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**FILED**  
Superior Court of California  
County of Los Angeles

MAR 06 2018

Sherri R. Carrer, Executive Officer/Clerk of Court  
By *[Signature]*, Deputy

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**FOR THE COUNTY OF LOS ANGELES, UNLIMITED JURISDICTION**

BC 6 9 6 8 8 4 5 0 0

10 CHUONG THAI, an individual, )  
11 )  
12 Plaintiff, )  
13 vs. )  
14 CITY OF MONTEREY PARK, a public )  
15 entity; and DOES 1 through 20, inclusive, )  
16 Defendants. )

CASE NO. )  
UNLIMITED JURISDICTION )  
COMPLAINT FOR: )  
1. RETALIATION IN VIOLATION )  
OF CAL. LAB. CODE 1102.5; AND )  
2. DEFAMATION )  
DEMAND FOR JURY TRIAL )

MAR 05 2018

FILING WINDOW

02/10/2018

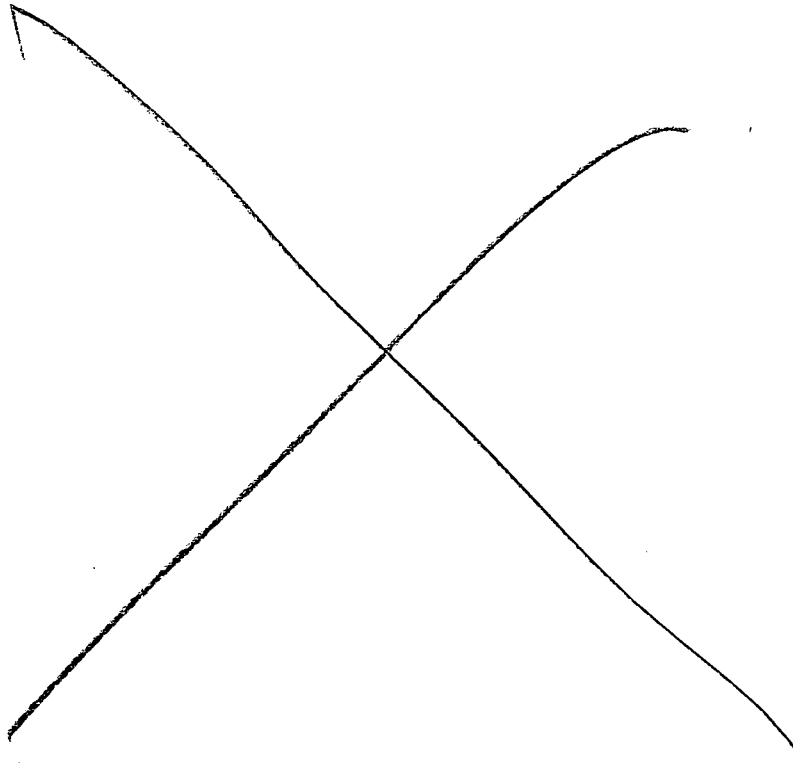
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03/07/18

CIT/CASE: BC696884  
LEA/DEF#:

RECEIPT #: CCH505376033  
DATE PAID: 03/07/18 10:51 AM  
PAYMENT: \$435.00 310  
RECEIVED:

CHECK:	\$435.00
CASH:	\$0.00
CHANGE:	\$0.00
CARD:	\$0.00



5/20

1 **INTRODUCTION**

2 1. Plaintiff CHUONG THAI (hereinafter "Plaintiff" or "Thai") files this Complaint  
3 for Damages related to Plaintiff's former employment with Defendant THE CITY OF  
4 MONTEREY PARK (hereinafter "Defendant" or "City"), and DOES 1-20 (collectively referred  
5 to as "Defendants"). Plaintiff brings causes of action for (1) retaliation in violation of California  
6 Labor Code (hereinafter "Cal. Lab. Code") § 1102.5, and (2) defamation.

7  
8 **PARTIES AND JURISDICTION**

9 2. Plaintiff is informed and believes, and thereon alleges that, at all times material to  
10 this Complaint, Defendant City was and is a public entity in the State of California with offices in  
11 the County of Los Angeles.

12 3. Defendants sued herein as DOES 1 through 20 are sued under said fictitious names  
13 pursuant to California Code of Civil Procedure ("Cal. Code of Civ. Proc.") § 474. Plaintiff is  
14 informed and believes, and thereon alleges, that each defendant sued under such fictitious names  
15 is in some manner responsible for the wrongs and damages as alleged herein, and in so acting was  
16 functioning as the agent, servant, manager, supervisor, employee, subsidiary, and/or joint venturer  
17 of Defendant City and acted at the direction of or with the permission and consent of the  
18 Defendant City.

19 4. Plaintiff is informed and believes, and thereon alleges, that each and all of the acts  
20 and omissions alleged herein were performed by, and/or attributable to, all Defendants, each  
21 acting as agents and/or employees, and/or under the direction and control of each of the other  
22 Defendants, and that said acts and failures to act were within the course and scope of said agency,  
23 employment and/or direction and control. Plaintiff is informed and believes, and thereon alleges  
24 that, at all times material hereto, Defendants were and are the agents of each other.

25 5. Plaintiff was an employee of Defendant City, and, at all relevant times, was  
26 residing in and working as the Management Services Director for Defendant City in the County of  
27 Los Angeles, California.

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1 of public funds. These and similar budgetary irregularities amount to likely excess or  
2 inappropriate charges in the millions of dollars, which are paid by the residents of the city.

3 12. On or around April 19, 2017, after raising these concerns to Ron Bow and other  
4 city officials, Plaintiff was placed on administrative leave by Ron Bow. In a memorandum dated  
5 April 19, 2017, Defendant City accused Plaintiff of misconduct.

6 13. On or around April 21, 2017, the City of Monterey Park, by and through its  
7 employees and/or agents publicly accused Plaintiff of misappropriating public funds in a news  
8 article by the Pasadena Star. The specific allegation was that Plaintiff used public funds to pay for  
9 a trip he took to New York. Plaintiff categorically denies these allegations and has yet to see any  
10 evidence indicating that these allegations are true. Rather, Plaintiff possesses receipts and proof  
11 that he charged his trip-related expenses to his personal accounts. These false statements  
12 constitute defamation against Plaintiff and have harmed his reputation and ability to obtain  
13 comparable employment following his unlawful termination.

14 14. On April 27, 2017, Defendant City informed Plaintiff that he was being terminated  
15 from his position as Management Services Director. On or around April 29, 2017, Defendant City  
16 terminated Plaintiff's employment as Management Services Director. Plaintiff is informed and  
17 believes that his termination was in direct retaliation for his complaints of activities that he  
18 reasonably believed to be in violation of law. Plaintiff's termination was signed and approved by  
19 Interim City Manager Ron Bow, the same person to whom he brought his complaints and  
20 concerns.

21 15. Prior to Plaintiff's complaints to Ron Bow, he received performance reviews  
22 wherein his performance was rated as exceeds job standards. Plaintiff performed his job  
23 exceedingly well and had no prior discipline before his termination.

24 16. Plaintiff has exhausted his administrative remedies by timely filing a Government  
25 Claims Act form with Defendant City, which has been denied.

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**FIRST CAUSE OF ACTION**

**RETALIATION IN VIOLATION OF CAL. LAB. CODE § 1102.5**

**(Against Defendants CITY and DOES 1-10)**

17. As a separate and distinct cause of action, Plaintiff complains and realleges all the allegations contained in the Complaint, and incorporates them by reference into this cause of action as though fully set forth herein, excepting those allegations which are inconsistent with this cause of action. This cause of action is brought against Defendants City and DOES 1 through 10.

18. During all relevant times, Plaintiff was an employee of Defendant City.

19. During his employment with Defendant City, Plaintiff engaged in protected activity subject to the protections of Cal. Lab. Code § 1102.5(b) by disclosing information to a person with authority over the employee or to another employee who has the authority to investigate, discover, or correct the violation or noncompliance, where Plaintiff had reasonable cause to believe that the information disclosed involved a violation of state or federal statutes, or a violation of or noncompliance with local, state, or federal rules or regulations.

20. During his employment with Defendant City, Plaintiff engaged in protected activity subject to the protections of Cal. Lab. Code § 1102.5(c) by refusing to participate in an activity that would result in a violation of state or federal statute, or a violation of or noncompliance with a local, state, or federal rule or regulation.

21. As a result of the protected activity described herein, Plaintiff was subjected to retaliation by Defendants. This retaliation was with the knowledge of Plaintiff's protected activity since his protected activity was within the City.

22. Plaintiff did in fact suffer adverse employment actions up to and including differential treatment and termination by Defendants in retaliation for Plaintiff's protected activity as stated herein.

23. Defendants intentionally created or knowingly permitted these working conditions wherein Plaintiff was directed to commit actions in violation of federal and state laws and regulations and retaliated against Plaintiff for reporting and refusing to engage in these actions.

03/10/11  
11:00 AM

1 24. As a proximate result of the retaliation against Plaintiff by Defendants in violation  
2 of Cal. Lab. Code § 1102.5, Plaintiff has been harmed.

3 WHEREFORE, Plaintiff requests relief as hereafter provided.  
4

5 **SECOND CAUSE OF ACTION**

6 **DEFAMATION**

7 **(Against Defendants CITY and DOES 11-20)**

8 25. As a separate and distinct cause of action, Plaintiff complains and realleges all the  
9 allegations contained in this Complaint, and incorporates them by reference into this cause of  
10 action as though fully set forth herein, excepting those allegations that are inconsistent with this  
11 cause of action. Plaintiff brings this cause of action against Defendants City, and DOES 11  
12 through 20.

13 26. Plaintiff is further informed and believes, and thereon alleges Defendant City, its  
14 agents, officers, employees, including DOES 11 through 20, acting in the course of their  
15 employment at the City, have made false statements about Plaintiff including that Plaintiff  
16 misused public funds.

17 27. Defendants City, its agents, officers, employees, and/or DOES 11 through 20 made  
18 one or more of these statements to a person other than Plaintiff that disparaged Plaintiff's  
19 character and integrity.

20 28. These persons reasonably understood the statements to mean that Plaintiff was  
21 violating department policies and committing a misuse of public resources.

22 29. The statements made by Defendant City, its agents, officers, employees, and/or  
23 DOES 11 through 20 about Plaintiff were false and known to be false. At minimum the statements  
24 should have been known to be false by the Defendants. Plaintiff denies ever misusing public  
25 resources to pay for a trip to New York with his family.

26 30. Defendants, their agents, officers, employees, and/or DOES 11 through 20 knew  
27 these statements were false and/or had serious doubts about the truth of these statements and/or  
28 acted with reckless disregard of the truth of falsity of these statements.

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1 31. Defendants, their agents, officers, employees, and/or DOES 11 through 20 knew or  
2 should have recognized that someone else might act in reliance on the statements, causing  
3 Plaintiff harm to his reputation.

4 32. As a proximate result of Defendant's willful, knowing, and intentional actions  
5 against Plaintiff, Plaintiff has suffered and continues to suffer humiliation, emotional distress, and  
6 meant and physical pain and anguish, in a sum according to proof.

7 33. Defendants City, its agents, officers, employees, and/or DOES 11 through 20's  
8 wrongful conduct was a substantial motivating factor in causing Plaintiff's harm.

9 34. Plaintiff is informed and believes and thereon alleges that the aforesaid acts  
10 directed toward him were carried out by DOES 11 through 20 with a conscious disregard of  
11 Plaintiff's right to be free from such illegal behavior, such as to constitute oppression, fraud, or  
12 malice pursuant to Cal. Civ. Code § 3294 entitling Plaintiff to punitive damages in an amount  
13 appropriate to punish and set an example of these individual Defendants.

14 35. Plaintiff has adequately exhausted all of his administrative remedies by timely  
15 filing a tort claim for defamation under Government Claims Program and having it rejected and  
16 denied.

17 WHEREFORE, Plaintiff requests relief as hereafter provided.

18  
19  
20 **PRAYER FOR RELIEF**

21 WHEREFORE, Plaintiff prays for relief and judgment against all Defendants, jointly and  
22 severally, as to her First and Second Causes of Action, as follows:

- 23 1. For restitution of all monies due to Plaintiff including back pay, front pay, lost  
24 employment benefits and other compensation, and other special damages according  
25 to proof;
- 26 2. For general damages to compensate Plaintiff for his past, present, and future  
27 emotional distress, pain and suffering, and loss of pleasure and enjoyment of life;
- 28 3. For all applicable injunctive relief as allowed by law;



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4. For all applicable civil penalties as allowed by law including appropriate Cal. Lab. Code sections;
5. For an award of interest, including prejudgment interest, at the legal rate as allowed by law;
6. For punitive damages as allowed by law;
7. For costs of suit incurred; and
8. For such other and further relief as this Court deems appropriate.

Dated: March 6, 2018

HENNIG RUIZ P.C.



\_\_\_\_\_  
Rob Hennig  
Sereena J. Singh  
Attorneys for Plaintiff CHUONG THAI

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1 DEMAND FOR JURY TRIAL

2  
3 Plaintiff demands trial by jury in this matter.

4  
5 Dated: March 6, 2018

HENNIG RUIZ P.C.

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8 \_\_\_\_\_  
9 Rob Hennig  
10 Sereena J. Singh  
11 Attorneys for Plaintiff CHUONG THAI  
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MAR 07 2018

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FOR COURT USE ONLY

AT ORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):  
Rob Hennig (SBN 174646); Sereena J. Singh (SBN 276781)  
Hennig Ruiz.p.c.  
3600 Wilshire Blvd., Suite 820  
Los Angeles, CA 90010  
TELEPHONE NO.: (213) 386-3741 FAX NO.: (213) 386-3740  
ATTORNEY FOR (Name): Chuong Thai

**FILED**  
Superior Court of California  
County of Los Angeles  
MAR 06 2018  
Sherri R. Carter, Executive Officer/Clerk of Court  
By: *[Signature]* Glorietta Robinson, Deputy

SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles  
STREET ADDRESS: 111 N. Hill Street  
MAILING ADDRESS:  
CITY AND ZIP CODE: Los Angeles, CA 90012  
BRANCH NAME: CENTRAL

CASE NAME:  
Thai v. City of Monterey Park, 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 696884**  
JUDGE:  
DEPT:

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

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

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

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

4. Number of causes of action (specify): 2

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: 3/6/18

Sereena J. Singh

(TYPE OR PRINT NAME)

*[Signature]*

(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: Thai v. City of Monterey Park, et al.	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 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 <sup>20</sup>  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)**

- |   |   |
|---|---|
| <ol style="list-style-type: none"> <li>1. Class actions must be filed in the Stanley Mosk Courthouse, central district.</li> <li>2. May be filed in central (other county, or no bodily injury/property damage).</li> <li>3. Location where cause of action arose.</li> <li>4. Location where bodily injury, death or damage occurred.</li> <li>5. Location where performance required or defendant resides.</li> </ol> | <ol style="list-style-type: none"> <li>6. Location of property or permanently garaged vehicle.</li> <li>7. Location where petitioner resides.</li> <li>8. Location wherein defendant/respondent functions wholly.</li> <li>9. Location where one or more of the parties reside.</li> <li>10. Location of Labor Commissioner Office</li> </ol> |
|---|---|

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

	<b>A</b> Civil Case Cover Sheet Category No.	<b>B</b> Type of Action (Check only one)	<b>C</b> Applicable Reasons - See Step 3 Above
<b>Auto Tort</b>	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.
<b>Other Personal Injury/Property Damage/ Wrongful Death Tort</b>	Asbestos (04)	<input type="checkbox"/> A6070 Asbestos Property Damage <input type="checkbox"/> A7221 Asbestos - Personal Injury/Wrongful Death	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.) <input type="checkbox"/> A7270 Intentional Infliction of Emotional Distress <input type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death	1., 4. 1., 3. 1., 4.

SHORT TITLE: Thai v. City of Monterey Park, et al.	CASE NUMBER
--	-------------

	<b>A</b> Civil Case Cover Sheet Category No.	<b>B</b> Type of Action (Check only one)	<b>C</b> Applicable Reasons - See Step 3 Above
<b>Non-Personal Injury/ Property Damage/ Wrongful Death Tort</b>	Business Tort (07)	<input type="checkbox"/> A6029 Other Commercial/Business Tort (not fraud/breach of contract)	1., 3.
	Civil Rights (08)	<input type="checkbox"/> A6005 Civil Rights/Discrimination	1., 2., 3.
	Defamation (13)	<input checked="" type="checkbox"/> A6010 Defamation (slander/libel)	1., 2., 3.
	Fraud (16)	<input type="checkbox"/> A6013 Fraud (no contract)	1., 2., 3.
	Professional Negligence (25)	<input type="checkbox"/> A6017 Legal Malpractice <input type="checkbox"/> A6050 Other Professional Malpractice (not medical or legal)	1., 2., 3. 1., 2., 3.
	Other (35)	<input type="checkbox"/> A6025 Other Non-Personal Injury/Property Damage tort	2.,3.
<b>Employment</b>	Wrongful Termination (36)	<input type="checkbox"/> A6037 Wrongful Termination	1., 2., 3.
	Other Employment (15)	<input checked="" type="checkbox"/> A6024 Other Employment Complaint Case <input type="checkbox"/> A6109 Labor Commissioner Appeals	1., 2., 3., 10.
<b>Contract</b>	Breach of Contract/ Warranty (06) (not insurance)	<input type="checkbox"/> A6004 Breach of Rental/Lease Contract (not unlawful detainer or wrongful eviction) <input type="checkbox"/> A6008 Contract/Warranty Breach -Seller Plaintiff (no fraud/negligence) <input type="checkbox"/> A6019 Negligent Breach of Contract/Warranty (no fraud) <input type="checkbox"/> A6028 Other Breach of Contract/Warranty (not fraud or negligence)	2., 5. 2., 5. 1., 2., 5. 1., 2., 5.
	Collections (09)	<input type="checkbox"/> A6002 Collections Case-Seller Plaintiff <input type="checkbox"/> A6012 Other Promissory Note/Collections Case	2., 5., 6. 2., 5.
	Insurance Coverage (18)	<input type="checkbox"/> A6015 Insurance Coverage (not complex)	1., 2., 5., 8.
	Other Contract (37)	<input type="checkbox"/> A6009 Contractual Fraud <input type="checkbox"/> A6031 Tortious Interference <input type="checkbox"/> A6027 Other Contract Dispute(not breach/insurance/fraud/negligence)	1., 2., 3., 5. 1., 2., 3., 5. 1., 2., 3., 8.
	Eminent Domain/Inverse Condemnation (14)	<input type="checkbox"/> A7300 Eminent Domain/Condemnation      Number of parcels _____	2.
<b>Unlawful Detainer / Real Property</b>	Wrongful Eviction (33)	<input type="checkbox"/> A6023 Wrongful Eviction Case	2., 6.
	Other Real Property (26)	<input type="checkbox"/> A6018 Mortgage Foreclosure <input type="checkbox"/> A6032 Quiet Title <input type="checkbox"/> A6060 Other Real Property (not eminent domain, landlord/tenant, foreclosure)	2., 6. 2., 6. 2., 6.
	Unlawful Detainer-Commercial (31)	<input type="checkbox"/> A6021 Unlawful Detainer-Commercial (not drugs or wrongful eviction)	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.

SHORT TITLE: Thai v. City of Monterey Park, et al.	CASE NUMBER
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	<b>A</b> Civil Case Cover Sheet Category No.	<b>B</b> Type of Action (Check only one)	<b>C</b> Applicable Reasons - See Step 3 Above
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)	1., 2., 8.
<input type="checkbox"/> A6000 Other Civil Complaint (non-tort/non-complex)		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.	

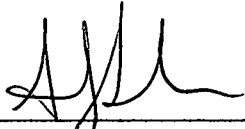
SHORT TITLE: Thai v. City of Monterey Park, et al.	CASE NUMBER
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**Item III. Statement of Location:** Enter the address of the accident, party's residence or place of business, performance, or other circumstance indicated in Item II., Step 3 on Page 1, as the proper reason for filing in the court location you selected.

<b>REASON: Check the appropriate boxes for the numbers shown under Column C for the type of action that you have selected for this case.</b>  <input type="checkbox"/> 1. <input checked="" type="checkbox"/> 2. <input checked="" type="checkbox"/> 3. <input type="checkbox"/> 4. <input type="checkbox"/> 5. <input type="checkbox"/> 6. <input type="checkbox"/> 7. <input type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10.		ADDRESS:  100 S. Main Street
CITY: Los Angeles	STATE: CA	ZIP CODE: 90012

**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: 03/6/18

  
 \_\_\_\_\_  
 (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.

03/06/18  
 10:30 AM  
 100 S. Main Street  
 Los Angeles, CA 90012