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Dept. Assigned _____
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Marc I. Bloomenfeld, Esq., [SBN: 108763]
BLOOMENFELD LAW, APC
9454 Wilshire Blvd., Penthouse Suite
Beverly Hills, CA 90212
(310)246-5115
(310)246-5117-Fax

FILED
Superior Court of California
County of Los Angeles

SEP 28 2018

Sherri R. Carter, Executive Officer/Clerk
By Nancy Alvarez Deputy

Attorney for Plaintiffs: Maria V. Solis Munoz, et al.

SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF LOS ANGELES

MARIA VERONICA SOLIS MUNOZ, in her individual capacity and as Successor In Interest of the ESTATES of MARCOS ANTONIO HERNANDEZ and JOSE LUIS HERNANDEZ, decedent minors.

Plaintiff,

vs.

COUNTY OF LOS ANGELES, a governmental entity; LOS ANGELES COUNTY SHERIFF'S DEPARTMENT, a governmental entity; DEPUTY-SHERIFF CARRIE ESMERALDA ROBLES-PLACENCIA, an individual; DEPUTY-SHERIFF VINCENT MORAN, an individual and DOES 1 to 50, inclusive.

Defendants.

Case No.:

BC 7 23 65 8

COMPLAINT FOR DAMAGES

- 1) NEGLIGENCE/NEGLIGENCE PER SE
- 2) WRONGFUL DEATH
- 3) NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS (NIED)
- 4) SURVIVAL ACTIONS (CCP 773.30)

DEMAND FOR JURY TRIAL

Plaintiff, MARIA VERONICA SOLIS MUNOZ, in her individual capacity and as Successor In Interest of the ESTATES of MARCOS ANTONIO HERNANDEZ and JOSE LUIS HERNANDEZ complains and alleges against Defendants COUNTY OF LOS ANGELES; LOS ANGELES COUNTY SHERIFF'S DEPARTMENT; Deputy-Sheriff CARRIE ESMERALDA ROBLES-PLACENCIA; Deputy-Sheriff VINCENT MORAN; and DOES 1 to 50, inclusive, as follows:

I. INTRODUCTION

1. On November 16, 2017, Plaintiff and her two children, Marcos Antonio and Jose Luis

FSC: 3/13/2020 TRIAL: 3:30 / 2020 OSC: 9/28/2021

CITY/CASE: BC723658
LEHDEF#:
RECEIVED:
DATE PAID: 09/28/18 04:22 PM
AMOUNT: \$435.00
RECEIPT #: CCH451233107
CLASS:
CHARGE:
CASH:
CHECK:
\$435.00
\$0.00
\$0.00
\$0.00

70023 A7100

1 were struck by an on duty marked police vehicle driven by Los Angeles County DEPUTY- SHERIFF
2 CARRIE ESMERALDA ROBLES-PLACENCIA (hereinafter referred to as "DEPUTY ROBLES-
3 PLACENCIA") and occupied by Los Angeles County DEPUTY-SHERIFF VINCENT MORAN
4 (hereinafter referred to as "DEPUTY MORAN"). As a result thereof, Plaintiff sustained significant
5 physical and emotional injuries and her two children were killed.

6 2. Plaintiff has presented to Defendants LOS ANGELES COUNTY and LOS ANGELES
7 COUNTY SHERIFF'S DEPARTMENT, timely written claims for damages, pursuant to California
8 *Government Code sections 905 and 910, et seq.* Written notice of rejection of those claims were mailed
9 to Plaintiff on or about April 27, 2018.

10 **II. VENUE AND JURISDICTION**

11 1. Venue is proper in the Superior Court of the State of California, for the County of Los Angeles
12 because the injury alleged herein occurred within the present judicial district.

13 2. This Court has jurisdiction over the present matter because as delineated within this complaint,
14 the nature of the claims and amounts in controversy meet the requirements for unlimited damages
15 jurisdiction in the Superior Court.

16 **III. PARTIES**

17 3. At all times relevant hereto, Plaintiff, Maria Veronica Solis Munoz, was a resident of the State of
18 California, County of Los Angeles. She is the natural mother of Decedents Marco Antonio Hernandez
19 (12/04/2007) and Jose Luis Hernandez (10/25/2010).

20 4. The Estates of Marco Antonio Hernandez and Jose Luis Hernandez for survival actions pursuant
21 to California Code of Civil Procedure Section 377.30, et. seq. are brought herein by and through
22 Successor In Interest, Maria Veronica Solis Munoz.

23 5. At all times relevant hereto, Defendant COUNTY OF LOS ANGELES was a public entity duly
24 organized and existing under, and by virtue of, the laws of the State of California.

25 6. At all times relevant, Defendant LOS ANGELES COUNTY SHERIFF'S DEPARTMENT was
26 an agency and department of Defendant COUNTY OF LOS ANGELES. Defendants COUNTY OF LOS
ANGELES and LOS ANGELES COUNTY SHERIFF'S DEPARTMENT are hereinafter referred to
collectively as the "COUNTY".

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1 7. At all times relevant, Defendants and each of them were acting under color of the laws, statutes,
2 ordinances, regulations, customs and usages of the State of California and County of Los Angeles,
3 pursuant to their official authority and their policies, procedures, practices and/or established by
4 directives and/or other acts of the COUNTY

5 8. At all times relevant hereto, Deputy Robles-Placencia and Deputy Moran were Officers, Deputy-
6 Sheriffs, and/or employees of Defendant Los Angeles County Sheriff's Department ("LASD"), a
7 department and subdivision of Defendant County of Los Angeles ("LA County").

8 9. At all times alleged herein, Defendants Deputy Robles-Placencia and Deputy Moran, were acting
9 within the course and scope of their employment and/or agency with Defendant LA County, by and
10 through its Sheriff's Department, which is liable in respondeat superior pursuant to section 815.2 of the
11 California Government Code for the acts of said Defendants which are alleged herein.

12 10. Plaintiff is ignorant of the true names, identities, and capacities, whether individual, corporate,
13 associate or otherwise of Defendants DOES 1 to 50, inclusive, and therefore sues these Defendants by
14 such fictitious names. Plaintiff will amend this Complaint to allege said Defendants' true names and
15 capacities when ascertained. Plaintiff is informed and believes, and thereon alleges, that each of the
16 fictitiously named Defendants is responsible in some manner for the occurrences herein alleged, and that
17 Plaintiff's injuries and losses herein alleged were proximately caused by the acts and/or omissions of
18 said fictitiously named Defendants.

19 11. Plaintiff's wrongful death action as alleged herein, for the death of her two minor children is
20 brought pursuant to California Code of Civil Procedure Section 377.60, et. seq.

21 12. The estate claims of the minor decedents are brought pursuant to California Code of Civil
22 Procedure Section 377.30, et. seq.

23
24 **IV. FACTUAL ALLEGATIONS**

25 **The Incident:**

26 13. On November 16, 2017 at approximately 7:20 pm, Plaintiff and her children were lawfully
27 occupying the southeast corner of South Indiana Street and Whittier Boulevard near the East Los
28 Angeles/Boyle Heights border.

10-27-2018

- 1 14. On November 16, 2017 at approximately 7:20 p.m., Deputy Robles-Placencia was on duty and
2 operating a LASD marked patrol SUV owned by COUNTY with Defendant Deputy Moran in
3 the front passenger seat. It is believed and based thereon alleged that Deputy Robles-Placencia
4 was undergoing patrol training and Deputy Moran was her training supervisor on that date.
- 5 15. At said time and place, Plaintiff is informed and believes and based thereon alleges that
6 Defendants were possibly responding from the area of Indiana Street and Gleason to a dispatched
7 call of an assault in the East Los Angeles area at Downey Road and Triggs Street.
- 8 16. As Defendants travelled southbound on Indiana Street, their vehicle was observed travelling at
9 an excessive and reckless speed, without any emergency overhead flashing lights or audible siren
10 activated.
- 11 17. When they reached the intersection of Indiana Street and Whittier Boulevard, Deputy Robles-
12 Placencia drove the patrol vehicle into the intersection against a red traffic signal at an excessive
13 and reckless speed, and without due regard to vehicular and pedestrian presence in and about the
14 subject intersection.
- 15 18. Defendants' action caused a collision with another vehicle and a chain of events leading to the
16 collision of Defendant's vehicle with the bodies of Plaintiff and her children.
- 17 19. As a result of the impact, Plaintiff suffered serious and permanent physical, emotional and
18 psychological injuries. Both of her children, Marcos Antonio, age 9 and Jose Luis, age 7 were
19 killed.

20 The Cause:

- 21 20. As Ms. Solis and her children, Marcos and Luis, stood on the sidewalk, Defendant Deputy
22 Robles-Placencia approached the corner of Indiana and Whittier at a high rate of speed with no
23 emergency lights or siren engaged, all in violation of California Vehicle Code Section 21055 as
24 both lights and sirens were reasonably necessary given the circumstances.
- 25 21. Defendant Deputy Robles-Placencia, in violation of Cal. Vehicle Code Section 21453(a), entered
26 the intersection on a red phase tri-light and failed to stop, wait for traffic to clear and proceed
27 with due regard for the safety of all persons on the highway.
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1 22. Furthermore, in violation of Cal. Vehicle Code Section 21056, Defendant Deputy Robles-
2 Placencia failed to use due regard for the safety of all persons on the highway in that she, among
3 other things:

- 4 a. Failed to consider the traffic conditions and the presence of a significant number of
5 vehicles and pedestrians in and around the intersection when she recklessly and carelessly
6 accelerated at a high rate of speed into the subject intersection against a red light;
7 b. Failed to activate an audible siren and provide other means of warning in a timely manner
8 which would enable others to safely and sufficiently react to her actions;
9 c. Was going faster than her skills allowed for the complete control of the vehicle;
10 d. Failed to consider the reasonably foreseeable acts of other drivers in reaction to
11 Defendants' vehicle;
12 e. Failed to drive attentively enough to see and predict what was going around them;
13 f. Failed to give herself a reasonable way out of a collision given the circumstances;
14 g. Was paying too much attention to too little;
15 h. Was driving in a distracted manner;
16 i. Failed to stop and/or slow down for the intersection; and
17 j. Was violating all industry standards for safe driving of emergency vehicles.

18 23. At all relevant times, Defendant Deputy Robles-Placencia was driving negligently, carelessly,
19 and recklessly operating her police cruiser and driving at an unsafe speed.

20 24. At all times relevant, Defendants failed to comply with applicable provisions of the LASD
21 Manual of Policy and Procedures as they relate to emergency driving procedures, vehicle
22 operations and tactics and vehicle speeds.

23 25. Pursuant to LASD Manual of Policy and Procedures section 5-09/200.30, "In non-pursuit Code 3
24 operations, vehicle speed should not exceed that which is reasonable and prudent and within the
25 restrictions imposed by section 22350 California Vehicle, "Basic Speed Law"...Red light and
26 siren must be used to warn other motorists and assist in gaining the right of way" (*emphasis*
27 *added*).

1 26. Pursuant to LASD Manual of Policy and Procedures section 5-09/200.35, in "Entering and
2 Clearing Intersections", "...Deputy personnel shall slow and, if necessary, stop at all
3 intersections when faced with a red traffic signal light or stop sign. Using a continuous siren, the
4 Deputy shall then proceed with extreme caution. The Deputy shall drive slowly, paying
5 particular attention not only to yielding vehicles in the intersection, but to approaching vehicles
6 as well. Deputy personnel shall clear the intersection "lane by lane" and if necessary, stop at each
7 lane before proceeding... (*emphasis added*).

8 27. Immediately prior to the subject incident, Defendant Deputy Robles-Placencia approached the
9 corner of Indiana Street and Whittier Blvd. in such a careless, distracted, and reckless manner
10 that her driving caused a collision that set off a chain of events leading to the collision of her
11 vehicle with the bodies of Ms. Solis and her decedent children.

12 28. The collision was further caused by the failure of Defendant Deputy Moran to train, supervise,
13 instruct and/or control Defendant Deputy Robles-Placencia while operating the subject Police
14 SUV, as well as the premature allowing of Defendant Deputy Robles to drive on the street before
15 the completion of her training.

16 29. Several blocks prior to reaching the subject intersection, defendant's vehicle was observed
17 travelling at extremely excessive and reckless speeds without any emergency overhead flashing
18 lights or audible siren activated. Given the neighborhood, traffic and road conditions existing at
19 the time, an accident was almost surely to happen. Defendant Deputy Moran, acting as a training
20 and supervising officer had ample opportunity in the moments leading up to this incident to
21 correct, modify or control the actions and driving of Deputy Robles-Placencia so as to minimize
22 the risks of an accident occurring.

23 30. As an actual and proximate result of the Defendant Deputies' acts and/or omissions, Plaintiff's
24 Decedent minor children lost their lives and Plaintiff was severely injured. As a result of this
25 sudden and traumatic loss of her children's lives, Ms. Solis has suffered and continues to suffer
26 physical injury and severe emotional and psychological pain, suffering, loss of enjoyment of life,
27 and a loss of a familial relationship with her two sons.

1 31. At all relevant times, Ms. Solis and her Decedent minor children did not in any way contribute
2 to, or cause the collision.

3 32. Due to this traumatic loss, Ms. Solis has suffered and continues to experience the loss of the
4 familial relationship, and loss of love, care, and comfort of her children.

5 33. Ms. Solis, as an individual and representative of the Estates of Marcos and Jose Hernandez, have
6 timely filed tort claims with the County of Los Angeles pursuant to Government Code Sections
7 910, et seq.

8 **V. CAUSES OF ACTION**

9 **FIRST CAUSE OF ACTION**
10 **NEGLIGENCE/NEGLIGENCE PER SE**
11 **(As Against ALL DEFENDANTS)**

12 34. Plaintiff repeats and re-alleges each and every allegation above, as though fully set forth herein.

13 35. At all times relevant, Defendant's and each of them owed a duty of due care to members of the
14 public to properly engage in and conduct law enforcement activities.

15 36. At all relevant times, and as more fully set forth above, Defendant Deputy Robles negligently,
16 carelessly, and/or recklessly drove her Police SUV at a speed greater than was reasonable or
17 prudent and failed to follow proper law enforcement practices and protocols while engaged in an
18 emergency response, all in violation of both her common law and statutory duties of due care to
19 members of the public. Moreover, Plaintiff is informed and believes and based thereon alleges
20 that Defendant Deputy Moran, as training officer failed to adequately or properly train, supervise
21 and/or control Defendant Deputy Robles as she operated her Police SUV in an emergency
22 response situation.

23 37. This resulted in an impact that killed Ms. Solis' two minor children, and caused serious and
24 severe physical, psychological, and emotional damages to Plaintiff.

25 38. Ms. Solis is informed and believes and thereon alleges that Defendant County of Los Angeles
26 knew, or reasonably should have known, that due to lack of experience, Defendant Deputy
27 Robles was unfit to competently operate her police vehicle. Despite this knowledge, Defendants
28 negligently, carelessly, and/or recklessly allowed Deputy Robles to operate said vehicle.

1 39. At all relevant times, Ms. Solis and her Decedent minor children, did not in any way contribute
2 to, or cause the collision.

3 **SECOND CAUSE OF ACTION**
4 **WRONGFUL DEATH**
5 (As Against ALL DEFENDANTS)

6 40. Plaintiff hereby repeats, re-alleges and incorporates the allegations contained in all paragraphs
7 above as though fully set forth herein.

8 41. Plaintiff asserts a wrongful death cause of action based on said allegations.

9 42. As an actual and proximate result of Defendants acts and omissions delineated above, Plaintiff
10 suffered the loss of her children. Due to this traumatic loss she has undergone pain, suffering,
11 grief, anxiety, loss of enjoyment of life, loss of familial relationship, and loss of love, care,
12 comfort, and support of her sons.

13 43. At all relevant times, Plaintiff's Decedents did not in any way contribute to, or cause the
14 collision.

15 **THIRD CAUSE OF ACTION**
16 **NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS**
17 (As Against ALL DEFENDANTS)

18 44. Plaintiff hereby repeats, re-alleges and incorporates the allegations contained in all paragraphs
19 above as though fully set forth herein.

20 45. Plaintiff asserts a cause of action for negligent infliction of emotional distress as both direct and
21 indirect victim alleging as follows:

22 46. That as a victim of Defendants negligent and unlawful acts and/or omissions and conduct, she
23 suffered directly, physical and emotional injuries.

24 47. That as a bystander and indirect victim of Defendants negligent and unlawful acts and/or
25 omissions and conduct; that she was the decedents' mother; that she was present at the scene of
26 the incident producing their deaths and was contemporaneously aware of the circumstances
27 surrounding and causing their injuries and gruesome and horrific deaths.

28 48. That as a direct and proximate result of the wrongful acts, conduct and/or omissions of

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1 Defendants and each of them, which proximately caused physical, emotional and psychological
2 injury to Plaintiff and the death of her children, Marcos Antonio and Jose Luis, Plaintiff has
3 suffered and continues to suffer extreme and serious emotional distress.

4 49. Additionally, that as a direct result of Plaintiff 's witnessing and experiencing the horrific and
5 gruesome injuries to and death of her children, she sustained extreme and serious emotional
6 distress, as a separate and distinct measure of damages caused by the wrongful acts, conduct
7 and/or omissions of the Defendants.

8
9 **FOURTH CAUSE OF ACTION**
10 **SURVIVAL ACTIONS (CCP 773.30)**
11 **(As Against ALL DEFENDANTS)**

12 50. Plaintiff hereby repeats, re-alleges and incorporates the allegations contained in all paragraphs
13 above as though fully set forth herein.

14 51. As a legal result of the aforesaid conduct of Defendants and each of them, as set forth above,
15 Marcos Antonio and Jose Luis were killed.

16 52. As a further direct and proximate result of the aforesaid conduct of Defendants and each of them,
17 the ESTATE of MARCOS ANTONIO HERNANDEZ, was required to and did employ the
18 services of emergency medical personnel to care and treat MARCOS ANTONIO
19 HERNANDEZ, and did incur medical expenses in addition to funeral, burial and related
20 expenses, in an amount to be established according to proof at or prior to trial.

21 53. As a further direct and proximate result of the aforesaid conduct of Defendants and each of them,
22 the ESTATE of JOSE LUIS HERNANDEZ, incurred funeral, burial and related expenses, in an
23 amount to be established according to proof at or prior to trial.

24 **VI. PRAYER**

25 Wherefore, PLAINTIFFS pray for judgement against each defendant as follows:

- 26 1. For compensatory and general damages, past, present and future, loss of love, companionship,
27 comfort, care, assistance, protection, affection, society and moral support according to proof, all
28 in excess of the requirements for this Court's jurisdiction.

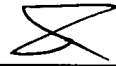
10/06/2018

- 2. For funeral and burial expenses;
- 3. For legal interest on the judgement;
- 4. For such other and further relief as the Court may deem just and proper.

Dated: September 27th, 2018

BLOOMENFELD LAW, APC

BY: _____



Marc I. Bloomenfeld, Esq.

VII. DEMAND FOR JURY TRIAL

Comes now Plaintiff Maria Veronica Solis Munoz, as an individual and in her capacity as representative of the Estates of Marcos Antonio and Jose Luis Hernandez, respectfully demand that the present matter be set for a jury trial.

Dated: September 27th, 2018

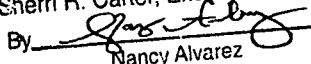
BLOOMENFELD LAW, APC

BY: _____



Marc I. Bloomenfeld, Esq.

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ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Marc I. Bloomenfeld, Esq., [SBN: 108703] BLOOMENFELD LAW, APC 9454 Wilshire Blvd., Penthouse Suite Beverly Hills, CA 90212 TELEPHONE NO: (310) 246-5115 FAX NO: (310) 246-5117 ATTORNEY FOR (Name): Maria V. Solis Munoz, et al.	FOR COURT USE ONLY <div style="border: 1px solid black; padding: 5px; display: inline-block;"> FILED Superior Court of California County of Los Angeles SEP 28 2018 Sherri R. Carter, Executive Officer/Clerk By  Deputy Nancy Alvarez </div>
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles STREET ADDRESS: 111 N. Hill Street MAILING ADDRESS: CITY AND ZIP CODE: Los Angeles, CA 90012 Stanley Mosk Courthouse BRANCH NAME:	CASE NUMBER: JUDGE: DEPT: BC 7 2 3 6 5 8
CASE NAME: Maria V. Solis Munoz, et al. v. Los Angeles County, et al.	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) <div style="display: flex; justify-content: space-around;"> <div style="text-align: center;"> Complex Case Designation <input type="checkbox"/> Counter <input type="checkbox"/> Joinder Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402) </div> </div>

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 checked="" type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46) 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) 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) Employment <input type="checkbox"/> Wrongful termination (36) <input type="checkbox"/> Other employment (15)	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) Real Property <input type="checkbox"/> Eminent domain/Inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (26) Unlawful Detainer <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38) 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)	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) Enforcement of Judgment <input type="checkbox"/> Enforcement of judgment (20) Miscellaneous Civil Complaint <input type="checkbox"/> RICO (27) <input type="checkbox"/> Other complaint (not specified above) (42) Miscellaneous Civil Petition <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> Other petition (not specified above) (43)
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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): **4**

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: **9/28/2018**
 Marc I. Bloomenfeld, Esq.
 (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.

SHORT TITLE MARIA V. SOLIS MUNOZ v. COUNTY OF LOS ANGELES, et al.

CASE NUMBER

BC728658

CIVIL CASE COVER SHEET ADDENDUM AND STATEMENT OF LOCATION (CERTIFICATE OF GROUNDS FOR ASSIGNMENT TO COURTHOUSE LOCATION)

This form is required pursuant to Local Rule 2.3 in all new civil case filings in the Los Angeles Superior Court.

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

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

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

Applicable Reasons for Choosing Court Filing Location (Column C)

- 1. Class actions must be filed in the Stanley Mosk Courthouse, Central District.
2. Permissive filing in central district.
3. Location where cause of action arose.
4. Mandatory personal injury filing in North District.
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.
11. Mandatory filing location (Hub Cases - unlawful detainer, limited non-collection, limited collection, or personal injury).

Table with 3 columns: A (Civil Case Cover Sheet Category No.), B (Type of Action), and C (Applicable Reasons). Rows include Auto Tort, Asbestos, Product Liability, Medical Malpractice, and Other Personal Injury/Property Damage/Wrongful Death.

Auto Tort
Other Personal Injury/Property Damage/Wrongful Death Tort
10/10/01

SHORT TITLE: MARIA V. SOLIS MUNOZ v. COUNTY OF LOS ANGELES, et al.

CASE NUMBER

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, 2, 3
Civil Rights (08)	<input type="checkbox"/> A6005 Civil Rights/Discrimination	1, 2, 3
Defamation (13)	<input type="checkbox"/> A6010 Defamation (slander/libel)	1, 2, 3
Fraud (16)	<input type="checkbox"/> A6013 Fraud (no contract)	1, 2, 3
Professional Negligence (25)	<input type="checkbox"/> A6017 Legal Malpractice	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	1, 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	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	5, 6, 11
	<input type="checkbox"/> A6012 Other Promissory Note/Collections Case	5, 11
	<input type="checkbox"/> A6034 Collections Case-Purchased Debt (Charged Off Consumer Debt Purchased on or after January 1, 2014)	5, 6, 11
Insurance Coverage (18)	<input type="checkbox"/> A6015 Insurance Coverage (not complex)	1, 2, 5, 8
Other Contract (37)	<input type="checkbox"/> A6009 Contractual Fraud	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, 9
Eminent Domain/Inverse Condemnation (14)	<input type="checkbox"/> A7300 Eminent Domain/Condemnation Number of parcels _____	2, 6
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)	6, 11
Unlawful Detainer-Residential (32)	<input type="checkbox"/> A6020 Unlawful Detainer-Residential (not drugs or wrongful eviction)	6, 11
Unlawful Detainer- Post-Foreclosure (34)	<input type="checkbox"/> A6020F Unlawful Detainer-Post-Foreclosure	2, 6, 11
Unlawful Detainer-Drugs (38)	<input type="checkbox"/> A6022 Unlawful Detainer-Drugs	2, 6, 11

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SHORT TITLE: MARIA V. SOLIS MUNOZ v. COUNTY OF LOS ANGELES, et al.

CASE NUMBER

A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Asset Forfeiture (05)	<input type="checkbox"/> A6108 Asset Forfeiture Case	2, 3, 6
Petition re Arbitration (11)	<input type="checkbox"/> A6115 Petition to Compel/Confirm/Vacate Arbitration	2, 5
Writ of Mandate (02)	<input type="checkbox"/> A6151 Writ - Administrative Mandamus	2, 8
	<input type="checkbox"/> A6152 Writ - Mandamus on Limited Court Case Matter	2
	<input type="checkbox"/> A6153 Writ - Other Limited Court Case Review	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	2, 5, 11
	<input type="checkbox"/> A6160 Abstract of Judgment	2, 6
	<input type="checkbox"/> A6107 Confession of Judgment (non-domestic relations)	2, 9
	<input type="checkbox"/> A6140 Administrative Agency Award (not unpaid taxes)	2, 8
	<input type="checkbox"/> A6114 Petition/Certificate for Entry of Judgment on Unpaid Tax	2, 8
	<input type="checkbox"/> A6112 Other Enforcement of Judgment Case	2, 8, 9
RICO (27)	<input type="checkbox"/> A6033 Racketeering (RICO) Case	1, 2, 8
Other Complaints (Not Specified Above) (42)	<input type="checkbox"/> A6030 Declaratory Relief Only	1, 2, 8
	<input type="checkbox"/> A6040 Injunctive Relief Only (not domestic/harassment)	2, 8
	<input type="checkbox"/> A6011 Other Commercial Complaint Case (non-tort/non-complex)	1, 2, 8
	<input type="checkbox"/> A6000 Other Civil Complaint (non-tort/non-complex)	1, 2, 8
Partnership Corporation Governance (21)	<input type="checkbox"/> A6113 Partnership and Corporate Governance Case	2, 8
Other Petitions (Not Specified Above) (43)	<input type="checkbox"/> A6121 Civil Harassment	2, 3, 9
	<input type="checkbox"/> A6123 Workplace Harassment	2, 3, 9
	<input type="checkbox"/> A6124 Elder/Dependent Adult Abuse Case	2, 3, 9
	<input type="checkbox"/> A6190 Election Contest	2
	<input type="checkbox"/> A6110 Petition for Change of Name/Change of Gender	2, 7
	<input type="checkbox"/> A6170 Petition for Relief from Late Claim Law	2, 3, 8
	<input type="checkbox"/> A6100 Other Civil Petition	2, 9

Judicial Review

Provisionally Complex Litigation

Enforcement of Judgment

Miscellaneous Civil Complaints

Miscellaneous Civil Petitions

10/10/07

SHORT TITLE: MARIA V. SOLIS MUNOZ v. COUNTY OF LOS ANGELES, et al.	CASE NUMBER
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Step 4: Statement of Reason and Address: Check the appropriate boxes for the numbers shown under Column C for the type of action that you have selected. Enter the address which is the basis for the filing location, including zip code. (No address required for class action cases).

REASON: <input checked="" type="checkbox"/> 1. <input type="checkbox"/> 2. <input type="checkbox"/> 3. <input checked="" type="checkbox"/> 4. <input type="checkbox"/> 5. <input type="checkbox"/> 6. <input type="checkbox"/> 7. <input type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10. <input checked="" type="checkbox"/> 11.	ADDRESS: At or near the intersection of Whittier Blvd. and S. Indiana Street			
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 33%; padding: 2px;">CITY: Los Angeles</td> <td style="width: 33%; padding: 2px;">STATE: CA</td> <td style="width: 33%; padding: 2px;">ZIP CODE: 90023</td> </tr> </table>	CITY: Los Angeles	STATE: CA	ZIP CODE: 90023	
CITY: Los Angeles	STATE: CA	ZIP CODE: 90023		

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

Dated: 9-28-2018



 (SIGNATURE OF ATTORNEY/FILING PARTY)

PLEASE HAVE THE FOLLOWING ITEMS COMPLETED AND READY TO BE FILED IN ORDER TO PROPERLY COMMENCE YOUR NEW COURT CASE:

1. Original Complaint or Petition.
2. If filing a Complaint, a completed Summons form for issuance by the Clerk.
3. Civil Case Cover Sheet, Judicial Council form CM-010.
4. Civil Case Cover Sheet Addendum and Statement of Location form, LACIV 109, LASC Approved 03-04 (Rev. 02/16).
5. Payment in full of the filing fee, unless there is court order for waiver, partial or scheduled payments.
6. A signed order appointing the Guardian ad Litem, Judicial Council form CIV-010, if the plaintiff or petitioner is a minor under 18 years of age will be required by Court in order to issue a summons.
7. Additional copies of documents to be conformed by the Clerk. Copies of the cover sheet and this addendum must be served along with the summons and complaint, or other initiating pleading in the case.

10/01/2018