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10 DOE

A6000

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D 17 Rico

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

NOV 08 2016

Sherri R. Carter, Executive Officer/Clerk  
By Charlie L. Coleman Deputy  
Charlie L. Coleman

11 SUPERIOR COURT OF CALIFORNIA

12 FOR THE COUNTY OF LOS ANGELES – CENTRAL DISTRICT

13 DOE,  
14 an individual,

15 Plaintiffs,

16 vs.

17 ELIZABETH RUIZ, an individual,  
18 and DOES 1-10 inclusive,

19 Defendants.

CASE NO. **BC640012**

ACTION BASED ON CIVIL CODE  
SECTION 1708.85

20  
21  
22  
23  
24 11/08/2016

CIT/CASE: BC640012  
LEA/DEF#: RECEIPT #: CCH243111022  
DATE PAID: 11/08/16 10:12 AM  
PAYMENT: \$435.00  
RECEIVED: 310  
CHECK: \$435.00  
CASH: \$0.00  
CHANGE: \$0.00  
CARD: \$0.00

1 Plaintiff Doe ("Plaintiff) for his Complaint against defendant Elizabeth Ruiz  
2 ("Ruiz" or "Defendant") and Does 1-10 (collectively, "Defendants"), alleges as  
3 follows:

4 **SUMMARY OF ACTION**

5 1. Plaintiff has worked hard his entire life to hone his skills and become  
6 one of the most talented people at his craft in the United States and the world.  
7 Plaintiff has received the highest honors, awards and accolades available in his  
8 profession and is widely recognized as the world's best at his job. Plaintiff earns  
9 his living not only from his ability to outperform others with his skills but also with  
10 the incumbent fame that comes with his unparalleled talent in a high profile  
11 profession. His ability to benefit from this fame depends on the appeal of his  
12 persona to many different people from virtually all walks of life, including families  
13 and children. He cannot count on this appeal if Ruiz exposes images of him in the  
14 most intimate of physical acts between a man and a woman, done in private and  
15 intended to remain private.

16 2. Ruiz has not achieved a similar level of success in her chosen career  
17 path, but she desperately craves fame and fortune. She is willing to betray  
18 Plaintiff's trust and to shame and humiliate him to achieve her craven aims. Ruiz  
19 herself has stated that she wants "to be the next Kim Kardashian" and hopes to be  
20 catapulted to fame and fortune with a sex tape at Plaintiff's expense and without his  
21 permission.

22 3. This action arises from Ruiz's threat to release, exploit, sell, display,  
23 publicize, and/or otherwise distribute a cellular phone recording in Ruiz's  
24 possession purportedly depicting Ruiz and Plaintiff engaged in consensual sexual  
25 intercourse ("recording") unless Plaintiff gives Ruiz \$2,500,000. Ruiz contacted a  
26 TMZ entity to try to "sell" the recording and then contacted a widely-known "sex  
27 tape broker" to assist her in "selling" the recording. Ruiz also retained attorney  
28 Corey Boddie to negotiate on her behalf to extort money from Plaintiff in exchange

1 for Ruiz turning over the recording to Plaintiff and not releasing it, apparently being  
2 willing to settle for fortune if she could not also achieve fame. Ruiz's illegal  
3 actions threaten to harm Plaintiff's reputation and his employment, as set forth  
4 more fully below. As also set forth below, Plaintiff seeks monetary damages and,  
5 most importantly, preliminary and permanent injunctive relief preventing Ruiz from  
6 releasing, distributing, displaying or otherwise attempting to exploit the recording.

7 **THE PARTIES**

8 4. Plaintiff proceeds under the pseudonym "Doe" pursuant to California  
9 Civil Code section 1708.85(f)(1).

10 5. Defendant Ruiz is an individual and at all relevant times has been a  
11 resident of the County of Los Angeles, State of California.

12 6. Plaintiff is informed and believes and based thereon alleges that the  
13 fictitiously named defendants sued herein as Does 1 through 10, inclusive, and each  
14 of them (the "Doe Defendants"), were in some manner responsible or legally liable  
15 for the actions, events, transactions and circumstances alleged herein. The true  
16 names and capacities of the Doe Defendants, whether individual, corporate,  
17 associate or otherwise, are presently unknown to Plaintiff, and Plaintiff will seek  
18 leave of Court to amend this Complaint to assert the true names and capacities of  
19 the Doe Defendants when Plaintiff has ascertained them. Ruiz and the Doe  
20 Defendants are collectively, the "Defendants."

21 7. Plaintiff is informed and believes and based thereon alleges that  
22 Defendants, and each of them, were the agents, employees, partners, joint-  
23 venturers, co-conspirators, owners, principals, and employers of the remaining  
24 defendants, and each of them, and are, and at all times herein mentioned were,  
25 acting within the course and scope of that agency, partnership, employment,  
26 conspiracy, ownership, or joint venture. Plaintiff is further informed and believes  
27 and based thereon alleges that the acts and conduct herein alleged of each such  
28 defendant was known to, authorized by, and/or ratified by the other defendants, and

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1 each of them.

2 **JURISDICTION AND VENUE**

3 8. This Court has jurisdiction over all causes of action asserted herein  
4 because all such causes of action arise out of conduct undertaken by defendants in  
5 the County of Los Angeles, State of California. Each of Defendants has sufficient  
6 minimum contacts with the State of California, is a citizen of the State of  
7 California, or otherwise intentionally availed herself, himself or itself of the  
8 benefits of the State of California so as to render the exercise of jurisdiction by this  
9 Court consistent with traditional notions of fair play and substantial justice.

10 9. Venue is proper in this Court under California Code of Civil Procedure  
11 section 393 because the cause of action, or some part thereof, arose in the County of  
12 Los Angeles, State of California.

13 **FACTUAL BACKGROUND**

14 10. In June of 2016, Plaintiff and Ruiz met in Cancun, Mexico. While  
15 there, Plaintiff and Ruiz engaged in consensual sexual intercourse while they were  
16 alone indoors. Ruiz recorded the sexual intercourse on Ruiz's cellular phone, and  
17 Plaintiff insisted at all times that the recording be kept private. Ruiz agreed that she  
18 would keep the recording private.

19 11. Shortly thereafter, Plaintiff returned to the United States, and Plaintiff  
20 spoke with Ruiz on the telephone to ask her if she still had the recording. Ruiz  
21 responded that she did. Plaintiff reminded Ruiz that he did not want anyone to see  
22 the recording and asked Ruiz to erase the recording. Ruiz refused to provide the  
23 recording to Plaintiff and responded, "Gotcha," to Plaintiff's request that Ruiz  
24 destroy the recording. Ruiz did not destroy the recording.

25 12. On September 16, 2016, Kevin Blatt ("Blatt"), a "sex tape broker," left  
26 a telephone message for one of Plaintiff's (non-attorney) representatives  
27 ("Plaintiff's representative") saying that he wanted to discuss a "sensitive matter"  
28 pertaining to a "client" of Plaintiff's representative (Blatt did not mention Plaintiff

1 by name at this time) and asking for a return telephone call.

2 13. On September 17, 2016, Andrew Kim ("Kim"), an attorney for  
3 Plaintiff and for Plaintiff's representative, telephoned Blatt in response to that  
4 message. Blatt told Kim on the telephone that:

5 (a) Blatt is a "sex tape broker" who is widely known;

6 (b) A Google search of Blatt will show that he is "the guy" in the  
7 sex tape broker business;

8 (c) Ruiz had contacted Blatt to seek Blatt's assistance in selling the  
9 recording;

10 (d) Ruiz wants to sell the recording and to become the next "Kim  
11 Kardashian" (Kim Kardashian became famous, in part, based on the release  
12 of a sex tape);

13 (e) Ruiz had already approached a TMZ entity, but that entity was  
14 not interested in paying for the recording;

15 (f) Ruiz wants to find a buyer for the recording, notwithstanding  
16 TMZ's lack of interest;

17 (g) Blatt and Ruiz had decided to approach Plaintiff directly to try  
18 to sell the recording;

19 (h) Ruiz had only one copy of the recording on her cellular phone  
20 and had shown the recording to Blatt and Ruiz's mother;

21 (i) Ruiz's mother had advised Ruiz to engage counsel;

22 (j) Ruiz wanted to "do a deal" immediately;

23 (k) Blatt did not know whether he could "control" Ruiz and stop her  
24 from releasing the recording or portions of it; and

25 (l) Blatt asked that Plaintiff make a proposal to purchase the  
26 recording as that would be the "only way" Plaintiff could stop the release of  
27 the recording.

28 14. On or about September 22, 2016, Plaintiff's representative received a

1 letter from attorney Corey Boddie ("Boddie"). The letter stated *in toto*, "[w]e are  
2 representing an individual who owns property involving [Plaintiff]. Upon my  
3 client's request, please notify our offices within five (5) days of receipt of this  
4 letter. My direct line is 917-292-4852."

5 15. On September 26, 2016, Plaintiff's representative and Kim had a  
6 conference call with Boddie. Boddie said that he wanted to meet in person to show  
7 them intellectual property involving Plaintiff. Boddie refused to tell Kim or  
8 Plaintiff's representative on the telephone exactly what the property was, who his  
9 client was, or what his client wanted from Plaintiff. Although Boddie would be out  
10 of town and unavailable to meet starting on September 28 through October 2,  
11 Boddie repeatedly stressed the urgency of meeting in person before he left town and  
12 even tried to arrange an after-hours meeting that very night. Ultimately, Plaintiff's  
13 representative, Kim and Boddie set a meeting for October 3, 2016.

14 16. On October 3, 2016, Matthew Johnson ("Johnson") (another attorney  
15 representing Plaintiff), Plaintiff's non-attorney representative and Kim met in  
16 person with Boddie. Plaintiff's non-attorney representative attended the meeting  
17 via Skype. At the meeting, Boddie showed portions of the recording and claimed  
18 Ruiz owned the intellectual property rights in it. Boddie identified his client as  
19 Ruiz in response to Johnson's questions and confirmed that the recording depicted  
20 Ruiz. Boddie said that Ruiz wanted Plaintiff to purchase the intellectual property  
21 rights to the recording from her. Otherwise, Boddie stated, Ruiz would reserve her  
22 right to exploit the recording. In response to Johnson's questions, Boddie said that  
23 Ruiz had shown the recording only to her mother, a "sex tape broker" Ruiz had  
24 previously contacted, and to Boddie. Boddie stated that Ruiz had told him she was  
25 no longer working with the broker. Boddie stated that he had a single copy of the  
26 recording on a thumb drive which was the thumb drive he showed to Johnson, Kim  
27 and Plaintiff's representative during the meeting. Boddie said that he had placed  
28 Ruiz's cellular phone in his office safe. Boddie stated that he believed there were

1 no other copies of the recording. Kim asked Boddie whether Ruiz had ever had or  
2 still has copies of the recording on any cloud storage service. Boddie stated that  
3 Ruiz had formerly had a copy “in the cloud” but that Ruiz destroyed it.

4 17. At the October 3, 2016 meeting, Johnson asked Boddie “what does  
5 your client want?” Boddie responded that Ruiz wanted Plaintiff to make a  
6 monetary offer to purchase the recording and thereby keep the recording  
7 confidential. Boddie stated that Ruiz wanted to get this deal done quickly and that  
8 Boddie was not certain he could control Ruiz. Boddie made this threat, and in  
9 every communication from Boddie, he tried to impose time pressure to get a “deal  
10 done.” Johnson, Kim and Plaintiff’s non-attorney representative told Boddie that  
11 they would have to discuss the matter and meet with Plaintiff and would  
12 communicate with Boddie after that occurred. Kim asked Boddie to agree on his  
13 own behalf and on behalf of Ruiz not to disclose or discuss or display any  
14 information pertaining to the recording to or with anyone while the parties  
15 discussed how to resolve this matter. Boddie agreed.

16 18. Kim sent an email to Boddie on October 4, 2016 in which Kim told  
17 Boddie that Johnson and Plaintiff’s non-attorney representative would be meeting  
18 with Plaintiff on Sunday, October 9, 2016. Kim asked Boddie to confirm that  
19 Boddie and Ruiz had agreed “that no one, including without limitation you and/or  
20 your client, will disclose or discuss or display any information pertaining to this  
21 matter to or with anyone while we are discussing how to resolve this matter.” That  
22 same day, Boddie confirmed by email his and Ruiz’s agreement on that point.

23 19. On or about October 12, 2016, Boddie sent a letter to Kim stating  
24 Boddie would be terminated as Ruiz’s counsel on October 14, 2016 at 5 p.m.  
25 because he had not heard from Kim since October 4, 2016.

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1           20.       On October 13, 2016, Martin D. Singer ("Singer"), another of  
2 Plaintiff's attorneys, sent Boddie a letter stating, among other things, that Plaintiff  
3 intended the recording to be private and not shared with any third party, and the  
4 recording had minimal pecuniary value because exploiting it without Plaintiff's  
5 permission was against the law. Singer informed Boddie that Ruiz's release,  
6 exploitation, sale, display, publicizing, and/or otherwise distributing the recording  
7 would expose her to significant liability as she did not have a right to do so without  
8 Plaintiff's permission and consent.

9           21.       On October 14, 2016, Singer spoke with Boddie on the telephone.  
10 Singer again told Boddie the recording has minimal pecuniary value because Ruiz  
11 is prohibited by law from releasing the recording without Plaintiff's permission and  
12 consent. Singer again told Boddie that Plaintiff does not consent and has never  
13 consented to the display of the recording for anyone. Singer reminded Boddie that  
14 releasing the recording would violate numerous laws as stated in the prior letter to  
15 him. Boddie told Singer that Ruiz "is itchy," she "could care less" about the law,  
16 and she wants \$2,500,000 to transfer ownership of the recording to Plaintiff.  
17 Otherwise, Ruiz will release the recording. Boddie tried to impose time pressure on  
18 Singer by stating that Ruiz had told Boddie she intended to fire him if Boddie did  
19 not complete a transaction within a few days. Singer told Boddie that Ruiz's  
20 demand was extortion. Boddie said his client was unpredictable and may do  
21 anything with the recording if she does not get \$2,500,000. Boddie told Singer that  
22 Boddie was aware of two existing copies of the recording, one on Ruiz's cellular  
23 phone and a copy Boddie had made on an external thumb drive.

24           22.       On or about October 20, 2016, Boddie sent a letter to Singer stating  
25 that Ruiz had "disengaged" Boddie. Ruiz has not yet informed Plaintiff's  
26 representatives of whether she has engaged replacement counsel.

27           23.       On October 30, 2016, Kim's office sent a letter to Ruiz reaffirming that  
28 Plaintiff does not consent to release of the recording and demanding that Ruiz

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1 respond and acknowledge she will not release, exploit or display the recording.  
2 Ruiz has not responded. The letter informed Ruiz that her release of the recording  
3 would violate California Penal Code Section 647(j)(4), which provides for  
4 punishment of up to six (6) months in county jail and fines of up to \$1,000,  
5 California Civil Code §3344 and Plaintiff's common law right of privacy. In  
6 addition, the letter specifically warned Ruiz that a release of the recording would  
7 violate California Civil Code 1708.85.

8 **FIRST CAUSE OF ACTION**

9 [For Preliminary and Permanent Injunction And Damages  
10 Pursuant to Civil Code §1708.85(d) Against Defendants]

11 24. Plaintiff repeats and realleges each and every allegation contained in  
12 Paragraphs 1 through 23, inclusive, above, as if fully set forth herein.

13 25. In June of 2016, Plaintiff and Ruiz engaged in consensual sexual  
14 intercourse while they were alone and indoors. Ruiz recorded the sexual  
15 intercourse on Ruiz's cellular phone, and Plaintiff insisted then and at all times that  
16 the recording be kept private. Ruiz agreed that she would keep the recording  
17 private. Shortly after the recording was made, Plaintiff reaffirmed his request that  
18 the recording remain private when he spoke on the phone with Ruiz and told her  
19 that he did not want the recording viewed by anyone and that he wanted Ruiz to  
20 erase the recording.

21 26. Ruiz did not erase the recording. In an effort to shame and humiliate  
22 Plaintiff and to catapult herself to fame and fortune through exploiting the  
23 recording and violating Plaintiff's rights of privacy, among others,, Ruiz engaged a  
24 "sex tape broker," retained an attorney to "negotiate" for payment of the recording,  
25 and has approached at least one media outlet to try to sell the recording. Ruiz has  
26 pressured her attorney to reach a deal quickly to extort money from Plaintiff – and  
27 her attorney has, in turn, pressured Plaintiff and his representatives by demanding  
28 \$2,500,000 from Plaintiff in exchange for Ruiz's promise not to release, exploit,

1 sell, display, publicize and/or distribute the recording. Ruiz refuses to acknowledge  
2 the law and refuses to agree not to release, exploit, sell, display, publicize, and/or  
3 distribute the recording. In fact, Ruiz continues to threaten to release, exploit, sell,  
4 display, publicize, and/or distribute the recording unless Plaintiff pays her millions  
5 of dollars. Ruiz's "sex tape broker" and her former attorney warn that Ruiz is  
6 unpredictable and believes that she will become rich and famous by releasing the  
7 recording.

8 27. Plaintiff does not consent to release, exploit, sell, display, publicize,  
9 and/or otherwise distribute this recording. At all times, Plaintiff understood, based  
10 on his expressed desire that the recording remain private and Ruiz's agreement that  
11 it would remain private, that Ruiz would never show the recording to anyone.  
12 According to Ruiz's "sex tape broker" and former attorney, Ruiz has displayed and  
13 the recording to, at least, her mother, Blatt, and Boddie. Ruiz has shown that she  
14 has no intention of keeping the recording private. Plaintiff does not want anyone  
15 else to view the recording and, therefore, wants the recording and any and all copies  
16 destroyed.

17 28. Unless this Court orders Ruiz to refrain from duplicating the recording  
18 and to cease immediately and for all time her attempts to release, exploit, sell,  
19 display, publicize, duplicate and/or distribute this recording, Plaintiff will suffer  
20 irreparable harm to his reputation and standing in the community as well as shame,  
21 humiliation and financial damages of enormous proportions (e.g., lost current and  
22 future endorsements, termination or penalizing of Plaintiff under his current  
23 employment contracts).

24 29. Plaintiff has no adequate remedy at law for the injuries threatened.

25 30. Defendants' wrongful acts were wanton, malicious and were  
26 undertaken by Defendants with willful and conscious disregard for Plaintiff's  
27 rights. As a result, the imposition of exemplary or punitive damages against  
28 Defendants is warranted.

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time Defendants and each of them, and any and all persons acting in concert with any of them, on their behalf or pursuant to their instructions, demands or requests, including without limitation Ruiz, Blatt and Boddie, from:

- a. duplicating, releasing, exploiting, selling, displaying, publicizing, and/or distributing the recording and/or attempting to engage in any of the foregoing acts;
- b. allowing anyone to view the recording and/or attempting to engage in the foregoing acts; and
- c. providing, giving, selling or otherwise placing in anyone's possession, custody or control the recording, or any copies thereof, and/or attempting to engage in any of the foregoing acts;

- 4. For issuance of a permanent injunction ordering Defendants and each of them, and any and all persons acting in concert with any of them, on their behalf or pursuant to their instructions, demands or requests, including without limitation Ruiz, Blatt and Boddie, to destroy all copies of the recording, in whatever form and/or media (including ESI);
- 5. For compensatory damages, according to proof at trial;
- 6. For exemplary damages, according to proof at trial;
- 7. For costs of suit herein incurred;
- 8. For reasonable attorneys' fees;
- 9. For interest on any monetary award to Plaintiff at the legal rate;

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10. For such other and further relief as this Court may deem just and proper.

DATED: November 7, 2016

LAW OFFICE OF ANDREW F. KIM, ESQ. P.C.

By

  
Andrew F. Kim  
Attorneys for Plaintiff DOE

11/08/2016

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, Street number, and address):  
Andrew F. Kim, Esq. (SBN 16533); Rebecca J. Riley, Esq. (SBN 139085)  
9018 Balboa Boulevard, #552, Northridge, CA 91325  
TELEPHONE NO.: 818 216 5288 FAX NO.: 818 993 3012  
ATTORNEY FOR (Name):

FOR COURT USE ONLY  
**FILED**  
Superior Court Of California  
County Of Los Angeles  
**NOV 08 2016**  
Shorri R. Carter, Executive Officer/Clerk  
By Charlie L. Coleman Deputy  
Charlie L. Coleman

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, CA 90012  
BRANCH NAME: Stanley Mosk Courthouse -- Central District

CASE NAME:  
DOE, an individual v. Elizabeth Ruiz, an individual, and Does 1-10 incl.

**CIVIL CASE COVER SHEET**  
 **Unlimited**  
(Amount demanded exceeds \$25,000)  
 **Limited**  
(Amount demanded is \$25,000 or less)

**Complex Case Designation**  
 **Counter**  **Joinder**  
Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)

CASE NUMBER: **BC 040012**  
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:
- |   |   |  |
|---|---|--|
| <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 type="checkbox"/> Other employment (15) | <p><b>Contract</b></p> <input type="checkbox"/> Breach of contract/warranty (06)<br><input type="checkbox"/> Rule 3.740 collections (09)<br><input type="checkbox"/> Other collections (09)<br><input type="checkbox"/> Insurance coverage (18)<br><input type="checkbox"/> Other contract (37) <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 checked="" 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. Remedies sought (check all that apply): a.  monetary b.  nonmonetary; declaratory or injunctive relief c.  punitive
4. Number of causes of action (specify): One Cause of Action -- Action Based on Civil Code Section 1708.85
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: November 7, 2016  
Andrew F. Kim  
(TYPE OR PRINT NAME)

(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

**NOTICE**  
• Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.  
• File this cover sheet in addition to any cover sheet required by local court rule.  
• If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.  
• Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

SHORT TITLE: DOE v. RUIZ

CASE NUMBER

BC 6 4 0 0 1 2

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

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

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

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

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

Applicable Reasons for Choosing Court Filing Location (Column C)

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

Auto Tort

Other Personal Injury/Property Damage/Wrongful Death Tort

Table with 3 columns: A (Civil Case Cover Sheet Category No.), B (Type of Action), and C (Applicable Reasons). Rows include categories like Auto (22), Uninsured Motorist (46), Asbestos (04), Product Liability (24), Medical Malpractice (45), and Other Personal Injury Property Damage Wrongful Death (23).

SHORT TITLE: **DOE v. RUIZ**

CASE NUMBER

Non-Personal Injury/ Property Damage/ Wrongful Death Tort

Employment

Contract

Real Property

Unlawful Detainer

<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, 2, 3
Civil Rights (08)	<input type="checkbox"/> A6005 Civil Rights/Discrimination	1, 2, 3
Defamation (13)	<input type="checkbox"/> A6010 Defamation (slander/libel)	1, 2, 3
Fraud (16)	<input type="checkbox"/> A6013 Fraud (no contract)	1, 2, 3
Professional Negligence (25)	<input type="checkbox"/> A6017 Legal Malpractice	1, 2, 3
	<input type="checkbox"/> A6050 Other Professional Malpractice (not medical or legal)	1, 2, 3
Other (35)	<input type="checkbox"/> A6025 Other Non-Personal Injury/Property Damage tort	1, 2, 3
Wrongful Termination (36)	<input type="checkbox"/> A6037 Wrongful Termination	1, 2, 3
Other Employment (15)	<input type="checkbox"/> A6024 Other Employment Complaint Case	1, 2, 3
	<input type="checkbox"/> A6109 Labor Commissioner Appeals	10
Breach of Contract/ Warranty (06) (not insurance)	<input type="checkbox"/> A6004 Breach of Rental/Lease Contract (not unlawful detainer or wrongful eviction)	2, 5
	<input type="checkbox"/> A6008 Contract/Warranty Breach -Seller Plaintiff (no fraud/negligence)	2, 5
	<input type="checkbox"/> A6019 Negligent Breach of Contract/Warranty (no fraud)	1, 2, 5
	<input type="checkbox"/> A6028 Other Breach of Contract/Warranty (not fraud or negligence)	1, 2, 5
Collections (09)	<input type="checkbox"/> A6002 Collections Case-Seller Plaintiff	5, 6, 11
	<input type="checkbox"/> A6012 Other Promissory Note/Collections Case	5, 11
	<input type="checkbox"/> A6034 Collections Case-Purchased Debt (Charged Off Consumer Debt Purchased on or after January 1, 2014)	5, 6, 11
Insurance Coverage (18)	<input type="checkbox"/> A6015 Insurance Coverage (not complex)	1, 2, 5, 8
Other Contract (37)	<input type="checkbox"/> A6009 Contractual Fraud	1, 2, 3, 5
	<input type="checkbox"/> A6031 Tortious Interference	1, 2, 3, 5
	<input type="checkbox"/> A6027 Other Contract Dispute(not breach/insurance/fraud/negligence)	1, 2, 3, 8, 9
Eminent Domain/Inverse Condemnation (14)	<input type="checkbox"/> A7300 Eminent Domain/Condemnation      Number of parcels _____	2, 6
Wrongful Eviction (33)	<input type="checkbox"/> A6023 Wrongful Eviction Case	2, 6
Other Real Property (26)	<input type="checkbox"/> A6018 Mortgage Foreclosure	2, 6
	<input type="checkbox"/> A6032 Quiet Title	2, 6
	<input type="checkbox"/> A6060 Other Real Property (not eminent domain, landlord/tenant, foreclosure)	2, 6
Unlawful Detainer-Commercial (31)	<input type="checkbox"/> A6021 Unlawful Detainer-Commercial (not drugs or wrongful eviction)	6, 11
Unlawful Detainer-Residential (32)	<input type="checkbox"/> A6020 Unlawful Detainer-Residential (not drugs or wrongful eviction)	6, 11
Unlawful Detainer-Post-Foreclosure (34)	<input type="checkbox"/> A6020F Unlawful Detainer-Post-Foreclosure	2, 6, 11
Unlawful Detainer-Drugs (38)	<input type="checkbox"/> A6022 Unlawful Detainer-Drugs	2, 6, 11



SHORT TITLE:

DOE v. RUIZ

CASE NUMBER

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

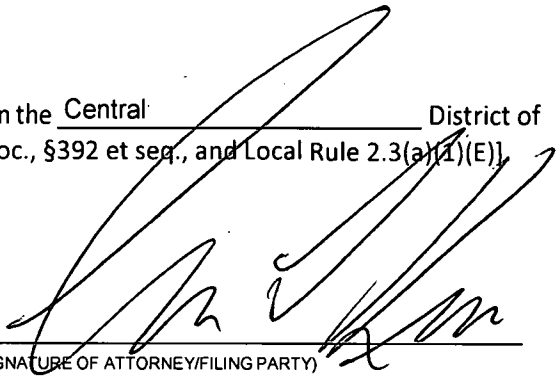
SHORT TITLE: DOE v. RUIZ	CASE NUMBER
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**Step 4: Statement of Reason and Address:** Check the appropriate boxes for the numbers shown under Column C for the type of action that you have selected. Enter the address which is the basis for the filing location, including zip code. (No address required for class action cases).

<b>REASON:</b> <input type="checkbox"/> 1. <input type="checkbox"/> 2. <input checked="" type="checkbox"/> 3. <input type="checkbox"/> 4. <input type="checkbox"/> 5. <input type="checkbox"/> 6. <input type="checkbox"/> 7. <input type="checkbox"/> 8. <input checked="" type="checkbox"/> 9. <input type="checkbox"/> 10. <input type="checkbox"/> 11.			<b>ADDRESS:</b> 1616 N. Serrano Avenue, Apt. 107
<b>CITY:</b> Los Angeles	<b>STATE:</b> CA	<b>ZIP CODE:</b> 90027	

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

Dated: November 7, 2016

  
 (SIGNATURE OF ATTORNEY/FILING PARTY)

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

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

11/08/2016