

EXHIBIT A

MKG 3/18/19 1:33 pm

Electronically FILED by Superior Court of California, County of Los Angeles on 02/25/2019 at 06:08 AM Sherri R. Carter, Executive Officer/Clerk of Court, by M. Mariscal, Deputy Clerk

SUM-100

**SUMMONS
(CITACION JUDICIAL)**

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

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

Regents of the University of California, an entity, and DOES 1 through 25, inclusive

Accepted on Behalf
of the Regents Only

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

Justine Tanjaya, DDS, an individual

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), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), or by contacting your local court or county bar association. **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), 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), en el Centro de Ayuda de las Cortes de California, (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
Central-Stanley Mosk Courthouse
111 North Hill Street, Los Angeles, CA 90012

CASE NUMBER:
(Número del Caso):
19STCV06426

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):
Carol Gillam, The Gillam Law Firm, 10866 Wilshire Blvd, Ste 400, Los Angeles, CA 90024; (310) 203-9977

DATE: February 25, 2019 Clerk, by _____, Deputy
(Fecha) Sherri R. Carter Executive Officer / Clerk of Court (Secretario) **Marcos Mariscal** (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

- as an individual defendant.
- as the person sued under the fictitious name of (specify):
- on behalf of (specify): The Regents of the University of California, an entity
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):
- by personal delivery on (date):

Electronically FILED by Superior Court of California, County of Los Angeles on 02/25/2019 05:38 PM Sheri H. Carter, Executive Officer/Clerk of Court, by M. Mariscal, Deputy Clerk

Assigned for all purposes to: Stanley Mosk Courthouse, Judicial Officer: Rupert Byrdsong

1 **THE GILLAM LAW FIRM**
 2 *A Professional Law Corporation*
 3 Carol L. Gillam (SBN 102354)
 4 Sara Heum (SBN 288136)
 5 10866 Wilshire Boulevard, Suite 400
 6 Los Angeles, California 90024
 7 Telephone: (310) 203-9977
 8 Facsimile: (310) 203-9922
 9 carol@gillamlaw.com,
 10 sara@gillamlaw.com
 11 Attorneys for Plaintiff Justine Tanjaya, DDS

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
 9 COUNTY OF LOS ANGELES

10 JUSTINE TANJAYA, DDS, an individual,

Case No: **19STCV06426**

11 Plaintiff,

COMPLAINT FOR DAMAGES
AND OTHER RELIEF

12 vs.

13 REGENTS OF THE UNIVERSITY OF
14 CALIFORNIA, an entity, and DOES 1
15 through 25, inclusive,

16 Defendants.

- 17 1. Sex Discrimination (Title IX, Education Amendments of 1972, 20 U.S.C. § 1681 *et seq.*)
- 18 2. Retaliation (Title IX, Education Amendments of 1972, 20 U.S.C. § 1681 *et seq.*)
- 19 3. Sex Discrimination (Cal. Gov. Code § 11135)
- 20 4. Sex Discrimination (Civil Rights Act of 1964, Title VI, 42 U.S.C. § 2000d *et seq.*)
- 21 5. Retaliation (Civil Rights Act of 1964, Title VI, 42 U.S.C. § 2000d *et seq.*)
- 22 6. Hostile Environment and Quid Pro Quo Harassment (Title IX, Education Amendments of 1972, 20 U.S.C. § 1681 *et seq.*)

23 **DEMAND FOR JURY TRIAL**

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 27 Plaintiff JUSTINE TANJAYA, DDS, an individual, ("Plaintiff") complains and
 28 alleges the following against REGENTS OF THE UNIVERSITY OF CALIFORNIA,

1 an entity, and DOES 1 through 25, inclusive, (collectively, DEFENDANTS or
2 REGENTS).

3 INTRODUCTION

4 1. Plaintiff JUSTINE TANJAYA, DDS, is a talented dentist who excelled in
5 school and was admitted to REGENTS' doctorate program at UCLA. Defendant
6 REGENTS OF THE UNIVERSITY OF CALIFORNIA ("DEFENDANT,"
7 "REGENTS" or "UCLA") is a large public university that receives federal and state
8 funds in a variety of ways, including payments for dental services rendered by students
9 and student aid.

10 JURISDICTION AND VENUE

11 2. This Court has jurisdiction pursuant to California Code of Civil Procedure
12 § 410.10. Venue is proper in this Court under California Code of Civil Procedure §§
13 395 and 395.5 because DEFENDANTS operate in this County, Plaintiff resided in this
14 county, and the injuries that are the subject of her lawsuit arose in this county.

15 PARTIES

16 3. JUSTINE TANJAYA, DDS ("Plaintiff" or "DR. TANJAYA") is an Asian
17 American woman pursuing her doctorate in oral biology at UCLA School of Dentistry.

18 4. At all times material to this complaint, DEFENDANTS enrolled and taught
19 Plaintiff in their dental school located at 10833 LeConte, Los Angeles CA 90095 ("the
20 School of Dentistry"). At all relevant times DEFENDANTS employed more than fifty
21 employees.

22 5. Throughout the time she was enrolled as a student by DEFENDANTS,
23 Plaintiff was subjected to the following unlawful conduct by DEFENDANTS:

- 24 a. A tenured professor/Senior Associate Dean sexually
25 harassed Plaintiff;
 - 26 b. DEFENDANTS treated Plaintiff differently from other
27 students;
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- c. DEFENDANTS retaliated against Plaintiff when she complained of sexual harassment by the tenured professor/Senior Associate Dean; and
- d. DEFENDANTS failed to take all reasonable steps necessary to prevent additional harassment, discrimination and retaliation against her.

6. Plaintiff is ignorant of the true names and capacities of DEFENDANTS sued herein as DOES 1 - 25, inclusive, and therefore sues these DEFENDANTS by such fictitious names and capacities. Plaintiff is informed and believes, and on that basis alleges, that each Defendant sued under such fictitious names is in some manner responsible for the occurrences herein alleged, and that Plaintiff's injuries as herein alleged were proximately caused by the conduct of such DEFENDANTS.

7. Plaintiff is informed and believes and thereupon alleges that, at all times material herein, each of the DEFENDANTS was functioning as the agent, servant, partner, employee and/or working in concert with his, her or its co-DEFENDANTS and was acting within the course and scope of such agency, partnership, employment and/or concerted activity. To the extent that certain acts and omissions were perpetrated by certain DEFENDANTS, each remaining DEFENDANT confirmed and ratified such acts and omissions of the co-DEFENDANTS, and in doing the actions mentioned below was acting within the course and scope of his, her or its authority as such agent, servant, partner, and employee with the permission, consent and ratification of the co-DEFENDANTS.

8. Plaintiff is informed and believes and thereupon alleges that, at all times material herein, each defendant was completely dominated and controlled by his, her or its co-defendants. Whenever and wherever reference is made in this complaint to any act or failure to act by a DEFENDANT or DEFENDANTS, such allegations and reference shall also be deemed to mean the acts and failures to act of each

1 DEFENDANT acting individually, jointly, and severally. Whenever and wherever
2 reference is made to individuals who are not named as Plaintiff or DEFENDANTS in
3 this complaint but who were employees/agents of DEFENDANTS, such individuals at
4 all relevant times acted on behalf of DEFENDANTS within the course and scope of
5 their employment.

6 9. Plaintiff is informed and believes and thereupon alleges that, at all
7 times material herein, DEFENDANTS and each of them, and/or their agents/employees
8 or supervisors, authorized, condoned and ratified the unlawful conduct of each other.

9 10. Plaintiff is informed and believes and thereupon alleges that, at all
10 times material herein, DEFENDANTS, and/or their agents/employees knew or
11 reasonably should have known that unless they intervened to protect Plaintiff, and to
12 adequately supervise, prohibit, control, regulate, discipline, and/or otherwise penalize
13 the conduct of the employees of REGENTS, the remaining DEFENDANTS and
14 employees perceived the conduct and omissions as being ratified and condoned.

15 **FACTS COMMON TO ALL CAUSES OF ACTION**

16 11. Plaintiff enrolled in UCLA's doctoral program in Oral Biology at UCLA
17 School of Dentistry in or about 2017. She satisfactorily performed her assignments as
18 expected.

19 12. On or about April 13, 2018, Plaintiff went to a scheduled meeting with
20 Senior Associate Dean/Professor Soltirios Tetradis, DDS, Ph.D. in his office. Plaintiff
21 was hoping for guidance and constructive advice in handling some issues with her
22 research mentor, Dr. Kang Ting. Dr. Tetradis instructed Plaintiff to close the door. They
23 were alone.

24 13. Once the door was closed, Dr. Tetradis asked Plaintiff to forward him
25 email messages between her and Dr. Ting. Plaintiff was hesitant to do so. Dr. Tetradis
26 became insistent, demanding her phone and reaching for it. He then began to stroke
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1 Plaintiff's hand repeatedly, making her feel extremely uncomfortable. He moved closer
2 to Plaintiff on the pretext that he could not read her phone well.

3 14. Plaintiff felt sexually violated, and tried to move away from Dr. Tetradis.
4 He raised his voice and insisted repeatedly that she send him the email chain with Dr.
5 Ting or there would be ramifications, which she reasonably understood as a threat.

6 15. Dr. Tetradis again moved closer to Plaintiff after she tried to move away
7 from him. He sat so close that his legs touched Plaintiff's. This made her feel even more
8 uncomfortable. She began to cry. She also worried that no one from outside would hear
9 her if she cried for help.

10 16. Dr. Tetradis asked if Plaintiff had anything else that would expose Dr.
11 Ting in a negative light. She replied that she did not. He asked if Dr. Ting had ever
12 touched Plaintiff inappropriately (as Dr. Tetradis was then doing!). She said no, her only
13 issues with Dr. Ting were about research expectations.

14 17. Dr. Tetradis then said that Plaintiff would not be able to graduate from the
15 doctoral program without his help, that if she cooperated with him, Dr. Tetradis would
16 help her produce a written agreement on how to complete her remaining clinical
17 orthodontic and PhD training in a reasonable time.

18 18. Coming from the Senior Associate Dean, this caused Plaintiff further fear
19 and frustration. She felt both sexually harassed and academically threatened
20 simultaneously.

21 19. Once she was able to leave the meeting, she emailed Dr. Tetradis that she
22 had no intention of reporting anyone or complaining about the program.

23 20. On April 18, 2018 (five days later), Plaintiff had another meeting with Dr.
24 Tetradis. Again he closed the doors and they were alone. He pressured Dr. Tanjaya to
25 file a Title IX complaint against Dr. Ting. Plaintiff continued to insist that Dr. Ting was
26 guilty of no such thing. Dr. Tetradis continued to pressure her, saying he would report it
27 even if she didn't agree. Unbeknownst to Plaintiff at the time, Dr. Tetradis had already
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1 falsely reported Dr. Ting as committing a Title IX violation against Dr. Tanjaya. He told
2 Plaintiff that he and Dean Paul Krebsbach were much more powerful than Dr. Ting, and
3 the university, including the Title IX office, is much bigger than Dr. Ting, and is on his
4 and the Dean's side.

5 21. As the meeting continued, Dr. Tetradis boasted that he was good friends
6 with Mohammed Cato, the Title IX Coordinator, and that he can bring any file to Mr.
7 Cato anonymously. He further told Plaintiff that she does not need to worry about Dr.
8 Ting since he and the university are much bigger than Dr. Ting.

9 22. Throughout the meeting, Dr. Tetradis was very intimidating to Plaintiff,
10 who felt disgusted, violated and powerless. He kept insisting she should listen to him
11 and follow his order to cooperate with filing a Title IX complaint against Dr. Ting. As
12 the meeting drew to a close, Dr. Tetradis began to stroke Plaintiff's back and arms,
13 perhaps under the guise of comforting her. She understood it for what it was – a sexual
14 assault. This made her feel even more fearful, angry, frustrated and distrustful. The
15 pressure for her to lie about Dr. Ting along with the sexual assault by Dr. Tetradis were
16 deeply disturbing.

17 23. Dr. Tanjaya was too afraid of Dr. Tetradis and the power he boasted of to
18 make an immediate complaint about him. She remained haunted by his inappropriate
19 gestures. By May 31, 2018, she decided to cut off all communication with Dr. Tetradis
20 and resign from any lab assignment he had pushed her into.

21 24. Dr. Tetradis repeatedly demanded that Plaintiff come to his office again.
22 In June 2018 he threatened her again that her actions would negatively impact the
23 continuity of her studies. Plaintiff also learned that Dr. Tetradis was reaching out to
24 various administrative employees to track her down and he even came unexpectedly to
25 the orthodontic clinic where she was working. This, in light of his previous behavior,
26 was very disturbing to Plaintiff. In no way did it appear that Dr. Tetradis had any
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1 legitimate basis for repeatedly trying to approach her or persuade her to come to his
2 office again.

3 25. On or about June 25, 2018, Plaintiff gathered the courage to file a
4 complaint against Dr. Tetradis with the Title IX office on campus.

5 26. Thereafter, retaliation from Dr. Tetradis and others associated with him
6 continued. While UCLA assured her of its non-retaliation policies, the reality was
7 starkly different. In addition, it appeared that any supposed confidentiality regarding her
8 Title IX complaint was non-existent, as another official outside the Title IX office had a
9 copy of her sworn statement and questioned her about it in a surprise meeting.

10 27. It appeared that Dr. Tetradis was using Plaintiff to cause harm to Dr. Ting,
11 and Plaintiff repeatedly said she wanted no part of it. On information and belief, Dr.
12 Ting has suffered considerable personal and professional harm as a result of Dr.
13 Tetradis's actions.

14 28. As a proximate result of Dr. Tetradis's conduct, Plaintiff has been
15 severely damaged in her ability to focus her efforts on successful completion of her
16 doctorate. She has sustained considerable emotional harm and damage to her
17 professional reputation.

18 29. As a further direct and legal result of the acts and conduct of
19 DEFENDANTS, and each of them, as aforesaid, Plaintiff has been caused to and did
20 suffer and continues to suffer severe emotional and mental distress, anguish,
21 humiliation, embarrassment, fright, shock, discomfort and anxiety. The exact nature,
22 duration, and extent of such injuries are presently unknown to Plaintiff.

23
24 **FIRST CAUSE OF ACTION**

25 **(Sex Discrimination in Violation of Title IX, 20 U.S.C. § 1681 *et seq.*)**

26 **(Against All Defendants)**

27 30. As a separate and distinct cause of action, Plaintiff complains and
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1 realleges all of the allegations contained in this complaint, and incorporates them by
2 reference into this cause of action as though fully set forth herein, excepting those
3 allegations which are inconsistent with this cause of action.

4 31. At all times relevant to this Complaint, DEFENDANTS were subject to
5 the provisions of Title IX of the Education Amendments of 1972, 20 U.S.C. § 1681 *et*
6 *seq.*). Title IX, in pertinent part, forbids DEFENDANTS from discriminating against, or
7 excluding from participation in, or denying the benefits of any education program
8 receiving Federal assistance, to any person on the basis of sex.

9 32. Plaintiff is informed and believes, and thereon alleges that
10 DEFENDANTS' conduct was wilful, purposeful and unlawful, and done in accordance
11 with the policies and practices of DEFENDANTS' operations.

12 33. Plaintiff is further informed and believes, and thereon alleges that
13 DEFENDANTS' policies and practices create a disparate impact on female students.

14 34. As a proximate cause of the aforementioned violations, Plaintiff has been
15 damaged in an amount according to proof at time of trial, but in an amount in excess of
16 the jurisdiction of this Court.

17 35. Plaintiff also seeks equitable and injunctive relief to the full extent
18 allowable by law.

19 36. Plaintiff also seeks attorneys' fees and costs to the full extent allowable by
20 law.

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22 **SECOND CAUSE OF ACTION**

23 **(Retaliation in Violation of Title IX, 20 U.S.C. § 1681 *et seq.*)**

24 **(Against All Defendants)**

25 37. As a separate and distinct cause of action, Plaintiff complains and
26 realleges all of the allegations contained in this complaint, and incorporates them by
27 reference into this cause of action as though fully set forth herein, excepting those
28 allegations which are inconsistent with this cause of action.

1 44. At all times relevant to this Complaint, REGENTS was an entity
2 governed by California Government Code Section 11135, in that it is a public agency
3 and receives funding from the State of California, including but not limited to its budget
4 appropriations, payments under Denti-Cal and student aid money.

5 45. California Government Code Section 11135 bars REGENTS from
6 discriminating and/or denying full and equal access to the benefits of its programs and
7 activities, including the School of Dentistry, to any person on the basis of sex, among
8 other things.

9 46. At times relevant to this Complaint, Plaintiff was an aggrieved person
10 under California Government Code Section 11135, in that she was discriminated
11 against, and denied full and equal access to the benefits of UCLA's School of Dentistry,
12 on the basis of her sex.

13 47. Plaintiff is entitled to and hereby asserts her right to a private right of
14 action under California Government Code Section 11135.

15 48. Plaintiff is informed and believes, and thereon alleges that
16 DEFENDANTS' conduct was wilful, purposeful and unlawful, and done in accordance
17 with the policies and practices of DEFENDANTS' operations.

18 49. As a further direct and legal result of the acts and conduct of
19 DEFENDANTS, and each of them, as aforesaid, Plaintiff has been caused to and did
20 suffer and continues to suffer severe emotional and mental distress, anguish,
21 humiliation, embarrassment, fright, shock, discomfort and anxiety. The exact nature,
22 duration, and extent of such injuries are presently unknown to Plaintiff. Plaintiff is
23 thereby entitled to general and compensatory damages in amounts as prayed below and
24 to be proven at trial. Wherefore Plaintiff prays for relief as set forth below.

25 50. As a proximate cause of the aforementioned violations, Plaintiff has been
26 damaged in an amount according to proof at time of trial, but in an amount in excess of
27 the jurisdiction of this Court.

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1 law.

2 **FIFTH CAUSE OF ACTION**
3 **(Retaliation in Violation of Title VI, Civil Rights Act of 1964)**
4 **(42 U.S.C. § 2000d)**
5 **(Against All Defendants)**

6 60. As a separate and distinct cause of action, Plaintiff complains and
7 realleges all of the allegations contained in this complaint, and incorporates them by
8 reference into this cause of action as though fully set forth herein, excepting those
9 allegations which are inconsistent with this cause of action.

10 61. At relevant times herein and in violation of 42 U.S.C. § 2000d, *et seq.*,
11 DEFENDANTS and/or their agents/employees, retaliated against Plaintiff by adversely
12 affecting Plaintiff's status as an orthodontic resident and PhD student and retaliating
13 against her after she complained to Title IX office, and otherwise engaged in protected
14 activity.

15 62. As a proximate cause of the aforementioned violations, Plaintiff has been
16 damaged in an amount according to proof at time of trial, but in an amount in excess of
17 the jurisdiction of this Court.

18 63. As a direct and proximate result of DEFENDANTS' willful, knowing, and
19 retaliation against Plaintiff, Plaintiff has sustained and continues to sustain substantial
20 losses including future earnings, and other pecuniary loss not presently ascertained.

21 64. As a further direct and legal result of the acts and conduct of
22 DEFENDANTS, and each of them, as aforesaid, Plaintiff has been caused to and did
23 suffer and continues to suffer severe emotional and mental distress, anguish,
24 humiliation, embarrassment, fright, shock, discomfort and anxiety. The exact, duration,
25 and extent of such injuries are presently unknown to Plaintiff.

26 65. As a proximate cause of the aforementioned violations, Plaintiff has been
27 damaged in an amount according to proof at time of trial, but in an amount in excess of
28 the jurisdiction of this Court.

SIXTH CAUSE OF ACTION

(Hostile Environment and Quid Pro Quo Harassment – Title IX)

(Against All Defendants)

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4 66. As a separate and distinct cause of action, Plaintiff complains and
5 realleges all of the allegations contained in this complaint, and incorporates them by
6 reference into this cause of action as though fully set forth herein, excepting those
7 allegations which are inconsistent with this cause of action.

8 67. By their conduct alleged above, DEFENDANTS created a hostile
9 environment for Plaintiff, and engaged in quid pro quo harassment, thereby causing her
10 harm, all in violation of Title IX, Education Amendments of 1972, 20 U.S.C. § 1681.

11 68. As a direct and proximate result of DEFENDANTS' maintaining a
12 hostile environment for Plaintiff, Plaintiff has sustained and continues to sustain
13 substantial losses including future earnings.

14 69. As a further direct and legal result of the acts and conduct of
15 DEFENDANTS, and each of them, as aforesaid, Plaintiff has been caused to and did
16 suffer and continues to suffer severe emotional and mental distress, anguish,
17 humiliation, embarrassment, fright, shock, discomfort and anxiety. The exact nature,
18 duration, and extent of such injuries are presently unknown to Plaintiff. Plaintiff is
19 thereby entitled to general and compensatory damages in amounts as prayed below and
20 to be proven at trial. Wherefore Plaintiff prays for relief as set forth below.

21 70. As a proximate cause of the aforementioned violations, Plaintiff has been
22 damaged in an amount according to proof at time of trial, but in an amount in excess of
23 the jurisdiction of this Court.

24 71. Plaintiff also seeks equitable and injunctive relief to the full extent
25 allowable by law.

26 72. Plaintiff also seeks attorneys' fees and costs to the full extent allowable
27 by law.

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PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment as follows:

1. For all actual, consequential and incidental financial losses including mental and emotional distress, lost future wages, medical bills, student loans and other special and general damages according to proof;
2. For injunctive relief enjoining DEFENDANTS, their agents, successors and employees from engaging in each unlawful practice set forth above, and for such other injunctive relief as the Court may deem proper;
3. For general and compensatory damages according to proof;
4. For general, mental and emotional distress damages;
5. For restitution of all monies due to Plaintiff;
6. For equitable relief including directing DEFENDANTS to allow Plaintiff to receive equal treatment in pursuit of her Ph.D. from the School of Dentistry, and directing Dr. Tetradis to cease any efforts to interfere with her pursuit of her doctorate;
7. For pre-judgment interest;
8. For costs of the suit incurred herein;
9. For attorneys' fees and costs pursuant to Title IX, Title VI, California Code of Civil Procedure Section 1021.5, and any other law under which they may be awardable herein; and
10. For any such other and further relief that the Court may deem just and proper.

DATED: February 25, 2019

THE GILLAM LAW FIRM
A Professional Law Corporation



CAROL L. GILLAM
Attorneys for Plaintiff
Justine Tanjaya, DDS

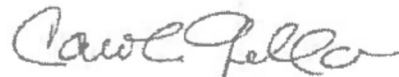
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DEMAND FOR JURY TRIAL

Plaintiff hereby demands a trial by jury on all issues so triable.

DATED: February 25, 2019

THE GILLAM LAW FIRM
A Professional Law Corporation



CAROL L. GILLAM
Attorneys for Plaintiff
Justine Tanjaya, DDS

CM-010

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): The Gillam Law Firm, P.C. Carol L. Gillam (SBN 102354); Sara Heum (SBN 288136) 10866 Wilshire Blvd, Ste 400 Los Angeles, CA 90024 TELEPHONE NO: (310) 203-9977 FAX NO: (310) 203-9922 ATTORNEY FOR (Name) Plaintiff, Justine Tanjaya, an individual	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles STREET ADDRESS: 111 North Hill Street MAILING ADDRESS: CITY AND ZIP CODE: Los Angeles, CA 90012 BRANCH NAME: Central-Stanley Mosk Courthouse	CASE NUMBER: 19STCV06426
CASE NAME: Tanjaya vs. Regents of the University of California	JUDGE: DEPT:
CIVIL CASE COVER SHEET <input checked="" type="checkbox"/> Unlimited (Amount demanded exceeds \$25,000) <input type="checkbox"/> Limited (Amount demanded is \$25,000 or less)	Complex Case Designation <input type="checkbox"/> Counter <input type="checkbox"/> Joinder Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)

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:

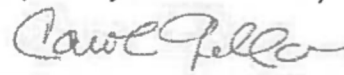
Auto Tort <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46)	Contract <input type="checkbox"/> Breach of contract/warranty (06) <input type="checkbox"/> Rule 3.740 collections (09) <input type="checkbox"/> Other collections (09) <input type="checkbox"/> Insurance coverage (18) <input type="checkbox"/> Other contract (37)	Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403) <input type="checkbox"/> Antitrust/Trade regulation (03) <input type="checkbox"/> Construction defect (10) <input type="checkbox"/> Mass tort (40) <input type="checkbox"/> Securities litigation (28) <input type="checkbox"/> Environmental/Toxic tort (30) <input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41)
Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort <input type="checkbox"/> Asbestos (04) <input type="checkbox"/> Product liability (24) <input type="checkbox"/> Medical malpractice (45) <input type="checkbox"/> Other PI/PD/WD (23)	Real Property <input type="checkbox"/> Eminent domain/Inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (26)	Enforcement of Judgment <input type="checkbox"/> Enforcement of judgment (20)
Non-PI/PD/WD (Other) Tort <input type="checkbox"/> Business tort/unfair business practice (07) <input checked="" type="checkbox"/> Civil rights (08) <input type="checkbox"/> Defamation (13) <input type="checkbox"/> Fraud (16) <input type="checkbox"/> Intellectual property (19) <input type="checkbox"/> Professional negligence (25) <input type="checkbox"/> Other non-PI/PD/WD tort (35)	Unlawful Detainer <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38)	Miscellaneous Civil Complaint <input type="checkbox"/> RICO (27) <input type="checkbox"/> Other complaint (not specified above) (42)
Employment <input type="checkbox"/> Wrongful termination (36) <input type="checkbox"/> Other employment (15)	Judicial Review <input type="checkbox"/> Asset forfeiture (05) <input type="checkbox"/> Petition re: arbitration award (11) <input type="checkbox"/> Writ of mandate (02) <input type="checkbox"/> Other judicial review (39)	Miscellaneous Civil Petition <input type="checkbox"/> Partnership and corporate governance (21) <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): **6**
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: February 25, 2019
 Carol Gillam

(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 Tanjaya v. Regents of the University of California	CASE NUMBER
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**CIVIL CASE COVER SHEET ADDENDUM AND STATEMENT OF LOCATION
(CERTIFICATE OF GROUNDS FOR ASSIGNMENT TO COURTHOUSE LOCATION)**

This form is required pursuant to LASC Local Rule 2.0 in all new civil case filings in the Los Angeles Superior Court.

Item I. Check the types of hearing and fill in the estimated length of hearing expected for this case:

JURY TRIAL? YES CLASS ACTION? YES LIMITED CASE? YES TIME ESTIMATED FOR TRIAL 5-7 HOURS/ DAYS

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

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

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

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

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

- | | |
|--|---|
| 1. Class Actions must be filed in the County Courthouse, Central District.
2. May be filed in Central (Other county, or no Bodily Injury/Property Damage)
3. Location where cause of action arose.
4. Location where bodily injury, death or damage occurred.
5. Location where performance required or defendant resides. | 6. Location of property or permanently garaged vehicle
7. Location where petitioner resides.
8. Location wherein defendant/respondent functions wholly.
9. Location where one or more of the parties reside.
10. Location of Labor Commissioner Office. |
|--|---|

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

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

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

SHORT TITLE Tanjaya v. Regents of the University of California	CASE NUMBER
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Employment

A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons -See Step 3 Above
Professional Negligence (25)	<input type="checkbox"/> A6017 Legal Malpractice <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.
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.

Real Property

Eminent Domain/Inverse Condemnation (14)	<input type="checkbox"/> A7300 Eminent Domain/Condemnation Number of parcels _____	2.
Wrongful Eviction (33)	<input type="checkbox"/> A6023 Wrongful Eviction Case	2., 6.
Other Real Property (26)	<input type="checkbox"/> A6018 Mortgage Foreclosure <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.

Judicial Review Unlawful Detainer

Unlawful Detainer-Commercial (31)	<input type="checkbox"/> A6021 Unlawful Detainer-Commercial (not drugs or wrongful eviction)	2., 6.
Unlawful Detainer-Residential (32)	<input type="checkbox"/> A6020 Unlawful Detainer-Residential (not drugs or wrongful eviction)	2., 6.
Unlawful Detainer-Drugs (38)	<input type="checkbox"/> A6022 Unlawful Detainer-Drugs	2., 6.
Asset Forfeiture (05)	<input type="checkbox"/> A6108 Asset Forfeiture Case	2., 6.
Petition re Arbitration (11)	<input type="checkbox"/> A6115 Petition to Compel/Confirm/Vacate Arbitration	2., 5.

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Judicial Review (Cont'd.)

Provisionally Complex Litigation

Enforcement of Judgment

Miscellaneous Civil Complaints

Miscellaneous Civil Petitions

A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Writ of Mandate (02)	<input type="checkbox"/> A6151 Writ - Administrative Mandamus <input type="checkbox"/> A6152 Writ - Mandamus on Limited Court Case Matter <input type="checkbox"/> A6153 Writ - Other Limited Court Case Review	2., 8. 2. 2.
Other Judicial Review (39)	<input type="checkbox"/> A6150 Other Writ /Judicial Review	2., 8.
Antitrust/Trade Regulation (03)	<input type="checkbox"/> A6003 Antitrust/Trade Regulation	1., 2., 8.
Construction Defect (10)	<input type="checkbox"/> A6007 Construction defect	1., 2., 3.
Claims Involving Mass Tort (40)	<input type="checkbox"/> A6006 Claims Involving Mass Tort	1., 2., 8.
Securities Litigation (28)	<input type="checkbox"/> A6035 Securities Litigation Case	1., 2., 8.
Toxic Tort Environmental (30)	<input type="checkbox"/> A6036 Toxic Tort/Environmental	1., 2., 3., 8.
Insurance Coverage Claims from Complex Case (41)	<input type="checkbox"/> A6014 Insurance Coverage/Subrogation (complex case only)	1., 2., 5., 8.
Enforcement of Judgment (20)	<input type="checkbox"/> A6141 Sister State Judgment <input type="checkbox"/> A6160 Abstract of Judgment <input type="checkbox"/> A6107 Confession of Judgment (non-domestic relations) <input type="checkbox"/> A6140 Administrative Agency Award (not unpaid taxes) <input type="checkbox"/> A6114 Petition/Certificate for Entry of Judgment on Unpaid Tax <input type="checkbox"/> A6112 Other Enforcement of Judgment Case	2., 9. 2., 6. 2., 9. 2., 8. 2., 8. 2., 8., 9.
RICO (27)	<input type="checkbox"/> A6033 Racketeering (RICO) Case	1., 2., 8.
Other Complaints (Not Specified Above) (42)	<input type="checkbox"/> A6030 Declaratory Relief Only <input type="checkbox"/> A6040 Injunctive Relief Only (not domestic/harassment) <input type="checkbox"/> A6011 Other Commercial Complaint Case (non-tort/non-complex) <input type="checkbox"/> A6000 Other Civil Complaint (non-tort/non-complex)	1., 2., 8. 2., 8. 1., 2., 8. 1., 2., 8.
Partnership Corporation Governance(21)	<input type="checkbox"/> A6113 Partnership and Corporate Governance Case	2., 8.
Other Petitions (Not Specified Above) (43)	<input type="checkbox"/> A6121 Civil Harassment <input type="checkbox"/> A6123 Workplace Harassment <input type="checkbox"/> A6124 Elder/Dependent Adult Abuse Case <input type="checkbox"/> A6190 Election Contest <input type="checkbox"/> A6110 Petition for Change of Name <input type="checkbox"/> A6170 Petition for Relief from Late Claim Law <input type="checkbox"/> A6100 Other Civil Petition	2., 3., 9. 2., 3., 9. 2., 3., 9. 2. 2., 7. 2., 3., 4., 8. 2., 9.

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Item III. Statement of Location: Enter the address of the accident, party's residence or place of business, performance, or other circumstance indicated in Item II., Step 3 on Page 1, as the proper reason for filing in the court location you selected.

REASON: CHECK THE NUMBER UNDER COLUMN C WHICH APPLIES IN THIS CASE <input type="checkbox"/> 1. <input 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: 10833 LeConte
CITY: Los Angeles	STATE: CA	ZIP CODE: 90095

Item IV. Declaration of Assignment: I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that the above-entitled matter is properly filed for assignment to the Stanley Mosk courthouse in the Central District of the Los Angeles Superior Court (Code Civ. Proc., § 392 et seq., and LASC Local Rule 2.0, subs. (b), (c) and (d)).

Dated: February 25, 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 form CM-010.
4. Complete Addendum to Civil Case Cover Sheet form LACIV 109 (Rev. 01/07), LASC Approved 03-04.
5. Payment in full of the filing fee, unless fees have been waived.
6. Signed order appointing the Guardian ad Litem, JC form FL-935, if the plaintiff or petitioner is a minor under 18 years of age, or if required by Court.
7. Additional copies of documents to be conformed by the Clerk. Copies of the cover sheet and this addendum must be served along with the summons and complaint, or other initiating pleading in the case.

Print

Save

Clear

<p>SUPERIOR COURT OF CALIFORNIA COUNTY OF LOS ANGELES</p>	<p>Reserved for Clerk's File Stamp</p> <p>FILED Superior Court of California County of Los Angeles 02/25/2019 Sherri R. Carter, Executive Officer / Clerk of Court By: <u>Marcos Mariscal</u> Deputy</p>
<p>COURTHOUSE ADDRESS: Stanley Mosk Courthouse 111 North Hill Street, Los Angeles, CA 90012</p>	
<p>NOTICE OF CASE ASSIGNMENT UNLIMITED CIVIL CASE</p>	
<p>Your case is assigned for all purposes to the judicial officer indicated below.</p>	<p>CASE NUMBER 19STCV06426</p>

THIS FORM IS TO BE SERVED WITH THE SUMMONS AND COMPLAINT

	ASSIGNED JUDGE	DEPT	ROOM		ASSIGNED JUDGE	DEPT	ROOM
<input checked="" type="checkbox"/>	Rupert A. Byrdsong	28					

Given to the Plaintiff/Cross-Complainant/Attorney of Record Sherri R. Carter, Executive Officer / Clerk of Court
 on 02/27/2019 (Date) By Marcos Mariscal, 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.



