

**SUMMONS  
(CITACION JUDICIAL)**

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

**NOTICE TO DEFENDANT:  
(AVISO AL DEMANDADO):**

GINSEY INDUSTRIES, INC.,

**YOU ARE BEING SUED BY PLAINTIFF:  
(LO ESTÁ DEMANDANDO EL DEMANDANTE):**

SHEFA LMV, INC.,

**NOTICE!** You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

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](http://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](http://www.lawhelpcalifornia.org)), the California Courts Online Self-Help Center ([www.courtinfo.ca.gov/selfhelp](http://www.courtinfo.ca.gov/selfhelp)), or by contacting your local court or county bar association. **NOTE:** The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case. **¡AVISO!** Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información a continuación.

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.sucorte.ca.gov](http://www.sucorte.ca.gov)), en la biblioteca de leyes de su condado o en la corte que le quede 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](http://www.lawhelpcalifornia.org)), en el Centro de Ayuda de las Cortes de California, ([www.sucorte.ca.gov](http://www.sucorte.ca.gov)) o poniéndose en contacto con la corte o el colegio de abogados locales. **AVISO:** Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 ó más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desechar el caso.

The name and address of the court is:  
(El nombre y dirección de la corte es): Los Angeles Superior Court  
Stanley Mosk Courthouse;

CASE NUMBER:  
(Número del Caso):  
**19STCV23409**

111 N. Hill Street, Los Angeles CA 90012

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):  
Daniel N. Greenbaum, Esq., 7120 Hayvenhurst Ave., Suite 320, Van Nuys CA 91604; 818-809-2199

Sherri R. Carter Executive Officer / Clerk of Court

DATE: 07/03/2019 Clerk, by Romunda Clifton, Deputy  
(Fecha) (Secretario) (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:  CCP 416.10 (corporation)  CCP 416.60 (minor)  
 CCP 416.20 (defunct corporation)  CCP 416.70 (conservatee)  
 CCP 416.40 (association or partnership)  CCP 416.90 (authorized person)  
 other (specify):
4.  by personal delivery on (date):

Assigned for all purposes to: Stanley Mosk Courthouse, Judicial Officer: Patricia Nieto

1 Daniel N. Greenbaum, Esq. (SBN 268104)  
LAW OFFICE OF DANIEL N. GREENBAUM  
2 The Hathaway Building  
7120 Hayvenhurst Ave., Suite 320  
3 Van Nuys CA 91406  
Telephone: (818) 809-2199  
4 Facsimile: (424) 243-7689  
Email: dgreenbaum@greenbaumlawfirm.com

5 Attorney for Shefa LMV, INC.  
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7 SUPERIOR COURT OF THE STATE OF CALIFORNIA

8 COUNTY OF LOS ANGELES  
9

10	SHEFA LMV, INC.,	)	Unlimited Jurisdiction
11		)	
12	Plaintiff,	)	CASE NO.
13	vs.	)	
14	GINSEY INDUSTRIES, INC.,	)	COMPLAINT FOR CIVIL PENALTY AND
15		)	INJUNCTIVE RELIEF
16	Defendant.	)	
17		)	(Health & Safety Code § 25249.5 et seq.)
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1 Plaintiff, Shefa LMV, INC., hereby alleges:

2 **I. PRELIMINARY STATEMENT**

3 1. This complaint seeks to remedy the failure of Defendants to warn persons of exposure  
4 to Di[2-Ethylhexyl] Phthalate (“DEHP”), a chemical known to the State of California to cause cancer  
5 and/or reproductive harm.

6 2. Under the Safe Drinking Water and Toxic Enforcement Act of 1986, Health & Safety  
7 Code § 25249.6 (also known as “Proposition 65”) businesses must provide persons with a “clear and  
8 reasonable warning” before exposing individuals to chemicals known to the state to cause cancer,  
9 birth defects or other reproductive harm.

10 3. Plaintiff alleges that Defendant(s) failed to provide such warnings before exposing  
11 individuals to DEHP.

12 **II. PARTIES**

13 4. Plaintiff is a non-profit public benefit corporation formed pursuant to the laws of the  
14 State of California, made up of California citizens, represented by and through its counsel of record,  
15 the Law Office of Daniel N. Greenbaum.

16 5. Health & Safety Code § 25249.7(d) provides that actions to enforce Proposition 65  
17 may be brought by “any person in the public interest.”

18 6. Defendant GINSEY INDUSTRIES, INC., is a business entity with ten or more  
19 employees that sells, or has, at times relevant to this complaint, authorized the manufacture,  
20 distribution, or sale of plastic organizer products manufactured by or for Defendant, imported by or  
21 for Defendant, or distributed or sold by or for Defendant, including, but not limited to, UPC:  
22 047968481175 Arm & Hammer Collapsible Shoe Box, that contain DEHP, for sale within the State  
23 of California, without first giving clear and reasonable warning.

24 7. Defendant named in paragraphs 6 has at all times relevant to this complaint,  
25 authorized the manufacture, distribution, or sale of plastic organizer products, including, but not  
26 limited to, UPC: 047968481175 Arm & Hammer Collapsible Shoe Box, that contain DEHP  
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1 (hereinafter “PRODUCTS”), for sale within the State of California, without first giving clear and  
2 reasonable warning.

3 **III. JURISDICTION AND VENUE**

4 8. This Court has jurisdiction pursuant to California Constitution Article VI, section 10,  
5 because this case is a cause not given by statute to other trial courts.

6 9. This Court has jurisdiction over Defendants, because they are business entities that do  
7 sufficient business, have sufficient minimum contacts in California, or otherwise intentionally avail  
8 themselves of the California market, through the sale, marketing, and use of its products in  
9 California, to render the exercise of jurisdiction over it by the California courts consistent with  
10 traditional notions of fair play and substantial justice.

11 10. Venue is proper in this Court because the cause, or part thereof, arises in Los Angeles  
12 County because Defendant’s products are sold and consumed in this county.

13 **IV. STATUTORY BACKGROUND**

14 11. The Safe Drinking Water and Toxic Enforcement Act of 1986 is an initiative statute  
15 passed as “Proposition 65” by a vote of the people in November of 1986.

16 12. The warning requirement of Proposition 65 is contained in Health & Safety Code §  
17 25249.6, which provides:

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

21 13. An exposure to a chemical in a consumer product is one “which results from a  
22 person’s acquisition, purchase, storage, consumption, or other reasonably foreseeable use of a  
23 consumer good, or any exposure that results from receiving a consumer service.” (27 CCR 25602(b))

24 14. Proposition 65 establishes a procedure by which the State develops a list of chemicals  
25 “known to the State to cause cancer or reproductive toxicity.” (Health & Safety Code § 25249.8.)

26 15. No warning need be given concerning a listed chemical until one year after the  
27 chemical first appears on the list. (Health & Safety Code § 25249.10(b).)

1 16. Any person “violating or threatening to violate” the statute may be enjoined in any  
2 court of competent jurisdiction. (Health & Safety Code, § 25249.7.)

3 17. To “threaten to violate” is defined to mean “to create a condition in which there is a  
4 substantial probability that a violation will occur.” (Health & Safety Code § 25249.11(e).)

5 18. In addition, violators are liable for civil penalties of up to \$2,500 per day for each  
6 violation, recoverable in a civil action. (Health & Safety Code § 25249.7 (b).)

7 19. Actions to enforce the law “may be brought by the Attorney General in the name of  
8 the People of the State of California [or] by any district attorney [or] by any City Attorney of a City  
9 having a population in excess of 750,000 . . .” (Health & Safety Code § 25249.7(c).)

10 20. Private parties are given authority to enforce Proposition 65 “in the public interest,”  
11 but only if the private party first provides written notice of a violation to the alleged violator, the  
12 Attorney General, and every District Attorney in whose jurisdiction the alleged violation occurs.

13 21. If no public prosecutors commence enforcement within sixty days, then the private  
14 party may sue. (Health & Safety Code § 25249.7(d).)

15 **V. FACTS**

16 22. DEHP was placed on the Governor’s list of chemicals known to the State to cause  
17 cancer on January 1, 1988. (27 CCR 27001(b))

18 23. DEHP was placed on the Governor’s list of chemicals known to the State to cause  
19 reproductive toxicity on October 24, 2003. (27 CCR 27001(b))

20 24. Defendant GINSEY INDUSTRIES, INC., is the manufacturer of the PRODUCTS for  
21 use by individuals in the home and other endeavors.

22 25. The PRODUCTS are sold through various retailers, including but not limited to Bed  
23 Bath & Beyond, Inc., located in California for use by citizens of the State of California.

24 26. On December 20, 2018, Plaintiff’s expert prepared a report summarizing the results of  
25 analysis on the PRODUCTS, including the amount of the DEHP in the product.  
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1           27.     Based on the levels, Plaintiff's expert opined that use of the PRODUCTS would lead  
2 to exposure to DEHP above the safe harbor levels set by the Office of Environment Health Hazard  
3 Assessment (OEHHA).

4           28.     Based on that report and opinion, Plaintiff and its counsel prepared a Notice of  
5 Violation.

6           29.     Pursuant to the statute and regulations referenced above, on February 1, 2019, Plaintiff  
7 served the Notices of Violation on the Office of the Attorney General, Defendant, as well as all  
8 required public agencies.

9           30.     Plaintiff is unaware of any governmental prosecution against Defendant.

10          31.     At least sixty days have elapsed since service of the Notice of Violation.

11          32.     Based upon consultation with experts, Plaintiff alleges that individuals who purchase,  
12 handle, or use the PRODUCTS are exposed to DEHP chiefly through:

13           a.     contact between the item and the skin;

14           b.     transfer of DEHP from the skin to the mouth, both by transfer of DEHP  
15 directly from the hand to mouth, and indirectly by transfer of DEHP from the skin to objects  
16 that are placed in the mouth, such as food; and

17           c.     through absorption of DEHP through the skin.

18          33.     Such individuals are thereby exposed to the DEHP that is present on or in the  
19 PRODUCTS during the intended and reasonably foreseeable use of the PRODUCTS.

20          34.     At all times material to this complaint, Defendants have had knowledge that the  
21 PRODUCTS contain DEHP and that an individual's skin may contact DEHP through the intended  
22 and reasonably foreseeable use of the PRODUCTS.

23          35.     At all times material to this complaint, Defendants have had knowledge that  
24 individuals within the State of California handle the PRODUCTS, which contain DEHP.

25          36.     At all times material to this complaint, Defendants knew that the PRODUCTS were  
26 sold throughout the State of California, and Defendants profited from such sales.

1 37. Notwithstanding this knowledge, Defendants intentionally authorized and reauthorized  
2 the sale of the PRODUCTS, thereby exposing consumers to DEHP.

3 38. At all times material to this complaint, therefore, Defendants have knowingly and  
4 intentionally exposed individuals within the State of California to DEHP.

5 39. The exposure is knowing and intentional because it is the result of the Defendant's  
6 deliberate act of authorizing the sale of products known to contain DEHP, in a manner whereby these  
7 products were, and would inevitably be, sold to consumers within the state of California, and with the  
8 knowledge that the intended use of this PRODUCTS would result in exposures to DEHP by  
9 individuals within the State of California.

10 40. Defendants have failed to provide clear and reasonable warnings that the use of the  
11 PRODUCTS in question in California results in exposure to a chemical known to the State of  
12 California to cause cancer, birth defects, and other reproductive harm, and no such warning was  
13 provided to those individuals by any other person.

14 **VI. FIRST CAUSE OF ACTION**

15 **(Against All Defendants for Violation of Proposition 65)**

16 41. Paragraphs 1 through 40 are re-alleged as if fully set forth herein.

17 42. By committing the acts alleged above, Defendants have, in the course of doing  
18 business, knowingly and intentionally exposed individuals in California to chemicals known to the  
19 State of California to cause cancer or reproductive toxicity without first giving clear and reasonable  
20 warning to such individuals, within the meaning of Health & Safety Code § 25249.6.

21 43. Said violations render Defendants liable to Plaintiffs for civil penalties not to exceed  
22 \$2,500 per day for each violation, as well as other remedies.

23 **PRAYER FOR RELIEF**

24 WHEREFORE, Plaintiffs pray that the Court:

- 25 1. Pursuant to the First Causes of Action, grant civil penalties according to proof;  
26 2. Pursuant to Health & Safety Code § 25249.7, enter such temporary restraining orders,  
27 preliminary injunctions, permanent injunctions, or other orders prohibiting Defendant from  
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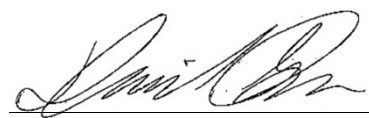
exposing persons within the State of California to Listed Chemicals caused by the use of their products without providing clear and reasonable warnings, as Plaintiffs shall specify in further application to the court;

3. Pursuant to Code of Civil Procedure § 1021.5, award Plaintiff their reasonable attorney's fees and costs, including any and all multipliers allowed under California law;
4. Award Plaintiffs their costs of suit;
5. Grant such other and further relief as the court deems just and proper.

Respectfully submitted,

DATED: July 2, 2019

LAW OFFICE OF DANIEL N. GREENBAUM



By: DANIEL N. GREENBAUM  
Attorneys for Plaintiff  
Shefa LMV, INC.



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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 Local Rule 2.3 in all new civil case filings in the Los Angeles Superior Court.**

**Step 1:** After completing the Civil Case Cover Sheet (Judicial Council form CM-010), find the exact case type in Column A that corresponds to the case type indicated in the Civil Case Cover Sheet.

**Step 2:** In Column B, check the box for the type of action that best describes the nature of the case.

**Step 3:** In Column C, circle the number which explains the reason for the court filing location you have chosen.

**Applicable Reasons for Choosing Court Filing Location (Column C)**

- |  |   |
|--|---|
| <ul style="list-style-type: none"> <li>1. Class actions must be filed in the Stanley Mosk Courthouse, Central District.</li> <li>2. Permissive filing in central district.</li> <li>3. Location where cause of action arose.</li> <li>4. Mandatory personal injury filing in North District.</li> <li>5. Location where performance required or defendant resides.</li> <li>6. Location of property or permanently garaged vehicle.</li> </ul> | <ul style="list-style-type: none"> <li>7. Location where petitioner resides.</li> <li>8. Location wherein defendant/respondent functions wholly.</li> <li>9. Location where one or more of the parties reside.</li> <li>10. Location of Labor Commissioner Office.</li> <li>11. Mandatory filing location (Hub Cases – unlawful detainer, limited non-collection, limited collection, or personal injury).</li> </ul> |
|--|---|

	<b>A</b> Civil Case Cover Sheet Category No.	<b>B</b> Type of Action (Check only one)	<b>C</b> Applicable Reasons - See Step 3 Above
<b>Auto Tort</b>	Auto (22)	<input type="checkbox"/> A7100 Motor Vehicle - Personal Injury/Property Damage/Wrongful Death	1, 4, 11
	Uninsured Motorist (46)	<input type="checkbox"/> A7110 Personal Injury/Property Damage/Wrongful Death – Uninsured Motorist	1, 4, 11
<b>Other Personal Injury/ Property Damage/ Wrongful Death Tort</b>	Asbestos (04)	<input type="checkbox"/> A6070 Asbestos Property Damage <input type="checkbox"/> A7221 Asbestos - Personal Injury/Wrongful Death	1, 11 1, 11
	Product Liability (24)	<input type="checkbox"/> A7260 Product Liability (not asbestos or toxic/environmental)	1, 4, 11
	Medical Malpractice (45)	<input type="checkbox"/> A7210 Medical Malpractice - Physicians & Surgeons <input type="checkbox"/> A7240 Other Professional Health Care Malpractice	1, 4, 11 1, 4, 11
	Other Personal Injury Property Damage Wrongful Death (23)	<input type="checkbox"/> A7250 Premises Liability (e.g., slip and fall)	1, 4, 11
		<input type="checkbox"/> A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.)	1, 4, 11
<input type="checkbox"/> A7270 Intentional Infliction of Emotional Distress		1, 4, 11	
<input type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death		1, 4, 11	

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	<b>A</b> Civil Case Cover Sheet Category No.	<b>B</b> Type of Action (Check only one)	<b>C</b> Applicable Reasons - See Step 3 Above
<b>Non-Personal Injury/ Property Damage/ Wrongful Death Tort</b>	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
	Professional Negligence (25)	<input type="checkbox"/> A6017 Legal Malpractice <input type="checkbox"/> A6050 Other Professional Malpractice (not medical or legal)	1, 2, 3 1, 2, 3
	Other (35)	<input checked="" type="checkbox"/> A6025 Other Non-Personal Injury/Property Damage tort	1, 2, 3
<b>Employment</b>	Wrongful Termination (36)	<input type="checkbox"/> A6037 Wrongful Termination	1, 2, 3
	Other Employment (15)	<input type="checkbox"/> A6024 Other Employment Complaint Case <input type="checkbox"/> A6109 Labor Commissioner Appeals	1, 2, 3 10
<b>Contract</b>	Breach of Contract/ Warranty (06) (not insurance)	<input type="checkbox"/> A6004 Breach of Rental/Lease Contract (not unlawful detainer or wrongful eviction) <input type="checkbox"/> A6008 Contract/Warranty Breach -Seller Plaintiff (no fraud/negligence) <input type="checkbox"/> A6019 Negligent Breach of Contract/Warranty (no fraud) <input type="checkbox"/> A6028 Other Breach of Contract/Warranty (not fraud or negligence)	2, 5 2, 5 1, 2, 5 1, 2, 5
	Collections (09)	<input type="checkbox"/> A6002 Collections Case-Seller Plaintiff <input type="checkbox"/> A6012 Other Promissory Note/Collections Case <input type="checkbox"/> A6034 Collections Case-Purchased Debt (Charged Off Consumer Debt Purchased on or after January 1, 2014)	5, 6, 11 5, 11 5, 6, 11
	Insurance Coverage (18)	<input type="checkbox"/> A6015 Insurance Coverage (not complex)	1, 2, 5, 8
	Other Contract (37)	<input type="checkbox"/> A6009 Contractual Fraud <input type="checkbox"/> A6031 Tortious Interference <input type="checkbox"/> A6027 Other Contract Dispute(not breach/insurance/fraud/negligence)	1, 2, 3, 5 1, 2, 3, 5 1, 2, 3, 8, 9
	Eminent Domain/Inverse Condemnation (14)	<input type="checkbox"/> A7300 Eminent Domain/Condemnation      Number of parcels_____	2, 6
<b>Real Property</b>	Wrongful Eviction (33)	<input type="checkbox"/> A6023 Wrongful Eviction Case	2, 6
	Other Real Property (26)	<input type="checkbox"/> A6018 Mortgage Foreclosure <input type="checkbox"/> A6032 Quiet Title <input type="checkbox"/> A6060 Other Real Property (not eminent domain, landlord/tenant, foreclosure)	2, 6 2, 6 2, 6
	Unlawful Detainer-Commercial (31)	<input type="checkbox"/> A6021 Unlawful Detainer-Commercial (not drugs or wrongful eviction)	6, 11
<b>Unlawful Detainer</b>	Unlawful Detainer-Residential (32)	<input type="checkbox"/> A6020 Unlawful Detainer-Residential (not drugs or wrongful eviction)	6, 11
	Unlawful Detainer- Post-Foreclosure (34)	<input type="checkbox"/> A6020F Unlawful Detainer-Post-Foreclosure	2, 6, 11
	Unlawful Detainer-Drugs (38)	<input type="checkbox"/> A6022 Unlawful Detainer-Drugs	2, 6, 11

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	<b>A</b> Civil Case Cover Sheet Category No.	<b>B</b> Type of Action (Check only one)	<b>C</b> Applicable Reasons - See Step 3 Above
<b>Judicial Review</b>	Asset Forfeiture (05)	<input type="checkbox"/> A6108 Asset Forfeiture Case	2, 3, 6
	Petition re Arbitration (11)	<input type="checkbox"/> A6115 Petition to Compel/Confirm/Vacate Arbitration	2, 5
	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
<b>Provisionally Complex Litigation</b>	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
<b>Enforcement of Judgment</b>	Enforcement of Judgment (20)	<input type="checkbox"/> A6141 Sister State Judgment	2, 5, 11
		<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
<b>Miscellaneous Civil Complaints</b>	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 type="checkbox"/> A6000 Other Civil Complaint (non-tort/non-complex)		1, 2, 8	
<b>Miscellaneous Civil Petitions</b>	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/Change of Gender	2, 7
		<input type="checkbox"/> A6170 Petition for Relief from Late Claim Law	2, 3, 8
<input type="checkbox"/> A6100 Other Civil Petition		2, 9	

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**Step 4: Statement of Reason and Address:** Check the appropriate boxes for the numbers shown under Column C for the type of action that you have selected. Enter the address which is the basis for the filing location, including zip code. (No address required for class action cases).

<b>REASON:</b> <input type="checkbox"/> 1. <input type="checkbox"/> 2. <input checked="" 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. <input type="checkbox"/> 11.		ADDRESS: 1646 Stearns Dr.
CITY: Los Angeles	STATE: CA	ZIP CODE: 90035

**Step 5: Certification of Assignment:** I certify that this case is properly filed in the Central District of the Superior Court of California, County of Los Angeles [Code Civ. Proc., §392 et seq., and Local Rule 2.3(a)(1)(E)].

Dated: July 2, 2019



(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, Judicial Council form CM-010.
4. Civil Case Cover Sheet Addendum and Statement of Location form, LACIV 109, LASC Approved 03-04 (Rev. 02/16).
5. Payment in full of the filing fee, unless there is court order for waiver, partial or scheduled payments.
6. A signed order appointing the Guardian ad Litem, Judicial Council form CIV-010, if the plaintiff or petitioner is a minor under 18 years of age will be required by Court in order to issue a summons.
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.

<b>SUPERIOR COURT OF CALIFORNIA COUNTY OF LOS ANGELES</b>	<small>Reserved for Clerk's File Stamp</small>  <b>FILED</b> Superior Court of California County of Los Angeles <b>07/03/2019</b> Sherri R. Carter, Executive Officer / Clerk of Court By: <u>Romunda Clifton</u> Deputy
<small>COURTHOUSE ADDRESS:</small> Stanley Mosk Courthouse 111 North Hill Street, Los Angeles, CA 90012	
<b>NOTICE OF CASE ASSIGNMENT UNLIMITED CIVIL CASE</b>	
<b>Your case is assigned for all purposes to the judicial officer indicated below.</b>	<small>CASE NUMBER:</small> <b>19STCV23409</b>

**THIS FORM IS TO BE SERVED WITH THE SUMMONS AND COMPLAINT**

	ASSIGNED JUDGE	DEPT	ROOM		ASSIGNED JUDGE	DEPT	ROOM
✓	Patricia D. Nieto	24					

Given to the Plaintiff/Cross-Complainant/Attorney of Record Sherri R. Carter, Executive Officer / Clerk of Court  
 on 07/08/2019 (Date) By Romunda Clifton, Deputy Clerk

## INSTRUCTIONS FOR HANDLING UNLIMITED CIVIL CASES

The following critical provisions of the California Rules of Court, Title 3, Division 7, as applicable in the Superior Court, are summarized for your assistance.

### APPLICATION

The Division 7 Rules were effective January 1, 2007. They apply to all general civil cases.

### PRIORITY OVER OTHER RULES

The Division 7 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 Independent Calendaring Courts 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.

### 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.

### STATUS CONFERENCE

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 to attend a final status conference not more than 10 days before the scheduled trial date. All parties shall have motions in limine, bifurcation motions, statements of major evidentiary issues, dispositive motions, requested form jury instructions, special jury instructions, and special jury verdicts timely filed and served prior to the conference. These matters may be heard and resolved at this conference. At least five 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 Three of the Los Angeles Superior Court Rules.

### SANCTIONS

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

**This is not a complete delineation of the Division 7 or Chapter Three 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 imperative.**

### Class Actions

Pursuant to Local Rule 2.3, all class actions shall be filed at the Stanley Mosk Courthouse and are randomly assigned to a complex judge at the designated complex courthouse. If the case is found not to be a class action it will be returned to an Independent Calendar Courtroom for all purposes.

### \*Provisionally Complex Cases

Cases filed as provisionally complex are initially assigned to the Supervising Judge of complex litigation for determination of complex status. If the case is deemed to be complex within the meaning of California Rules of Court 3.400 et seq., it will be randomly assigned to a complex judge at the designated complex courthouse. If the case is found not to be complex, it will be returned to an Independent Calendar Courtroom for all purposes.

**SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES**

**Branch Name:** Stanley Mosk Courthouse  
**Mailing Address:** 111 North Hill Street  
**City, State and Zip Code:** Los Angeles CA 90012

**SHORT TITLE:** SHEFA LMV, INC. vs GINSEY INDUSTRIES, INC.**CASE NUMBER:**  
19STCV23409**NOTICE OF CONFIRMATION OF ELECTRONIC FILING**

The Electronic Filing described by the below summary data was reviewed and accepted by the Superior Court of California, County of LOS ANGELES. In order to process the filing, the fee shown was assessed.

**Electronic Filing Summary Data**

Electronically Submitted By: One Legal  
Reference Number: 13453623  
Submission Number: 19LA00844879  
Court Received Date: 07/03/2019  
Court Received Time: 1:47 pm  
Case Number: 19STCV23409  
Case Title: SHEFA LMV, INC. vs GINSEY INDUSTRIES, INC.  
Location: Stanley Mosk Courthouse  
Case Type: Civil Unlimited  
Case Category: Other Non-Personal Injury/Property Damage tort  
Jurisdictional Amount: Over \$25,000  
Notice Generated Date: 07/08/2019  
Notice Generated Time: 9:10 am

**Documents Electronically Filed/Received****Status**

Complaint	Accepted
Summons	Accepted
Civil Case Cover Sheet	Accepted
Civil Case Cover Sheet	Accepted

Notice (name extension)

Accepted

**Comments**

Submitter's Comments:

Clerk's Comments:

**Electronic Filing Service Provider Information**

Service Provider: One Legal

Contact: One Legal

Phone: (800) 938-8815