulating Party
 Plaintiff Defendant Cross-defendant

 Name of Party or Attorney Executing Stipulation

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 Signature of Party or Attorney

 Name of Stipulating Party
 Plaintiff Defendant Cross-defendant

 Name of Party or Attorney Executing Stipulation

 Signature of Party or Attorney

SHORT TITLE: CHRISTINE DEUBLER v. DEL LABORATORIES, et al.	CASE NUMBER
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**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.
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. | 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 checked="" 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) <input type="checkbox"/> A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.) <input type="checkbox"/> A7270 Intentional Infliction of Emotional Distress <input type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death	1., 2., 4. 1., 2., 4. 1., 2., 3. 1., 2., 4.
	Business Tort (07)	<input type="checkbox"/> A6029 Other Commercial/Business Tort (not fraud/breach of contract)	1., 2., 3.
Non-Personal Injury/Property Damage/Wrongful Death Tort	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.

Non-Personal Injury/Property Damage/
Wrongful Death Tort (Cont'd.)

SHORT TITLE: CHRISTINE DEUBLER v. DEL LABORATORIES, et al.	CASE NUMBER
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Employment

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.

Contract

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.

Real Property

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.

Judicial Review Unlawful Detainer

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: CHRISTINE DEUBLER v. DEL LABORATORIES, et al.	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 <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.

SHORT TITLE: CHRISTINE DEUBLER v. DEL LABORATORIES, et al.	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		ADDRESS: 110 E. 9th Street	
<input type="checkbox"/> 1. <input checked="" type="checkbox"/> 2. <input type="checkbox"/> 3. <input type="checkbox"/> 4. <input type="checkbox"/> 5. <input type="checkbox"/> 6. <input type="checkbox"/> 7. <input type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10.			
CITY: Los Angeles	STATE: CA	ZIP CODE: 90079	

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 15, 2007



 (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 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.