

1 Michael Waddington, Esq. (SBN 172279)  
2 LAW OFFICE OF MICHAEL WADDINGTON  
3 9615 Brighton Way, Suite 400  
4 Beverly Hills, California 90210  
Telephone: (310) 276-4100  
Facsimile: (310) 276-4006

5 Attorney for Plaintiff,  
6 CHANTEL THOMAS

**FILED**  
SUPERIOR COURT OF CALIFORNIA  
COUNTY OF LOS ANGELES

AUG 12 2010

John A. Clarke/Executive Officer/Clerk  
By Amber Lafleur-Clayton Deputy  
AMBER LAFLEUR-CLAYTON

7 *D31 Alan Rosenfield*

8 SUPERIOR COURT OF STATE OF CALIFORNIA  
9 LOS ANGELES COUNTY, CENTRAL DISTRICT

11 CHANTEL THOMAS, an individual,

12 Plaintiff,

13 vs.

14 SHED MEDIA U.S., INC. a Delaware  
15 Corporation; SURVIVING TERROR, LLC, a  
16 Delaware Limited Liability Corporation; and  
17 DOES 1 through 100, inclusive,

18 Defendants.

) Case No.

**BC443559**

) **COMPLAINT FOR DAMAGES**

- 19 ) **1. Violation of DFEH Act, Gov. Code**  
20 ) **§12940 et seq. – Discrimination Based on**  
21 ) **Sex.**
- 22 ) **2. Violation of DFEH Act, Gov. Code**  
23 ) **§12940 et seq. – Hostile Work**  
24 ) **Environment/Harassment Based on Sex.**
- 25 ) **3. Violation of DFEH Act, Gov. Code**  
26 ) **§12940(i) – Failure to Take Corrective**  
27 ) **Action to Prevent Harassment**
- 28 ) **4. Tortious Termination in Violation of**  
Public Policy.
5. **Breach of Implied Covenant of Good**  
Faith and Fair Dealing.

RECEIVED:  
DATE PAID: 08/12/10 09:45 AM  
PAYMENT: \$355.00  
RECEIPT #: CCH503052015  
CIT/CASE: BC443559 LER/LEN  
CHECK: 355.00  
CASH:  
CHANGE:  
CARD:

Plaintiff CHANTEL THOMAS, by and through her undersigned counsel, hereby files this  
Complaint for Damages against Defendants Shed Media U.S., Inc. and Surviving Terror, LLC  
(collectively "Defendants") alleging as follows:

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**PARTIES**

1. Plaintiff Chantel Thomas (“Ms. Thomas”) at all relevant times was and is a resident of the State of California, County of Los Angeles.

2. Defendant Shed Media US, Inc. (hereinafter “Shed Media”) is a Delaware corporation that is licensed to do and is doing business within in the State of California, County of Los Angeles. At all times herein mentioned Government Code sections 12940 et seq. were in full force and effect and were binding on the Defendant. These sections require Defendant to refrain from discrimination and harassment against any employee on the basis of sex, among other things. Within the time provided by law, Plaintiff filed a complaint with the California Department of Fair Employment and Housing, in full compliance with these sections, and received a right-to-sue letter, a copy of which is attached as Exhibit “A.”

3. Defendant Surviving Terror, LLC (hereinafter “Surviving Terror”) is a Delaware limited liability corporation that at all times was licensed to do and is doing business in the State of California, County of Los Angeles. At all times herein mentioned Government Code sections 12940 et seq. were in full force and effect and were binding on the Defendant. These sections require Defendant to refrain from discrimination and harassment against any employee on the basis of sex, among other things. Within the time provided by law, Plaintiff filed a complaint with the California Department of Fair Employment and Housing, in full compliance with these sections, and received a right-to-sue letter, a copy of which is attached as Exhibit “B.”

4. Plaintiff is ignorant of the true names and capacities of Defendants Does 1 through 100 and therefore sues them by fictitious names. Plaintiff will seek leave to amend this complaint when the true names of the Doe Defendants have been ascertained. Plaintiff is informed and believes and on that basis alleges that the Doe Defendants were in some way responsible for, participated in or contributed to the matters and things detailed in this complaint and therefore should assume legal responsibility.

5. Each of the Defendants and/or their predecessors, affiliates, subsidiaries and related entities, were the agents, servants, employees, fellow members, associates and/or joint-ventures of

1  
2 each of the other remaining Defendants. Each of the Defendants acted within the purpose and  
3 scope of the agency, employment or joint-venture, and the express and/or implied knowledge,  
4 consent, advice and/or permission of the remaining Defendants. The acts of each Defendant were  
5 approved, adopted and/or ratified by each other and together constitute a single course of conduct.

6 6. Jurisdiction and Venue is proper in the Central District of Los Angeles Court.

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

8 7. Plaintiff Chantel Thomas, an experienced costumed designer was hired by  
9 Defendants to be the lead costume designer for the television show *Surviving Terror*.

10 8. Cade Courtley ("Mr. Courtley") was the host of *Surviving Terror*. Mr. Courtley, a  
11 former Navy Seal, was not only the host of the show, but was also the spokesman.

12 9. Jeanie Whitmeyer ("Ms. Whitmeyer") was Ms. Thomas' assistant. Ms. Whitmeyer  
13 had little or no previous experience as a costume designer.

14 10. Thereinafter, Mr. Courtley and Ms. Whitmeyer began a sexual relationship.

15 11. After Mr. Courtley began having a sexual relationship with Ms. Thomas'  
16 subordinate, Mr. Courtley began harassing Ms. Thomas. He began refusing to wear underwear in  
17 any of his numerous fittings, even the boxer shorts and briefs that she specifically purchased for  
18 him. Mr. Courtley began making inappropriate comments to Ms. Thomas. Ms. Thomas'  
19 complainants to the Defendants regarding Mr. Courtley's harassing behavior were summarily  
20 ignored.  
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24 12. Defendants knew, or should have known, of Mr. Courtley's sexual relationship  
25 with a subordinate.

26 13. Per Mr. Courtley's demand and ultimatum, Defendants subsequently terminated  
27 Ms. Thomas' employment in order to promote Ms. Whitman.  
28

1           14. Less than two months after Ms. Thomas was terminated, Mr. Courtley and Ms.  
2  
3 Whitmeyer began residing together.

4                                   **FIRST CAUSE OF ACTION**  
5                                   **Violation of DFEH Act, Gov. Code, §12940 et seq.**  
6                                   **Discrimination Based on Sex**  
7                                   **[As Against All Named Defendants]**

8           15. The allegations set forth in Paragraphs 1 through 14 are re-alleged and incorporated  
9 herein by reference.

10           16. Defendants, and each of them, were employers.

11           17. Ms. Thomas was an employee of Defendants.

12           18. Defendants discharged Ms. Thomas.

13           19. Ms. Thomas's protected status based upon her sex was a motivating reason for the  
14 discharge. Mr. Courtley was having a sexual relationship with Ms. Thomas' subordinate.  
15 Defendants terminated Ms. Thomas in order to promote her subordinate, effectively rewarding her  
16 for

17           20. Such discrimination is in violation of DEFH Act, Gov. Code §12940 et seq. and has  
18 resulted in damage and injury to Ms. Thomas as alleged herein.

19           21. As a proximate result of the Defendants' willful, knowing, and intentional  
20 discrimination against Ms. Thomas, she has sustained and continues to sustain substantial losses in  
21 earnings, career opportunities, and other employment benefits, the precise amount of which will be  
22 proved at trial.

23           22. As a proximate result of the Defendants' willful, knowing, and intentional  
24 discrimination against Ms. Thomas, she has suffered and continues to suffer humiliation,  
25 emotional distress, anger, loss of enjoyment of life, embarrassment, anxiety, and mental and  
26 physical pain and anguish, all to her damage in a sum according to proof.

27           23. Defendants committed the acts alleged herein maliciously, fraudulently, and  
28 oppressively, and with the wrongful intention of injuring Ms. Thomas. Alternatively, Defendants'  
despicable conduct was carried out in conscious disregard of Ms. Thomas's rights. Defendants'

1  
2 conduct was carried out by a managing agent, or an officer, a director, or a managing agent of  
3 Defendants who had advanced knowledge of the unfitness of its decision-maker and employed the  
4 decision-maker with a conscious disregard of Ms. Thomas's rights and/or authorized and/or  
5 ratified the decision-maker's conduct. As a result of the Defendants' conduct, Ms. Thomas is  
6 entitled to recover punitive damages in an amount commensurate with each Defendant's wealth.

7 24. In light of the Defendants' willful, knowing, and intentional discrimination against  
8 Ms. Thomas, she seeks equitable relief, including, but not limited to, the return to her previous  
9 position, with full employment benefits as if she were never terminated.

10 **SECOND CAUSE OF ACTION**  
11 **Violation of DFEH Act, Gov. Code, §12940 *et seq.***  
12 **Hostile Work Environment/Harassment Based on Sex**  
13 **[As Against All Named Defendants]**

14 25. The allegations set forth in Paragraphs 1 through 24 are re-alleged and  
15 incorporated herein by reference.

16 26. Ms. Thomas was an employee of Defendants.

17 27. Ms. Thomas was subjected to unwanted harassing conduct because of her sexual  
18 orientation.

19 28. The harassing conduct was so severe, widespread, or persistent that a reasonable  
20 person in Ms. Thomas's circumstances would have considered the work environment hostile or  
21 abusive.

22 29. Ms. Thomas considered the work environment hostile or abusive.

23 30. A supervisor with actual or reasonably perceived authority over Ms. Thomas  
24 engaged in the conduct.

25 31. Such discrimination is in violation of DEFH Act, Gov. Code §12940 *et seq.* and has  
26 resulted in damage and injury to Ms. Thomas as alleged herein.

27 32. As a proximate result of the Defendants' willful, knowing, and intentional  
28 harassment of Ms. Thomas, she has sustained and continues to sustain substantial losses in  
earnings, career opportunities, and other employment benefits, the precise amount of which will be  
proved at trial.

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2 33. As a proximate result of the Defendants' willful, knowing, and intentional  
3 harassment of Ms. Thomas, she has suffered and continues to suffer humiliation, emotional  
4 distress, anger, loss of enjoyment of life, embarrassment, anxiety, and mental and physical pain  
5 and anguish, all to her damage in a sum according to proof.

6 34. Defendants committed the acts alleged herein maliciously, fraudulently, and  
7 oppressively, and with the wrongful intention of injuring Ms. Thomas. Alternatively, Defendants'  
8 despicable conduct was carried out in conscious disregard of Ms. Thomas's rights. Defendants'  
9 conduct was carried out by a managing agent, or an officer, a director, or a managing agent of  
10 Defendants who had advanced knowledge of the unfitness of its decision-maker and employed the  
11 decision-maker with a conscious disregard of Ms. Thomas's rights and/or authorized and/or  
12 ratified the decision-maker's conduct. As a result of the Defendant's conduct, Ms. Thomas is  
13 entitled to recover punitive damages in an amount commensurate with each Defendant's wealth.

14 35. In light of the Defendants' willful, knowing, and intentional harassment of Ms.  
15 Thomas, she seeks equitable relief, including, but not limited to, the return to her previous  
16 position, with full employment benefits as if she were never terminated.

17 36. Ms. Thomas has incurred and continues to incur legal expenses and attorney fees.  
18 Ms. Thomas is presently unaware of the precise amount of these expenses and fees and prays  
19 leave of court to amend this complaint when the amounts are more fully known.

20 **THIRD CAUSE OF ACTION**

21 **Violation of DFEH Act, Gov. Code, §12940(i)**

22 **Failure to Take Corrective Action to Prevent Harassment**

23 **[As Against All Named Defendants]**

24 37. The allegations set forth in Paragraphs 1 through 36 are re-alleged and incorporated  
25 herein by reference.

26 38. At all times mentioned in this complaint, Government Code §12940(i) was in full  
27 force and effect and was binding on the Defendants. This subsection requires Defendants to take  
28 all reasonable steps necessary to prevent discrimination and harassment from occurring. As  
alleged above, Defendants violated this subsection by failing to take all reasonable steps necessary  
to prevent discrimination and harassment from occurring.

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39. As a proximate result of Defendants' conduct, Ms. Thomas sustained and continues to sustain damage and injury as alleged herein.

40. As a proximate result of the Defendants' willful, knowing, and intentional violation of Government Code §12940(i), Ms. Thomas has sustained and continues to sustain substantial losses in earnings, career opportunities, and other employment benefits, the precise amount of which will be proved at trial.

41. As a proximate result of the Defendants' willful, knowing, and intentional violation of Government Code §12940(i), Ms. Thomas has suffered and continues to suffer humiliation, emotional distress, anger, loss of enjoyment of life, embarrassment, anxiety, and mental and physical pain and anguish, all to her damage in a sum according to proof.

42. Defendants committed the acts alleged herein maliciously, fraudulently, and oppressively, and with the wrongful intention of injuring Ms. Thomas. Alternatively, Defendants' despicable conduct was carried out in conscious disregard of Ms. Thomas's rights. Defendants' conduct was carried out by a managing agent, or an officer, a director, or a managing agent of Defendants who had advanced knowledge of the unfitness of its decision-maker and employed the decision-maker with a conscious disregard of Ms. Thomas's rights and/or authorized and/or ratified the decision-maker's conduct. As a result of the Defendant's conduct, Ms. Thomas is entitled to recover punitive damages in an amount commensurate with each Defendant's wealth.

43. In light of the Defendants' willful, knowing, and intentional discrimination against Ms. Thomas, she seeks equitable relief, including, but not limited to, the return to her previous position, with full employment benefits as if she were never terminated.

44. Ms. Thomas has incurred and continues to incur legal expenses and attorney fees. Ms. Thomas is presently unaware of the precise amount of these expenses and fees and prays leave of court to amend this complaint when the amounts are more fully known.

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**FOURTH CAUSE OF ACTION**  
**Tortious Termination in Violation of Public Policy**  
**[As Against All Named Defendants]**

45. The allegations set forth in Paragraphs 1 through 44 are re-alleged and incorporated herein by reference.

46. By the aforementioned actions, Defendants violated the laws of the State of California, constitutional and statutory authority. Defendants committed the acts alleged herein maliciously, fraudulently, and oppressively, and with the wrongful intention of injuring Ms. Thomas.

47. As a proximate result of the Defendants' willful, knowing, and intentional violation of the fundamental, substantial, and well-established statutes, rules and ordinances, Ms. Thomas has sustained and continues to sustain substantial losses in earnings, career opportunities, and other employment benefits, the precise amount of which will be proved at trial.

48. As a proximate result of the Defendants' willful, knowing, and intentional violation of the fundamental, substantial, and well-established statutes, rules and ordinances, Ms. Thomas has suffered and continues to suffer humiliation, emotional distress, anger, loss of enjoyment of life, embarrassment, anxiety, and mental and physical pain and anguish, all to her damage in a sum according to proof.

49. Defendants committed the acts alleged herein maliciously, fraudulently, and oppressively, and with the wrongful intention of injuring Ms. Thomas. Alternatively, Defendants' despicable conduct was carried out in conscious disregard of Ms. Thomas's rights. Defendants' conduct was carried out by a managing agent, or an officer, a director, or a managing agent of Defendants who had advanced knowledge of the unfitness of its decision-maker and employed the decision-maker with a conscious disregard of Ms. Thomas's rights and/or authorized and/or ratified the decision-maker's conduct. As a result of the Defendant's conduct, Ms. Thomas is entitled to recover punitive damages in an amount commensurate with each Defendant's wealth.



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2 50. Ms. Thomas has incurred and continues to incur legal expenses and attorney fees.  
3 Ms. Thomas is presently unaware of the precise amount of these expenses and fees and prays  
4 leave of court to amend this complaint when the amounts are more fully known.

5 **FIFTH CAUSE OF ACTION**  
6 **Breach of Implied Covenant of Good Faith and Fair Dealing**  
7 **[As Against All Named Defendants]**

8 51. The allegations set forth in Paragraphs 1 through 49 are re-alleged and incorporated  
9 herein by reference.

10 52. The relationship between employer and employee is fundamentally contractual.  
11 Inherent in this contractual relationship is a covenant of good faith and fair dealing, which implies  
12 a promise that each party will refrain from doing anything to injure the other's right to receive the  
13 benefits of the agreement and which protects the parties' reasonable expectations. The provisions  
14 of the California Labor Code are implied by law into all employment agreements, including the  
15 employment agreement entered into between Ms. Thomas and the Defendants. By discharging  
16 Ms. Thomas, Defendants injured Ms. Thomas's right to receive the benefits of her employment  
17 agreement and thwarted Ms. Thomas's reasonable expectations; i.e., Defendants breached the  
18 implied covenant of good faith and fair dealing.

19 53. As a proximate result of the Defendants' willful, knowing, and intentional breach  
20 of the implied covenant of good faith and fair dealing, Ms. Thomas has sustained and continues to  
21 sustain substantial losses in earnings, career opportunities, and other employment benefits, the  
22 precise amount of which will be proved at trial.

23 54. As a proximate result of the Defendants' willful, knowing, and intentional breach  
24 of the implied covenant of good faith and fair dealing, Ms. Thomas has suffered and continues to  
25 suffer humiliation, emotional distress, anger, loss of enjoyment of life, embarrassment, anxiety,  
26 and mental and physical pain and anguish, all to her damage in a sum according to proof.

27 55. Defendants committed the acts alleged herein maliciously, fraudulently, and  
28 oppressively, and with the wrongful intention of injuring Ms. Thomas. Alternatively, Defendants'  
despicable conduct was carried out in conscious disregard of Ms. Thomas's rights. Defendants'

1  
2 conduct was carried out by a managing agent, or an officer, a director, or a managing agent of  
3 Defendants who had advanced knowledge of the unfitness of its decision-maker and employed the  
4 decision-maker with a conscious disregard of Ms. Thomas's rights and/or authorized and/or  
5 ratified the decision-maker's conduct. As a result of the Defendant's conduct, Ms. Thomas is  
6 entitled to recover punitive damages in an amount commensurate with each Defendant's wealth.

7 56. In light of the Defendants' willful, knowing, and intentional breach of the implied  
8 covenant of good faith and fair dealing, Ms. Thomas seeks equitable relief, including, but not  
9 limited to, the return to her previous position, with full employment benefits as if she were never  
10 terminated.

11 57. Ms. Thomas has incurred and continues to incur legal expenses and attorney fees.  
12 Ms. Thomas is presently unaware of the precise amount of these expenses and fees and prays  
13 leave of court to amend this complaint when the amounts are more fully known.

14 **REQUEST FOR JURY TRIAL**

15 1. Plaintiff Chantel Thomas requests a trial by jury.

16 **PRAYER FOR RELIEF**

17 **WHEREFORE**, Plaintiff Chantel Thomas requests the following:

- 18 1. For general damages to compensate Plaintiff for the humiliation, emotional  
19 distress, anger, loss of enjoyment of life, embarrassment, anxiety, and mental and  
20 physical pain and anguish she has and will suffer;
- 21 2. For all damages provided under California Civil Code, §3294;
- 22 3. For punitive damages;
- 23 4. For medical and related expenses, past and future, in an amount according to proof  
24 at the time of trial;
- 25 5. For loss of earnings, past and future, and all other special damages in an amount  
26 according to proof at the time of trial;
- 27 6. For diminution in earning capacity, past and future, in an amount according to  
28 proof at trial;
7. For mental and emotional distress damages on each cause of action;

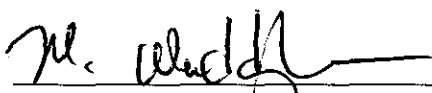
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- 8. For all equitable remedies available, including, but not limited to, her being returned to her former position with the Defendants, along with all the benefits that would have accrued to her as if she had never been terminated.
- 9. For pre-judgment interest on all damages award under Civil Code §3291 and Civil Code §1021.5, and any other applicable statute or legal principle.
- 10. For all civil penalties provided for by statute;
- 11. For attorney's fees;
- 12. For costs of suit herein incurred; and,
- 13. For such other and further relief as the court may deem just and proper.

DATED: August 12, 2010

Respectfully submitted,

**LAW OFFICE OF MICHAEL WADDINGTON, APC**



Michael Waddington, Esq.  
Attorney for Plaintiff,  
CHANTEL THOMAS

**DEPARTMENT OF FAIR EMPLOYMENT & HOUSING**

1055 West 7<sup>th</sup> Street, Suite 1400, Los Angeles, CA 90017  
(213) 439-6799 (800) 700-2320 Fax (213) 439-6796

www.dfeh.ca.gov



March 3, 2010

CHANTAL THOMAS  
9601 Wilshire Blvd., Ste. 650  
Beverly Hills, CA 90210

RE: E200910S0756-01-sc  
THOMAS/SHED MEDIA U.S., INC.

Dear CHANTAL THOMAS:

**NOTICE OF CASE CLOSURE**

This letter informs that the above-referenced complaint that was filed with the Department of Fair Employment and Housing (DFEH) has been closed effective February 25, 2010 because an immediate right-to-sue notice was requested. DFEH will take no further action on the complaint.

This letter is also the Right-To-Sue Notice. According to Government Code section 12965, subdivision (b), a civil action may be brought under the provisions of the Fair Employment and Housing Act against the person, employer, labor organization or employment agency named in the above-referenced complaint. The civil action must be filed within one year from the date of this letter.

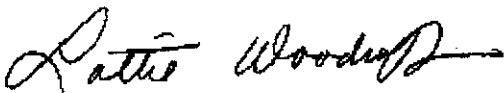
If a federal notice of Right-To-Sue is wanted, the U.S. Equal Employment Opportunity Commission (EEOC) must be visited to file a complaint within 30 days of receipt of this DFEH *Notice of Case Closure* or within 300 days of the alleged discriminatory act, whichever is earlier.

A handwritten signature in black ink, appearing to be "EJA", located at the bottom center of the page.

Notice of Case Closure  
Page Two

DFEH does not retain case files beyond three years after a complaint is filed, unless the case is still open at the end of the three-year period.

Sincerely,



Lottie Woodruff  
District Administrator

cc: Case File

SHED MEDIA U.S., INC. IS AN EQUAL OPPORTUNITY EMPLOYER  
EEO Representative  
SHED MEDIA U.S., INC.  
3800 Barham Blvd., Ste. 400  
Los Angeles, CA 90068

COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

DFEH # E-200910-S-0756-01-sc

DFEH USE ONLY

CALIFORNIA DEPARTMENT OF FAIR EMPLOYMENT AND HOUSING

YOUR NAME (Indicate Mr. or Ms.)

Chantal Thomas

TELEPHONE NUMBER (INCLUDE AREA CODE)

(310) 276-4100

ADDRESS

10441 N. Waddington 9601 Wilshire Blvd, 650

CITY/STATE/ZIP

Beverly Hills, CA 90210

COUNTY

CA

NAMED IS THE EMPLOYER, PERSON, LABOR ORGANIZATION, EMPLOYMENT AGENCY, APPRENTICESHIP COMMITTEE, OR STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME:

NAME

Shed Media U.S. Inc.

TELEPHONE NUMBER (Include Area Code)

ADDRESS

3800 Barham Blvd, Suite 400

DFEH USE ONLY

CITY/STATE/ZIP

Los Angeles, CA 90068

COUNTY

CA

COUNTY CODE

NO. OF EMPLOYEES/MEMBERS (if known)

50+

DATE MOST RECENT OR CONTINUING DISCRIMINATION

TOOK PLACE (month, day, and year)

March 3, 2009

RESIDENT CODE

THE PARTICULARS ARE:

On March 3, 2009 was

- fired
- laid off
- demoted
- harassed
- genetic characteristics testing
- forced to quit

- denied employment
- denied promotion
- denied transfer
- denied accommodation
- impermissible non-job-related inquiry
- other (specify)

- denied family or medical leave
- denied pregnancy leave
- denied equal pay
- denied right to wear pants
- denied pregnancy accommodation

by Cade Courtney harassed & had me fired - Nat Grville (Prod) told me I was fired.

because of my:

- sex
- age
- religion
- race/color
- national origin/ancestry
- marital status
- sexual orientation
- association
- physical disability
- mental disability
- cancer
- genetic characteristic

(Check one) filing proceeding, participating in investigation (retaliation fee)

other (specify) "reverse" sexual harassment

the reason given by Cade Courtney harassed & had me fired / Nat Grville (Prod) told me I was fired

Was because of (please state what you believe to be reason(s)) Cade Courtney was having sexual relations with my assistant Jeannie Whitmeyer. Cade Courtney harassed me and then had me fired in order that Jeannie Whitmeyer could have my job

I wish to pursue this matter in court. I hereby request that the Department of Fair Employment and Housing provide a right-to-sue notice. I understand that if I want a federal notice of right-to-sue, I must visit the U.S. Equal Employment Opportunity Commission (EEOC) to file a complaint within 30 days of receipt of the DFEH "Notice of Case Closure," or within 300 days of the alleged discriminatory act, whichever is earlier.

I have not been coerced into making this request, nor do I make it based on fear of retaliation if I do not do so. I understand that it is the Department of Fair Employment and Housing's policy to not process or reopen a complaint once the complaint has been closed on the basis of "Complainant Elects Court Action."

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge except as to matters stated as my information and belief, and as to those matters I believe it to be true.

Dated x 2/24/10

[Signature]

COMPLAINANT'S SIGNATURE

At x Los Angeles, CA

RECEIVED

DATE FILED: February 25, 2010

FEB 25 2010

**DEPARTMENT OF FAIR EMPLOYMENT & HOUSING**

1055 West 7<sup>th</sup> Street, Suite 1400, Los Angeles, CA 90017  
(213) 439-6799 (800) 700-2320 Fax (213) 439-6796

www.dfeh.ca.gov



March 3, 2010

CHANTAL THOMAS  
9601 Wilshire Blvd., Ste. 650  
Beverly Hills, CA 90210

RE: E200910S0756-00-sc  
THOMAS/SURVIVING TERROR, LLC

Dear CHANTAL THOMAS:

**NOTICE OF CASE CLOSURE**

This letter informs that the above-referenced complaint that was filed with the Department of Fair Employment and Housing (DFEH) has been closed effective February 25, 2010 because an immediate right-to-sue notice was requested. DFEH will take no further action on the complaint.

This letter is also the Right-To-Sue Notice. According to Government Code section 12965, subdivision (b), a civil action may be brought under the provisions of the Fair Employment and Housing Act against the person, employer, labor organization or employment agency named in the above-referenced complaint. The civil action must be filed within one year from the date of this letter.

If a federal notice of Right-To-Sue is wanted, the U.S. Equal Employment Opportunity Commission (EEOC) must be visited to file a complaint within 30 days of receipt of this DFEH *Notice of Case Closure* or within 300 days of the alleged discriminatory act, whichever is earlier.

for B

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**

LIVE ELECTRONIC

DFEH # E-200910-S-0756-00-sc

DFEH USE ONLY

**CALIFORNIA DEPARTMENT OF FAIR EMPLOYMENT AND HOUSING**

YOUR NAME (Indicate Mr. or Ms.) Chantal Thomas TELEPHONE NUMBER (Include Area Code) (310) 276-4100

ADDRESS 10447 N. Waddington 9601 Wilshire Blvd, 650  
CITY/STATE/ZIP Beverly Hills, CA 90210 COUNTY CA COUNTY CODE

NAMED IS THE EMPLOYER, PERSON, LABOR ORGANIZATION, EMPLOYMENT AGENCY, APPRENTICESHIP COMMITTEE, OR STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME:

NAME Surviving Terror, LLC TELEPHONE NUMBER (Include Area Code)

ADDRESS 3800 Burbank Blvd, Suite 400 DFEH USE ONLY

CITY/STATE/ZIP Los Angeles, CA 90068 COUNTY LA COUNTY CODE

NO. OF EMPLOYEES/MEMBERS (if known) 50+ DATE MOST RECENT OR CONTINUING DISCRIMINATION TOOK PLACE (month, day, and year) March 3, 2009 RESPONDENT CODE

THE PARTICULARS ARE:

On March 3, 2009 was  fired  denied employment  denied family or medical leave  
 laid off  denied promotion  denied pregnancy leave  
 demoted  denied transfer  denied equal pay  
 harassed  denied accommodation  denied right to wear pants  
 genetic characteristics testing  impermissible non-job-related inquiry  denied pregnancy accommodation  
 forced to quit  other (specify) \_\_\_\_\_

by Cade Courtney harassed & had me fired by Nat Griville (Producer)  
Name of Person Job Title (supervisor/manager/personnel Director/etc.) told me I was fired.

because of my:  sex  national origin/ancestry  physical disability  cancer  (Check and fill in: protecting/participating in investigation/prosecution for)  
 age  marital status  mental disability  genetic characteristic  
 religion  sexual orientation  other (specify) "griville" sexual harassment  
 racial/color  association

the reason given by Cade Courtney harassed & had me fired / Nat Griville (Prod)  
Name of Person and Job Title told me I was fired.

Was because of Cade Courtney was having sexual relations with my assistant,  
(please state what you believe to be reason(s)) Jeannie Whitmeyer. Cade Courtney harassed me and then he  
me fired in order that Jeannie Whitmeyer could have my job

I wish to pursue this matter in court. I hereby request that the Department of Fair Employment and Housing provide a right-to-sue notice. I understand that if I want a federal notice of right-to-sue, I must visit the U.S. Equal Employment Opportunity Commission (EEOC) to file a complaint within 30 days of receipt of the DFEH "Notice of Case Closure," or within 300 days of the alleged discriminatory act, whichever is earlier.

I have not been coerced into making this request, nor do I make it based on fear of retaliation if I do not do so. I understand it is the Department of Fair Employment and Housing's policy to not process or reopen a complaint once the complaint has been closed on the basis of "Complainant Elected Court Action."

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge, except as to matters stated on my information and belief, and as to those matters I believe it to be true.

Dated 2/24/10 [Signature]  
At Los Angeles, CA City

**RECEIVED**  
FEB 25 2010  
Department of Fair Employment and Housing  
STATE OF CALIFORNIA  
Fair Employment and Housing

DATE FILED: February 25, 2010



Notice of Case Closure  
Page Two

DFEH does not retain case files beyond three years after a complaint is filed, unless the case is still open at the end of the three-year period.

Sincerely,



Lottie Woodruff  
District Administrator

cc: Case File

DFEH is an Equal Opportunity Employer. Minorities and women are encouraged to apply.  
EEO Representative  
SURVIVING TERROR, LLC  
3800 Barham Blvd., Ste. 400  
Los Angeles, CA 90068

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): <b>Michael Waddington (SBN 172279)</b> <b>LAW OFFICE OF MICHAEL WADDINGTON, APC</b> 9615 Brighton Way, Suite 400 Beverly Hills, CA 90210 TELEPHONE NO.: 310-276-4100 FAX NO.: 310-276-4106 ATTORNEY FOR (Name): <b>Plaintiff Chantel Thomas</b>	<b>FOR COURT USE ONLY</b>  <h1 style="margin:0;">FILED</h1> <b>SUPERIOR COURT OF CALIFORNIA</b> <b>COUNTY OF LOS ANGELES</b>  AUG 12 2010  John A. Clarke, Executive Officer/Clerk By <u><i>[Signature]</i></u> , Deputy <b>AMBER LAFLEUR-CLAYTON</b>	
<b>SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES</b> STREET ADDRESS: 111 N. Hill Street MAILING ADDRESS: CITY AND ZIP CODE: Los Angeles, CA BRANCH NAME: Central		
CASE NAME: <b>Thomas v. Shed Media USA, Inc.</b>		
<b>CIVIL CASE COVER SHEET</b> <input checked="" type="checkbox"/> <b>Unlimited</b> (Amount demanded exceeds \$25,000) <input type="checkbox"/> <b>Limited</b> (Amount demanded is \$25,000 or less)	<b>Complex Case Designation</b> <input type="checkbox"/> <b>Counter</b> <input type="checkbox"/> <b>Joinder</b> Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)	CASE NUMBER: <b>BC443559</b>  JUDGE:  DEPT:

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

1. Check one box below for the case type that best describes this case:

<b>Auto Tort</b> <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46) <b>Other PIP/D/W (Personal Injury/Property Damage/Wrongful Death) Tort</b> <input type="checkbox"/> Asbestos (04) <input type="checkbox"/> Product liability (24) <input type="checkbox"/> Medical malpractice (45) <input type="checkbox"/> Other PIP/D/W (23) <b>Non-PI/PD/W (Other) Tort</b> <input type="checkbox"/> Business tort/unfair business practice (07) <input type="checkbox"/> Civil rights (08) <input type="checkbox"/> Defamation (13) <input type="checkbox"/> Fraud (16) <input type="checkbox"/> Intellectual property (19) <input type="checkbox"/> Professional negligence (25) <input type="checkbox"/> Other non-PI/PD/W tort (35) <b>Employment</b> <input checked="" type="checkbox"/> Wrongful termination (36) <input type="checkbox"/> Other employment (15)	<b>Contract</b> <input type="checkbox"/> Breach of contract/warranty (06) <input type="checkbox"/> Rule 3.740 collections (09) <input type="checkbox"/> Other collections (09) <input type="checkbox"/> Insurance coverage (18) <input type="checkbox"/> Other contract (37) <b>Real Property</b> <input type="checkbox"/> Eminent domain/Inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (26) <b>Unlawful Detainer</b> <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38) <b>Judicial Review</b> <input type="checkbox"/> Asset forfeiture (05) <input type="checkbox"/> Petition re: arbitration award (11) <input type="checkbox"/> Writ of mandate (02) <input type="checkbox"/> Other judicial review (39)	<b>Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403)</b> <input type="checkbox"/> Antitrust/Trade regulation (03) <input type="checkbox"/> Construction defect (10) <input type="checkbox"/> Mass tort (40) <input type="checkbox"/> Securities litigation (28) <input type="checkbox"/> Environmental/Toxic tort (30) <input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41) <b>Enforcement of Judgment</b> <input type="checkbox"/> Enforcement of judgment (20) <b>Miscellaneous Civil Complaint</b> <input type="checkbox"/> RICO (27) <input type="checkbox"/> Other complaint (not specified above) (42) <b>Miscellaneous Civil Petition</b> <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> Other petition (not specified above) (43)
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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): 5
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-915.)

Date: August 12, 2010  
 Michael Waddington  
 (TYPE OR PRINT NAME)

*[Signature]*  
 (SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

**NOTICE**

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

SHORT TITLE: Thomas v. Shed Media USA Inc., et al.	CASE NUMBER <b>BC443559</b>
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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 LASC 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 5  HOURS/  DAYS

Item II. Select 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 Los Angeles Superior Court Local Rule 2.0.

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

- |   |  |
|---|--|
| 1. Class Actions must be filed in the County Courthouse, Central District.      | 6. Location of property or permanently garaged vehicle.    |
| 2. May be filed in Central (Other county, or no Bodily Injury/Property Damage). | 7. Location where petitioner resides.                      |
| 3. Location where cause of action arose.  | 8. Location wherein defendant/respondent functions wholly. |
| 4. Location where bodily injury, death or damage occurred.                      | 9. Location where one or more of the parties reside.       |
| 5. Location where performance required or defendant resides.                    | 10. Location of Labor Commissioner Office.                 |

**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., 2., 4. 1., 2., 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., 2., 4. 1., 2., 4. 1., 2., 3. 1., 2., 4.
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., 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.

Non-Personal Injury/Property Damage/  
Wrongful Death Tort (Cont'd.)  
  
Employment  
  
Contract  
  
Real Property  
  
Unlawful Detainer  
  
Judicial Review

SHORT TITLE: Thomas v. Shed Media USA Inc., et al.	CASE NUMBER
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A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons -See Step 3 Above
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.
Wrongful Termination (36)	<input checked="" type="checkbox"/> A6037 Wrongful Termination	1., 2., 3.
Other Employment (15)	<input type="checkbox"/> A6024 Other Employment Complaint Case <input type="checkbox"/> A6109 Labor Commissioner Appeals	1., 2., 3. 10.
Breach of Contract/Warranty (06) (not insurance)	<input type="checkbox"/> A6004 Breach of Rental/Lease Contract (not Unlawful Detainer or wrongful eviction) <input type="checkbox"/> A6008 Contract/Warranty Breach -Seller Plaintiff (no fraud/negligence) <input type="checkbox"/> A6019 Negligent Breach of Contract/Warranty (no fraud) <input type="checkbox"/> A6028 Other Breach of Contract/Warranty (not fraud or negligence)	2., 5. 2., 5. 1., 2., 5. 1., 2., 5.
Collections (09)	<input type="checkbox"/> A6002 Collections Case-Seller Plaintiff <input type="checkbox"/> A6012 Other Promissory Note/Collections Case	2., 5., 6. 2., 5.
Insurance Coverage (18)	<input type="checkbox"/> A6015 Insurance Coverage (not complex)	1., 2., 5., 8.
Other Contract (37)	<input type="checkbox"/> A6009 Contractual Fraud <input type="checkbox"/> A6031 Tortious Interference <input type="checkbox"/> A6027 Other Contract Dispute(not breach/insurance/fraud/negligence)	1., 2., 3., 5. 1., 2., 3., 5. 1., 2., 3., 8.
Eminent Domain/Inverse Condemnation (14)	<input type="checkbox"/> A7300 Eminent Domain/Condemnation      Number of parcels _____	2.
Wrongful Eviction (33)	<input type="checkbox"/> A6023 Wrongful Eviction Case	2., 6.
Other Real Property (26)	<input type="checkbox"/> A6018 Mortgage Foreclosure <input type="checkbox"/> A6032 Quiet Title <input type="checkbox"/> A6060 Other Real Property (not eminent domain, landlord/tenant, foreclosure)	2., 6. 2., 6. 2., 6.
Unlawful Detainer-Commercial (31)	<input type="checkbox"/> A6021 Unlawful Detainer-Commercial (not drugs or wrongful eviction)	2., 6.
Unlawful Detainer-Residential (32)	<input type="checkbox"/> A6020 Unlawful Detainer-Residential (not drugs or wrongful eviction)	2., 6.
Unlawful Detainer-Drugs (38)	<input type="checkbox"/> A6022 Unlawful Detainer-Drugs	2., 6.
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.

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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
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.

Judicial Review (Cont'd.)  
Provisionally Complex Litigation  
Enforcement of Judgment  
Miscellaneous Civil Complaints  
Miscellaneous Civil Petitions

SHORT TITLE: Thomas v. Shed Media USA Inc., 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.

REASON: CHECK THE NUMBER UNDER COLUMN C WHICH APPLIES IN THIS CASE			ADDRESS:
<input checked="" type="checkbox"/> 1. <input checked="" type="checkbox"/> 2. <input checked="" type="checkbox"/> 3. <input type="checkbox"/> 4. <input type="checkbox"/> 5. <input type="checkbox"/> 6. <input type="checkbox"/> 7. <input type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10.			3800 Barham Blvd.
CITY: Los Angeles	STATE: CA	ZIP CODE: 90068	

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

Dated: August 12, 2010

  
(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 form CM-010.
4. Complete Addendum to Civil Case Cover Sheet form LACIV 109 (Rev. 01/07), LASC Approved 03-04.
5. Payment in full of the filing fee, unless fees have been waived.
6. Signed order appointing the Guardian ad Litem, JC form FL-935, if the plaintiff or petitioner is a minor under 18 years of age, or if required by Court.
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.