



1 **NATURE OF THE ACTION**

2 1. Plaintiff brings this action against all Defendants for Defendants' unauthorized  
3 accessing, taking, use, disclosure and dissemination of Plaintiff's attorney privileged documents  
4 and confidential communications and property.

5 2. Starting February 2013, all Defendants, illegally and unethically, hacked into one  
6 of the sources for the storing and retrieval of client information used by Plaintiff, approxiametly  
7 2000 case materials which contained Plaintiff's attorney privileged documents and confidential  
8 communications and property, a password protected computer network, owned and operated by a  
9 sign-up services vendor named HQ Sign-Up Services Inc. ("HQSU").  
10

11 3. HQSU operated as Plaintiff's agent in delivering and/or picking up, and storing  
12 attorney privileged documents and confidential communications and property.<sup>1</sup> Ex. 1, Declaraion  
13 of Carlos Morales, President of HQSU.  
14

15 4. Defendants wrongfully obtained and retained thousands of Plaintiff's attorney  
16 privileged documents and confidential communications and property belonging to Plaintiff.

17 5. The sheer number of Defendants' unauthorized accessing, taking, use, disclosure  
18 and dissemination of Plaintiff's attorney privileged documents and confidential communications  
19 exceeded the allowable amount of review that results from an attorneys inadvertent receipt or  
20 review of attorney privileged documents and confidential communications.  
21

22 6. These unlawful and unethical actions of the Defendants were first uncovered  
23 during an in chambers hearing on April 20, 2014, in the Hector Casillas vs. XERXES CORP;  
24 BROADSPIRE CLAIMS SERVICES WCAB NO. ADJ903073 (Marina del Rey District  
25 Office).  
26

27 <sup>1</sup> These documents included client interview forms prepared by Plaintiff with the name of  
28 Plaintiff on it, retainer agreements with the name of Plaintiff on it, and other documents relating  
to the initial but ongoing process of collecting confidential information to continue with the  
vetting and review of a new case.

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1           7.     Attorney's employed by Defendants, Russell Ching and Stella Mendoza  
2 desperate to win a discovery motion to compel deposition answers and production of documents  
3 suddenly pulled attorney privileged documents and confidential communications of Plaintiff  
4 from their file and attempted to use them in support for their motions.  
5

6           8.     Plaintiff's counsel and Plaintiff were shocked and demanded the return of their  
7 attorney privileged documents and confidential communications and property.

8           9.     Plaintiff's counsel and Plaintiff asked how they obtained possession of their  
9 attorney privileged documents and confidential communications. At first, the Defendants stated  
10 they did not know. Under further questioning, for example whether someone gave them to you,  
11 the Defendants said they were found on the internet. When asked how they were found on the  
12 internet, the Defendants attorneys, Ching and Mendoza spontaneously asserted they didn't know  
13 for sure.  
14

15          10.    Presiding Judge Levy reviewed the documents and agreed with Plaintiff's claim  
16 and ordered that attorney privileged documents and confidential communications and property  
17 be turned over to Plaintiff immediately.

18          11.    In an *in camera* hearing, Judge Levy found that all documents presented by  
19 Defendant's employees were found to be protected as privileged and the Court noted ethical  
20 concerns and ordered the immediate return of all documents to Plaintiff. Ex. 2, Judge Levy  
21 response to Petition for Removal.  
22

23          12.    Due to the number of pages of documents, at least 4 to 6, and the length of  
24 possession, the suppression of the documents and communications and property, and familiarity  
25 with all parts of the Plaintiff's attorney privileged documents and confidential communications  
26 and property the Defendants are prevented from justifying their unethical and unlawful actions  
27 as the product of any inadvertent receipt or possession of unauthorized accessing, taking, use,  
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1 disclosure and dissemination of Plaintiff's attorney privileged documents and confidential  
2 communications.

3 13. The Defendants never notified or informed the Plaintiff's that they were in  
4 possession of over 2000 of Plaintiffs attorney privileged documents and confidential  
5 communications and property until around November 2014.

6 14. Judge Levy further ordered that they return any other of Paintiff's attorney  
7 privileged documents and confidential communications in their possession and purge them from  
8 their files and conduct a due diligence to have them purged from the files of third parties they  
9 shared these files with. Ex. 2.

10 11 15. The Defendants have never turned-over the more than 2000 of Paintiff's attorney  
12 privileged documents and confidential communications and property in their possession. Ex. 3,  
13 Declarations of Jorge Reyes and Ronnie Barsoum.

14 15 16. Subsequently, the Defendants have admitted to Plaintiff to obtaining over 30,000  
16 attorney files and documents and property of Plaintiff and other lawyers from the HQSU  
17 website in February 2013. Ex. 3.

18 17. The Defendants knew these files contained attorney privileged documents and  
19 confidential communications of Plaintiff and other attorneys.

20 18. Defendants even showed Plaintiff's a video of how they illegally downloaded  
21 Plaintiff's attorney privileged documents and confidential communications and property  
22 conceding that their conduct was an intentional, unethical, unauthorized accessing, taking, use,  
23 disclosure and dissemination of Plaintiff's attorney privileged documents and confidential  
24 communications.  
25

26 18. Subsequently, the Plaintiff's have discovered that Defendants have shared its files  
27 and property with other law firms.  
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0212015

1 **PARTIES**

2 19. Plaintiff, Reyes and Barsoum, LLP is a California Limited Liability Partnership  
3 Law Firm with its principal place of business in Los Angeles, California.

4 20. Defendant Knox Ricksen, LLP ("Knox Ricksen") is a California Limited Liability  
5 Partnership Law Firm with its principal place of business in Oakland, California and in Los  
6 Angeles, California.

7  
8 21. Defendant Eric Danowitz ("Danowitz") is an attorney licensed in the state of  
9 California and employed as a partner at Defendant Knox Ricksen in the Los Angeles California  
10 office.

11 22. Defendant Daniel Sharp ("Sharp") is an attorney licensed in the state of California  
12 and employed as an associate at Defendant Knox Ricksen in the Oakland, California office.

13 23. Plaintiff is ignorant of the true names and capacities of defendants sued herein as  
14 Does 1 through 1000, inclusive, and therefore sues these defendants by such fictitious names.  
15 Plaintiff will amend this complaint to allege their true names and capacities when ascertained.  
16 However, on information and belief, Does 1 through 10 sued herein was/is the agent or employee  
17 of each of the remaining defendants and was at all times acting within the purpose and scope of  
18 such agency and employment.  
19

20  
21 **JURISDICTION AND VENUE**

22 24. Personal Jurisdiction and Venue are proper because the improper conduct alleged  
23 in this Complaint occurred in, was directed from, and originated from Los Angeles California  
24 where the Plaintiff and HQSU are located, and the Defendants are either employed or have a  
25 principal office located within.  
26

27 **FACTS**

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1           25. Starting February 2013, all Defendants, illegally and unethically, hacked into one  
2 of the sources for the storing and retrieval of client information used by Plaintiff, approxiametly  
3 2000 case materials which contained Plaintiff's attorney privileged documents and confidential  
4 communications and property, a password protected computer network, owned and operated by a  
5 sign-up services vendor named HQSU. Ex. 1.  
6

7           26. HQSU operated as Plaintiff's agent in delivering and/or picking up, and storing  
8 attorney privileged documents and confidential communications and property.<sup>2</sup> Ex. 1. Neither  
9 Plaintiff or its Agent HQSU ever consented to or authorized public access to its website or to the  
10 Defendants.  
11

12           27. Defendants intentionally developed a scheme and business practice to hack into  
13 and wrongfully obtain, retain and use thousands of Plaintiff's attorney privileged documents and  
14 confidential communications and property.  
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16           28. The scheme used by the Defendants was planned, developed and executed by  
17 Defendant's Danowitz and Sharp with the knowledge that the sheer number of Defendants'  
18 unauthorized accessing, taking, use, disclosure and dissemination of Plaintiff's attorney  
19 privileged documents and confidential communications exceeded the allowable amount of review  
20 that results from an attorneys inadvertent receipt or review of attorney privileged documents and  
21 confidential communications.  
22

23           29. The intentional and active concealment of these unlawful and unethical actions of  
24 the Defendants, in particular Danowitz and Sharp were first uncovered during an in chambers  
25 hearing on April 20, 2014, in the Hector Casillas vs. XERXES CORP; BROADSPIRE CLAIMS  
26 SERVICES WCAB NO. ADJ903073 (Marina del Rey District Office).  
27

28           30. Attorney's employed by Defendants, Russell Ching and Stella Mendoza

02/20/2015

1 desperate to win a discovery motion to compel deposition answers and production of documents  
2 suddenly pulled attorney privileged documents and confidential communications and property  
3 of Plaintiff lodged from their file and attempted to use them in support for their motions.

4 31. Plaintiff's counsel and Plaintiff were shocked and demanded the return of their  
5 attorney privileged documents and confidential communications and property.

6 32. Plaintiff's counsel and Plaintiff asked how they obtained possession of their  
7 attorney privileged documents and confidential communications. At first, the Defendants stated  
8 they did not know and attempted to perpetuate and conceal a falsehood on the Court. Under  
9 further questioning, for example whether someone gave them to you, the Defendants said they  
10 didn't know. Later, the Defendants stated they were found on the internet. When asked how they  
11 were found on the internet, the Defendants attorneys, Ching and Mendoza spontaneously  
12 returned to their statement of lack of any knowledge thus, attempting to perpetuate and  
13 conceal a falsehood on the Court.

14 33. Presiding Judge Levy reviewed the documents and agreed with Plaintiff's claim  
15 and ordered that attorney privileged documents and confidential communications and property  
16 be turned over to Plaintiff immediately.

17 34. In an *in camera* hearing, Judge Levy found that all documents presented by  
18 Defendant's employees were found to be protected as privileged and the Court noted ethical  
19 concerns and ordered the immediate return of all documents to Plaintiff. Ex. 2.

20 35. The Defendants filed a Petition for Removal of Judge Levy after her order. The  
21 Workers Compensation Appeals Board denied the appeal. A similar Writ to Court of Appeals  
22 was dismissed. Ex. 4.

23 35. Due to the number of pages of documents, at least 4 to 6, and the length of  
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28 <sup>2</sup> These documents included client interview forms prepared by Plaintiff with the name of Plaintiff on it, retainer agreements with the name of Plaintiff on it, and other documents relating to the initial but ongoing process of collecting confidential information to

1 possession, the suppression of the documents and communicatons and property, and familiarity  
2 with all parts of the Plainmtiff's attorney privileged documents and confidential communications  
3 and property the Defendants are prevented from justifying their unethical and unlawful actions  
4 as the product of any inadvertent receipt or possession of unauthorized accessing, taking, use,  
5 disclosure and dissemination of Plaintiff's attorney privileged documents and confidential  
6 communications.  
7

8 36. The Defendants never notified or informed the Plaintiff's that they were in  
9 possession of over 2000 of Plaintiffs attorney privileged documents and confidential  
10 communications and property until caught around November 2014.

11 37. Judge Levy further ordered that they return any other of Paintiff's attorney  
12 privileged documents and confidential communications in their possession and purge them from  
13 their files and conduct a due diligence to have them purged from the files of third parties they  
14 shared these files with.  
15

16 38. The Defendants have never turned-over the more than 2000 of Paintiff's attorney  
17 privileged documents and confidential communications and property in their possession.

18 39. Subsequently, the Defendants, in particular Danowitz, have admitted to Plaintiff  
19 to obtaining over 30,000 attorney files and documents and property of Plaintiff and other  
20 lawyers from the HQSU website in February 2013. Ex. 3.

21 40. The Defendants knew these files contained attorney privileged documents and  
22 confidential communications of Plaintiff and other attorneys and developed and implemented a  
23 plan, practice and scheme to obtain them.  
24

25 41. Proud of the fruits of their scheme and business practices Defendant, Danowitz  
26 even showed Plaintiff's a video of how easy it was to steal, hack and illegally download Paintiff's  
27 attorney privileged documents and confidential communications and property, conceding that  
28

1 their conduct was an intentional, unethical, unauthorized accessing, taking, use, disclosure and  
2 dissemination of Plaintiff's attorney privileged documents and confidential communications and  
3 property.

4 42. Subsequently, the Plaintiff's have discovered that Defendants have shared its files  
5 and property with other law firms.

6 43. Defendants have never turned over the Plaintiff's attorney privileged documents  
7 and confidential communications and property.

8 44. Subsequently, on November 24, 2015, the Defendants were admonished by  
9 another Judge, Judge Palmer ordered Defendants not to use the Plaintiff's intake forms, because  
10 they were attorney privileged documents and confidential communications and property as  
11 previously ruled by Judge Levy. Ex. 5, order of Judge Palmer.

#### 14 **FIRST CAUSE OF ACTION**

#### 15 **Violation of California Penal Code §502, California Computer Crime Law**

#### 16 **("CCCL") Against All Defendants**

17 45. Plaintiff incorporates by reference the foregoing allegations.

18 46. Defendants knowingly used data, computers, computer systems or computer  
19 networks by accessing, taking, using, disclosing and disseminating Plaintiff's privileged  
20 information in order to wrongfully control or obtain data- Plaintiff's electronic privileged  
21 communications in violation of California Penal Code §§502(c)(2) and 502(c)(7).

22 47. Defendants accessed and without permission took, downloaded, copied and/or  
23 made use of Plaintiff's privileged electronic communications obtained from the HQ Sign-Up  
24 network in violation of Penal Code §502(c)(2)

25 48. Defendants knowingly and without permission accessed or caused to be accessed  
26 HQSU computers by impermissibly accessing, collecting and disseminating Plaintiff's  
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1 privileged communications in violation of Penal Code §502(c)(7).

2 49. As a direct and proximate result of Defendants unlawful conduct within the  
3 meaning of Penal Code §502, Defendants have caused loss to Plaintiff in an amount to be  
4 proven at trial. Plaintiff is also entitled to recover his attorney's fees pursuant to Penal Code  
5 §§502(e).  
6

7 50. Plaintiff has also suffered irreparable injury from these acts, including damage to  
8 Plaintiff's professional reputation. Accordingly, Plaintiff and have no adequate remedy at law,  
9 entitling them to injunctive relief.

10 51. Defendants conduct was and is willful, malicious and despicable thereby  
11 warranting the imposition of punitive and exemplary damages. Plaintiff prays that the Court will  
12 impose punitive and exemplary damages on Defendants in amounts sufficient to punish them and  
13 deter other such conduct in the future. The above-recited actions of Defendants were done  
14 intentionally, with malice, fraud, oppression and in reckless disregard of Plaintiffs rights, thereby  
15 justifying the imposition of punitive damages pursuant to Civil Code section 3294, for the  
16 purpose of punishment and deterrence; and prejudgment interest pursuant to Civil Code section  
17 3288.  
18

19  
20 **SECOND CAUSE OF ACTION**

21 **Violation of California Business Professions Code §17200**

22 **Against All Defendants**

23 51. Plaintiff incorporates by reference the foregoing allegations.

24 52. Section 17200 outlines unfair business competition and defines this to include  
25 any unfair, unlawful, or fraudulent business practice or act.

26 53. Defendants violated Section 17200 by its aforementioned conduct, specifically  
27 violations of the CFAA and the CCCL.  
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1 amount to be determined at trial;

2 3. Restrain Defendants, their officers, agents, servants, employees, and attorneys, and  
3 those in active concert or participation with them from continued access, taking, use, disclosure,  
4 dissemination of Plaintiff's privileged electronic communications;

5 4. Order Defendants to return all originals, copies, electronic copies of Plaintiff's  
6 privileged electronic communications/information in Defendants' possession to Plaintiff  
7 immediately;

8 5. Award Plaintiff reasonable attorney's fees and litigation expenses;

9 6. Enter injunctive and/or declaratory relief as is necessary to protect the interests of the  
10 Plaintiff;

11 7. Award such other relief as necessary.

12 8. Enter an award of punitive damages.

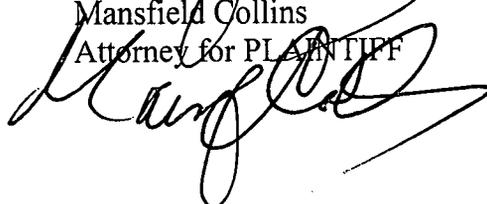
13 **JURY TRIAL**

14 Plaintiff demands a trial by jury for all issues so triable.

15  
16 Dated: February 20, 2015

17 Respectfully submitted  
18 REYES & BARSOUM, LLP

19 By: 

20 Mansfield Collins  
21 Attorney for PLAINTIFF  


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VERIFICATION

STATE OF CALIFORNIA        )  
  )  
COUNTY OF LOS ANGELES    )

Plaintiff's Verified Complaint

I, the undersigned, say (check applicable paragraph): I have reviewed and responded to the discovery requests in this matter from the defendants.

I am a party to this action. I have read the above document(s) and know its contents. The matters stated in it are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

I am an officer/a partner of Reyes & Barsoum, LLP, a party to this action, and am authorized to make this verification for and on its behalf, and I make this verification for that reason. I have read the above document and know its contents. I am informed and believe and on that ground allege that the matters stated in it are true.

I am one of the attorneys for \_\_\_\_\_, a party to this action. Such party is absent from the County of Los Angeles, California, where such attorneys have their office, and I make this verification for and on behalf of that party for that reason. I have read the above document and know its contents. I am informed and believe and on that ground allege that the matters stated in it are true.

Executed on February 20, 2015 at Los Angeles, California.

I declare under penalty of perjury pursuant to the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

Ronnie Barsoum  
  
\_\_\_\_\_

02/20/2015

**EX. 1**

02 \* 20 \* 2015

**DECLARATION OF CARLOS MORALES**

**I, CARLOS MORALES, hereby declare as follows:**

1. I am over the age of 18 years old and I have personal knowledge, information and/or belief of the facts recited below and as to matters that are based on information and belief, I would so state.
2. The matters contained in this declaration, I could and would competently testify if called as a witness.
3. I am the President of HQ Sign-Up Services, Inc., a California Corporation, headquartered at 1609 E. Palmdale Boulevard, Suite D, Palmdale, California 93550. HQ Sign-up Services, Inc. contracts to conduct client sign-up and document gathering on behalf of its customers throughout the State of California.
4. HQ Sign-Up Services, Inc., hires employees and independent contractors to conduct sign-up/intake document gathering on behalf of HQ Sign-Up customers. To ensure customer confidentiality, HQ Sign-Up Services enters into voluntary Confidentiality Agreements with its employees and independent contractors which protects HQ Sign-Up Services, Inc.'s trade secrets, including but not limited to business records and communications of HQ Sign-Up Services, Inc.'s customers.
5. HQ Sign-Up Services, Inc. was a contracted agent for Reyes & Barsoum, LLP to conduct client sign-ups/intakes. The intakes contain (Applicant's Declaration Pursuant to Labor Code Section 4906(g), Venue Authorization, Fee Disclosure, Initial Client Intake that describe facts, describe injured body parts, and private information related to the Applicant's immigration status, and other sensitive information. All of these documents are legal documents clearly labeled for the law office of Reyes & Barsoum
6. As an agent/independent contractor, HQ Sign-up Services on behalf of Reyes & Barsoum contacts clients in the limited capacity of obtaining information, forms and signatures from new clients that have previously contacted Reyes & Barsoum.

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7. At the direction of Reyes & Barsoum, after completion of the attorney-client in-take document, HQ Sign-up Services uploads the in-take form to a secured password protected website and then send the original documents to Reyes & Barsoum.
8. HQ Sign-Up Services, Inc.'s website where the confidential attorney-client information and documents are uploaded are intended to be accessed by HQ Sign-Up customers only by way of a secured password protected user name and log-in.
9. The attorney-client in-take and other documents on the HQ Sign-Up Services, Inc.'s website is not intended to be accessed by the general public and is not in the public domain.
10. In the matter of Applicant Hector Casillas vs. Defendants Xerxes Corporation; Broadspire Claims Services, HQ Sign-ups, Inc.'s employees and independent contractors did not (directly or indirectly) provide, transmit, deliver, or send to defendants Xerxes Corporation or Broadspire Claims Services the Reyes & Barsoum, LLP client intake form for Hector Casillas.
11. In the matter of Applicant Hector Casillas vs. Defendants Xerxes Corporation; Broadspire Claims Services, HQ Sign-ups, Inc.'s employees and independent contractors did not (directly or indirectly) provide, transmit, deliver, or send the Reyes & Barsoum, LLP client intake form or information pertaining to Hector Casillas to any of Defendants' attorneys at Knox and Ricksen.
12. The intake forms clearly state they are legal documents of the law office of Reyes & Barsoum.
13. The intake forms also contain private medical information protected by HIPPA.
14. The intake forms also contain private information related to immigration status.
15. The intake forms also contain private information related to social security numbers.
16. Reyes & Barsoum was provided an HQ Sign-Up Services, Inc.'s secured log-in and password for access to their clients only.

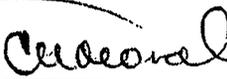
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17. In my opinion the only way someone other than Reyes & Barsoum could access Mr. Casillas' intake forms, would be to "hack" into the secured HQ Sign-Up Services, Inc.'s website and steal important and privileged legal documents.
18. If anyone hacked into my website by breaching my security they would have access to over 30,000 attorney-client/work-product, medical, social security, immigration status and other information protected by privacy laws.

Executed in the City of \_\_\_\_\_, State of California

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my personal knowledge and belief.

DATED: November 19, 2014

  
\_\_\_\_\_  
Carlos Morales,  
President

02 \* 20 \* 2015

EX. 2

02/28/2015

STATE OF CALIFORNIA  
WORKERS' COMPENSATION APPEALS BOARD  
DIVISION OF WORKERS' COMPENSATION

WCAB CASE NUMBER ADJ9030735

HECTOR CASILLAS

vs. XERXES CORP.

DATE OF INJURY:

6/1/1987-7/27/2013

WORKERS' COMPENSATION  
ADMINISTRATIVE LAW JUDGE:

HON. PAIGE S. LEVY

**REPORT AND RECOMMENDATION ON PETITION  
FOR REMOVAL**

**I.  
INTRODUCTION**

1. Applicant's Occupation: General Labor  
Age: 49 yrs.  
Parts of Body Injured: Shoulders, hand, and arm
2. Identity of Petitioner: Defendant  
Timeliness: The Petition was timely filed.  
Verified: The Petition was verified.
3. Date of Issuance of Order: 4/30/2014
4. The Petitioner contends:

The Judge erred when she denied the following motions filed by defendants:

- 1) Motion to compel deposition answers.
- 2) Motion to compel production of documents.
- 3) Motion to compel deposition of Chantell Obregon.

02/26/2015

**II.**  
**SUMMARY OF FACTS**

Defendant filed three discovery motions in the case 1) a motion to compel deposition answers that the applicant had refused to answer at the time of his deposition 2) a motion to compel production of documents whereby defendant requests applicant to produce a business card that he testified that he had obtained and 3) a motion to compel the deposition of Chantell Obregon, an agent of the applicant's attorney. The motions had previously been filed and applicant had filed responses thereto. The undersigned heard arguments on the day of the conference. During oral argument the undersigned obtained the following facts. Applicant's attorney hires a contractor to go to client's locations to fill out the initial paperwork for their workers' compensation case. This company is called HQ Sign-Up Services. This company employs an individual by the name of Chantell Obregon. In this matter Chantell Oregon was sent to applicant's home to handle the initial intake and sign up. In oral argument it was disclosed to the court that someone in applicant's attorney's office speaks with the applicant and then if they are going to sign up the applicant as a client someone from HQ Sign-Up Services meets with them to prepare the paperwork.

During the course of discovery, defendants obtained a copy of the intake form prepared by Chantell Obregon. This was disclosed at the time of the conference. At that time the undersigned ruled that the document was privileged since it was prepared by an agent of the attorney. The defense attorney was ordered to turn that document and any copies of that document over to applicant's attorney. This was done in front of the undersigned. Thereafter the undersigned denied the three motions on lack of relevancy. Defendant filed the within petition for removal arguing that they had reason to believe that there was fraud in this case. They appear to have developed this belief as a result of the privileged document that they were ordered to turn over. In fact their entire argument appears to be based on this document that was found privileged.

### III. DISCUSSION

For defendant to prevail on a petition for removal they must show that there will be irreparable harm or significant prejudice if removal is not granted. Defendant alleges that they will not be able to obtain information on fraudulent actions by applicant or applicant's attorney. However, defendant has not shown how obtaining this information will assist with this investigation. Nor have they shown what harm will come.

Defendant argues that they are entitled to obtain certain information that applicant refused at the time of his deposition. They requested three questions be answered "1) Do you know who is handling your case at the attorney's office? 2) Have you ever met your attorney? 3) When the person answered the phone-- ... --did whoever it was that answered the phone identify the name of the company?" Defendant argues that these answers are necessary to allow them to investigate fraud. The undersigned determined that none of these questions were calculated to lead to admissible discovery and denied the motion based on lack of relevancy. Defendant has not shown how any of these answers will lead to admissible discovery concerning fraud or any other aspect of this case.

Defendant argues that they are entitled to a card the applicant testified he had obtained with an 800 number on the card. Defendant filed a petition to compel production of this card. Defendant has again not shown any basis in which this card with a number on it would have any relevancy to this case or to the allegation of fraud. Further defendant has not shown any evidence which supports this allegation of fraud.

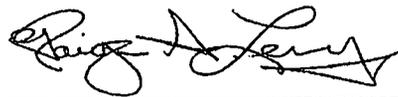
Defendant argues that they are entitled to the deposition of Chantell Obron, a contractor who handled the intake form for the applicant's attorney's firm. Defendant has used a privileged document to come to this request. In fact defendant refers to this document throughout this petition, in violation of the finding of privilege. Based on the information presented Chantall Obron is an agent of the attorney. The document she prepared is a privileged document of which the undersigned determined at the time of the 4/30/2014 hearing. It is based on this privileged document that defendant has noticed this deposition. In the matter of *SCIF v. WPS Inc.* 70

Cal.App.4<sup>th</sup> 644 and *Rico v. Mitsubishi Motors Corp.* 42 Cal. 4<sup>th</sup> 807 the court held that when an attorney receives privileged documents through inadvertence they shall immediately notify the sender that they are in possession of privileged materials. (It should be noted that the undersigned assumes that the attorney received this document through inadvertence. Defendant did not disclose how this document was obtained.) The lawyer may not use that document in preparation of their case. In *Rico* the court held that disqualification of the plaintiffs' legal team was proper due to the irreversible prejudice caused by opposing counsel's unethical use of the notes obtained in the case. Defendants' use of this privileged document in preparation of their case and in support of their petition is a violation of that privilege. Further, defendant has again not shown any basis in which Chantall Obron's deposition would be relevant to this case.

**IV.**  
**CONCLUSION**

It is respectfully recommended that the defendant's petition for removal be denied for the reasons stated herein.

Dated 6/2/2014

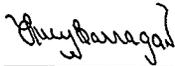


**PAIGE S. LEVY**

Presiding Workers' Compensation Judge

Dated: 6/2/2014

Filed and Served by mail on:  
On all parties on the  
Official Address Record.



**LUCY BARRAGAN**

02 / 20 / 2015

**EX. 3**

01/20/2015

EX. 4

1 **WORKERS' COMPENSATION APPEALS BOARD**

2 **STATE OF CALIFORNIA**

3  
4 **HECTOR CASILLAS,**

5 *Applicant,*

6 **vs.**

7 **XERXES CORPORATION; BROADSPIRE**  
8 **CLAIMS SERVICES,**

9 *Defendants.*

Case No. ADJ9030735

(Marina del Rey District Office)

**ORDER DENYING  
PETITION FOR REMOVAL**

10  
11  
12 We have considered the allegations of the Petition for Removal and the contents of the Report of  
13 the workers' compensation administrative law judge with respect thereto. Based on our review of the  
14 record, and for the reasons stated in said Report, which we adopt and incorporate, we will deny removal.

15 Defendant may have a legitimate concern regarding running, capping and steering. However, this  
16 is not the forum for that determination and an inquiry into those matters is unlikely to result in evidence  
17 which is relevant to applicant's claim. While defendant may have a legitimate concern about a  
18 fraudulent claim of injury, that showing has not been made here.

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1 For the foregoing reasons,

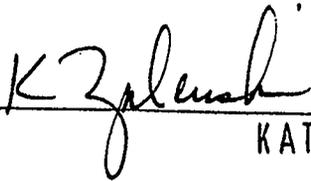
2 **IT IS ORDERED** that said Petition for Removal be, and the same hereby is, **DENIED**.

3 **WORKERS' COMPENSATION APPEALS BOARD**

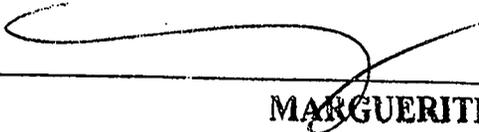
4  
5 

6 **RONNIE G. CAPLANE**

7 **I CONCUR,**

8  
9  
10 

11 **KATHERINE ZALEWSKI**

12  
13 

14 **MARGUERITE SWEENEY**

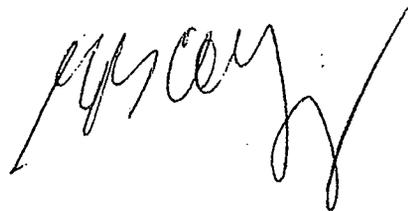


15  
16 **DATED AND FILED AT SAN FRANCISCO, CALIFORNIA**

17 **JUL 08 2014**

18  
19 **SERVICE MADE ON THE ABOVE DATE ON THE PERSONS LISTED BELOW AT THEIR**  
20 **ADDRESSES SHOWN ON THE CURRENT OFFICIAL ADDRESS RECORD.**

21 **HECTOR CASILLAS**  
22 **KNOX RICKSEN**  
23 **REYES BARSOUM**

24  
25 

26 sye

OCT 22 2014

IN THE COURT OF APPEAL OF THE STATE OF CALIFORNIA

SECOND APPELLATE DISTRICT

DIVISION FOUR

COURT OF APPEAL - SECOND DISTRICT  
**FILED**

OCT 21 2014

JOSEPH A. LANE Clerk  
S. VEVERKA Deputy Clerk

BROADSPIRE CLAIMS SERVICES,

Petitioner,

v.

WORKERS' COMPENSATION  
APPEALS BOARD and HECTOR  
CASILLAS.

Respondents.

No. B258346

(W.C.A.B. No. ADJ9030735)

**ORDER**

THE COURT:

The petition is dismissed in that there is no final order or decision of the Workers' Compensation Appeals Board. (Lab. Code §§ 5900, 5901; *Maranian v. Workers' Comp. Appeals Bd.* (2000) 81 Cal.App.4th 1068, 1074.)

EPSTEIN, P.J.

WILLHITE, J.

MANELLA, J.

02/20/2015

0212012015

**EX. 5**

STATE OF CALIFORNIA  
WORKERS' COMPENSATION APPEALS BOARD

Hector Casillas

Applicant,

v.

ZCL Composites, XL Insurance c/o  
Broadspire

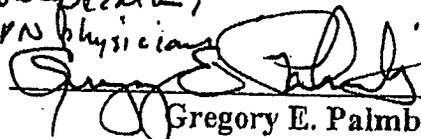
Defendants.

Case No. ADJ9030735

Stipulations and Order

- 1) Petition for Disqualification ~~is~~ denied.
- 2) Defendant is admonished by court and agrees not to use, disclose, or disseminate Hector Casillas intake form or Tomas Montano intake form, and utilize it in ~~any~~ <sup>investigate</sup>.
- 3) Parties agree to utilize David Heskiuff, MD as orthopedic AMOE.
- 4) Defendant agrees to the following:
  - a) Acceptance of claim to bilateral shoulders only;
  - b) Payment of retroactive TTD for all periods up and through 11/24/14 for total of \$6,691.<sup>95</sup> (includes any/all claim for penalties and interest)
  - c) Pick up TTD as of 11/24/14. TTD can be terminated on notice and does not require Petition to WCAB.
- 5) Applicant agrees as follows:
  - a) not to appeal denial of Disqualification;
  - b) Transfer applicant's care to MPA's physicians.

Dated:

 11/24/14

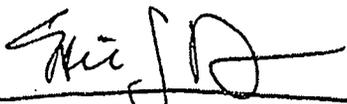
Gregory E. Palmberg

WORKERS' COMPENSATION ADMINISTRATIVE LAW JUDGE

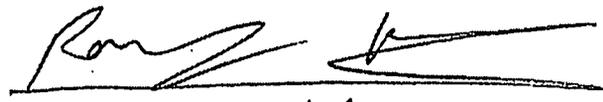
Filed and Served by mail on  
all parties shown on the  
Official Address Record.

By: \_\_\_\_\_

- 2) Judge Palmberg held Judge Levy ordered defendant to turn over Hector Casillas intake form to applicant's attorney based on Levy's in camera review of intake form and finding it to be privileged as indicated in her Report and Recommendation on Removal.
- 1) Defendants agree to waive any appeal/due process arguments to Judge Palmberg and Judge Levy's order.
- 3) Applicant agrees to withdraw Emergency Stay Petition dated 11/19/2014 and SOT dated 11/26/14 pending receipt of Casillas and Morfano intake forms, workable copy of Google search DVD, and declaration of compliance with turn over order.
- 1) Parties agree that attorney's fees and cost per LC 5813/5814 deferred pending ruling of Petition/DOR in issue;
- 2) Depositions of current treating physicians deferred until after resolution of case in chief. Parties agree that only depositions related to med-legal reporting subsequent to 11/24/14 allowed to be set in this case.
- 1) 15% Attorney on Retro-TTD deferred pending written agreement by applicant.



Defendant Attorney



Applicant Attorney

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State, number, and address):  
MANSFIELD Collins  
100 N. DARRANCA AVE  
7TH FL, WEST COVINA, CA 91791  
TELEPHONE NO: 213-381-0982 FAX NO: 866-333-2045  
ATTORNEY FOR (Name): PLAINTIFF

FOR COURT USE ONLY  
**FILED**  
Superior Court of California  
County of Los Angeles  
FEB 20 2015  
Sherri R. Carter, Executive Officer/Clerk  
By:  Deputy  
Shaunya Bolden

SUPERIOR COURT OF CALIFORNIA, COUNTY OF  
STREET ADDRESS: 111 N. Hill St  
MAILING ADDRESS:  
CITY AND ZIP CODE: 90012  
BRANCH NAME: STANLEY MOSK

CASE NAME: Leyes + DARRANCA LLP v. KNOX RICHSEN

**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: **BC 572975**  
JUDGE:  
DEPT:

Items 1-6 below must be completed (see instructions on page 2).

1. Check one box below for the case type that best describes this case:
- |  |  |  |
|--|--|--|
| <b>Auto Tort</b><br><input type="checkbox"/> Auto (22)<br><input type="checkbox"/> Uninsured motorist (46)<br><b>Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort</b><br><input type="checkbox"/> Asbestos (04)<br><input type="checkbox"/> Product liability (24)<br><input type="checkbox"/> Medical malpractice (45)<br><input type="checkbox"/> Other PI/PD/WD (23)<br><b>Non-PI/PD/WD (Other) Tort</b><br><input type="checkbox"/> Business tort/unfair business practice (07)<br><input type="checkbox"/> Civil rights (08)<br><input type="checkbox"/> Defamation (13)<br><input type="checkbox"/> Fraud (16)<br><input type="checkbox"/> Intellectual property (19)<br><input type="checkbox"/> Professional negligence (25)<br><input type="checkbox"/> Other non-PI/PD/WD tort (35)<br><b>Employment</b><br><input type="checkbox"/> Wrongful termination (36)<br><input type="checkbox"/> Other employment (15) | <b>Contract</b><br><input type="checkbox"/> Breach of contract/warranty (06)<br><input type="checkbox"/> Rule 3.740 collections (09)<br><input type="checkbox"/> Other collections (09)<br><input type="checkbox"/> Insurance coverage (18)<br><input type="checkbox"/> Other contract (37)<br><b>Real Property</b><br><input type="checkbox"/> Eminent domain/Inverse condemnation (14)<br><input type="checkbox"/> Wrongful eviction (33)<br><input type="checkbox"/> Other real property (26)<br><b>Unlawful Detainer</b><br><input type="checkbox"/> Commercial (31)<br><input type="checkbox"/> Residential (32)<br><input type="checkbox"/> Drugs (38)<br><b>Judicial Review</b><br><input type="checkbox"/> Asset forfeiture (05)<br><input type="checkbox"/> Petition re: arbitration award (11)<br><input type="checkbox"/> Writ of mandate (02)<br><input type="checkbox"/> Other judicial review (39) | <b>Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403)</b><br><input type="checkbox"/> Antitrust/Trade regulation (03)<br><input type="checkbox"/> Construction defect (10)<br><input type="checkbox"/> Mass tort (40)<br><input type="checkbox"/> Securities litigation (28)<br><input type="checkbox"/> Environmental/Toxic tort (30)<br><input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41)<br><b>Enforcement of Judgment</b><br><input type="checkbox"/> Enforcement of judgment (20)<br><b>Miscellaneous Civil Complaint</b><br><input type="checkbox"/> RICO (27)<br><input type="checkbox"/> Other complaint (not specified above) (42)<br><b>Miscellaneous Civil Petition</b><br><input type="checkbox"/> Partnership and corporate governance (21)<br><input type="checkbox"/> Other petition (not specified above) (43) |
|--|--|--|

2. This case  is  is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:
- |  |  |
|--|--|
| a. <input type="checkbox"/> Large number of separately represented parties   | d. <input type="checkbox"/> Large number of witnesses  |
| b. <input type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve | e. <input type="checkbox"/> Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court |
| c. <input type="checkbox"/> Substantial amount of documentary evidence   | f. <input type="checkbox"/> Substantial postjudgment judicial supervision  |

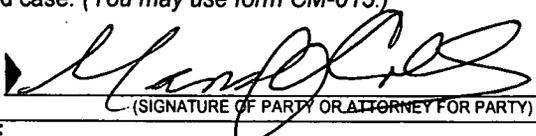
3. Remedies sought (check all that apply): a.  monetary b.  nonmonetary; declaratory or injunctive relief c.  punitive

4. Number of causes of action (specify):

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: 2-20-15  
Mansfield Collins  
(TYPE OR PRINT NAME)

  
(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

**NOTICE**  
• Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.  
• File this cover sheet in addition to any cover sheet required by local court rule.  
• If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.  
• Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

## INSTRUCTIONS ON HOW TO COMPLETE THE COVER SHEET

**To Plaintiffs and Others Filing First Papers.** If you are filing a first paper (for example, a complaint) in a civil case, you must complete and file, along with your first paper, the *Civil Case Cover Sheet* contained on page 1. This information will be used to compile statistics about the types and numbers of cases filed. You must complete items 1 through 6 on the sheet. In item 1, you must check one box for the case type that best describes the case. If the case fits both a general and a more specific type of case listed in item 1, check the more specific one. If the case has multiple causes of action, check the box that best indicates the primary cause of action. To assist you in completing the sheet, examples of the cases that belong under each case type in item 1 are provided below. A cover sheet must be filed only with your initial paper. Failure to file a cover sheet with the first paper filed in a civil case may subject a party, its counsel, or both to sanctions under rules 2.30 and 3.220 of the California Rules of Court.

**To Parties in Rule 3.740 Collections Cases.** A "collections case" under rule 3.740 is defined as an action for recovery of money owed in a sum stated to be certain that is not more than \$25,000, exclusive of interest and attorney's fees, arising from a transaction in which property, services, or money was acquired on credit. A collections case does not include an action seeking the following: (1) tort damages, (2) punitive damages, (3) recovery of real property, (4) recovery of personal property, or (5) a prejudgment writ of attachment. The identification of a case as a rule 3.740 collections case on this form means that it will be exempt from the general time-for-service requirements and case management rules, unless a defendant files a responsive pleading. A rule 3.740 collections case will be subject to the requirements for service and obtaining a judgment in rule 3.740.

**To Parties in Complex Cases.** In complex cases only, parties must also use the *Civil Case Cover Sheet* to designate whether the case is complex. If a plaintiff believes the case is complex under rule 3.400 of the California Rules of Court, this must be indicated by completing the appropriate boxes in items 1 and 2. If a plaintiff designates a case as complex, the cover sheet must be served with the complaint on all parties to the action. A defendant may file and serve no later than the time of its first appearance a joinder in the plaintiff's designation, a counter-designation that the case is not complex, or, if the plaintiff has made no designation, a designation that the case is complex.

## CASE TYPES AND EXAMPLES

## Auto Tort

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

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

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

## Non-PI/PD/WD (Other) Tort

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

## Employment

Wrongful Termination (36)  
Other Employment (15)

## Contract

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

## Real Property

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

## Unlawful Detainer

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

## Judicial Review

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

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

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

## Enforcement of Judgment

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

## Miscellaneous Civil Complaint

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

## Miscellaneous Civil Petition

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

SHORT TITLE:

ARSON v. RICKSEN

CASE NUMBER:

BC 572975

**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 2.0 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 \_\_\_\_\_  HOURS/  DAYS

**Item II.** Indicate 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 Local Rule 2.0.

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

- Class actions must be filed in the Stanley Mosk Courthouse, central district.
- May be filed in central (other county, or no bodily injury/property damage).
- Location where cause of action arose.
- Location where bodily injury, death or damage occurred.
- Location where performance required or defendant resides.
- Location of property or permanently garaged vehicle.
- Location where petitioner resides.
- Location wherein defendant/respondent functions wholly.
- Location where one or more of the parties reside.
- Location of Labor Commissioner Office

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

	<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
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., 4. 1., 4.
	Other Personal Injury Property Damage Wrongful Death (23)	<input type="checkbox"/> A7250 Premises Liability (e.g., slip and fall)	1., 4.
		<input type="checkbox"/> A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.)	1., 4.
<input type="checkbox"/> A7270 Intentional Infliction of Emotional Distress		1., 3.	
	<input type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death	1., 4.	

SHORT TITLE:

BARSON V. RICKSEN

CASE NUMBER

	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons See Step 3 Above
Non-Personal Injury/ Property Damage/ Wrongful Death Tort	Business Tort (07)	<input checked="" type="checkbox"/> A6029 Other Commercial/Business Tort (not fraud/breach of contract)	1., 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 type="checkbox"/> A6025 Other Non-Personal Injury/Property Damage tort	2., 3.
Employment	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.
Contract	Breach of Contract/ Warranty (06) (not insurance)	<input type="checkbox"/> A6004 Breach of Rental/Lease Contract (not unlawful detainer or wrongful eviction) <input type="checkbox"/> A6008 Contract/Warranty Breach -Seller Plaintiff (no fraud/negligence) <input type="checkbox"/> A6019 Negligent Breach of Contract/Warranty (no fraud) <input type="checkbox"/> A6028 Other Breach of Contract/Warranty (not fraud or negligence)	2., 5. 2., 5. 1., 2., 5. 1., 2., 5.
	Collections (09)	<input type="checkbox"/> A6002 Collections Case-Seller Plaintiff <input type="checkbox"/> A6012 Other Promissory Note/Collections Case	2., 5., 6. 2., 5.
	Insurance Coverage (18)	<input type="checkbox"/> A6015 Insurance Coverage (not complex)	1., 2., 5., 8.
	Other Contract (37)	<input type="checkbox"/> A6009 Contractual Fraud <input type="checkbox"/> A6031 Tortious Interference <input type="checkbox"/> A6027 Other Contract Dispute(not breach/insurance/fraud/negligence)	1., 2., 3., 5. 1., 2., 3., 5. 1., 2., 3., 8.
	Eminent Domain/Inverse Condemnation (14)	<input type="checkbox"/> A7300 Eminent Domain/Condemnation      Number of parcels _____	2.
Real Property	Wrongful Eviction (33)	<input type="checkbox"/> A6023 Wrongful Eviction Case	2., 6.
	Other Real Property (26)	<input type="checkbox"/> A6018 Mortgage Foreclosure <input type="checkbox"/> A6032 Quiet Title <input type="checkbox"/> A6060 Other Real Property (not eminent domain, landlord/tenant, foreclosure)	2., 6. 2., 6. 2., 6.
	Unlawful Detainer-Commercial (31)	<input type="checkbox"/> A6021 Unlawful Detainer-Commercial (not drugs or wrongful eviction)	2., 6.
Unlawful Detainer	Unlawful Detainer-Residential (32)	<input type="checkbox"/> A6020 Unlawful Detainer-Residential (not drugs or wrongful eviction)	2., 6.
	Unlawful Detainer- Post-Foreclosure (34)	<input type="checkbox"/> A6020F Unlawful Detainer-Post-Foreclosure	2., 6.
	Unlawful Detainer-Drugs (38)	<input type="checkbox"/> A6022 Unlawful Detainer-Drugs	2., 6.

SHORT TITLE:

BARSOOM V. RICKSEN

CASE NUMBER

	<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
Judicial Review	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.
	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.
Provisionally Complex Litigation	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	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.		
Miscellaneous Civil Complaints	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) <input type="checkbox"/> A6000 Other Civil Complaint (non-tort/non-complex)		1., 2., 8. 1., 2., 8.	
Miscellaneous Civil Petitions	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 <input type="checkbox"/> A6100 Other Civil Petition		2., 3., 4., 8. 2., 9.	

SHORT TITLE: <i>BARSOOM V. RICKSEN</i>	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.

<b>REASON:</b> Check the appropriate boxes for the numbers shown under Column C for the type of action that you have selected for this case.  <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.	ADDRESS: <i>2055 Wilshire Bl. #670</i> <i>LA, CA. 90010</i>	
	CITY: <i>Los Angeles</i>	STATE: <i>CA</i>

**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 *Central* courthouse in the *Sanby Mox* District of the Superior Court of California, County of Los Angeles [Code Civ. Proc., § 392 et seq., and Local Rule 2.0, subds. (b), (c) and (d)].

Dated: *2-15-20*

*[Signature]*  
 (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. 03/11).
5. Payment in full of the filing fee, unless fees have been waived.
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.

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