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12 Attorneys for Plaintiff ANA CRUZ
13 individually, and on behalf of other similarly
14 situated

15 *D323 Judge Elinu Berle*
16 SUPERIOR COURT OF THE STATE OF CALIFORNIA

17 COUNTY OF LOS ANGELES

18 ANA CRUZ, an individual, and on behalf of
19 other similarly situated

20 Plaintiff,

21 vs.

22 FOUR SEASONS HEALTHCARE &
23 WELLNESS CENTER, LP, a California
24 limited partnership; CHANDLER
25 CONVALESCENT HOSPITAL, INC., a
26 California corporation; FOUR SEASONS
27 WELLNESS GP, LLC, a California limited
28 liability company; and DOES 1 through 50,
inclusive,

Defendants

*A6024
91607
CAC*

FILED
Superior Court of California
County of Los Angeles

JUL 22 2015

Sherri R. Carter, Executive Officer/Clerk
By *Cristina Grijalva* Deputy
Cristina Grijalva

BC 5 8 8 9 6 0

CASE NO.:

CLASS ACTION

COMPLAINT:

1. Failure to Provide Required Meal Periods
2. Failure to Provide Required Rest Periods
3. Failure to Pay Overtime Wages
4. Failure to Pay Minimum Wages
5. Failure to Pay All Wages Due to Discharged and Quitting Employees
6. Failure to Maintain Required Records
7. Failure to Furnish Accurate Itemized Wage Statements
8. Failure to Indemnify Employees for Necessary Expenditures Incurred in Discharge of Duties
9. Unfair and Unlawful Business Practices

DEMAND FOR JURY TRIAL

CIT/CASE: BC588960
LSA/DEF#: _____
RECEIPT #: CCH195707054
DATE PAID: 07/22/15 03:39 PM
PAYMENT: \$1,435.00
RECEIVED: _____
CHECK: \$1,435.00
CASH: \$0.00
CHANGE: \$0.00
PRD: \$0.00

07/22/2015

1 PLAINTIFF ANA CRUZ (“PLAINTIFF”) an individual, demanding a jury trial, on behalf
2 of herself and other persons similarly situated, hereby alleges as follows:

3 **JURISDICTION AND VENUE**

4 1. The Superior Court of the State of California has jurisdiction in this matter because
5 PLAINTIFF is a resident of the State of California, and Defendants FOUR SEASONS
6 HEALTHCARE & WELLNESS CENTER LP, (“FOUR SEASONS HEALTHCARE”), a
7 California limited partnership, CHANDLER CONVALESCENT HOSPITAL, INC.
8 (“CHANDLER”) a California corporation, FOUR SEASONS WELLNESS GP, LLC (“FOUR
9 SEASONS WELLNESS”), and DOES 1 through 50 inclusive (collectively “DEFENDANTS”),
10 are qualified to do business in California and regularly conduct business in California. Further, no
11 federal question is at issue because the claims are based solely on California law.

12 2. Venue is proper in this judicial district and the County of Los Angeles, California
13 because PLAINTIFF, and other persons similarly situated, performed work for DEFENDANTS
14 in the County of Los Angeles, DEFENDANTS maintain offices and facilities and transact
15 business in the County of Los Angeles, and because DEFENDANTS’ illegal payroll policies and
16 practices which are the subject of this action were applied, at least in part, to PLAINTIFF, and
17 other persons similarly situated, in the County of Los Angeles.

18 **PLAINTIFF**

19 3. PLAINTIFF is a female resident of the State of California and a former employee
20 of DEFENDANTS.

21 4. PLAINTIFF, on behalf of herself and other similarly situated current and former
22 non-exempt employees of DEFENDANTS in the State of California at any time during the four
23 years preceding the filing of this action, and continuing while this action is pending, brings this
24 class action to recover, among other things, wages and penalties from unpaid wages earned and
25 due, including but not limited to unpaid minimum wages, unpaid and illegally calculated overtime
26 compensation, illegal meal and rest period policies, failure to pay all wages due to discharged and
27 quitting employees, failure to indemnify employees for necessary expenditures and/or losses
28 incurred in discharging their duties, failure to provide accurate itemized wage statements, failure

1 to maintain required records, and interest, attorneys' fees, costs, and expenses.

2 5. PLAINTIFF brings this action on behalf of herself and the following similarly
3 situated class of individuals ("CLASS MEMBERS"): all current and former non-exempt
4 employees of DEFENDANTS in the State of California at any time within the period
5 beginning four (4) years prior to the filing of this action and ending at the time this action
6 settles or proceeds to final judgment (the "CLASS PERIOD"). PLAINTIFF reserves the right
7 to name additional class representatives.

8 **DEFENDANTS**

9 6. PLAINTIFF is informed and believes, and thereon alleges, that DEFENDANT
10 FOUR SEASONS HEALTHCARE is, and at all times relevant hereto was, a partnership
11 organized and existing under the laws of the State of California. PLAINTIFF is further informed
12 and believes, and thereon alleges, that DEFENDANT FOUR SEASONS HEALTHCARE is
13 authorized to conduct business in the State of California, and does conduct business in the State
14 of California. Specifically, DEFENDANT FOUR SEASONS HEALTHCARE maintains offices
15 and facilities and conducts business in, and engages in illegal payroll practices or policies in, the
16 County of Los Angeles, State of California.

17 7. PLAINTIFF is informed and believes, and thereon alleges, that DEFENDANT
18 CHANDLER is, and at all times relevant hereto was, a California corporation organized and
19 existing under the laws of the State of California. PLAINTIFF is further informed and believes,
20 and thereon alleges, that DEFENDANT CHANDLER is authorized to conduct business in the
21 State of California, and does conduct business in the State of California. Specifically,
22 DEFENDANT CHANDLER maintains offices and facilities and conducts business in, and
23 engages in illegal payroll practices or policies in, the County of Los Angeles, State of California.

24 8. PLAINTIFF is informed and believes, and thereon alleges, that DEFENDANT
25 FOUR SEASONS WELLNESS is, and at all times relevant herein was, a limited liability
26 company organized and existing under the laws of the State of California. PLAINTIFF is further
27 informed and believes, and thereon alleges, that DEFENDANT FOUR SEASONS WELLNESS
28 is authorized to conduct business in the State of California, and does conduct business in the

1 State of California. Specifically, upon information and belief, DEFENDANT FOUR
2 SEASONS WELLNESS maintains offices and facilities and conducts business in, and engages in
3 illegal payroll practices or policies in, the County of Los Angeles, State of California.

4 9. The true names and capacities of DOES 1 through 50, inclusive, are unknown to
5 PLAINTIFF at this time, and PLAINTIFF therefore sues such DOE Defendants under fictitious
6 names. PLAINTIFF is informed and believes, and thereon alleges, that each Defendant
7 designated as a DOE is in some manner highly responsible for the occurrences alleged herein, and
8 that PLAINTIFF and CLASS MEMBERS' injuries and damages, as alleged herein, were
9 proximately caused by the conduct of such DOE Defendants. PLAINTIFF will seek leave of the
10 court to amend this Complaint to allege their true names and capacities of such DOE Defendants
11 when ascertained.

12 10. At all relevant times herein, DEFENDANTS were the joint employers of
13 PLAINTIFF and CLASS MEMBERS. PLAINTIFF is informed and believes, and thereon alleges,
14 that at all times material to this complaint DEFENDANTS were the alter egos, divisions,
15 affiliates, integrated enterprises, joint employers, subsidiaries, parents, principals, related entities,
16 co-conspirators, authorized agents, partners, joint venturers, and/or guarantors, actual or
17 ostensible, of each other. Each Defendant was completely dominated by his, her or its co-
18 Defendant, and each was the alter ego of the other.

19 11. At all relevant times herein, PLAINTIFF and CLASS MEMBERS were employed
20 by DEFENDANTS under employment agreements that were partly written, partly oral, and partly
21 implied. In perpetrating the acts and omissions alleged herein, DEFENDANTS, and each of them,
22 acted pursuant to, and in furtherance of, their policies and practices of not paying PLAINTIFF
23 and CLASS MEMBERS all wages earned and due, through methods and schemes which include,
24 but are not limited to, failing to pay overtime premiums; failing to provide rest and meal periods;
25 failing to properly maintain records; failing to provide accurate itemized statements for each pay
26 period; failing to properly compensate PLAINTIFF and CLASS MEMBERS for necessary
27 expenditures; and requiring, permitting or suffering the employees to work off the clock, in
28 violation of the California Labor Code and the applicable Welfare Commission ("IWC") Orders.

FIRST CAUSE OF ACTION

Failure to Provide Required Meal Periods

[Cal. Labor Code §§ 226.7, 510, 512, 1194, 1197; IWC Wage Order No. 5-2001, § 11]

(Against all DEFENDANTS)

15. PLAINTIFF incorporates herein by specific reference, as though fully set forth, the allegations in paragraphs 1 through 14.

16. During the CLASS PERIOD, as part of DEFENDANTS' illegal payroll policies and practices to deprive their non-exempt employees all wages earned and due, DEFENDANTS required, permitted or otherwise suffered PLAINTIFF and CLASS MEMBERS to take less than the 30-minute meal period, or to work through them, and have failed to otherwise provide the required meal periods to PLAINTIFF and CLASS MEMBERS pursuant to California Labor Code § 226.7, 512 and IWC Order No. 5-2001, § 11.

17. DEFENDANTS further violated California Labor Code §§ 226.7 and IWC Wage Order No. 5-2001, § 11 by failing to compensate PLAINTIFF and CLASS MEMBERS who were not provided with a meal period, in accordance with the applicable wage order, one additional hour of compensation at each employee's regular rate of pay for each workday that a meal period was not provided.

18. DEFENDANTS further violated California Labor Code §§ 226.7, 510, 1194, 1197, and IWC Wage Order No. 5-2001 by failing to compensate PLAINTIFF and CLASS MEMBERS for all hours worked during their meal periods.

19. As a proximate result of the aforementioned violations, PLAINTIFF and CLASS MEMBERS have been damaged in an amount according to proof at trial, and seek all wages earned and due, interest, penalties, expenses, and costs of suit.

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1 **SECOND CAUSE OF ACTION**

2 **Failure to Provide Required Rest Periods**

3 **[Cal. Labor Code §§ 226.7, 512; IWC Wage Order No. 5-2001, § 12]**

4 **(Against all DEFENDANTS)**

5 20. PLAINTIFF incorporates herein by specific reference, as though fully set forth, the
6 allegations in paragraphs 1 through 19.

7 21. At all times relevant herein, as part of DEFENDANTS' illegal payroll policies and
8 practices to deprive their non-exempt employees all wages earned and due, DEFENDANTS
9 failed to provide rest periods to PLAINTIFF and CLASS MEMBERS as required under
10 California Labor Code §§ 226.7 and 512, and IWC Wage Order No. 5-2001, § 12.

11 22. DEFENDANTS further violated California Labor Code § 226.7 and IWC Wage
12 Order No. 5-2001, § 12 by failing to pay PLAINTIFF and CLASS MEMBERS who were not
13 provided with a rest period, in accordance with the applicable wage order, one additional hour of
14 compensation at each employee's regular rate of pay for each workday that a rest period was not
15 provided.

16 23. As a proximate result of the aforementioned violations, PLAINTIFF and CLASS
17 MEMBERS have been damaged in an amount according to proof at trial, and seek all wages
18 earned and due, interest, penalties, expenses, and costs of suit.

19 **THIRD CAUSE OF ACTION**

20 **Failure to Pay Overtime Wages**

21 **[Cal. Labor Code §§ 510, 1194, 1198; IWC Wage Order No. 5-2001, § 3]**

22 **(Against all DEFENDANTS)**

23 24. PLAINTIFF incorporates herein by specific reference, as though fully set forth, the
24 allegations in paragraphs 1 through 23.

25 25. Pursuant to California Labor Code §§ 510, 1194, and IWC Wage Order No. 5-
26 2001, § 3, DEFENDANTS are required to compensate PLAINTIFF and CLASS MEMBERS for
27 all overtime, which is calculated at one and one-half (1 ½) times the regular rate of pay for all
28 hours worked in excess of eight (8) hours per day and/or forty (40) hours per week, and for the

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1 first eight (8) hours on the seventh consecutive workday, with double time for all hours worked in
2 excess of twelve (12) hours in any workday and for all hours worked in excess of eight (8) hours
3 on the seventh consecutive day of work in any workweek.

4 26. PLAINTIFF and CLASS MEMBERS are current and former non-exempt
5 employees entitled to the protections of California Labor Code §§ 510, 1194, and IWC Wage
6 Order No. 5-2001. During the CLASS PERIOD, DEFENDANTS failed to compensate
7 PLAINTIFF and CLASS MEMBERS for all overtime hours worked as required under the
8 foregoing provisions of the California Labor Code and IWC Wage Order by, among other things:
9 failing to pay overtime at one and one-half (1 ½) or double the regular rate of pay as provided by
10 California Labor Code §§ 510, 1194, and IWC Wage Order No. 5-2001, § 3; requiring, permitting
11 or suffering PLAINTIFF and CLASS MEMBERS to work off the clock; requiring, permitting or
12 suffering PLAINTIFF and CLASS MEMBERS to work through meal and rest breaks; illegally
13 and inaccurately recording time in which PLAINTIFF and CLASS MEMBERS worked; failing to
14 properly maintain PLAINTIFF's and CLASS MEMBERS' records; failing to provide accurate
15 itemized wage statements to PLAINTIFF for each pay period; and other methods to be
16 discovered.

17 27. In violation of California law, DEFENDANTS have knowingly and willfully
18 refused to perform their obligations to compensate PLAINTIFF and CLASS MEMBERS for all
19 wages earned and all hours worked. As a proximate result, PLAINTIFF and CLASS MEMBERS
20 have suffered, and continue to suffer, substantial losses related to the use and enjoyment of such
21 wages, lost interest on such wages, and expenses and attorneys' fees in seeking to compel
22 DEFENDANTS to fully perform their obligations under state law, all to their respective damages
23 in amounts according to proof at time of trial, and within the jurisdiction of this Court.

24 28. DEFENDANTS' conduct described herein violates California Labor Code §§ 510,
25 1194, 1198 and IWC Wage Order No. 5-2001, § 3. Therefore, pursuant to California Labor Code
26 §§ 200, 203, 226, 558, 1194, 1197.1, and other applicable provisions under the California Labor
27 Code and IWC Wage Orders, PLAINTIFF and CLASS MEMBERS are entitled to recover the
28 unpaid balance of wages owed to them by DEFENDANTS, plus interest, penalties, attorneys'

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1 fees, expenses, and costs of suit.

2 **FOURTH CAUSE OF ACTION**

3 **Failure to Pay Minimum Wages**

4 **[Cal Labor Code §§ 1194, 1197; IWC Wage Order No. 5-2001, § 4]**

5 **(Against all DEFENDANTS)**

6 29. PLAINTIFF incorporates herein by specific reference, as though fully set forth, the
7 allegations in paragraphs 1 through 28.

8 30. Pursuant to California Labor Code §§ 1194, 1197, and IWC Wage Order No. 5-
9 2001, § 4, payment to an employee of less than the applicable minimum wage for all hours
10 worked in a payroll period is unlawful.

11 31. During the CLASS PERIOD, DEFENDANTS failed to pay PLAINTIFF and
12 CLASS MEMBERS minimum wages for all hours worked by, among other things: requiring,
13 permitting or suffering PLAINTIFF and CLASS MEMBERS to work off the clock; requiring,
14 permitting or suffering PLAINTIFF and CLASS MEMBERS to work through meal and rest
15 breaks; illegally and inaccurately recording time in which PLAINTIFF and CLASS MEMBERS
16 worked; failing to properly maintain PLAINTIFF's and CLASS MEMBERS' records; failing to
17 provide accurate itemized wage statements to PLAINTIFF and CLASS MEMBERS for each pay
18 period; and other methods to be discovered.

19 32. DEFENDANTS' conduct described herein violates California Labor Code §§
20 1194, 1197, and IWC Wage Order No. 5-2001, § 4. As a proximate result of the aforementioned
21 violations, PLAINTIFF and CLASS MEMBERS have been damaged in an amount according to
22 proof at trial. Therefore, pursuant to California Labor Code §§ 200, 203, 226, 558, 1194, 1197.1,
23 and other applicable provisions under the Labor Code and IWC Wage Orders, PLAINTIFF and
24 CLASS MEMBERS are entitled to recover the unpaid balance of wages owed to them by
25 DEFENDANTS, plus interest, penalties, attorneys' fees, expenses, and costs of suit.

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FIFTH CAUSE OF ACTION

Failure to Pay All Wages Due to Discharged and Quitting Employees

[Cal. Labor Code §§ 201, 202, 203]

(Against all DEFENDANTS)

33. PLAINTIFF incorporates herein by specific reference, as though fully set forth, the allegations in paragraphs 1 through 32.

34. Pursuant to California Labor Code § 201, 202, and 203, DEFENDANTS are required to pay all earned and unpaid wages to an employee who is discharged. California Labor Code § 201 mandates that if an employer discharges an employee, the employee's wages accrued and unpaid at the time of discharge are due and payable immediately.

35. Furthermore, pursuant to California Labor Code § 202, DEFENDANTS are required to pay all accrued wages due to an employee no later than 72 hours after the employee quits his or her employment, unless the employee provided 72 hours previous notice of his or her intention to quit, in which case the employee is entitled to his or her wages at the time of quitting.

36. California Labor Code § 203 provides that if an employer willfully fails to pay, in accordance with California Labor Code §§ 201 and 202, any wages of an employee who is discharged or who quits, the employer is liable for waiting time penalties in the form of continued compensation to the employee at the same rate for up to 30 workdays.

37. During the CLASS PERIOD, DEFENDANTS have willfully failed to pay accrued wages and other compensation to PLAINTIFF and CLASS MEMBERS in accordance with California Labor Code §§ 201 and 202.

38. As a result, PLAINTIFF and CLASS MEMBERS are entitled to all available statutory penalties, including the waiting time penalties provided in California Labor Code § 203, together with interest thereon, as well as other available remedies.

39. As a proximate result of DEFENDANTS' unlawful actions and omissions, PLAINTIFF and CLASS MEMBERS have been deprived of compensation in an amount according to proof at the time of trial, but in excess of the jurisdiction of this Court, and are entitled to recovery of such amounts, plus interest thereon, and attorneys' fees and costs, pursuant

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1 to California Labor Code §§ 1194 and 2699.

2 **SIXTH CAUSE OF ACTION**

3 **Failure to Maintain Required Records**

4 **[Cal. Labor Code §§ 226; IWC Wage Order No. 5-2001, § 7]**

5 **(Against all DEFENDANTS)**

6 40. PLAINTIFF incorporates herein by specific reference, as though fully set forth, the
7 allegations in paragraphs 1 through 39.

8 41. During the CLASS PERIOD, as part of DEFENDANTS' illegal payroll policies
9 and practices to deprive PLAINTIFF and CLASS MEMBERS of all wages earned and due,
10 DEFENDANTS knowingly and intentionally failed to maintain records as required under
11 California Labor Code §§ 226, 1174, and IWC Wage Order No. 5-2001, § 7, including but not
12 limited to the following records: total daily hours worked by each employee; applicable rates of
13 pay; all deductions; meal periods; time records showing when each employee begins and ends
14 each work period; and accurate itemized statements.

15 42. As a proximate result of DEFENDANTS' unlawful actions and omissions,
16 PLAINTIFF and CLASS MEMBERS have been damaged in an amount according to proof at
17 trial, and are entitled to all wages earned and due, plus interest thereon. Additionally,
18 PLAINTIFF and CLASS MEMBERS are entitled to all available statutory penalties, including
19 but not limited to civil penalties pursuant to California Labor Code §§ 226(e), 226.3, and 1174.5,
20 and an award of costs, expenses, and reasonable attorneys' fees, including but not limited to those
21 provided in California Labor Code § 226(e), as well as other available remedies.

22 **SEVENTH CAUSE OF ACTION**

23 **Failure to Furnish Accurate Itemized Wage Statements**

24 **[Cal. Labor Code §§ 226, 1174; IWC Wage Order No. 5-2001, § 7]**

25 **(Against all DEFENDANTS)**

26 43. PLAINTIFF incorporates herein by specific reference, as though fully set forth, the
27 allegations in paragraphs 1 through 42.

28 44. During the CLASS PERIOD, DEFENDANTS routinely failed to provide

1 PLAINTIFF and CLASS MEMBERS with timely, accurate, and itemized wage statements in
2 writing showing each employee's gross wages earned, total hours worked, all deductions made,
3 net wages earned, the name and address of the legal entity or entities employing PLAINTIFF and
4 CLASS MEMBERS, and all applicable hourly rates in effect during each pay period and the
5 corresponding number of hours worked at each hourly rate, in violation of California Labor Code
6 § 226 and IWC Wage Order No. 5-2001, § 7.

7 45. During the CLASS PERIOD, DEFENDANTS knowingly and intentionally failed
8 to provide PLAINTIFF and CLASS MEMBERS with timely, accurate, and itemized wage
9 statements in accordance with California Labor Code § 226(a).

10 46. As a proximate result of DEFENDANTS' unlawful actions and omissions,
11 PLAINTIFF and CLASS MEMBERS have been damaged in an amount according to proof at
12 trial, and seek all wages earned and due, plus interest thereon. Additionally, PLAINTIFF and
13 CLASS MEMBERS are entitled to all available statutory penalties, including but not limited to
14 civil penalties pursuant to California Labor Code §§ 226(e), 226.3, and 1174.5, and an award of
15 costs, expenses, and reasonable attorneys' fees, including but not limited to those provided in
16 California Labor Code § 226(e), as well as other available remedies.

17 **EIGHTH CAUSE OF ACTION**

18 **Failure to Indemnify Employees for Necessary Expenditures Incurred in Discharge of**
19 **Duties**

20 **[Cal. Labor Code § 2802]**

21 **(Against all DEFENDANTS)**

22 47. PLAINTIFF incorporates herein by specific reference, as though fully set forth, the
23 allegations in paragraphs 1 through 46.

24 48. California Labor Code § 2802(a) requires an employer to indemnify an employee
25 for all necessary expenditures or losses incurred by the employee in direct consequence of the
26 discharge of her his or her duties, or of his or her obedience to the directions of the employer.

27 49. During the CLASS PERIOD, DEFENDANTS knowingly and willfully failed to
28 indemnify PLAINTIFF and CLASS MEMBERS for all business expenses and/or losses incurred

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1 in direct consequence of the discharge of their duties while working under the direction of
2 DEFENDANTS, including but not limited to expenses for uniforms, cell phone usage, and other
3 employment-related expenses, in violation of California Labor Code § 2802.

4 50. As a proximate result of DEFENDANTS' unlawful actions and omissions,
5 PLAINTIFF and CLASS MEMBERS have been damaged in an amount according to proof at
6 trial, and seek reimbursement of all necessary expenditures, plus interest thereon pursuant to
7 California Labor Code § 2802(b). Additionally, PLAINTIFF and CLASS MEMBERS are
8 entitled to all available statutory penalties and an award of costs, expenses, and reasonable
9 attorneys' fees, including those provided in California Labor Code § 2802(c), as well as other
10 available remedies.

11 **NINTH CAUSE OF ACTION**

12 **Unfair and Unlawful Business Practices**

13 **[Cal. Bus. & Prof. Code §§ 17200 et. seq.]**

14 **(Against all DEFENDANTS)**

15 51. PLAINTIFF incorporates herein by specific reference, as though fully set forth, the
16 allegations in paragraphs 1 through 50.

17 52. Each and every one of DEFENDANTS' acts and omissions in violation of the
18 California Labor Code and/or the applicable IWC Wage Order as alleged herein, including but
19 not limited to DEFENDANTS' failure and refusal to provide required meal periods,
20 DEFENDANTS' failure and refusal to provide required rest periods, DEFENDANTS' failure and
21 refusal to pay overtime compensation, DEFENDANTS' failure and refusal to pay minimum
22 wages, DEFENDANTS' failure and refusal to pay all wages due to discharged or quitting
23 employees, DEFENDANTS' failure and refusal to furnish accurate itemized wage statements;
24 DEFENDANTS' failure and refusal to maintain required records, DEFENDANTS' failure and
25 refusal to indemnify PLAINTIFF and CLASS MEMBERS for necessary expenditures and/or
26 losses incurring in discharging their duties, constitutes an unfair and unlawful business practice
27 under California Business and Professions Code § 17200 et seq.

28 53. DEFENDANTS' violations of California wage and hour laws constitute a business

1 practice because DEFENDANTS' aforementioned acts and omissions were done repeatedly over
2 a significant period of time, and in a systematic manner, to the detriment of PLAINTIFF and
3 CLASS MEMBERS.

4 54. DEFENDANTS have avoided payment of wages, overtime wages, meal periods,
5 rest periods, and other benefits as required by the California Labor Code, the California Code of
6 Regulations, and the applicable IWC Wage Order. Further, DEFENDANTS have failed to
7 record, report, and pay the correct sums of assessment to the state authorities under the California
8 Labor Code and other applicable regulations.

9 55. As a result of DEFENDANTS' unfair and unlawful business practices,
10 DEFENDANTS have reaped unfair and illegal profits during the CLASS PERIOD at the expense
11 of PLAINTIFF, CLASS MEMBERS, and members of the public. DEFENDANTS should be
12 made to disgorge their ill-gotten gains and to restore them to PLAINTIFF and CLASS
13 MEMBERS.

14 56. DEFENDANTS' unfair and unlawful business practices entitle PLAINTIFF and
15 CLASS MEMBERS to seek preliminary and permanent injunctive relief, including but not
16 limited to orders that DEFENDANTS account for, disgorge, and restore to PLAINTIFF and
17 CLASS MEMBERS the wages and other compensation unlawfully withheld from them.
18 PLAINTIFF and CLASS MEMBERS are entitled to restitution of all monies to be disgorged
19 from DEFENDANTS in an amount according to proof at the time of trial, but in excess of the
20 jurisdiction of this Court.

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PRAYER FOR RELIEF

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2 **WHEREFORE**, PLAINTIFF, individually and on behalf of all other persons similarly
3 situated, respectfully prays for relief against DEFENDANTS and DOES 1 through 50, inclusive,
4 and each of them, as follows:


- 5 1. For compensatory damages in an amount to be ascertained at trial;
- 6 2. For restitution of all monies due to PLAINTIFF and CLASS MEMBERS, as well
7 as disgorged profits from the unfair and unlawful business practices of DEFENDANTS;
- 8 3. For meal and rest period compensation pursuant to California Labor Code § 226.7
9 and IWC Wage Order No. 5-2001;
- 10 4. For liquidated damages pursuant to California Labor Code §§ 1194.2 and 1197.1;
- 11 5. For preliminary and permanent injunctive relief enjoining DEFENDANTS from
12 violating the relevant provisions of the California Labor Code and the IWC Wager Orders, and
13 from engaging in the unlawful business practices complained of herein;
- 14 6. For waiting time penalties pursuant to California Labor Code § 203;
- 15 7. For statutory and civil penalties according to proof, including but not limited to all
16 penalties authorized by the California Labor Code §§ 226(e);
- 17 8. For interest on the unpaid wages at 10% per annum pursuant to California Labor
18 Code §§ 218.6, 1194, 2802, California Civil Code §§ 3287, 3288, and/or any other applicable
19 provision providing for pre-judgment interest;
- 20 9. For reasonable attorneys' fees and costs pursuant to California Labor Code §§
21 1194, 2699, 2802, California Civil Code § 1021.5, and/or any other applicable provisions
22 providing for attorneys' fees and costs;
- 23 10. For declaratory relief;
- 24 11. For an order requiring and certifying the First, Second, Third, Fourth, Fifth, Sixth,
25 Seventh, Eighth, and Ninth Causes of Action as a class action;
- 26 12. For an order appointing PLAINTIFF as class representative and PLAINTIFF's
27 counsel as class counsel; and
- 28 13. For such further relief that the Court may deem just and proper.

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DATED: July 23, 2015

Respectfully submitted,

MATERN LAW GROUP

By: 

Matthew J. Matern
Dalia R. Khalili
Serena M. Patel
Attorneys for Plaintiff
ANA CRUZ
individually, and on behalf of other persons
similarly situated

07 / 22 / 2015

DEMAND FOR JURY TRIAL

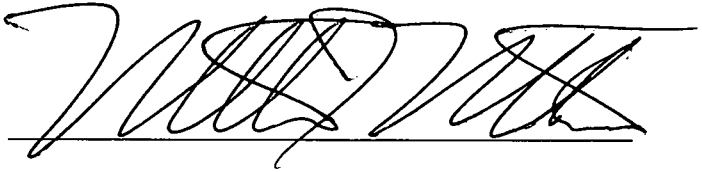
PLAINTIFF hereby demands a jury trial with respect to all issues triable of right by jury.

DATED: July 23, 2015

Respectfully submitted,

MATERN LAW GROUP

By:



Matthew J. Matern

Dalia R. Khalili

Serena M. Patel

Attorneys for Plaintiff

ANA CRUZ

individually, and on behalf of other persons
similarly situated

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07 / 22 / 2015

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):
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ATTORNEY FOR (Name): ANA CRUZ

FOR COURT USE ONLY
FILED
Superior Court of California
County of Los Angeles
JUL 22 2015
Sherri R. Carter, Executive Officer/Clerk
By Cristina Grijalva Deputy
Cristina Grijalva

SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles
STREET ADDRESS: 111 North Hill Street
MAILING ADDRESS: 111 North Hill Street
CITY AND ZIP CODE: Los Angeles, California 90012-3014
BRANCH NAME: Central District

CASE NAME:
Ana Cruz vs. Four Seasons Healthcare & Wellness Center, LP et. al.

CIVIL CASE COVER SHEET
 Unlimited (Amount demanded exceeds \$25,000)
 Limited (Amount demanded is \$25,000 or less)

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

CASE NUMBER: **BC 588960**
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:

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 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 checked="" 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. Large number of separately represented parties d. Large number of witnesses
b. Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve e. Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court
c. Substantial amount of documentary evidence f. Substantial postjudgment judicial supervision

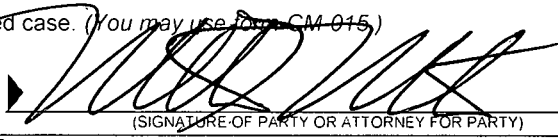
3. Remedies sought (check all that apply): a. monetary b. nonmonetary; declaratory or injunctive relief c. punitive

4. Number of causes of action (specify): Nine (9)

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: 07/21/2015
Matthew J. Matern
(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

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

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BC 5 8 8 9 6 0

**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 15-20 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)

1. Class actions must be filed in the Stanley Mosk 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., 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.	

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Non-Personal Injury/ Property
Damage/ Wrongful Death Tort

Employment

Contract

Real Property

Unlawful Detainer

A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Business Tort (07)	<input 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	1., 2., 3.
	<input type="checkbox"/> A6050 Other Professional Malpractice (not medical or legal)	1., 2., 3.
Other (35)	<input type="checkbox"/> A6025 Other Non-Personal Injury/Property Damage tort	2.,3.
Wrongful Termination (36)	<input type="checkbox"/> A6037 Wrongful Termination	1., 2., 3.
Other Employment (15)	<input checked="" type="checkbox"/> A6024 Other Employment Complaint Case	① 2., 3.
	<input type="checkbox"/> A6109 Labor Commissioner Appeals	10.
Breach of Contract/ Warranty (06) (not insurance)	<input type="checkbox"/> A6004 Breach of Rental/Lease Contract (not unlawful detainer or wrongful eviction)	2., 5.
	<input type="checkbox"/> A6008 Contract/Warranty Breach -Seller Plaintiff (no fraud/negligence)	2., 5.
	<input type="checkbox"/> A6019 Negligent Breach of Contract/Warranty (no fraud)	1., 2., 5.
	<input type="checkbox"/> A6028 Other Breach of Contract/Warranty (not fraud or negligence)	1., 2., 5.
Collections (09)	<input type="checkbox"/> A6002 Collections Case-Seller Plaintiff	2., 5., 6.
	<input type="checkbox"/> A6012 Other Promissory Note/Collections Case	2., 5.
Insurance Coverage (18)	<input type="checkbox"/> A6015 Insurance Coverage (not complex)	1., 2., 5., 8.
Other Contract (37)	<input type="checkbox"/> A6009 Contractual Fraud	1., 2., 3., 5.
	<input type="checkbox"/> A6031 Tortious Interference	1., 2., 3., 5.
	<input type="checkbox"/> A6027 Other Contract Dispute(not breach/insurance/fraud/negligence)	1., 2., 3., 8.
Eminent Domain/Inverse Condemnation (14)	<input type="checkbox"/> A7300 Eminent Domain/Condemnation Number of parcels _____	2.
Wrongful Eviction (33)	<input type="checkbox"/> A6023 Wrongful Eviction Case	2., 6.
Other Real Property (26)	<input type="checkbox"/> A6018 Mortgage Foreclosure	2., 6.
	<input type="checkbox"/> A6032 Quiet Title	2., 6.
	<input type="checkbox"/> A6060 Other Real Property (not eminent domain, landlord/tenant, foreclosure)	2., 6.
Unlawful Detainer-Commercial (31)	<input type="checkbox"/> A6021 Unlawful Detainer-Commercial (not drugs or wrongful eviction)	2., 6.
Unlawful Detainer-Residential (32)	<input type="checkbox"/> A6020 Unlawful Detainer-Residential (not drugs or wrongful eviction)	2., 6.
Unlawful Detainer- 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.

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	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
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	2., 3., 4., 8.
<input type="checkbox"/> A6100 Other Civil Petition	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 appropriate boxes for the numbers shown under Column C for the type of action that you have selected for this case. <input checked="" type="checkbox"/> 1. <input type="checkbox"/> 2. <input type="checkbox"/> 3. <input type="checkbox"/> 4. <input type="checkbox"/> 5. <input type="checkbox"/> 6. <input type="checkbox"/> 7. <input type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10.			ADDRESS: Four Seasons Healthcare & Wellness Center 5335 Laurel Canyon Blvd.
CITY: North Hollywood	STATE: CA	ZIP CODE: 91607	

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 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: 7/21/2015


 (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.

07/22/2015