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FILED  
Superior Court of California  
County of Los Angeles

MAY 20 2015

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

9 BC 582516

10 DELLA HILL, )  
11 )  
12 Plaintiff, )  
13 vs. )  
14 ASIAN AMERICAN DRUG ABUSE )  
PROGRAM, INC., a California corporation; )  
15 and Does 1 through 20, inclusive, )  
16 Defendants. )

CASE NUMBER:

COMPLAINT FOR DAMAGES:

1. VIOLATION OF CALIFORNIA FAMILY RIGHTS ACT
2. DISCRIMINATION IN VIOLATION OF FEHA
3. FAILURE TO MAKE REASONABLE ACCOMMODATIONS
4. FAILURE TO ENGAGE IN INTERACTIVE PROCESS
5. FAILURE TO TAKE REASONABLE STEPS TO PREVENT DISCRIMINATION
6. FAILURE TO PAY MINIMUM WAGES
7. FAILURE TO PAY OVERTIME WAGES
8. FAILURE TO PROVIDE ITEMIZED WAGE STATEMENTS
9. WAITING TIME PENALTIES
10. WRONGFUL TERMINATION IN VIOLATION OF PUBLIC POLICY

DEMAND FOR JURY TRIAL

CIT/CASE: BC582516  
 LSA/DEF#: \_\_\_\_\_  
 RECEIVED: \_\_\_\_\_  
 DATE FILED: 05/20/15 03:46 PM  
 PAYMENT: \$435.00  
 CHECK: \$435.00  
 CASH: \$0.00  
 CHANGE: \$0.00  
 PRD: \$0.00

COMPLAINT FOR DAMAGES

05/20/2015

1 Plaintiff Della Hill ("Plaintiff") hereby alleges as follows:

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

- 3 1. At all times material, Plaintiff was a resident of Los Angeles County.
- 4 2. On information and belief, Defendant American Asian Drug Abuse Program, Inc.  
5 ("AADAP") is a corporation organized under the laws of the State of California.
- 6 3. The true names and capacities, whether individual, corporate, associate or otherwise of  
7 Defendants designated herein as Does 1 through 20, inclusive, are unknown to Plaintiff  
8 who therefore sue such Defendants by such fictitious names. Plaintiff will amend this  
9 complaint to show their true names and capacities when the same have been ascertained.  
10 Plaintiff is informed and believes and thereon alleges that each of the Defendants  
11 designated herein as a Doe was in some manner responsible for the occurrences and  
12 injuries alleged herein.
- 13 4. At all times mentioned herein, Defendants were the agents and/or employees of the other  
14 named Defendants, and in doing the things alleged were acting within the course and  
15 scope of such agency and employment, and in doing the acts herein alleged were acting  
16 with consent, permission and authorization of the remaining named Defendants. All  
17 actions of Defendants were ratified and approved by the other named Defendants.
- 18 5. Plaintiff was employed by Defendants in Los Angeles County.
- 19 6. Plaintiff has exhausted her administrative remedies by filing a charge with, and receiving  
20 a Right-to-Sue letter from, the California Department of Fair Employment and Housing  
21 ("DFEH").
- 22 7. Plaintiff was hired by AADAP on or about June 16, 2011 as a counselor where she  
23 remained employed until her termination on or about March 31, 2015 while she was on a  
24 protected medical leave.
- 25 8. Between December 31, 2014 and January 4, 2015, Plaintiff was scheduled off for the  
26 New Year holiday, during which time she fell and broke her humerus. On or about  
27 January 5, 2015, Plaintiff notified her supervisor, Estella Barajas, that she broke her arm  
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and would need a medical leave. Plaintiff submitted a doctor's note taking her off of work, and the leave was extended on several occasions. Several weeks after her fall, however, Plaintiff was diagnosed with major depression. She submitted medical absence notes from her doctor to AADAP throughout her leave. All together, Plaintiff's doctor had extended her leave until April 11, 2015.

9. On March 31, 2015, while Plaintiff was still on her medical leave, Defendants terminated Plaintiff for failing to return from her medical leave.

10. During certain periods of Plaintiff's employment Plaintiff worked 24 hour days 5 days a week, and at other times Plaintiff worked 24 hour days 2 days per week. Plaintiff estimates that she worked in excess of 326 24-hour days during her employment. Specifically, between approximately February 2012 through approximately October 2012 (nine months), and again between approximately October 2013 through approximately December 16, 2013 (two and a half months), Plaintiff worked as an in-home counselor at Defendant's "Satellite House," a "sober living" home, five days a week, 24 hours a day. Between approximately October 2012 though October 2013 (12 months), Plaintiff worked as an in-home counselor at the Satellite House on Wednesdays and Thursdays, and thus worked from 8:00 a.m. on Wednesday until 5:00 p.m. on Friday. The Satellite House is a sober living home for women and their children. Clients are referred to the Satellite House through the Department of Child and Family Service, through drug court, or through self-referral. Plaintiff's daily schedule was to wake with the clients at 7:00 a.m., help them and their children get ready for the day, drive the clients to their treatment at AADAP's outpatient facility during which time Plaintiff would attend to her clients and case files at the outpatient facility. Plaintiff would then drive the Satellite House clients back to the house at 2:30, and return to the outpatient facility where she continued to attend to her clients and files until 5:00 p.m. At 5:00 p.m., Plaintiff would leave the outpatient facility and return to the home where she made dinner for the clients or helped them make dinner. After dinner, Plaintiff would drive the clients to their Narcotics

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1 Anonymous meeting, and then drive them back home. Lights out was at 11:00 p.m., and  
2 the routine repeated itself at 7:00 in the morning the next day. Plaintiff did not work  
3 weekends.

4 11. Plaintiff additionally worked 30 minutes of overtime every Monday during the period  
5 December 16, 2013 through December 31, 2014, or a **total of 130 hours of overtime at**  
6 **time and a half** during that period.

7 12. During her employment, Plaintiff received a set salary regardless of how many hours she  
8 worked. Plaintiff's bi-weekly salary was \$1,601.46.

9 13. Plaintiff hereby demands a jury trial.

10 **FIRST CAUSE OF ACTION**

11 **VIOLATION OF THE CALIFORNIA FAMILY RIGHTS ACT**

12 (Govt. Code § 12945.2)

13 **(Against all Defendants)**

14 14. Plaintiff hereby re-alleges and incorporates by reference, as though fully set forth herein,  
15 the allegations contained in paragraphs 1 through 13.

16 15. Plaintiff is a member of the class of persons entitled to protected medical and/or family  
17 leave under the California Family Rights Act, embodied in Government Code section  
18 12945.2. Specifically, Plaintiff worked for more than one (1) year for Defendants and  
19 worked in excess of one thousand two hundred and fifty hours (1,250) in the preceding  
20 twelve (12) month period prior to her medical leave. Further, Plaintiff had a qualifying  
21 serious health condition, a broken humerus and major depression.

22 16. Defendants and each of them are employers covered by and subject to the California  
23 Family Rights Act because Defendants employed fifty (50) or more full- or part-time  
24 employees for each working day of each of the twenty (20) calendar weeks preceding and  
25 following the leave periods.

26 17. At all relevant times, Plaintiff had a qualifying serious health condition in that she was  
27 receiving continuing treatment and continuing supervision by a health care provider as a  
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result of her injury and her depression.

18. Defendants and each of them violated the California Family Rights Act by retaliating against Plaintiff for taking time off to receive treatment from her health care provider.

19. Plaintiff is informed and believes and thereon alleges that a substantial, motivating factor for her termination was the fact that Plaintiff needed and took time off to treat her serious health condition. Therefore, Defendants' decision to terminate Plaintiff violated Government Code § 12945.2(a).

20. As a direct and proximate result of the conduct of Defendants and their agents, Plaintiff has suffered and continues to suffer general damages in an amount according to proof with interest thereon.

21. As a further direct and proximate result of the conduct of Defendants and their agents, Plaintiff has suffered and continues to suffer economic and/or special damages in an amount according to proof with interest thereon.

22. As a further direct and proximate result of the conduct of Defendants and their agents, Plaintiff has suffered emotional distress including, but not limited to humiliation, embarrassment, and mental anguish in an amount according to proof.

23. Defendants' conduct of retaliating against Plaintiff for taking time off for treatment of a serious health condition was willful and malicious and in conscious disregard of Plaintiff's rights with the intent to vex, injure and annoy her, such as to constitute oppression, fraud or malice under California Civil Code § 3294. Defendants' conduct, as described above, was carried out by their officers, directors and managing agents, or by lower level employees, in whose conduct was knowingly authorized and ratified by the officers, directors, or managing agents of Defendants. Accordingly, Plaintiff is entitled to punitive damages in an amount appropriate to punish and set an example of Defendants.

24. Plaintiff will also seek and is entitled to recover attorney's fees in connection with this cause of action under Government Code § 12965(b).

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**SECOND CAUSE OF ACTION**

**DISABILITY DISCRIMINATION IN VIOLATION OF FEHA**

(Govt. Code § 12940(a))

**(Against All Defendants)**

25. Plaintiff hereby re-alleges and incorporates by reference, as though fully set forth herein, the allegations contained in paragraphs 1 through 13.

26. Pursuant to Government Code § 12940(a), employers may not terminate employees or discriminate against employees in the terms, conditions or privileges of employment because of an actual or perceived physical or mental disability.

27. Plaintiff suffered and/or was regarded as suffering from a mental illness, major depression. Plaintiff required time off from work and time to treat with her medical provider.

28. At all relevant times, Defendants and each of them, were aware of Plaintiff's mental disability and/or regarded Plaintiff as suffering from a mental and/or physical disability.

29. Defendants terminated Plaintiff during her protected medical leave for her illness and as a result of her real or perceived disability.

30. Plaintiff is informed and believes and thereon alleges that a substantial, motivating factor for her termination was her mental disability and/or that Defendants regarded her as suffering from a physical and/or mental disability, and/or that Defendants did not want to reasonably accommodate Plaintiff's disability and/or perceived disability. Therefore, Defendants' decision to terminate Plaintiff due to her disability and/or perceived disability violated Government Code § 12940(a).

31. As a direct and proximate result of the conduct of Defendants and their agents, Plaintiff has suffered and continues to suffer general damages in an amount according to proof with interest thereon.

32. As a further direct and proximate result of the conduct of Defendants and their agents, Plaintiff has suffered and continues to suffer economic and/or special damages in an

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amount according to proof with interest thereon.

33. As a further direct and proximate result of the conduct of Defendants and their agents, Plaintiff has suffered emotional distress including, but not limited to humiliation, embarrassment, and mental anguish in an amount according to proof.

34. Defendants' conduct of discriminating against Plaintiff because of her disability and/or perceived disability was willful and malicious and in conscious disregard of Plaintiff's rights with the intent to vex, injure and annoy her, such as to constitute oppression, fraud or malice under California Civil Code § 3294. Defendants' conduct, as described above, was carried out by their officers, directors and managing agents, or by lower level employees, in whose conduct was knowingly authorized and ratified by the officers, directors, or managing agents of Defendants. Accordingly, Plaintiff is entitled to punitive damages in an amount appropriate to punish and set an example of Defendants.

35. Plaintiff will also seek and is entitled to recover attorney's fees in connection with this cause of action under Government Code § 12965(b).

**THIRD CAUSE OF ACTION**

**FAILURE TO REASONABLY ACCOMMODATE DISABILITY**

(Govt. Code § 12940(m))

**(Against all Defendants)**

36. Plaintiff hereby re-alleges and incorporates by reference, as though fully set forth herein, the allegations contained in paragraphs 1 through 13.

37. Pursuant to Government Code § 19240(m), it is unlawful for an employer to fail to make reasonable accommodation for the known physical or mental disability and/or perceived physical or mental disability of an employee.

38. Prior to terminating Plaintiff on or about March 31, 2015, Defendants were fully aware of and had knowledge of Plaintiff's mental disability and/or perceived mental or physical disability. Notwithstanding this knowledge, and the knowledge that Plaintiff required an extension of her medical leave, Defendants chose to terminate Plaintiff and chose not to

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reasonably accommodate her. In fact, Defendants did not even allow Plaintiff the medical leave to which she was entitled under the CFRA terminating her before her leave entitlement expired.

39. Defendants' conduct as described above constituted a failure to reasonably accommodate Plaintiff's known disability and/or perceived disability. Therefore, such conduct violated Government Code § 12940(m).

40. As a direct and proximate result of the conduct of Defendants and their agents, Plaintiff has suffered and continues to suffer general damages in an amount according to proof with interest thereon.

41. As a further direct and proximate result of the conduct of Defendants and their agents, Plaintiff has suffered and continues to suffer economic and/or special damages in an amount according to proof with interest thereon.

42. As a further direct and proximate result of the conduct of Defendants and their agents, Plaintiff has suffered emotional distress including, but not limited to humiliation, embarrassment, and mental anguish in an amount according to proof.

43. Defendants' failure to reasonably accommodate Plaintiff's disability was willful and malicious and in conscious disregard of Plaintiff's rights with the intent to vex, injure and annoy her, such as to constitute oppression, fraud or malice under California Civil Code § 3294. Defendants' conduct, as described above, was carried out by their officers, directors and managing agents, or by lower level employees, in whose conduct was knowingly authorized and ratified by the officers, directors, or managing agents of Defendants. Accordingly, Plaintiff is entitled to punitive damages in an amount appropriate to punish and set an example of Defendants.

44. Plaintiff will also seek and is entitled to recover attorney's fees in connection with this cause of action under Government Code § 12965(b).

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**FOURTH CAUSE OF ACTION**

**FAILURE TO ENGAGE IN INTERACTIVE PROCESS**

(Govt. Code §12940(n))

**(Against all Defendants)**

45. Plaintiff hereby re-alleges and incorporates by reference, as though fully set forth herein, the allegations contained in paragraphs 1 through 13.

46. Pursuant to Government Code § 19240(n), it is unlawful for an employer to fail to engage in a timely, good faith, interactive process with an employee to determine effective reasonable accommodations for a known physical disability and/or perceived physical disability.

47. Prior to Plaintiff's termination on or about March 31, 2015, Defendants were fully aware of and had knowledge of Plaintiff's mental disability and/or perceived mental/physical disability. Notwithstanding this knowledge, and the knowledge that Plaintiff required an extension of her medical leave, Defendants chose to terminate Plaintiff and chose not to reasonably accommodate her. In fact, Defendants made no effort whatsoever to communicate with Plaintiff about why the requested leave extension was unreasonable or to propose any other possible accommodation.

48. Defendants' conduct as described above constituted a failure to engage in a good faith interactive process with Plaintiff as mandated by Government Code § 12940(m)).

49. As a direct and proximate result of the conduct of Defendants and their agents, Plaintiff has suffered and continues to suffer general damages in an amount according to proof with interest thereon.

50. As a further direct and proximate result of the conduct of Defendants and their agents, Plaintiff has suffered and continues to suffer economic and/or special damages in an amount according to proof with interest thereon.

51. As a further direct and proximate result of the conduct of Defendants and their agents, Plaintiff has suffered emotional distress including, but not limited to humiliation,

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1 embarrassment, and mental anguish in an amount according to proof.  
2 52. Defendants' failure to reasonably accommodate Plaintiff's known disabilities was willful  
3 and malicious and in conscious disregard of Plaintiff's rights with the intent to vex, injure  
4 and annoy her, such as to constitute oppression, fraud or malice under California Civil  
5 Code § 3294. Defendants were aware that it would not have been an unreasonable  
6 accommodation to provide Plaintiff a reasonable accommodation and they knew that it  
7 was not an undue hardship to do so. Yet, Defendants nonetheless chose to terminate  
8 Plaintiff. Defendants' conduct, as described above, was carried out by their officers,  
9 directors and managing agents, or by lower level employees, in whose conduct was  
10 knowingly authorized and ratified by the officers, directors, or managing agents of  
11 Defendants. Accordingly, Plaintiff is entitled to punitive damages in an amount  
12 appropriate to punish and set an example of Defendants.

13 53. Plaintiff will also seek and is entitled to recover attorney's fees in connection with this  
14 cause of action under Government Code § 12965(b).

15 **FIFTH CAUSE OF ACTION**

16 **FAILURE TO TAKE ALL REASONABLE STEPS**  
17 **TO PREVENT/CORRECT DISCRIMINATION**

18 (Govt. Code § 12940(k))

19 **(Against all Defendants)**

20 54. Plaintiff hereby re-alleges and incorporates by reference, as though fully set forth herein,  
21 the allegations contained in paragraphs 1 through 13.

22 55. Pursuant to Government Code § 12940(k), employers have an obligation to take all  
23 reasonable steps necessary to prevent discrimination from occurring.

24 56. By their conduct as alleged above, including in unlawfully terminating Plaintiff because  
25 of her disability and/or perceived disability, unlawfully failing to require consideration of  
26 reasonable accommodation and undue hardship, as is required by the FEHA, and/or in  
27 unlawfully failing to consider the possibility of reasonable accommodation and the  
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1 existence or non-existence of undue hardship, and/or in failing to properly train their staff  
2 to take such factors into consideration, Defendants, and each of them, and/or their  
3 agents/employees, failed to take all reasonable steps necessary to prevent discrimination  
4 from occurring.

5 57. The response of Defendants, and/or their agents/employees, to that knowledge was so  
6 inadequate as to establish a deliberate indifference to, or tacit authorization of, the alleged  
7 offensive practices, and an affirmative causal link existed between Defendants' inaction  
8 and the injuries suffered by Plaintiff.

9 58. By failing to take all reasonable steps necessary to prevent discrimination, Defendants,  
10 and each of them, committed unlawful employment practices as described and prohibited  
11 in Government Code § 12940(k). In engaging in the aforementioned conduct,  
12 Defendants, and each of them, aided, abetted, incited, compelled, and/or coerced unlawful  
13 employment practices in violation of the announced policy of this State against such  
14 practices.

15 59. As a direct and proximate result of the conduct of Defendants and their agents, Plaintiff  
16 has suffered and continues to suffer general damages in an amount according to proof  
17 with interest thereon.

18 60. As a further direct and proximate result of the conduct of Defendants and their agents,  
19 Plaintiff has suffered and continues to suffer economic and/or special damages in an  
20 amount according to proof with interest thereon.

21 61. As a further direct and proximate result of the conduct of Defendants and their agents,  
22 Plaintiff has suffered emotional distress including, but not limited to humiliation,  
23 embarrassment, and mental anguish in an amount according to proof.

24 62. Defendants' conduct of discriminating against Plaintiff because of his disabilities, was  
25 willful and malicious and in conscious disregard of Plaintiff's rights with the intent to  
26 vex, injure and annoy her, such as to constitute oppression, fraud or malice under  
27 California Civil Code § 3294. Defendants' conduct, as described above, was carried out  
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1 by their officers, directors and managing agents, or by lower level employees, in whose  
2 conduct was knowingly authorized and ratified by the officers, directors, or managing  
3 agents of Defendants. Accordingly, Plaintiff is entitled to punitive damages in an amount  
4 appropriate to punish and set an example of Defendants.

5 63. Plaintiff will also seek and is entitled to recover attorney's fees in connection with this  
6 cause of action under Government Code § 12965(b).

7 **SIXTH CAUSE OF ACTION**

8 **FOR FAILURE TO PAY STATE MINIMUM WAGE**

9 (California Labor Code Sections 510, 1194, 1194.2, 1197, 1198; IWC Wage Order No. 4-2001)

10 **Against All Defendants**

11 64. Plaintiff incorporates by reference and re-alleges paragraphs 1 through 13, inclusive, as  
12 though set forth fully herein.

13 65. The Code and the Wage Order provide that an employer must pay a minimum wage to an  
14 employee, which is eight dollars and no cents (\$8.00) per hour for all hours worked effective  
15 January 1, 2008, and nine dollars and no cents (\$9.00) per hour for all hours worked effective  
16 July 1, 2014.

17 66. The Code and the Wage Order provide that a workday consists of eight hours, a workweek  
18 consists of 40 hours, and an employer must compensate an employee who works overtime  
19 hours with either one-and-one-half times for hours worked in excess of 8 in a day or double  
20 the employee's regular rate of compensation for hours worked in excess of 12 in a day.

21 67. Throughout Plaintiff's employment, at the times set forth above, Defendants required  
22 Plaintiff to work more than 8 hours per day, and at other times more than 12 hours a day, and  
23 on repeated occasions for months at a time required Plaintiff to work 24 hour days 5 days per  
24 week. Defendants did not compensate Plaintiff for this time at all and thus failed to pay  
25 Plaintiff minimum wage as required by the Labor Code and Wage Order. Defendants thus  
26 required Plaintiff to work under conditions prohibited by order of the IWC, in violation of  
27 those orders.  
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1 68. Defendants deprived Plaintiff of her rightfully earned minimum wage compensation. Under  
2 Code section 1194, Plaintiff is entitled to recover such amounts, plus interest thereon,  
3 reasonable attorney's fees, and costs.

4 69. In addition, under Code section 1194.2, Plaintiff is entitled to recover liquidated damages in  
5 an amount equal to the minimum wages unlawfully unpaid, and interest thereon.

6 **SEVENTH CAUSE OF ACTION**

7 **FOR FAILURE TO PAY OVERTIME COMPENSATION**

8 (California Labor Code Sections 1194, 1198; IWC Wage Order No. 4-2001)

9 **Against All Defendants**

10 70. Plaintiff incorporates by reference and re-alleges paragraphs 1 through 13, inclusive, as  
11 though set forth fully herein.

12 71. The Code and the Wage Order provide that a workday consists of eight hours, a workweek  
13 consists of 40 hours, and an employer must compensate an employee who works overtime  
14 hours with either one-and-one-half times or double the employee's regular rate of  
15 compensation. The Code and the Wage Order also provide that the employee's regular rate  
16 of compensation equals one fortieth (1/40) of the employee's weekly salary.

17 72. As demonstrated above, Defendants employed Plaintiff for shifts in excess of eight hours per  
18 day and shifts in excess of 12 hours per day but Defendants failed to pay Plaintiff the  
19 overtime compensation required by the California Labor Code and the Wage Order.

20 73. Defendants deprived Plaintiff of her rightfully earned overtime wage compensation.  
21 Under Code section 1194, Plaintiff is entitled to recover such amounts, plus interest  
22 thereon, reasonable attorney's fees, and costs.

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**EIGHTH CAUSE OF ACTION**

**FOR FAILURE TO FURNISH TIMELY AND ACCURATE WAGE AND HOUR  
STATEMENTS**

(California Labor Code Section 226)

**Against All Defendants**

- 74. Plaintiff incorporates by reference and re-alleges paragraphs 1 through 13, inclusive, as though set forth fully herein.
- 75. Code section 226(a) required Defendants, "semimonthly or at the time of each payment of wages," to furnish Plaintiff "an accurate itemized statement in writing" showing gross and net wages earned, total hours worked by the employee, rates of pay, and other information. Defendants knowingly and intentionally failed to provide Plaintiff with such timely and accurate wage and hour statements.
- 76. Under Code section 226, subsections (e) and (f), and based on Defendants' conduct as alleged herein, Plaintiff is entitled to (a) fifty dollars (\$50) for the initial pay period in which a wage and hour statement violation occurred, and one hundred dollars (\$100) per employee for each violation in a subsequent pay period, not exceeding an aggregate penalty of four thousand dollars (\$4,000); and (c) injunctive relief to ensure Defendants' compliance with Labor Code Section 226; and (d) an award of costs and reasonable attorney's fees.
- 77. Defendants' conduct also entitles Plaintiff to seek preliminary and permanent injunctive relief, including but not limited to an order that Defendants issue wage and hour statements to Plaintiff that comply with Code section 226.

**NINTH CAUSE OF ACTION**

**FOR WAITING TIME PENALTIES**

(California Labor Code Section 201)

**Against All Defendants**

- 78. Plaintiff incorporates by reference and re-alleges paragraphs 1 through 13, inclusive, as though set forth fully herein.

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1 79. Code section 201 required Defendants to pay to Plaintiff all of her earned wages immediately  
2 upon discharge. Under section 203, if an employer fails to make payment timely pursuant  
3 to section 201, "the wages of the employee shall continue as a penalty from the due date  
4 thereof at the same rate until paid or until an action therefor is commenced; but the wages  
5 shall not continue more than 30 days."

6 80. Based on Defendants' conduct as alleged herein in failing to pay Plaintiff all of her earned  
7 wages upon discharge, Defendants must pay a penalty to Plaintiff of 30 days of wages at her  
8 daily rate.

9 **TENTH CAUSE OF ACTION**

10 **WRONGFUL TERMINATION IN VIOLATION OF PUBLIC POLICY**

11 **(Against all Defendants)**

12 81. Plaintiff hereby re-alleges and incorporates by reference, as though fully set forth herein,  
13 the allegations contained in paragraphs 1 through 13.

14 82. Plaintiff is informed and believes and thereon alleges that a substantial, motivating factor  
15 for her termination was the fact that Plaintiff suffered from a disability, that she had taken  
16 a medical leave of absence and that Defendants did not wish to reasonably accommodate  
17 her.

18 83. Defendants' termination of Plaintiff violated well-established, fundamental and  
19 substantial public policies of the State of California which prohibit discrimination against  
20 persons suffering from physical or mental disabilities, against employees who take  
21 protected medical leaves of absence and against employees who lawfully file a claim for  
22 workers compensation benefits. The premise for such public policies is within  
23 Government Code § 12940(a) and 12945.2 which prohibit discharge of and  
24 discrimination against employees with physical or mental disabilities and against  
25 employees who take protected medical leaves of absence.

26 84. As a direct and proximate result of the conduct of Defendants and their agents, Plaintiff  
27 has suffered and continues to suffer general damages in an amount according to proof  
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with interest thereon.

85. As a further direct and proximate result of the conduct of Defendants and their agents, Plaintiff has suffered and continues to suffer economic and/or special damages in an amount according to proof with interest thereon.

86. As a further direct and proximate result of the conduct of Defendants and their agents, Plaintiff has suffered emotional distress including, but not limited to humiliation, embarrassment, and mental anguish in an amount according to proof.

87. Defendants' conduct was willful and malicious and in conscious disregard of Plaintiff's rights with the intent to vex, injure and annoy her, such as to constitute oppression, fraud or malice under California Civil Code § 3294. Defendants' conduct, as described above, was carried out by their officers, directors and managing agents, or by lower level employees, whose conduct was knowingly authorized and ratified by the officers, directors, or managing agents of Defendants. Accordingly, Plaintiff is entitled to punitive damages in an amount appropriate to punish and set an example of Defendants.

**PRAYER**

WHEREFORE, Plaintiff demands judgment against Defendants as follows:

1. Compensatory damages in excess of the jurisdictional amount, with interest thereon, according to proof;
2. Economic and/or non-economic damages in excess of the jurisdictional amount, according to proof;
3. General and/or non-economic damages in excess of the jurisdictional amount, according to proof;
4. Damages for emotional distress;
5. Punitive damages;
6. Payment of earned wages, overtime compensation, liquidated damages and other damages according to proof in an amount to be ascertained at trial, and in excess of the jurisdictional limit of this Court;

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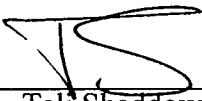


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- 7. For payment of all statutory obligations and penalties as required by law;
- 8. For injunctive relief to ensure Defendants' compliance with Labor Code Section 226;
- 9. For prejudgment interest on the foregoing at the legal rate;
- 10. Reasonable attorneys' fees as to the first eight causes of action;
- 11. For costs of suit incurred herein;
- 12. For such further relief as the Court may deem appropriate.

DATED: May 19, 2015

**AVILA & SHADOW**

By:   
Tali Shaddow,  
Attorneys for Plaintiff Della Hill

05 / 20 / 2015

**DEMAND FOR JURY TRIAL**

Plaintiff hereby demands trial by jury on all issues so triable in the Complaint.

DATED: May 19, 2015

**AVILA & SHADOW**

By: \_\_\_\_\_



Tali Shaddow,  
Attorneys for Plaintiff Della Hill

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ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Tali Shaddow, SBN 163644 Mark Steven Avila, SBN 169793 Avila & Shaddow 21800 Oxnard Street, Suite 1180 Woodland Hills, California 91367 TELEPHONE NO.: (818) 227-8610 FAX NO.: (818) 337-7265 ATTORNEY FOR (Name): Della Hill

FOR COURT USE ONLY FILED Superior Court of California County of Los Angeles MAY 20 2015 Sherri R. Carter, Executive Officer/Clerk By Cristina Grijalva Deputy

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

CASE NAME: Della Hill v. Asian American Drug Abuse Program, Inc.

CIVIL CASE COVER SHEET [X] 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 582516 JUDGE: DEPT:

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

- 1. Check one box below for the case type that best describes this case: Auto Tort, Contract, Provisionally Complex Civil Litigation, Other PI/PD/WD, Real Property, Enforcement of Judgment, Non-PI/PD/WD, Unlawful Detainer, Miscellaneous Civil Complaint, Employment, Judicial Review, Miscellaneous Civil Petition.

- 2. This case [ ] is [X] is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management: a. Large number of separately represented parties, b. Extensive motion practice, c. Substantial amount of documentary evidence, d. Large number of witnesses, e. Coordination with related actions, f. Substantial postjudgment judicial supervision.

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

4. Number of causes of action (specify): Ten (10)

5. This case [ ] is [X] 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: 5.19.15

Tali Shaddow, SBN 163644 (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.

**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: Della Hill v. Asian American Drug Abuse Program, Inc.

CASE NUMBER

BC 582516

## 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>5-10</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.

Auto Tort

Other Personal Injury/ Property Damage/ Wrongful Death Tort

<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
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.
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) <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., 4. 1., 3. 1., 4.

	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Non-Personal Injury/ Property Damage/ Wrongful Death Tort	Business Tort (07)	<input type="checkbox"/> A6029 Other Commercial/Business Tort (not fraud/breach of contract)	1., 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 <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.
Employment	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.
Contract	Breach of Contract/ Warranty (06) (not insurance)	<input type="checkbox"/> A6004 Breach of Rental/Lease Contract (not unlawful detainer or wrongful eviction) <input type="checkbox"/> A6008 Contract/Warranty Breach -Seller Plaintiff (no fraud/negligence) <input type="checkbox"/> A6019 Negligent Breach of Contract/Warranty (no fraud) <input type="checkbox"/> A6028 Other Breach of Contract/Warranty (not fraud or negligence)	2., 5. 2., 5. 1., 2., 5. 1., 2., 5.
	Collections (09)	<input type="checkbox"/> A6002 Collections Case-Seller Plaintiff <input type="checkbox"/> A6012 Other Promissory Note/Collections Case	2., 5., 6. 2., 5.
	Insurance Coverage (18)	<input type="checkbox"/> A6015 Insurance Coverage (not complex)	1., 2., 5., 8.
	Other Contract (37)	<input type="checkbox"/> A6009 Contractual Fraud <input type="checkbox"/> A6031 Tortious Interference <input type="checkbox"/> A6027 Other Contract Dispute(not breach/insurance/fraud/negligence)	1., 2., 3., 5. 1., 2., 3., 5. 1., 2., 3., 8.
		Eminent Domain/Inverse Condemnation (14)	<input type="checkbox"/> A7300 Eminent Domain/Condemnation Number of parcels _____
Real Property	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)
Unlawful Detainer	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: Della Hill v. Asian American Drug Abuse Program, Inc.

CASE NUMBER

Judicial Review

Provisionally Complex Litigation

Enforcement of Judgment

Miscellaneous Civil Complaints

Miscellaneous Civil Petitions

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

SHORT TITLE: Della Hill v. Asian American Drug Abuse Program, Inc.

CASE NUMBER

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:</b> Check the appropriate boxes for the numbers shown under Column C for the type of action that you have selected for this case.  <input type="checkbox"/> 1. <input checked="" type="checkbox"/> 2. <input type="checkbox"/> 3. <input type="checkbox"/> 4. <input type="checkbox"/> 5. <input type="checkbox"/> 6. <input type="checkbox"/> 7. <input type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10.		ADDRESS: 290 South Crenshaw Boulevard
CITY: Los Angeles	STATE: CA	ZIP CODE: 90016

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 Los Angeles 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, subs. (b), (c) and (d)].

Dated: 5.19.15

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

L A S C