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16 FRANCINE GODOY

**FILED**  
Los Angeles Superior Court

OCT 17 2013

Wory 9/20/13  
John A. Clarke, Executive Officer/Clerk  
By SHAUNYA WESLEY Deputy

11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
12 **FOR THE COUNTY OF LOS ANGELES, UNLIMITED JURISDICTION**

13 FRANCINE GODOY,  
14 )  
15 Plaintiff,  
16 vs.  
17 CITY OF LOS ANGELES; JOSE HUIZAR;  
18 and DOES 1-100, inclusive,  
19 Defendants.

Case No. BC524640

**Verified Complaint for Damages and Demand for Jury Trial**

- 1. Sexual Harassment
- 2. Retaliation in Violation of the Fair Employment and Housing Act

Over \$25,000.00

20 Plaintiff complains and alleges as follows:

- 21 1. At all times herein mentioned, Plaintiff was a resident of the County of Los Angeles, State of
- 22 California.
- 23 2. At all times herein mentioned, Defendant, CITY OF LOS ANGELES (hereinafter "CITY") is
- 24 a public entity and was Plaintiff's employer.
- 25 3. At all times herein mentioned, Defendant, JOSE HUIZAR (hereinafter "HUIZAR") was and
- 26 is a resident living in the County of Los Angeles in the State of California and at all times
- 27 herein mentioned was plaintiff's supervisor.

28 1.

Verified Complaint for Damages and Demand for Jury Trial

\$435.00  
\$0.00  
\$0.00  
\$0.00

CIT/CASE: BC524640  
LEA/DEPT: 1  
RECEIVED #: 104465980069  
DATE PAID: 10/17/13 12:09 PM  
PAYMENT: \$35.00  
RECEIVED: 310  
CHECK # 104465980069  
CITY OF LOS ANGELES

10/17/13

- 1 4. Plaintiff is ignorant of the true names and capacities, whether individual, corporate, or  
2 associate, of those Defendants fictitiously sued as DOES 1 through 100 inclusive and so the  
3 Plaintiff sues them by these fictitious names. The Plaintiff is informed and believes that each  
4 of the DOE Defendants reside in the State of California and are in some manner responsible  
5 for the conduct alleged herein. Upon discovering the true names and capacities of these  
6 fictitiously named Defendants, the Plaintiff will amend this complaint to show the true names  
7 and capacities of these fictitiously named Defendants.
- 8 5. Plaintiff was hired by CITY in 2006. During the course of her employment, she attained the  
9 title of Deputy Chief of Staff. During the course of her employment, Plaintiff worked under  
10 HUIZAR in the offices next to HUIZAR's office.
- 11 6. During the course of her employment under HUIZAR, Plaintiff was subjected to regular  
12 physical and verbal sexual harassment, including propositions for sexual favors.
- 13 7. HUIZAR's sexual harassment was severe and pervasive in Plaintiff's working environment.
- 14 8. As detailed in the example below, HUIZAR explicitly conditioned Plaintiff's employment  
15 benefits on sexual favors and when Plaintiff refused HUIZAR's sexual advances and opposed  
16 HUIZAR's sexual harassment, HUIZAR began a campaign of retaliation against Plaintiff.
- 17 9. The instances of HUIZAR's sexual harassment and retaliation against Plaintiff are too  
18 numerous to articulate, however the following paragraphs describe only one series of events  
19 in his campaign of sexual harassment and retaliation.
- 20 10. In or about October 2012, HUIZAR suggested that Plaintiff run for a position on the  
21 Community College Board of Trustees (hereinafter "CCBT").
- 22 11. In October 2012, Plaintiff worked full time in HUIZAR's City Hall office.
- 23 12. At some point in 2012, HUIZAR told influential people to support Plaintiff in her campaign  
24 for the CCBT.
- 25 13. On or about October 8, 2012 (Columbus Day), HUIZAR called Plaintiff after hours and told  
26 her to come to his office at City Hall.
- 27 14. On or about October 8, 2012, Plaintiff arrived at HUIZAR's office after 8:00 p.m.

PLAINTIFF'S EXHIBIT

- 1 15. On or about October 8, 2012, after Plaintiff arrived at HUIZAR's office at City Hall,  
2 HUIZAR told Plaintiff that if she wanted his continued support in her campaign for the  
3 CCBT, she would have to have sex with him.
- 4 16. On or about October 8, 2012, after HUIZAR conditioned his support on her having sex with  
5 him, Plaintiff refused his sexual advances.
- 6 17. On or about October 8, 2012, after Plaintiff refused HUIZAR's sexual advances, HUIZAR  
7 got angry and started yelling and cursing at Plaintiff.
- 8 18. On or about October 8, 2012, after Plaintiff refused HUIZAR's sexual advances, HUIZAR  
9 went into Plaintiff's office and started opening her drawers, taking her belongings, grabbing  
10 her files and taking her things into his office.
- 11 19. On or about October 8, 2012, while HUIZAR was taking things out of Plaintiff's office,  
12 Plaintiff left the office at City Hall.
- 13 20. On November 2, 2012, Plaintiff was scheduled to have her endorsement meeting with the  
14 Faculty Guild.
- 15 21. At some point prior to October 8, 2012, HUIZAR indicated to Plaintiff that with his  
16 endorsement, Plaintiff would be the Faculty Guild's candidate.
- 17 22. Once Plaintiff would be the Faculty Guild's candidate, she could then run for the position on  
18 the CCBT.
- 19 23. On November 1, 2012, after 10:00 p.m., HUIZAR contacted Plaintiff by cell phone.
- 20 24. On November 1, 2012, after 10:00 p.m., HUIZAR told Plaintiff that his car was parked down  
21 the street from her home and she should come meet him.
- 22 25. On November 1, 2012, after being contacted by HUIZAR, Plaintiff left her home and went  
23 into HUIZAR's car.
- 24 26. On November 1, 2012 after 10:00 p.m., while Plaintiff was in HUIZAR's car, HUIZAR told  
25 Plaintiff that he doesn't feel "close" to her.
- 26 27. On November 1, 2012 after 10:00 p.m., while Plaintiff was in HUIZAR's car, HUIZAR told  
27 Plaintiff that the campaign process was "difficult."

11/17/2012

- 1 28. On November 1, 2012 after 10:00 p.m., while Plaintiff was in HUIZAR's car, HUIZAR told  
2 Plaintiff that they needed to be "closer" for him to support Plaintiff through the campaign  
3 process.
- 4 29. On November 1, 2012, while Plaintiff was in HUIZAR's car, Plaintiff understood that these  
5 were sexual advances.
- 6 30. On November 1, 2012, while Plaintiff was in HUIZAR's car, she refused HUIZAR's sexual  
7 advances.
- 8 31. On November 1, 2012, while Plaintiff was in HUIZAR's car and after she refused his sexual  
9 advances, HUIZAR told Plaintiff that he was going to "cancel" Plaintiff's endorsement  
10 meeting scheduled for the next morning.
- 11 32. On November 1, 2012, after HUIZAR said he would cancel the endorsement meeting,  
12 Plaintiff left HUIZAR's car and returned home.
- 13 33. HUIZAR called Plaintiff many times between the evening of November 1, 2012 and the  
14 morning of November 2, 2012.
- 15 34. Plaintiff did not respond to HUIZAR's calls between the evening of November 1, 2012 and  
16 the morning of November 2, 2012.
- 17 35. HUIZAR even called Plaintiff's mother and asked if she knew where he could find Plaintiff.
- 18 36. On November 2, 2013, at approximately 8:30 a.m., Plaintiff showed up to the endorsement  
19 meeting with the Faculty Guild.
- 20 37. When Plaintiff entered the meeting with the Faculty Guild, the members of the Faculty Guild  
21 looked surprised to see Plaintiff. Plaintiff was asked to leave the room and she did.
- 22 38. Shortly thereafter, Plaintiff was told that the Faculty Guild was surprised that Plaintiff  
23 showed up because HUIZAR had contacted them indicating that he was pulling his support  
24 of Plaintiff since, as HUIZAR claimed, Ms. Godoy has an ill brother that needed her care and  
25 that Ms. Godoy was not capable of running for the position on the CCBT.

1 39. Plaintiff is informed, believes and thereupon alleges that at some point prior to the November  
2 2, 2012 Faculty Guild meeting, HUIZAR communicated to at least one person that he was  
3 pulling his support of Ms. Godoy running for a position on the CCBT.

4 40. Plaintiff is informed, believes and thereupon alleges that at some point prior to the November  
5 2, 2012 Faculty Guild meeting, HUIZAR communicated to at least one person that Ms.  
6 Godoy has an ill brother that needed her care and that Ms. Godoy was not capable of running  
7 for a position on the CCBT.

8 41. After the November 2, 2012 Faculty Guild meeting, HUIZAR removed some of Plaintiff's  
9 job duties.

10 42. In late December 2012 and/or early January 2013, Plaintiff was told that she should no longer  
11 show up at the office and should instead work from home.

12 43. After Plaintiff was told to work from home, her assignments and duties were cut significantly  
13 but she was still receiving her full salary.

14 44. Plaintiff would sit at home much of her time with no work to perform since she was being  
15 retaliated against by HUIZAR due to her refusal to have sex with him.

16 45. As a result of HUIZAR's sexual harassment and retaliation, ignoring, removing duties and  
17 assignments, and being banned from entry into the office, Plaintiff was forced to quit her  
18 position of Deputy Chief of Staff and took a position with the Department of Sanitation.

19 46. All of the foregoing and following actions taken towards the Plaintiff that are alleged in this  
20 complaint were carried out by HUIZAR, who was acting in a deliberate, cold, callous,  
21 malicious, oppressive, and intentional manner in order to injure and damage Plaintiff.

22 47. As a result of being subjected to sexual harassment and retaliation, Plaintiff suffered  
23 emotional injuries. Further, as a result of all of the foregoing and following actions taken  
24 towards Plaintiff as alleged herein, Plaintiff has incurred loss of earnings and benefits in an  
25 amount not yet ascertained.

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First Cause of Action

**SEXUAL HARASSMENT**

(As against all Defendants)

48. Plaintiff realleges the information set forth in Paragraphs 1-47 and incorporates these paragraphs into this cause of action as if they were fully alleged herein.

49. This cause of action is based upon California statutes prohibiting sexual harassment in the workplace including, but not limited to California Government Code §12940, et seq.

50. The Plaintiff has exhausted her administrative remedies under the California Fair Employment and Housing Act and was issued a Notice of Case Closure - Right to Sue against defendants.

51. Plaintiff is informed, believes, and alleges that at all times Plaintiff was employed by CITY, HUIZAR did the affirmative acts as described in the general allegations herein that constituted sexual harassment. Defendants knowingly and intentionally engaged in said unwelcome discriminatory and sexually harassing conduct towards Plaintiff.

52. As a direct, foreseeable, and proximate result of the conduct of defendants, Plaintiff has suffered, and continues to suffer emotional distress, losses in salary, bonuses, job benefits, and other employment benefits which she would have received from Defendants, plus expenses incurred in obtaining substitute employment and not being regularly employed all to her damage in a sum within the jurisdiction of this court, to be ascertained according to proof.

53. The grossly outrageous, reckless, oppressive, intentional, malicious and bad faith manner in which HUIZAR engaged in those acts as described in this cause of action entitled Plaintiff to an award of punitive damages against HUIZAR, in an amount within the jurisdiction of this court, to be ascertained by the fact finder, that is sufficiently high to punish HUIZAR, deter him from engaging in such conduct again, and to make an example of him to others.

54. The Plaintiff also requests costs and attorney fees, as allowed by FEHA for the Plaintiff's prosecution of this action in reference to the FEHA code violations described herein.

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Second Cause of Action

**RETALIATION IN VIOLATION OF THE FAIR EMPLOYMENT AND HOUSING ACT**

(As against CITY and DOES 1-50)

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4 55. Plaintiff realleges the information set forth in Paragraphs 1-54 as though fully set forth and  
5 alleged herein.
- 6 56. This cause of action is based upon *California Government Code Section 12940, et seq.* which  
7 prohibits retaliation against an employee for opposing any practice forbidden by the Fair  
8 Employment and Housing Act or for complaining about or protesting sexual harassment.
- 9 57. Plaintiff exhausted her administrative remedies under the California Fair Employment and  
10 Housing Act and the Department of Fair Housing and Employment has issued the Notice of  
11 Case Closure/Right-to-Sue Letter with respect to said defendants.
- 12 58. Defendants violated *Calif. Gov. Code §12940, et seq.* by retaliating against Plaintiff because  
13 she opposed, complained about and protested Defendant's sexual harassment.
- 14 59. As a direct, foreseeable, and proximate result of the conduct of Defendants, Plaintiff has  
15 suffered, and continues to suffer emotional distress, losses in salary, bonuses, job benefits,  
16 and other employment benefits which she would have received from Defendant, plus  
17 expenses incurred in obtaining substitute employment and not being regularly employed all to  
18 her damage in a sum within the jurisdiction of this court, to be ascertained according to proof.
- 19 60. The grossly outrageous, reckless, oppressive, intentional, malicious and bad faith manner in  
20 which HUIZAR engaged in those acts as described in this cause of action entitled Plaintiff to  
21 an award of punitive damages against HUIZAR, in an amount within the jurisdiction of this  
22 court, to be ascertained by the fact finder, that is sufficiently high to punish HUIZAR, deter  
23 him from engaging in such conduct again, and to make an example of him to others.
- 24 61. The Plaintiff also requests costs and attorney fees, as allowed by FEHA for the Plaintiff's  
25 prosecution of this action in reference to the FEHA code violations described herein.
- 26 62. Plaintiff demands a jury trial and the amount in controversy exceeds \$25,000.

20140612 10:10 AM

1. Plaintiff respectfully requests the following relief:

2. 1. For special damages in an amount according to proof for Plaintiff's loss of past and future earnings, loss of job security and all damages flowing therefrom;
3. 2. For all general and special damages to compensate Plaintiff for any injuries, medical expenses, suffering and related damages;
4. 3. As only against Defendant Jose Huizar and DOES 50-100, for punitive damages, as allowed by law, that will punish, make an example of, and deter future conduct by HUIZAR;
5. 4. For all interest as allowed by law;
6. 5. For all costs and disbursements incurred in this suit;
7. 6. For attorneys' fees;
8. 7. For such other and further relief as the Court deems just and proper.

9. DATED: October 15, 2013

EISENBERG & ASSOCIATES

10. By: 

11. Michael B. Eisenberg  
12. Attorneys for Plaintiff

15. 2013 OCT 15 10 10 AM



VERIFICATION

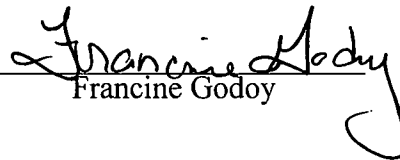
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I, the undersigned, declare:

I am a Plaintiff in the above-captioned matter and I am familiar with the contents of the foregoing document entitled Verified Complaint for Damages and Demand for Jury Trial.

The information supplied therein is based on my own personal knowledge and/or has been supplied by my attorneys or other agents. The information contained in the foregoing document is true, except as to the matters which are therein stated on information or belief, and, as to those matters, I am informed and believe that they are true.

I declare under penalty of perjury, pursuant to the laws of the State of California, that the foregoing is true and correct. Executed on October 15, 2013, at Los Angeles, California.

X   
Francine Godoy

2013 OCT 15 10 10 AM

FILED

FOR COURT USE ONLY

Los Angeles Superior Court

OCT 17 2013

John A. Clarke, Executive Officer/Clerk  
By SHAUNYA WESLEY Deputy

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):  
Michael B. Eisenberg, Esq. (State Bar No. 178308)  
EISENBERG & ASSOCIATES  
3580 Wilshire Blvd., Suite 1260  
Los Angeles, California 90010  
TELEPHONE NO.: (213) 201-9331 FAX NO.: (213) 382-4083  
ATTORNEY FOR (Name): Plaintiff, Francine Godoy

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

CASE NAME:  
Godoy vs. City of Los Angeles; Huizar; et. al.

CASE NUMBER: **BC 524640**

**CIVIL CASE COVER SHEET**  
 **Unlimited** (Amount demanded exceeds \$25,000)  **Limited** (Amount demanded is \$25,000 or less)  
**Complex Case Designation**  
 **Counter**  **Joinder**  
Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)

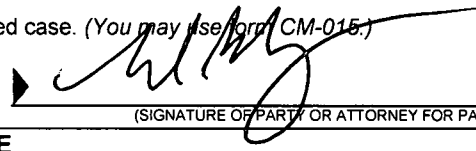
JUDGE:  
DEPT:

Items 1-5 below must be completed (see instructions on page 2).

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

2. This case  is  is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:
- |  |  |
|--|--|
| a. <input type="checkbox"/> Large number of separately represented parties   | d. <input type="checkbox"/> Large number of witnesses  |
| b. <input type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve | e. <input type="checkbox"/> Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court |
| c. <input type="checkbox"/> Substantial amount of documentary evidence   | f. <input type="checkbox"/> Substantial postjudgment judicial supervision  |
3. Type of remedies sought (check all that apply):
- |   |   |   |
|---|---|---|
| a. <input checked="" type="checkbox"/> monetary | b. <input type="checkbox"/> nonmonetary; declaratory or injunctive relief | c. <input checked="" type="checkbox"/> punitive |
|---|---|---|
4. Number of causes of action (specify): 2
5. This case  is  is not a class action suit.
6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)

Date: October 15, 2013  
Michael B. Eisenberg  
(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 complex case, this cover sheet will be used for statistical purposes only.

## INSTRUCTIONS ON HOW TO COMPLETE THE COVER SHEET

**To Plaintiffs and Others Filing First Papers**

If you are filing a first paper (for example, a complaint) in a civil case, you **must** complete and file, along with your first paper, the *Civil Case Cover Sheet* contained on page 1. This information will be used to compile statistics about the types and numbers of cases filed. You must complete items 1 through 5 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. You do not need to submit a cover sheet with amended papers. 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 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: Godoy vs. City of Los Angeles; Huizar, et. al.	CASE NUMBER
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**CIVIL CASE COVER SHEET ADDENDUM AND  
STATEMENT OF LOCATION  
(CERTIFICATE OF GROUNDS FOR ASSIGNMENT TO COURTHOUSE LOCATION)**

This form is required pursuant to Local Rule 2.0 in all new civil case filings in the Los Angeles Superior Court.

**Item I.** Check the types of hearing and fill in the estimated length of hearing expected for this case:  
 JURY TRIAL?  YES CLASS ACTION?  YES LIMITED CASE?  YES TIME ESTIMATED FOR TRIAL <sup>10-15</sup>  HOURS/  DAYS

**Item II.** Indicate the correct district and courthouse location (4 steps – If you checked “Limited Case”, skip to Item III, Pg. 4):

**Step 1:** After first completing the Civil Case Cover Sheet form, find the main Civil Case Cover Sheet heading for your case in the left margin below, and, to the right in Column **A**, the Civil Case Cover Sheet case type you selected.

**Step 2:** Check one Superior Court type of action in Column **B** below which best describes the nature of this case.

**Step 3:** In Column **C**, circle the reason for the court location choice that applies to the type of action you have checked. For any exception to the court location, see Local Rule 2.0.

**Applicable Reasons for Choosing Courthouse Location (see Column C below)**

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

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

	<b>A</b> Civil Case Cover Sheet Category No.	<b>B</b> Type of Action (Check only one)	<b>C</b> Applicable Reasons - See Step 3 Above
Auto Tort	Auto (22)	<input type="checkbox"/> A7100 Motor Vehicle - Personal Injury/Property Damage/Wrongful Death	1., 2., 4.
	Uninsured Motorist (46)	<input type="checkbox"/> A7110 Personal Injury/Property Damage/Wrongful Death – Uninsured Motorist	1., 2., 4.
Other Personal Injury/ Property Damage/ Wrongful Death Tort	Asbestos (04)	<input type="checkbox"/> A6070 Asbestos Property Damage <input type="checkbox"/> A7221 Asbestos - Personal Injury/Wrongful Death	2. 2.
	Product Liability (24)	<input type="checkbox"/> A7260 Product Liability (not asbestos or toxic/environmental)	1., 2., 3., 4., 8.
	Medical Malpractice (45)	<input type="checkbox"/> A7210 Medical Malpractice - Physicians & Surgeons <input type="checkbox"/> A7240 Other Professional Health Care Malpractice	1., 4. 1., 4.
	Other Personal Injury Property Damage Wrongful Death (23)	<input type="checkbox"/> A7250 Premises Liability (e.g., slip and fall)	1., 4.
		<input type="checkbox"/> A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.)	1., 4.
<input type="checkbox"/> A7270 Intentional Infliction of Emotional Distress		1., 3.	
	<input type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death	1., 4.	

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Non-Personal Injury/Property  
Damage/ Wrongful Death Tort

<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
Business Tort (07)	<input type="checkbox"/> A6029 Other Commercial/Business Tort (not fraud/breach of contract)	1., 3.
Civil Rights (08)	<input type="checkbox"/> A6005 Civil Rights/Discrimination	1., 2., 3.
Defamation (13)	<input type="checkbox"/> A6010 Defamation (slander/libel)	1., 2., 3.
Fraud (16)	<input type="checkbox"/> A6013 Fraud (no contract)	1., 2., 3.
Professional Negligence (25)	<input type="checkbox"/> A6017 Legal Malpractice	1., 2., 3.
	<input type="checkbox"/> A6050 Other Professional Malpractice (not medical or legal)	1., 2., 3.
Other (35)	<input type="checkbox"/> A6025 Other Non-Personal Injury/Property Damage tort	2., 3.

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	1., 2., 3.
	<input type="checkbox"/> A6109 Labor Commissioner Appeals	10.

Contract

Breach of Contract/ Warranty (06) (not insurance)	<input type="checkbox"/> A6004 Breach of Rental/Lease Contract (not unlawful detainer or wrongful eviction)	2., 5.
	<input type="checkbox"/> A6008 Contract/Warranty Breach -Seller Plaintiff (no fraud/negligence)	2., 5.
	<input type="checkbox"/> A6019 Negligent Breach of Contract/Warranty (no fraud)	1., 2., 5.
	<input type="checkbox"/> A6028 Other Breach of Contract/Warranty (not fraud or negligence)	1., 2., 5.
Collections (09)	<input type="checkbox"/> A6002 Collections Case-Seller Plaintiff	2., 5., 6.
	<input type="checkbox"/> A6012 Other Promissory Note/Collections Case	2., 5.
Insurance Coverage (18)	<input type="checkbox"/> A6015 Insurance Coverage (not complex)	1., 2., 5., 8.
Other Contract (37)	<input type="checkbox"/> A6009 Contractual Fraud	1., 2., 3., 5.
	<input type="checkbox"/> A6031 Tortious Interference	1., 2., 3., 5.
	<input type="checkbox"/> A6027 Other Contract Dispute(not breach/insurance/fraud/negligence)	1., 2., 3., 8.

Real Property

Eminent Domain/Inverse Condemnation (14)	<input type="checkbox"/> A7300 Eminent Domain/Condemnation      Number of parcels _____	2.
Wrongful Eviction (33)	<input type="checkbox"/> A6023 Wrongful Eviction Case	2., 6.
Other Real Property (26)	<input type="checkbox"/> A6018 Mortgage Foreclosure	2., 6.
	<input type="checkbox"/> A6032 Quiet Title	2., 6.
	<input type="checkbox"/> A6060 Other Real Property (not eminent domain, landlord/tenant, foreclosure)	2., 6.

Unlawful Detainer

Unlawful Detainer-Commercial (31)	<input type="checkbox"/> A6021 Unlawful Detainer-Commercial (not drugs or wrongful eviction)	2., 6.
Unlawful Detainer-Residential (32)	<input type="checkbox"/> A6020 Unlawful Detainer-Residential (not drugs or wrongful eviction)	2., 6.
Unlawful Detainer- Post-Foreclosure (34)	<input type="checkbox"/> A6020F Unlawful Detainer-Post-Foreclosure	2., 6.
Unlawful Detainer-Drugs (38)	<input type="checkbox"/> A6022 Unlawful Detainer-Drugs	2., 6.

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	<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., 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.
<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., 9.
		<input type="checkbox"/> A6160 Abstract of Judgment	2., 6.
		<input type="checkbox"/> A6107 Confession of Judgment (non-domestic relations)	2., 9.
		<input type="checkbox"/> A6140 Administrative Agency Award (not unpaid taxes)	2., 8.
		<input type="checkbox"/> A6114 Petition/Certificate for Entry of Judgment on Unpaid Tax	2., 8.
		<input type="checkbox"/> A6112 Other Enforcement of Judgment Case	2., 8., 9.
<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	2., 7.
		<input type="checkbox"/> A6170 Petition for Relief from Late Claim Law	2., 3., 4., 8.
<input type="checkbox"/> A6100 Other Civil Petition		2., 9.	

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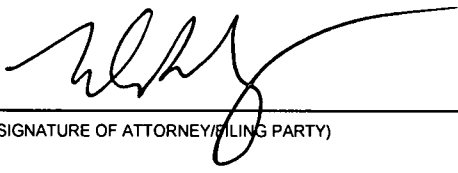
SHORT TITLE: Godoy vs. City of Los Angeles; Huizar, et. al.	CASE NUMBER
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**Item III. Statement of Location:** Enter the address of the accident, party's residence or place of business, performance, or other circumstance indicated in Item II., Step 3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

<b>REASON: Check the appropriate boxes for the numbers shown under Column C for the type of action that you have selected for this case.</b>  <input type="checkbox"/> 1. <input checked="" type="checkbox"/> 2. <input 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: 200 North Spring Street	
	CITY: Los Angeles	STATE: CA

**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 Central courthouse in the Central District of the Superior Court of California, County of Los Angeles [Code Civ. Proc., § 392 et seq., and Local Rule 2.0, subds. (b), (c) and (d)].

Dated: October 15, 2013

  
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 (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.

LACIV 109 (Rev. 03/11)