

1 Mitch Kalcheim (Bar No. 175846)  
2 **Legal GP**  
3 9663 Santa Monica Blvd., Suite 889  
4 Beverly Hills, California 90210  
5 Telephone: (310) 980-7749  
6 Email: MHK@LegalGP.com  
7 Attorney for Plaintiff

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

NOV 22 2017

herri K. Carter, Executive Officer  
By [Signature] Deputy  
Glorietta Roberts, J.

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

9 **FOR THE COUNTY OF LOS ANGELES**

Case No. **BC 6 8 4 2 1 8**

10 DAVIS GOLDSTEIN, Individually and on  
11 Behalf of All Others Similarly Situated,

12 Plaintiff,

13 vs.

14 KREATION JUICERY, INC., and Does 1-  
15 100,

16 Defendant.

Case No.

17 **CLASS ACTION COMPLAINT FOR:**

- 18 1. VIOLATION OF CAL. BUS. & PROF. CODE § 17500, ET SEQ.
- 19 2. UNFAIR AND FRAUDULENT BUSINESS PRACTICES IN VIOLATION OF CAL. BUS. & PROF. CODE § 17200, ET SEQ.
- 20 3. VIOLATION OF THE CONSUMER LEGAL REMEDIES ACT
- 21 4. FRAUD AND DECEIT
- 22 5. NEGLIGENT MISREPRESENTATION

23 Plaintiff Davis Goldstein ("Ms. Goldstein" or "Plaintiff") by and through its undersigned  
24 counsel brings this action both individually and on behalf of the class of persons defined  
25 below against Defendant Kreation Juicery, Inc. (hereafter "Kreation" or "Defendant") and  
26 makes the following allegations upon information and belief except for the allegations  
27 related to Plaintiff which are made on personal knowledge as follows:

11/22/2017

LEGAL GP  
BEVERLY HILLS, CALIFORNIA

CIT/CASE: BC684218  
LEA/DEF#:

RECEIPT #: CCH505376059  
DATE PAID: 11/22/17 11:07 AM  
PAYMENT: \$1,435.00 310  
RECEIVED:

CHECK: \$1,435.00  
CASH: \$0.00  
CHANGE: \$0.00  
CARD: \$0.00

11/22/2017

ORIGINAL BY FAX

310

LEGAL GP  
BEVERLY HILLS, CALIFORNIA

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

NATURE OF THE ACTION

1. Plaintiff alleges that Defendant advertises, promotes, offers for sale, sells and distributes a wide array of juice and supplement products (together "Products").

2. Plaintiff alleges that Defendant engages in an unlawful scheme whereby Defendant intentionally misleads consumers into making purchases of its *Products*, including, but not limited to those labeled as, "CBD OIL," "Shades of Green," "Green 1", "Green 2", "Green 4," "Strength," "Synchronize," "Clarity," "Healer," "Unity 12," "Charcoalade," "Enlighten," "Matcha Green Tea," and "RX" potions by falsely promising that these *Products* were proven to "reduce malignant tumors", cure Autism and aide in the treatment of Cancer (together the "Offending Products").

3. Defendant, markets its *Offending Products* to consumers throughout California in a uniformly unlawful and deceptive business practices in violation of California Business & Professions Code §§ 17200, 17500, *et seq* and the Consumer Legal Remedies Act ("CLRA"), as codified at California Civil Code § 1750, *et seq*.

4. Defendant knew, should have known, or recklessly disregarded the illegal and deceptive nature of this practice.

5. Thus, Plaintiff brings this action for injunctive relief and damages necessitated by Defendant's deceptive and unlawful marketing schemes in the multi-million dollar business of juice and supplement products.

6. Plaintiff brings this action individually and as a class action pursuant to Code of Civil Procedure § 382 and Civil Code § 1781.

7. Plaintiff seeks to represent: all persons and/or entities who within the four years prior to the filing of this Complaint (the "Class Period"): 1) purchased an *Offending Product* from Defendant in reliance on Defendant's false guarantees and representations (hereinafter collectively referred to as the "Class," "Class Members," "Consumer" and/or "Consumers").

8. Plaintiff's claims relate to Defendant's unlawful, inequitable and unfair marketing practices, whereby they dupe even the most sophisticated of consumers into

LEGAL GP  
BEVERLY HILLS, CALIFORNIA

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

making purchases of its *Offending Products* by misrepresenting the *Offending Products*' ability to cure disease.

9. Defendant makes these claims, through its labeling, on its website, on radio and on various signage throughout California.

10. Defendant's conduct has injured tens of thousands, if not hundreds of thousands of consumers, throughout California, and violates California's consumer protection laws and the Federal laws of the United States of America. Accordingly, Plaintiff individually and on behalf of a Class of similarly situated consumers seeks injunctive relief, restitution and monetary damages.

11. In short, Defendant uses a wide assortment of fraudulent, false and unlawful advertising to sell its *Offending Products*. The scheme is so deceptive that even the most wary of consumers whom exercise the highest level of reasonable prudence are often duped.

12. The crux, of Defendant's fraudulent marketing scheme consists of duping consumers into believing that its *Offending Products* cure and/or aid in the cure of many life threatening diseases, including but not limited to, high blood pressure, Autism and Cancer.

**JURISDICTION AND VENUE**

13. This Court has jurisdiction over all causes of action asserted herein pursuant to the California Constitution, Article IV, § 10, because this case is a cause not given by statute to other trial courts.

14. This matter is complex pursuant to the California Rules of Court, because it is an alleged class action and will involve: numerous pretrial motions raising difficult legal issues that will be time consuming to resolve; will require the management of a large number of witnesses or a substantial amount of documentary evidence; and substantial post-judgment judicial supervision.

15. This Court has jurisdiction over each Defendant named herein because each Defendant is either a person or a corporation or an association organized under the State of California, a foreign corporation or association authorized to do business in California and registered with the California Secretary of State, or does sufficient business in California

LEGAL CP  
BEVERLY HILLS, CALIFORNIA

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

and is registered with the California Secretary of State, or does sufficient business in California, has sufficient minimum contacts with California or otherwise intentionally avails itself of the laws and markets of California, through the promotion, advertising, sale, marketing and distribution of its products in California, to render the exercise of jurisdiction by the California courts permissible.

16. Venue is proper in this Court because Plaintiff resides in Los Angeles County, the transaction occurred within Los Angeles County, and all other events giving rise to this action occurred in Los Angeles County.

**PARTIES**

17. Plaintiff, Davis Goldstein, is a California consumer and resides in Los Angeles, County.

18. Kreation is located in Beverly Hills, CA. Kreation does business throughout Southern California through multiple retail locations. Kreation maintains at least 10 retail locations in Los Angeles County.

**DEFENDANTS' FRAUDULENT MARKETING SCHEME**

19. This action seeks to terminate and obtain redress for a damages stemming from a fraudulent and illegal marketing scheme perpetrated by a Company which has no respect for the laws of the state or any notion of fair play in advertising.

20. Over the past 4 years Defendant has bilked, thousands of consumers, out of hundreds of thousands, if not millions of dollars through a scheme of false and deceptive marketing.

21. Through the use of false statements and advertising Defendant has devised and implemented a scheme to sell its *Offending Products* to consumers and promise far more than they deliver.

22. **Indeed, Defendant claims that its *Offending Products* (which are not drugs and have never been evaluated by the FDA) are effective in treating cancer and other life threatening diseases.**

LEGAL GP  
BEVERLY HILLS, CALIFORNIA

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

23. Specifically, Defendant advertises, promotes, offers for sale, sells and distributes a wide array of *Offending Products* to consumers throughout California.

24. One telling example of the extent of Defendant's false and misleading conduct is their use of the following sign in which it sold a product labeled as CBD OIL. Defendant touts CBD OIL as a *Product* which provides pain relief, **shrinks malignant tumors, improves insulin sensitivity, and cures Autism. Such marketing claims are wholly unsubstantiated and violate state and Federal law.**

25. Another example of Defendant's false advertising relates to its juice products entitled "*Green 1,*" "*Green 2,*" "*50 Shades of Green,*" "*Synchronize,*" and "*Clarity.*" **Defendant claims that these juice mixtures will among other things lower blood pressure, lower cholesterol, and are "anti-inflammatory" and "anti-cancer." Again, such marketing claims are wholly unsubstantiated and violate state and Federal law.**

26. Defendant's labeling on the *Offending Products* and its internet marketing is designed to deceive and solicit a wide range of consumers, from the most desperate, seeking a cure for cancer, to the most wary of consumers.

27. In addition, to the representations detailed above, Defendant has made references to various other diseases throughout its marketing materials and states that its *Offending Products* will aid in the cure against these diseases.

28. Indeed, through its advertising and promotional materials, Defendant has represented expressly and by implication that its *Offending Products* are effective in the prevention, treatment, of many diseases, including, but not limited to, arthritis, high blood pressure, heart disease, and Cancer.

29. These outright fraudulent activities conducted by Defendant, were conducted by and/or with the knowledge of, and for the direct financial benefit of Defendant.

30. Further, through its advertising and promotional materials, Defendant has represented expressly and by implication that the Food and Drug Administration ("FDA") has evaluated the effectiveness of its *Products*.

LEGAL GP  
BEVERLY HILLS, CALIFORNIA

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

31. Specifically, Plaintiff alleges that Defendant marketed its *Offending Products* as an unapproved FDA drugs because it claims that its *Offending Products* can "cure" disease. Under 21 U.S.C. 343(r)(6) a retailer may only claim a product mitigates, treats, cures, a disease if it meets certain criteria including, being evaluated by the FDA.

32. Here, Kreation violates the law by making such claims about *Offending Products* because the FDA has not evaluated the effectiveness of any of Defendant's *Products*. Therefore, the making of these representations is a deceptive practice and constitutes false advertising.

33. The foregoing wrongful conduct has caused Plaintiff damages as such Plaintiff seeks monetary relief on behalf of herself and the class she seeks to represent.

34. Plaintiff further alleges that Defendant intends to continue its wrongful conduct and to severely harm consumers in order to increase sales of Defendant's *Offending Products*. Thus Plaintiff seeks injunctive relief as more fully described below.

**CLASS ACTION ALLEGATIONS**

35. Plaintiff brings this action individually, and as a class action pursuant to Code of Civil Procedure § 382 and Civil Code § 1781. Plaintiff seeks to represent: all persons and/or entities who within the Class Period: 1) purchased Defendant's *Offending Products* because of Defendant' express promises, representations, promotions, and guarantees that Defendant's *Offending Product* would aide in the cure of cancer or aide in the cure of a disease.

36. This action is properly maintainable as a class action. The Class is comprised of tens of thousands of persons who were induced to purchase Defendant's *Offending Products* based on Defendant' false representations and misrepresentations.

37. Joinder of such persons in one action is impracticable, and the disposition of their claims in a class action will provide substantial benefits to both the parties and the Court.

38. A class action is superior to other methods for the fair and efficient adjudication of the claims herein asserted, and no unusual difficulties are likely to be

LEGAL GP  
BEVERLY HILLS, CALIFORNIA

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

encountered in the management of this class action. Since the damages suffered by individual Class Members may be relatively small, the expense and burden of individual litigation makes it impossible for many of the Class Members to individually seek redress for the wrongful conduct alleged.

39. A class action provides a fair and efficient method for adjudicating this controversy because:

i. Common questions of law or fact predominate over any questions affecting only individual members. No significant questions of law or fact that might affect only individual members or subclasses of individual members exist that cannot be managed through effective subclass definitions, jury interrogatory modifications, or other methods which are consistent with sound and creative judicial management, due process of law, and fundamental fairness to Defendant and the Class:

ii. Plaintiff is aware of no difficulties likely to be encountered in the management of the action as a class action. Indeed, given Defendant's uniform practice of making false representations, this action properly invokes the class action procedural device;

iii. The prosecution of separate actions by individual Class Members would create a risk of inconsistent or varying adjudications with respect to each individual Class Member's claim, which would present the Defendant with incompatible standards of conduct. That is because the common questions of law and fact cited below could conceivably be answered by different courts and different fact finders in different ways;

iv. The prosecution of separate actions by individual Class Members would create a risk of adjudications which would as a practical matter be dispositive of the interests of other members not parties to such separate adjudications and which would substantially impair or impede the ability of such other members to protect their interests. This is so because separate actions by individual Class Members would effectively result in findings of fact in the first individual action tried being accorded collateral estoppel effect in later actions; and



LEGAL CP  
BEVERLY HILLS, CALIFORNIA

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

v. Plaintiff is aware of no litigation already commenced by a Class Member involving issues presented in this action.

40. There are questions of law and fact which are common to the Class and which predominate over questions affecting any individual Class Member. The common questions include, *inter alia*, the following:

- i. Whether Defendant's conduct and acts violated, *inter alia*, California Business & Professions Code § 17200, et seq., and/or any other applicable state, federal, common and statutory law;
- ii. Whether Defendant's conduct and acts constitute false advertising in violation of California Business & Professions Code § 17500, et seq., and/or any other applicable state, federal, common and statutory law;
- iii. Whether Defendant devised and deployed a scheme to defraud, or engaged in a common course of conduct which acted to defraud or deceive Plaintiff and the Class;
- iv. Whether Defendant intentionally misrepresented or failed to disclose material facts to Plaintiff and the Class regarding the health benefits provided by Defendant's Products;
- v. Whether Defendant intentionally and/or negligently misrepresented or failed to disclose material facts to Plaintiff and the Class regarding the effectiveness of Supplements;
- vi. Whether the Plaintiff and the Class have sustained damages and the proper measure of those damages;
- vii. Whether Plaintiff and the Class are entitled to an award of punitive damages and attorneys' fees against Defendant; and
- viii. Whether Plaintiff and the Class are entitled to equitable relief, including without limitation, injunctive and declaratory relief.

41. Plaintiff's claims and the claims of the Class Members all derive from a common nucleus of operative fact, Plaintiff is asserting claims that are typical of the claims of the entire Class and Plaintiff will fairly and adequately represent and protect the interests

LEGAL GP  
BEVERLY HILLS, CALIFORNIA

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

of the Class in that he has no interests that are antagonistic to those of the other Class Members.

42. Plaintiff has retained counsel who is competent and experienced in the prosecution of class action litigation.

**FIRST CAUSE OF ACTION**  
**(For Violation of Bus. & Prof. Code § 17500, et seq.)**

43. Plaintiff hereby incorporates by reference each of the preceding allegations as if fully set forth herein.

44. California Business and Professions Code § 17500 provides that “[i]t is unlawful for any person, firm, corporation or association with intent...to dispose of...personal property...to induce the public to enter into any obligation relating thereto, to make or disseminate or cause to be made or disseminated before the public in this state...any statement...which is untrue or misleading, and which is known, or which by the exercise of reasonable care should be known, to be untrue or misleading...”

45. Defendant regularly advertises that its *Offending Products* will, cure disease and assist in the treatment of cancer, when in fact Defendant had no factual basis to make such claims.

46. Defendant does not disclose, conspicuously or otherwise, that its advertisements and representations regarding the effectiveness of Defendant’s *Offending Products* were untrue, inaccurate, false or misleading.

47. Defendant’s acts of untrue and misleading advertising presents a continuing threat to members of the public because Defendant’s advertisements induce consumers to purchase its *Offending Products*.

48. As a result of the violations of California law described above, Defendant has been, and continues to be unjustly enriched by California consumers.

49. Pursuant to California Business & Professions Code § 17535, Plaintiff, individually and on behalf of the Class, requests that this Court make such orders or

LEGAL GP  
BEVERLY HILLS, CALIFORNIA

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

judgments as may be necessary to prevent the use or employment by Defendant of untrue and misleading advertisements, or other such orders which may be necessary to restore Plaintiff and the Class Members any money which may have been acquired by Defendant by means of its untrue and misleading advertisements.

50. By reason of Defendant's unlawful conduct in violation of § 17500, Plaintiff and the Class have suffered losses in amounts to be determined at the time of trial.

**SECOND CAUSE OF ACTION  
(Violation of Bus. & Prof. Code §17200, et seq.)**

51. Plaintiff hereby incorporates by reference each of the preceding allegations as if fully set forth herein.

52. California Business and Professions Code § 17200 prohibits acts of unfair competition, which include any "unfair or fraudulent business practice..."

53. Defendant has violated Business and Profession Code § 17200's prohibition against engaging in unfair or fraudulent business practices by, *inter alia*: making materially false and misleading representations to Plaintiff and the Class concerning the effectiveness of *its Offending Products*; making these representations which it knew at all times were false, or recklessly disregarded the truth of such representations before making them to Plaintiff and the Class; and the harm to Plaintiff, the Class Members, and the general public arising from Defendant's fraudulent, unfair and materially misleading practices outweighs the utility, if any, of those practices.

54. Pursuant to California Business & Professions Code § 17203, Plaintiff and the Class are therefore entitled to injunctive relief requiring Defendant: (a) to cease the acts of unfair competition alleged herein; (b) to make accurate disclosures and representations concerning the effectiveness of *its Offending Products*; (c) to make full restitution and disgorgement of all profits received as a result of its wrongful practices; (d) to make full restitution of all monies unlawfully collected by Defendant as a result of its false and

LEGAL GP  
BEVERLY HILLS, CALIFORNIA

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

misleading representations and (e) to make full payment of their attorneys' fees and costs pursuant to, *inter alia*, California Code of Civil Procedure § 1021.5.

**THIRD CAUSE OF ACTION  
(Violation of the Consumers Legal Remedies Act)**

55. Plaintiff hereby incorporates by reference each of the preceding allegations as if fully set forth herein.

56. Plaintiff brings this claim on behalf of herself and on behalf of all of the members of the Class. This action may be maintained as a class action under § 1781 of the CLRA for the reasons set forth above.

57. Plaintiff and all Class members are "consumers" within the meaning of Civil Code §§1761(d) and 1770(a) in that Plaintiff and all members of the Class are consumers.

58. Defendant violated §1770(a)(4) of the CLRA by deceptively representing to the public that *its Offending Products* were effective in treating disease, including, but not limited to, cancer when in fact there was no basis for such a representation.

59. Defendant violated § 1770(a)(5) of the CLRA by representing that its *Offending Products* had "characteristics, ingredients, uses, benefits...which they do not have."

60. Defendant violated § 1770(a)(7) of the CLRA by representing that its *Offending Products* "are of a particular standard, quality, or grade...if they are of another."

61. Defendant violated § 1770(a)(9)'s prohibition against advertising "goods or services with the intent not to sell them as advertised." Specifically, Defendant violated this section of the CLRA by advertising that its *Offending Products*, were effective in promoting treating cancer, when at all relevant times herein, Defendant knew that it did not.

62. As authorized by statute, Plaintiff, through counsel, sent a letter to Defendant in which, after generally describing the nature of this claim, Plaintiff demanded that:

63. Defendant identify the members of the Class;

LEGAL GP  
BEVERLY HILLS, CALIFORNIA

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

64. Defendant cease its practice of making false and misleading representations of fact concerning the effectiveness of its *Products*; and Defendant make full restitution to Plaintiff and the members of the Class for all monies gained by Defendant as a result of its unlawful practice of providing false and misleading information to the public concerning its *Offending Products*. Defendant has failed to comply.

65. Because Defendant has yet to correct, repair, replace or otherwise rectify the consumer fraud resulting from its conduct, Plaintiff seeks relief in the form of a claim for actual damages, punitive damages, attorneys' fees and costs and/or restitution.

66. Plaintiff and the Class Members also seek injunctive relief prohibiting Defendant from continuing to engage in the wrongful acts and practices alleged herein, restitution of the monies collected by Defendant as a result of its deceptive practices, costs and attorneys' fees, and any other appropriate relief under Civil Code § 1780.

**FOURTH CAUSE OF ACTION  
(Fraud and Deceit)**

67. Plaintiff hereby incorporates by reference each of the preceding allegations as if fully set forth herein.

68. Through its advertising, Defendant represented to Plaintiff and the Class that using its *Offending Products* would result in amongst other things; a cure of an assortment of diseases.

69. At all times herein, Defendant were aware of the falsity of the statements in its advertising its *Offending Products*.

70. The misrepresentations made by Defendant were made with the intent to induce Plaintiff and the Class Members to make purchases of Defendant's *Offending Products*.

71. If Plaintiff and the Class Members had been aware of the falsity of the representations made by Defendant, Plaintiff and the Class would not have, as they did, made purchases from Defendant, or at least not at the price which they paid.

LEGAL GP  
BEVERLY HILLS, CALIFORNIA

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

72. Plaintiff and the Class relied on Defendant's representations regarding the effectiveness of Defendant's *Offending Products*. Plaintiff and the Class are entitled to a full refund of the purchase price of from Defendant. Plaintiff and the Class' reliance on the misrepresentations described above were justified.

73. As a direct and proximate result of the fraudulent conduct of Defendant as herein alleged, Plaintiff and the Class have suffered damages by being induced by Defendant' false and misleading representations and promises to part with their money to purchase a product that has no capability of actually doing what Defendant stated it would do in its advertising.

74. As a result of the foregoing, Plaintiff and the Class Members are entitled to compensatory damages in an amount to be proven at trial.

**FIFTH CAUSE OF ACTION  
(Negligent Misrepresentation)**

75. Plaintiff hereby incorporates by reference each of the preceding allegations as though fully set forth herein.

76. In the course and scope of its business, Defendant supplied false material information and/or made material omissions intended for the guidance of Plaintiff and the Class.

77. Defendant, through its advertising, failed to exercise reasonable care or competence in providing accurate information to Plaintiff and the Class Members.

78. By reason of the foregoing, Plaintiff and the Class have been harmed and are entitled to compensatory damages in an amount to be established at trial.

11122222222222222222

LEGAL GP  
BEVERLY HILLS, CALIFORNIA

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**PRAYER FOR RELIEF**

**WHEREFORE**, Plaintiff prays for judgment against Defendant, and each of them, as follows:

1. An order certifying that this action may be maintained as a class action under Code of Civil Procedure § 382 and Civil Code § 1781 and appointing Plaintiff and her counsel of record to represent the Class;
2. Full restitution to Plaintiff and the Class;
3. An order-enjoining Defendant from engaging in the unfair, deceptive, and unlawful acts or practices set forth in this Complaint;
4. For general, special and compensatory damages according to proof;
5. For punitive damages according to proof;
6. For disgorgement of profits according to proof;
7. Granting other equitable and/or injunctive relief as permitted by law,
8. For attorneys' fees and costs of suit herein;
9. Prejudgment and post-judgment interest at the prevailing legal rate; and for such other and further relief as this Court may deem just and proper.

**JURY TRIAL DEMANDED**

Plaintiff, on behalf of himself and all other similarly situated, hereby demands a trial by jury on all issues so triable.

DATE: November 22, 2017

\_\_\_\_\_

11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

CM-010

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Mitch Kalcheim (175846) 9663 Santa Monica Blvd., Suite 889 Beverly Hills, CA 90210  TELEPHONE NO.: 310-980-7749 FAX NO.: ATTORNEY FOR (Name): Goldstein		FOR COURT USE ONLY  <b>FILED</b> Superior Court Of California County Of Los Angeles  NOV 22 2017  By: <i>[Signature]</i> Deputy Clerk Glorietta Roberts
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: Stanley Mosk		
CASE NAME:		CASE NUMBER:
<b>CIVIL CASE COVER SHEET</b> <input checked="" type="checkbox"/> <b>Unlimited</b> (Amount demanded exceeds \$25,000) <input type="checkbox"/> <b>Limited</b> (Amount demanded is \$25,000 or less)	<b>Complex Case Designation</b> <input type="checkbox"/> <b>Counter</b> <input type="checkbox"/> <b>Joinder</b> Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)	JUDGE: DEPT: <b>BC 6 8 4 2 1 8</b>

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> <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46)	<b>Contract</b> <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)	<b>Provisionally Complex Civil Litigation</b> (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)
<b>Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort</b> <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)	<b>Real Property</b> <input type="checkbox"/> Eminent domain/Inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (26)	<b>Enforcement of Judgment</b> <input type="checkbox"/> Enforcement of judgment (20)
<b>Non-PI/PD/WD (Other) Tort</b> <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 checked="" type="checkbox"/> Other non-PI/PD/WD tort (35)	<b>Unlawful Detainer</b> <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38)	<b>Miscellaneous Civil Complaint</b> <input type="checkbox"/> RICO (27) <input type="checkbox"/> Other complaint (not specified above) (42)
<b>Employment</b> <input type="checkbox"/> Wrongful termination (36) <input type="checkbox"/> Other employment (15)	<b>Judicial Review</b> <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)	<b>Miscellaneous Civil Petition</b> <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> Other petition (not specified above) (43)

2. This case  is  is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:
- |  |  |
|--|--|
| a. <input type="checkbox"/> Large number of separately represented parties   | d. <input type="checkbox"/> Large number of witnesses  |
| b. <input type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve | e. <input type="checkbox"/> Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court |
| c. <input type="checkbox"/> Substantial amount of documentary evidence   | f. <input type="checkbox"/> Substantial postjudgment judicial supervision  |
3. Remedies sought (check all that apply): a.  monetary b.  nonmonetary; declaratory or injunctive relief c.  punitive
4. Number of causes of action (specify): 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: 11/21/2017  
Mitch Kalcheim

(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.

Page 1 of 2

Form Adopted for Mandatory Use  
Judicial Council of California  
CM-010 [Rev. July 1, 2007]

**CIVIL CASE COVER SHEET**

Cal. Rules of Court, rules 2.30, 3.220, 3.400-3.403, 3.740;  
Cal. Standards of Judicial Administration, std. 3.10  
www.courtinfo.ca.gov

**ORIGINAL BY FAX**



**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**

<p><b>Auto Tort</b>                  Auto (22)—Personal Injury/Property Damage/Wrongful Death                  Uninsured Motorist (46) (<i>if the case involves an uninsured motorist claim subject to arbitration, check this item instead of Auto</i>)</p> <p><b>Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort</b>                  Asbestos (04)                  Asbestos Property Damage                  Asbestos Personal Injury/Wrongful Death                  Product Liability (<i>not asbestos or toxic/environmental</i>) (24)                  Medical Malpractice (45)                  Medical Malpractice—Physicians &amp; 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</p> <p><b>Non-PI/PD/WD (Other) Tort</b>                  Business Tort/Unfair Business Practice (07)                  Civil Rights (e.g., discrimination, false arrest) (<i>not civil harassment</i>) (08)                  Defamation (e.g., slander, libel) (13)                  Fraud (16)                  Intellectual Property (19)                  Professional Negligence (25)                  Legal Malpractice                  Other Professional Malpractice (<i>not medical or legal</i>)                  Other Non-PI/PD/WD Tort (35)</p> <p><b>Employment</b>                  Wrongful Termination (36)                  Other Employment (15)</p>	<p><b>Contract</b>                  Breach of Contract/Warranty (06)                  Breach of Rental/Lease Contract (<i>not unlawful detainer or wrongful eviction</i>)                  Contract/Warranty Breach—Seller Plaintiff (<i>not fraud or negligence</i>)                  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 (<i>not provisionally complex</i>) (18)                  Auto Subrogation                  Other Coverage                  Other Contract (37)                  Contractual-Fraud                  Other Contract Dispute</p> <p><b>Real Property</b>                  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 (<i>not eminent domain, landlord/tenant, or foreclosure</i>)</p> <p><b>Unlawful Detainer</b>                  Commercial (31)                  Residential (32)                  Drugs (38) (<i>if the case involves illegal drugs, check this item; otherwise, report as Commercial or Residential</i>)</p> <p><b>Judicial Review</b>                  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</p>	<p><b>Provisionally Complex Civil Litigation (Cal. Rules of Court Rules 3.400–3.403)</b>                  Antitrust/Trade Regulation (03)                  Construction Defect (10)                  Claims Involving Mass Tort (40)                  Securities Litigation (28)                  Environmental/Toxic Tort (30)                  Insurance Coverage Claims (<i>arising from provisionally complex case type listed above</i>) (41)</p> <p><b>Enforcement of Judgment</b>                  Enforcement of Judgment (20)                  Abstract of Judgment (Out of County)                  Confession of Judgment (<i>non-domestic relations</i>)                  Sister State Judgment                  Administrative Agency Award (<i>not unpaid taxes</i>)                  Petition/Certification of Entry of Judgment on Unpaid Taxes                  Other Enforcement of Judgment Case</p> <p><b>Miscellaneous Civil Complaint</b>                  RICO (27)                  Other Complaint (<i>not specified above</i>) (42)                  Declaratory Relief Only                  Injunctive Relief Only (<i>non-harassment</i>)                  Mechanics Lien                  Other Commercial Complaint Case (<i>non-tort/non-complex</i>)                  Other Civil Complaint (<i>non-tort/non-complex</i>)</p> <p><b>Miscellaneous Civil Petition</b>                  Partnership and Corporate Governance (21)                  Other Petition (<i>not specified above</i>) (43)                  Civil Harassment                  Workplace Violence                  Elder/Dependent Adult Abuse                  Election Contest                  Petition for Name Change                  Petition for Relief From Late Claim                  Other Civil Petition</p>
---	---	--

SHORT TITLE: Goldstein v. Kreation	CASE NUMBER
------------------------------------	-------------

**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. | 7. Location where petitioner resides.  |
| 2. Permissive filing in central district.  | 8. Location wherein defendant/respondent functions wholly.   |
| 3. Location where cause of action arose.   | 9. Location where one or more of the parties reside.   |
| 4. Mandatory personal injury filing in North District.                           | 10. Location of Labor Commissioner Office.   |
| 5. Location where performance required or defendant resides.                     | 11. Mandatory filing location (Hub Cases – unlawful detainer, limited non-collection, limited collection, or personal injury). |
| 6. Location of property or permanently garaged vehicle.                          |  |

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

A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Auto (22)	<input type="checkbox"/> A7100 Motor Vehicle - Personal Injury/Property Damage/Wrongful Death	1, 4, 11
Uninsured Motorist (46)	<input type="checkbox"/> A7110 Personal Injury/Property Damage/Wrongful Death – Uninsured Motorist	1, 4, 11
Asbestos (04)  Product Liability (24)  Medical Malpractice (45)  Other Personal Injury Property Damage Wrongful Death (23)	<input type="checkbox"/> A6070 Asbestos Property Damage	1, 11
	<input type="checkbox"/> A7221 Asbestos - Personal Injury/Wrongful Death	1, 11
	<input type="checkbox"/> A7260 Product Liability (not asbestos or toxic/environmental)	1, 4, 11
	<input type="checkbox"/> A7210 Medical Malpractice - Physicians & Surgeons	1, 4, 11
	<input type="checkbox"/> A7240 Other Professional Health Care Malpractice	1, 4, 11
	<input type="checkbox"/> A7250 Premises Liability (e.g., slip and fall)	1, 4, 11
	<input type="checkbox"/> A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.)	1, 4, 11
	<input type="checkbox"/> A7270 Intentional Infliction of Emotional Distress	1, 4, 11
	<input type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death	1, 4, 11

SHORT TITLE: <b>Goldstein v. Kreation</b>	CASE NUMBER
---	-------------

	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
<b>Non-Personal Injury/Property Damage/Wrongful Death Tort</b>	Business Tort (07)	<input checked="" 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	
<b>Employment</b>	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
<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)	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	
<b>Real Property</b>	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	
<b>Unlawful Detainer</b>	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

SHORT TITLE: <b>Goldstein v. Kreation</b>	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>Judicial Review</b>	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	
<b>Provisionally Complex Litigation</b>	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
<b>Enforcement of Judgment</b>	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
<b>Miscellaneous Civil Complaints</b>	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		
<b>Miscellaneous Civil Petitions</b>	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		

SHORT TITLE: Goldstein v. Kreation	CASE NUMBER
---------------------------------------	-------------

**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 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. <input type="checkbox"/> 11.			ADDRESS: Class Action must be filed in Central District. Damages occurred throughout Southern California
CITY: Los Angeles	STATE: CA	ZIP CODE: 90012	

**Step 5: Certification of Assignment:** I certify that this case is properly filed in the Central District 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: 11/21/2017

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

1-4  
1-4  
1-4  
1-4  
1-4  
1-4  
1-4  
1-4