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

MAY 10 2017

Herri R. Carter, Executive Officer/Clerk  
By *[Signature]*  
Glorietta Robinson, Deputy

5 Attorneys for Plaintiff  
6 DENISE BERTONE

8 **UNLIMITED JURISDICTION**  
9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
10 **FOR THE COUNTY OF LOS ANGELES**

11 DENISE BERTONE,  
12  
13 Plaintiff,  
14 vs.  
15 COUNTY OF LOS ANGELES, and DOES 1  
16 through 100, inclusive,  
17 Defendants.

CASE NO. **BC 6 6 0 7 3 6**  
COMPLAINT FOR DAMAGES:  
1. WHISTLEBLOWER  
RETALIATION (LABOR CODE §  
1102.5)  
DEMAND FOR JURY TRIAL

20 **GENERAL ALLEGATIONS**

21 1. At all times relevant hereto, DENISE BERTONE ("Plaintiff") was and is a  
22 resident of the County of Los Angeles, State of California, and was and is a competent  
23 adult.  
24 2. At all times relevant hereto, Plaintiff was and is a coroner investigator  
25 employed by the Los Angeles County Department of the Medical Examiner-Coroner  
26 3. Plaintiff is informed and believes and thereupon alleges that Defendants  
27 DOES 1 through 100, inclusive, and each of them, were, all times relevant hereto  
28 residents of the County of Los Angeles, State of California, and were agents, partners,

CIT/DASE: BC660736  
LEA/DEF#:  
RECEIPT #: CCH0536058  
DATE PAID: 05/07/17 02:12 PM  
PAYMENT: \$433.00  
RECEIVED:  
CHECK:  
CASH:  
CHARGE:  
CARD:  
\$433.00  
\$0.00  
\$0.00  
\$0.00

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1 and/or joint venturers of Defendants and/or each other, acting as supervisors, managers,  
2 administrators, owners, and/or directors or in some other unknown capacity.

3 4. The true names and capacities of Defendants DOES 1 through 100, and  
4 each of them, whether individual, corporate, associate or otherwise, are unknown to  
5 Plaintiff at this time, who therefore sues said Defendants by such fictitious names.  
6 Plaintiff will file DOE amendments, and/or ask leave of court to amend this complaint to  
7 assert the true names and capacities of these Defendants when they have been  
8 ascertained. Plaintiff is informed and believes, and upon such information and belief  
9 alleges, that each Defendant herein designated as a DOE was and is in some manner,  
10 negligently, wrongfully, or otherwise, responsible and liable to Plaintiff for the injuries and  
11 damages hereinafter alleged, and that Plaintiff's damages as herein alleged were  
12 proximately caused by their conduct.

13 5. Plaintiff is informed and believes, and thereupon alleges, that at all times  
14 material herein the Defendants, and each of them, were the agents, servants, and  
15 employees, or ostensible agents, servants, or employees of each other Defendant, and as  
16 such, were acting within the course and scope of said agency and employment or  
17 ostensible agency and employment, except on those occasions when Defendants were  
18 acting as principals, in which case, said Defendants, and each of them, were negligent in  
19 the selection, hiring, and use of the other Defendants.

20 6. Plaintiff is further informed and believes, and thereupon alleges, that at all  
21 times relevant hereto, Defendants, and each of them, acted in concert and in furtherance  
22 of the interests of each other Defendant.

23 7. This court is the proper court because injury or damage to Plaintiff occurred  
24 in its jurisdictional area.

25 8. Plaintiff has complied with and/or exhausted any applicable claims statutes  
26 and/or administrative and/or internal remedies and/or grievance procedures, or is excused  
27 from complying therewith.

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1 **FACTUAL ALLEGATIONS**

2 9. Plaintiff has been employed by the Los Angeles County Department of the  
3 Coroner-Medical Examiner (the "Coroner's Department" or "Department") as a coroner  
4 investigator since in or around 2002. For over a decade, Plaintiff investigated the deaths  
5 of the most vulnerable individuals in Los Angeles County—infants and children.

6 10. The Los Angeles County Coroner's Department is mandated by law to  
7 investigate all violent, sudden, and unusual deaths occurring within Los Angeles County,  
8 including all homicides, suicides, and accidental deaths, in order to determine the  
9 circumstances, manner, and cause of death.

10 11. To fulfill this mandate, the Department employs coroner investigators to  
11 conduct death investigations by responding to scenes where individuals have died;  
12 interviewing witnesses and law enforcement; collecting evidence; performing body  
13 examinations of the decedents; making a positive identification of the decedents; and  
14 documenting their investigations, among other responsibilities.

15 12. The Coroner's Department defines pediatric cases as cases involving the  
16 deaths of children and infants ages 0 to 14. These cases have particular social  
17 significance because approximately half of these deaths involve suspected child neglect  
18 and/or child abuse, including homicide.

19 13. In order to ensure the timely and thorough investigation of death cases  
20 involving suspected child abuse, the Coroner's Department has a policy stating that  
21 whenever possible, a single investigator will be assigned to investigate the deaths of  
22 children and infants under the age of 14.

23 14. Due to the medical expertise needed to eliminate potential medical causes  
24 of pediatric deaths, the Department only assigned registered nurses to work as full-time  
25 pediatric death investigators from in or around 1996 to 2014.

26 15. Plaintiff has been a registered nurse since 1992.

27 16. In or around 2004, due to her training as a nurse, Plaintiff became  
28 administratively assigned to pediatric death cases, meaning that she only handled death

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1 investigations of children and infants under the age of 14.

2 17. As the pediatric death investigator, Plaintiff relied heavily on her nursing  
3 background to recognize and differentiate inflicted injuries (child abuse) from injuries that  
4 resulted from medical problems, accidents, or medical interventions. For example,  
5 Plaintiff used her medical training to: identify the potential medical causes of bruising  
6 (such as hemophilia and leukemia) that had to be ruled out before she could determine  
7 that the bruises were caused by abuse; discern whether distended abdomens were  
8 caused by resuscitation or by liver lacerations, which is a sign of trauma; and determine  
9 whether oral injuries were caused by intubation or by the forcible shoving of some other  
10 object into the mouth of a child.

11 18. Plaintiff's nursing background also provided her with the skills and  
12 knowledge of a child's developmental stages to thoroughly review medical records,  
13 interview medical personnel, and evaluate the plausibility of caregivers' accounts of how  
14 the children died.

15 19. From in or around 2004 to in or around April of 2014, Plaintiff was the only  
16 coroner investigator in the Department assigned full-time to investigate pediatric deaths.  
17 As a result, Plaintiff was on call for pediatric death investigation field calls 24 hours a day,  
18 7 days a week; had a take-home car with which to respond to calls from her home; and  
19 worked a significant amount of overtime.

20 20. Through Plaintiff's thorough and meticulous death investigations, she sought  
21 justice for the most vulnerable members of Los Angeles County—deceased infants and  
22 children.

23 21. During the ten years that Plaintiff worked as the pediatric death investigator  
24 for the Department, she investigated the manner, mode, and cause of death for more than  
25 2,500 newborns, infants, children, and teenagers in Los Angeles County.

26 22. During the same time period, Plaintiff testified in approximately 30 criminal  
27 trials involving charges of child abuse and/or homicide. Convictions were obtained in all  
28 but one of those cases.

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1           23.    One Legacy is a private non-profit organization that is the only organ and  
2 tissue harvesting company in Southern California, and has significant influence over the  
3 Los Angeles County Coroner's Department.

4           24.    One Legacy has unfettered access to the Coroner Department's private  
5 crypt, which it monitors on a daily basis to examine decedents in order to identify target  
6 donors. One Legacy also has complete access to the Department's secure computer  
7 system, from which it obtains next of kin contact information to obtain authorization for  
8 harvesting. In addition, the Department has an insurance policy, purchased by One  
9 Legacy, for legal claims relating to organ and tissue donations.

10          25.    In cases of death resulting from traffic accidents and suspected homicides,  
11 One Legacy is required to obtain consent from a Coroner Department doctor before it can  
12 harvest the decedent's organs or tissue. Certain doctors in the Department never refuse  
13 consent, so One Legacy can always obtain consent to harvest if it asks certain doctors in  
14 the Department, even in cases where it is critical to preserve the decedents' bodies for  
15 homicide investigations.

16          26.    Moreover, based on an agreement between One Legacy and the Coroner's  
17 Department, whenever One Legacy obtains consent to harvest the organs of an individual  
18 who is hospitalized, a blood sample is taken from the person before they are removed  
19 from the ventilator and while their heart is still beating, and that is the blood sample  
20 provided to the Coroner's Department to be tested in the death investigation for toxicology  
21 purposes.

22          27.    In these cases, the practice of the Coroner's Department is not to test the  
23 blood that is recovered from the decedent during autopsy, even though the autopsy blood  
24 could reflect toxicology results that differ from the results of the earlier blood sample that  
25 was taken while the person was still alive.

26          28.    As set forth below, the last two Chief Medical Examiner-Coroners of the Los  
27 Angeles County Coroner's Department have had close ties to One Legacy, and have  
28 taken actions that were highly suspect in connection with the death investigation of a boy

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1 whose organs were harvested by One Legacy.

2 29. In or around the fall of 2013, the Coroner's Department received a case  
3 involving the death of a disabled boy.

4 30. Before the boy died, he had entered a coma after being submerged in a  
5 washing machine.

6 31. The boy was then taken to a hospital where One Legacy obtained consent  
7 from his guardians to have his organs harvested for donation after his cardiac death.

8 32. One Legacy prefers to harvest the skin of deceased young people or  
9 children since a young person's skin is more suitable for cosmetic surgery. However in  
10 this case, One Legacy did not harvest the child's skin, but harvested his kidneys and liver.

11 33. While the boy was still alive, he was taken off the ventilator, but then  
12 continued to gasp for air, and did not go into cardiac arrest.

13 34. When the boy failed to go into cardiac arrest, the attending physician  
14 administered 500 micrograms of Fentanyl—a strong narcotic—to the boy with the purpose  
15 of inducing his death while the harvesting team was waiting in the operating room.

16 35. After the 500 micrograms of Fentanyl were administered, the boy went into  
17 cardiac arrest and died, after which One Legacy harvested his organs. Under normal  
18 circumstances, a pathologist from the Coroner's office is present while a child's organs  
19 are being harvested. However, on this occasion, One Legacy harvested the boy's organs  
20 without a pathologist being present.

21 36. Plaintiff was assigned the investigation of the boy's death after his organs  
22 were harvested by One Legacy.

23 37. After conducting an investigation, Plaintiff formed the opinion that the  
24 Fentanyl that had been administered to the boy was the cause of his death.

25 38. On or about September 9, 2013, Plaintiff sent an e-mail to Chief Medical  
26 Examiner-Coroner Dr. Mark Fajardo informing him that this boy had died as a result of the  
27 Fentanyl that had been administered to him in the hospital, after his guardians consented  
28 to donate his organs. Plaintiff reasonably believed that this information disclosed

1 violations of California *Penal Code* sections 187 and/or 192, in that the physician that  
2 administered the Fentanyl committed a homicide.

3 39. Further, since the only blood sample from the boy that had been tested was  
4 the sample that was taken before he was removed from the ventilator and before the  
5 Fentanyl was administered, Plaintiff requested that the blood obtained during the boy's  
6 autopsy be tested to determine the level of narcotics in his blood when he died.

7 40. Despite Plaintiff's e-mail and the medical records supporting her conclusion,  
8 the boy's autopsy blood was not tested, and Dr. Fajardo closed the death investigation of  
9 the boy in October of 2013, falsely stating on the death certificate that the cause of the  
10 boy's death was consequences of "near drowning", which is suffocation caused by  
11 submersion in water.

12 41. Unsatisfied with this conclusion, in or around February of 2014, Plaintiff  
13 again requested that the blood obtained during the boy's autopsy be tested for narcotics.

14 42. Based on Plaintiff's multiple requests, Dr. Fajardo asked a Department  
15 toxicologist to test the autopsy blood "for academic reasons only".

16 43. In or around March or April of 2014, Plaintiff received the test results from  
17 the toxicology test of the boy's blood taken at autopsy. The results confirmed that the  
18 amount of Fentanyl that had been administered to the boy after he was removed from the  
19 ventilator was extremely high. In or around April of 2014, however, before Plaintiff was  
20 able to discuss the results with Dr. Fajardo, she was diagnosed with cancer and went out  
21 on medical leave.

22 44. In or around January of 2015, Plaintiff returned to work, but was not returned  
23 to her former assignment. Nevertheless, Plaintiff immediately started raising the boy's  
24 case again with Dr. Fajardo.

25 45. Relying on the toxicology results from the boy's autopsy blood, Plaintiff  
26 repeatedly informed Dr. Fajardo that she believed the true cause of the boy's death was  
27 the amount of Fentanyl that was administered to him at the hospital after he was taken off  
28 the ventilator. Plaintiff reasonably believed that this information disclosed violations of

1 California *Penal Code* sections 187 and/or 192.

2 46. In addition, following the test results of the boy's blood taken at autopsy,  
3 Plaintiff began to vocally advocate that whenever a decedent's organs or tissue has been  
4 harvested by One Legacy, the Department should always perform a toxicology test on the  
5 autopsy blood in addition to the blood provided by One Legacy, because the failure to test  
6 the autopsy blood could conceal evidence of criminal acts.

7 47. In or around March of 2015, Plaintiff approached Dr. Fajardo in his office  
8 and again told him that she believed the cause of the boy's death was the amount of  
9 Fentanyl that was given to him. In response, Dr. Fajardo stated: They killed him for his  
10 organs, I have no doubt, but you just can't say that.

11 48. Despite Dr. Fajardo's admission, he still refused to change the cause of  
12 death on the boy's death certificate.

13 49. In the same conversation, Plaintiff asked Dr. Fajardo where the hospital  
14 records from the boy's case file were. Dr. Fajardo responded by pointing to a white binder  
15 on his bookshelf. This was highly unusual and violated the Department's policy requiring  
16 that medical records related to a decedent's death investigation be maintained in the case  
17 file.

18 50. Dr. Fajardo also showed Plaintiff a letter from the Los Angeles County Inter-  
19 Agency Council on Child Abuse and Neglect (ICAN) Child Death Review Team, which  
20 advocated that the Department train a team of child death investigators to specialize in  
21 pediatric death investigations. Dr. Fajardo has admitted under oath to shredding this letter  
22 after he received it.

23 51. In a separate conversation between Plaintiff and Dr. Fajardo in or around the  
24 spring of 2015, Dr. Fajardo angrily told Plaintiff words to the effect of: While you work for  
25 me, you will never criticize One Legacy!

26 52. From in or around early 2015 to in or around October of 2015, Plaintiff  
27 repeatedly asked Dr. Fajardo that she be returned to her former assignment as the  
28 pediatric death investigator. Each time, Dr. Fajardo ignored Plaintiff's requests in



1 retaliation for her multiple disclosures that the disabled boy died as a result of the  
2 Fentanyl administered to him in the hospital.

3 53. In or around March of 2016, Dr. Fajardo resigned as the Chief Medical  
4 Examiner-Coroner after only having served in the position for approximately two years.

5 54. In or around April of 2016, Dr. Lakshmanan Sathyavagiswaran ("Dr.  
6 Lakshmanan"), who had previously served as the Chief Medical Examiner-Coroner of the  
7 Department from in or around 1992 to in or around 2013, was re-appointed to that  
8 position.

9 55. In or around August of 2016, Plaintiff, who was still extremely troubled by the  
10 case of the disabled boy, informed Dr. Lakshmanan that the boy had died as a result of a  
11 Fentanyl administered to him in the hospital, and requested that the boy's death  
12 investigation be reopened because it was not true that he had died from being submerged  
13 in water.

14 56. In or around September of 2016, Dr. Lakshmanan reopened the boy's death  
15 investigation, and also resigned from the One Legacy Board of Directors.

16 57. At that time, the hospital records were missing from the boy's case file, and  
17 therefore the Department had to request them again.

18 58. On or about December 2, 2016, Plaintiff reported to Dr. Lakshmanan and Dr.  
19 Christopher Rogers that Dr. Fajardo had stated to Plaintiff in early 2014: They killed [the  
20 boy] for his organs, I have no doubt, but you just can't say that. Plaintiff also informed Dr.  
21 Lakshmanan and Dr. Rogers that the following documents were missing from the boy's  
22 case file: the hospital records showing how much Fentanyl had been administered to the  
23 boy, and emails from February of 2014 reflecting that the autopsy blood was tested in  
24 2014 at Plaintiff's request.

25 59. Plaintiff reasonably believed that the information she reported concerning  
26 Dr. Fajardo's comments and the missing records from the boy's case file disclosed  
27 violations of California *Penal Code* sections 32, 135, and other applicable local, state, and  
28 federal statutes, rules, and regulations, in that a crime had been concealed, and that

1 because of the organ procurement, evidence that the boy had possibly been abused could  
2 have been disturbed.

3 60. On multiple occasions in late 2016 and early 2017, Plaintiff e-mailed Dr.  
4 Lakshmanan to request that she be returned to her previous assignment as the pediatric  
5 death investigator.

6 61. Despite Plaintiff's multiple requests, Dr. Lakshmanan and Chief of  
7 Investigations Brian Elias denied Plaintiff's request. Upon information and belief, Chief  
8 Elias was aware of Plaintiff's complaints to the Department regarding the boy's death, and  
9 he and Dr. Lakshmanan denied Plaintiff her previous position in retaliation for her  
10 disclosures concerning the cause of the boy's death, and/or for her complaints regarding  
11 Dr. Fajardo's cover up of the boy's cause of death.

12 62. On or about December 28, 2016, Dr. Lakshmanan changed the cause of the  
13 boy's death to consequences of the Fentanyl overdose.

14 63. Around the same time, Dr. Lakshmanan notified One Legacy, the hospital,  
15 and the hospital's attorney, of the change he had made to the cause of death. These  
16 notifications by Dr. Lakshmanan were highly suspect, since the hospital doctor is the  
17 suspected perpetrator in the boy's death.

18 64. In addition, from in or around December of 2016, and continuing to the  
19 present, Lt. Elissa Fleak—who was living with Chief Elias—has conducted multiple  
20 pediatric death investigations trainings, even though Fleak has almost no experience in  
21 investigating child deaths when compared with Plaintiff, and even though such training  
22 was previously Plaintiff's responsibility.

23 65. In or around February of 2017, Plaintiff e-mailed Dr. Rogers—the new Acting  
24 Chief Medical Examiner-Coroner—and requested to be returned to her former position as  
25 the pediatric death investigator. Dr. Rogers responded, stating that he deferred to Chief  
26 Elias on the issue. Intent on continuing to deny Plaintiff her former position in retaliation  
27 for her complaints regarding the cause of the boy's death and Dr. Fajardo's cover up of  
28 the cause of death, Chief Elias never even responded to Plaintiff's request.

1           66. As a result of the Department's denial of Plaintiff's former assignment to her,  
2 she has lost overtime and a take-home car, and her ability to advance and/or promote in  
3 the Department, and/or to obtain post-retirement employment opportunities, has been and  
4 will continue to be substantially and adversely impacted.

5           67. In or around March of 2017, Plaintiff applied for a promotion to Lieutenant,  
6 hoping that she could bring about positive change in the Department as a supervisor.

7           68. On or about March 17, 2017, Chief Elias denied Plaintiff the promotion to  
8 Lieutenant and gave the promotion to a less qualified individual. Chief Elias also denied  
9 Plaintiff this promotion in retaliation for her complaints as set forth above. As a result,  
10 Plaintiff has lost overtime, on-call pay, a take-home car, and other privileges and benefits.  
11 Plaintiff's ability to advance and/or promote in the Department, and/or to obtain post-  
12 retirement employment opportunities, also has been and will continue to be substantially  
13 and adversely impacted by this decision.

14           69. Since the Department first denied Plaintiff her former assignment, the  
15 majority of the Department's pediatric death investigations have been and are continuing  
16 to be handled by coroner investigators that have no medical background and little to no  
17 training in pediatric death investigations.

18           70. Due to the time-consuming nature of pediatric death investigations, many of  
19 the Department's coroner investigators actively avoid pediatric death investigations,  
20 resulting in occasions on which child decedents have been neglected for weeks before  
21 their deaths are investigated and their bodies autopsied.

22           71. Since the Department first denied Plaintiff her former assignment, numerous  
23 local law enforcement, prosecutorial, and family services agencies have complained to  
24 supervisors in the Coroner's Department that the quality of the Department's child death  
25 investigations is suffering, and that the child death notifications that are necessary to  
26 ensure the safety of siblings are not being made in a timely manner, or even at all.

27           72. In the latter half of 2016 alone, the Coroner's Department received  
28 complaints about one or more of these deficiencies from the Los Angeles Police

1 Department, the Los Angeles County Sheriff's Department, the Los Angeles County  
2 Department of Children and Family Services, the Los Angeles County District Attorney's  
3 Office, the Los Angeles County-USC Medical Center, and child abuse experts.

4 73. When abuse or neglect is suspected as the cause of a child or infant's  
5 death, the Coroner's Department has a duty to immediately notify the appropriate law  
6 enforcement agency and the Los Angeles County Department of Children and Family  
7 Services in order to evaluate whether the siblings should be removed from the home.

8 74. Since Plaintiff was denied her former position, however, other coroner  
9 investigators, who don't have the same level of expertise as Plaintiff in handling pediatric  
10 death investigations, have failed to notify the proper agencies of cases involving  
11 suspected child abuse and neglect. Plaintiff is aware of at least one case in which a  
12 sibling of a child-decedent was harmed as a result of the Department's failure to make the  
13 proper notifications.

14 75. As a result of the lack of training and expertise of investigators being  
15 assigned to handle pediatric deaths, as well as most Department investigators' aversion to  
16 the time-consuming nature of pediatric death investigations, law enforcement  
17 investigations and prosecutions of homicide suspects have been hampered, siblings have  
18 been put at risk and exposed to preventable harm, and families have been subjected to  
19 long waits for autopsies and investigation results.

20 76. Plaintiff has requested multiple times—to Dr. Fajardo, Dr. Lakshmanan,  
21 Director Elaine Palaiologos, and Chief Elias—to perform a quality assurance review of all  
22 of the pediatric death investigations that have been handled by other investigators since  
23 she went out on medical leave. All of Plaintiff's requests, however, have been ignored.

24 77. In addition, Plaintiff and the Los Angeles County ICAN Child Death Review  
25 Team have separately requested that Plaintiff be permitted to train a small team of  
26 investigators to handle the Department's pediatric death investigations, but their requests  
27 have also been ignored.

28 78. Despite the numerous complaints concerning recent pediatric death

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1 investigations and the repeated requests by Plaintiff and ICAN to return Plaintiff to her  
2 former assignment, the Coroner's Department is determined to deny Plaintiff her former  
3 position in retaliation for her protected activities described above. Tragically, the ultimate  
4 victims of the Department's retaliatory acts toward Plaintiff are the children and families of  
5 Los Angeles County, and most of all, the children of Los Angeles County who have died at  
6 the hands of others and who deserve justice.

7 **FIRST CAUSE OF ACTION**

8 **FOR WHISTLEBLOWER RETALIATION (LABOR CODE § 1102.5)**

9 **AGAINST ALL DEFENDANTS, AND EACH OF THEM**

10 79. Plaintiff repeats and re-alleges each and every allegation set forth in  
11 paragraphs 1 through 76 above, and incorporates same by reference as though set forth  
12 fully herein.

13 80. Plaintiff engaged in legally protected activities under *Labor Code* sections  
14 1102.5 and 1102.6, by disclosing to the County of Los Angeles information which Plaintiff  
15 had reasonable cause to believe disclosed violations of California *Penal Code* sections  
16 32, 135, 187, 192, and other applicable local, state and/or federal statutes and  
17 regulations.

18 81. Defendants, and each of them, and their respective supervisors, managers,  
19 officers, agents, and employees, retaliated against Plaintiff for engaging in activities  
20 protected under *Labor Code* section 1102.5 by subjecting her to multiple adverse  
21 employment actions, stand-alone actions and/or an ongoing series of actions, which have  
22 caused substantial and material adverse effects on the terms and conditions of Plaintiff's  
23 employment, including but not limited to, denying Plaintiff her former assignment as the  
24 pediatric death investigator, denying Plaintiff a promotion to lieutenant, and removing  
25 Plaintiff's responsibility of training other coroner investigators in pediatric death  
26 investigations. Said actions of retaliation were a direct violation of *Labor Code* section  
27 1102.5, and pursuant to *Labor Code* section 1102.6, Defendants, and each of them, have  
28 the burden of proof to demonstrate by clear and convincing evidence that each of the

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1 adverse employment actions alleged herein would have occurred for legitimate,  
2 independent reasons even if Plaintiff had not engaged in activities protected by *Labor*  
3 *Code* section 1102.5.

4 82. A contributing cause for Defendants, and each of them, engaging in the  
5 foregoing adverse employment actions against Plaintiff was to retaliate against Plaintiff for  
6 engaging in the above-described protected activities.

7 83. As a result of the aforesaid unlawful acts of Defendants, and each of them,  
8 Plaintiff has lost and may continue to lose income, wages, earnings, earning capacity,  
9 overtime, pension, benefits, a take-home car, and other economic loss, in an amount to  
10 be proven at time of trial.

11 84. As a further legal result of the conduct of Defendants, and each of them,  
12 Plaintiff has suffered and will continue to suffer physical, mental, and emotional injuries,  
13 pain, distress, suffering, anguish, fright, nervousness, grief, anxiety, worry, shame,  
14 mortification, injured feelings, shock, humiliation and indignity, as well as other unpleasant  
15 physical, mental, and emotional reactions, damages to reputation, and other non-  
16 economic damages, in a sum to be ascertained according to proof. Said damages are of  
17 the type that any person would suffer as result of the illegal and wrongful conduct of  
18 Defendants. Plaintiff does not claim that she has suffered any psychiatric illness as a  
19 result of the conduct of Defendants.

20 85. As a further legal result of the conduct of Defendants, and each of them,  
21 Plaintiff suffered other incidental and consequential damages, in an amount according to  
22 proof.

23 86. As a further legal result of the conduct of Defendants, and each of them,  
24 Plaintiff is entitled to attorneys' fees pursuant to *C.C.P.* section 1021.5 and other  
25 authorities, and costs in an amount according to proof.

26 87. As a further legal result of the conduct of Defendants, and each of them,  
27 Plaintiff is entitled to prejudgment interest pursuant to California *Civil Code* section 3287  
28 and/or any other provision of law providing for prejudgment interest.

1 88. Plaintiff further requests that the Court render appropriate injunctive or other  
2 extraordinary relief to remedy these violations and to prevent future violations of a like or  
3 similar nature, including, but not limited to, the granting of a permanent injunction requiring  
4 that the Department provide specialized training in pediatric death investigations to a team  
5 of at least six investigators, and require that pediatric death investigations only be  
6 conducted by those specialized investigators except in cases of extenuating  
7 circumstances.

8 **PRAYER**

9 **WHEREFORE**, Plaintiff seeks judgment against all Defendants, and each of them,  
10 on all causes of action, for:

11 1. Physical, mental, and emotional injuries, pain, distress, suffering, anguish,  
12 fright, nervousness, grief, anxiety, worry, shame, mortification, injured feelings, shock,  
13 humiliation and indignity, as well as other unpleasant physical, mental, and emotional  
14 reactions, damages to reputation, and other non-economic damages, in a sum to be  
15 ascertained according to proof;

16 2. Loss of wages, income, earnings, earning capacity, overtime, pension,  
17 benefits, and other economic damages in a sum to be ascertained according to proof;

18 3. Other actual, consequential, and/or incidental damages in a sum to be  
19 ascertained according to proof;

20 4. Attorneys' fees and costs of suit pursuant to C.C.P. 1021.5, and other  
21 authorities;

22 5. Costs of suit herein incurred;

23 6. Pre-judgment interest;

24 7. Injunctive or other extraordinary relief to remedy the violations described  
25 herein and to prevent future violations of a like or similar nature, including, but not limited  
26 to, the granting of a permanent injunction requiring that the Department provide  
27 specialized training in pediatric death investigations to a small team of at least six  
28 investigators, and require that pediatric death investigations only be conducted by those

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1 specialized investigators except in cases of extenuating circumstances.

2 8. Such other and further relief as the Court may deem just and proper.

3  
4 Dated: May 9, 2017

LAW OFFICES OF GREGORY W. SMITH

5  
6 By: 

7 \_\_\_\_\_  
8 GREGORY W. SMITH  
9 DIANA WANG WELLS  
10 LEILA K. AL FAIZ  
11 Attorneys for Plaintiff  
12 DENISE BERTONE  
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05/11/2017



FOR COURT USE ONLY

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):  
GREGORY W. SMITH (SBN 134385)  
DIANA WANG WELLS (SBN 284215)/LEILA K. AL FAIZ (SBN 284309)  
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**FILED**  
Superior Court Of California  
County Of Los Angeles

MAY 10 2017

Herri R. Carter, Executive Officer/Clerk  
By: *[Signature]* Deputy  
Glorietta Robinson

ATTORNEY FOR (Name): **PLAINTIFF DENISE BERTONE**  
**SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES**  
STREET ADDRESS: 111 NORTH HILL STREET  
MAILING ADDRESS: 111 NORTH HILL STREET  
CITY AND ZIP CODE: LOS ANGELES, CALIFORNIA 90012  
BRANCH NAME: CENTRAL DISTRICT

CASE NAME: DENISE BERTONE v. COUNTY OF LOS ANGELES, et al.

**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:  
JUDGE: **BC 660736**  
DEPT:

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

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

**Auto Tort**

- Auto (22)
- Uninsured motorist (46)

**Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort**

- Asbestos (04)
- Product liability (24)
- Medical malpractice (45)
- Other PI/PD/WD (23)

**Non-PI/PD/WD (Other) Tort**

- Business tort/unfair business practice (07)
- Civil rights (08)
- Defamation (13)
- Fraud (16)
- Intellectual property (19)
- Professional negligence (25)
- Other non-PI/PD/WD tort (35)

**Employment**

- Wrongful termination (36)
- Other employment (15)

**Contract**

- Breach of contract/warranty (06)
- Rule 3.740 collections (09)
- Other collections (09)
- Insurance coverage (18)
- Other contract (37)

**Real Property**

- Eminent domain/Inverse condemnation (14)
- Wrongful eviction (33)
- Other real property (26)

**Unlawful Detainer**

- Commercial (31)
- Residential (32)
- Drugs (38)

**Judicial Review**

- Asset forfeiture (05)
- Petition re: arbitration award (11)
- Writ of mandate (02)
- Other judicial review (39)

**Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403)**

- Antitrust/Trade regulation (03)
- Construction defect (10)
- Mass tort (40)
- Securities litigation (28)
- Environmental/Toxic tort (30)
- Insurance coverage claims arising from the above listed provisionally complex case types (41)

**Enforcement of Judgment**

- Enforcement of judgment (20)

**Miscellaneous Civil Complaint**

- RICO (27)
- Other complaint (not specified above) (42)

**Miscellaneous Civil Petition**

- Partnership and corporate governance (21)
- 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.  Large number of separately represented parties d.  Large number of witnesses  
b.  Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve e.  Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court  
c.  Substantial amount of documentary evidence f.  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 (1)
- 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: MAY 9, 2017  
GREGORY W. SMITH (SBN 134385)  
(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.

**To Plaintiffs and Others Filing First Papers.** If you are filing a first paper (for example, a complaint) in a civil case, you must complete and file, along with your first paper, the *Civil Case Cover Sheet* contained on page 1. This information will be used to compile statistics about the types and numbers of cases filed. You must complete items 1 through 6 on the sheet. In item 1, you must check **one** box for the case type that best describes the case. If the case fits both a general and a more specific type of case listed in item 1, check the more specific one. If the case has multiple causes of action, check the box that best indicates the **primary** cause of action. To assist you in completing the sheet, examples of the cases that belong under each case type in item 1 are provided below. A cover sheet must be filed only with your initial paper. Failure to file a cover sheet with the first paper filed in a civil case may subject a party, its counsel, or both to sanctions under rules 2.30 and 3.220 of the California Rules of Court.

**To Parties in Rule 3.740 Collections Cases.** A "collections case" under rule 3.740 is defined as an action for recovery of money owed in a sum stated to be certain that is not more than \$25,000, exclusive of interest and attorney's fees, arising from a transaction in which property, services, or money was acquired on credit. A collections case does not include an action seeking the following: (1) tort damages, (2) punitive damages, (3) recovery of real property, (4) recovery of personal property, or (5) a prejudgment writ of attachment. The identification of a case as a rule 3.740 collections case on this form means that it will be exempt from the general time-for-service requirements and case management rules, unless a defendant files a responsive pleading. A rule 3.740 collections case will be subject to the requirements for service and obtaining a judgment in rule 3.740.

**To Parties in Complex Cases.** In complex cases only, parties must also use the *Civil Case Cover Sheet* to designate whether the case is complex. If a plaintiff believes the case is complex under rule 3.400 of the California Rules of Court, this must be indicated by completing the appropriate boxes in items 1 and 2. If a plaintiff designates a case as complex, the cover sheet must be served with the complaint on all parties to the action. A defendant may file and serve no later than the time of its first appearance a joinder in the plaintiff's designation, a counter-designation that the case is not complex, or, if the plaintiff has made no designation, a designation that the case is complex.

## CASE TYPES AND EXAMPLES

**Auto Tort**

- Auto (22)—Personal Injury/Property Damage/Wrongful Death
- Uninsured Motorist (46) (*if the case involves an uninsured motorist claim subject to arbitration, check this item instead of Auto*)

**Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort**

- Asbestos (04)
  - Asbestos Property Damage
  - Asbestos Personal Injury/Wrongful Death
- Product Liability (*not asbestos or toxic/environmental*) (24)
- Medical Malpractice (45)
  - Medical Malpractice—Physicians & Surgeons
  - Other Professional Health Care Malpractice
- Other PI/PD/WD (23)
  - Premises Liability (e.g., slip and fall)
  - Intentional Bodily Injury/PD/WD (e.g., assault, vandalism)
  - Intentional Infliction of Emotional Distress
  - Negligent Infliction of Emotional Distress
- Other PI/PD/WD

**Non-PI/PD/WD (Other) Tort**

- Business Tort/Unfair Business Practice (07)
- Civil Rights (e.g., discrimination, false arrest) (*not civil harassment*) (08)
- Defamation (e.g., slander, libel) (13)
- Fraud (16)
- Intellectual Property (19)
- Professional Negligence (25)
  - Legal Malpractice
  - Other Professional Malpractice (*not medical or legal*)
- Other Non-PI/PD/WD Tort (35)

**Employment**

- Wrongful Termination (36)
- Other Employment (15)

**Contract**

- Breach of Contract/Warranty (06)
  - Breach of Rental/Lease Contract (*not unlawful detainer or wrongful eviction*)
  - Contract/Warranty Breach—Seller Plaintiff (*not fraud or negligence*)
  - Negligent Breach of Contract/Warranty
  - Other Breach of Contract/Warranty
- Collections (e.g., money owed, open book accounts) (09)
- Collection Case—Seller Plaintiff
- Other Promissory Note/Collections Case
- Insurance Coverage (*not provisionally complex*) (18)
  - Auto Subrogation
  - Other Coverage
- Other Contract (37)
  - Contractual Fraud
  - Other Contract Dispute

**Real Property**

- Eminent Domain/Inverse Condemnation (14)
- Wrongful Eviction (33)
- Other Real Property (e.g., quiet title) (26)
  - Writ of Possession of Real Property
  - Mortgage Foreclosure
  - Quiet Title
  - Other Real Property (*not eminent domain, landlord/tenant, or foreclosure*)

**Unlawful Detainer**

- Commercial (31)
- Residential (32)
- Drugs (38) (*if the case involves illegal drugs, check this item; otherwise, report as Commercial or Residential*)

**Judicial Review**

- Asset Forfeiture (05)
- Petition Re: Arbitration Award (11)
- Writ of Mandate (02)
  - Writ—Administrative Mandamus
  - Writ—Mandamus on Limited Court Case Matter
  - Writ—Other Limited Court Case Review
- Other Judicial Review (39)
  - Review of Health Officer Order
  - Notice of Appeal—Labor Commissioner Appeals

**Provisionally Complex Civil Litigation (Cal. Rules of Court Rules 3.400–3.403)**

- Antitrust/Trade Regulation (03)
- Construction Defect (10)
- Claims Involving Mass Tort (40)
- Securities Litigation (28)
- Environmental/Toxic Tort (30)
- Insurance Coverage Claims (*arising from provisionally complex case type listed above*) (41)

**Enforcement of Judgment**

- Enforcement of Judgment (20)
  - Abstract of Judgment (Out of County)
  - Confession of Judgment (*non-domestic relations*)
  - Sister State Judgment
  - Administrative Agency Award (*not unpaid taxes*)
  - Petition/Certification of Entry of Judgment on Unpaid Taxes
  - Other Enforcement of Judgment Case

**Miscellaneous Civil Complaint**

- RICO (27)
- Other Complaint (*not specified above*) (42)
  - Declaratory Relief Only
  - Injunctive Relief Only (*non-harassment*)
  - Mechanics Lien
  - Other Commercial Complaint Case (*non-tort/non-complex*)
  - Other Civil Complaint (*non-tort/non-complex*)

**Miscellaneous Civil Petition**

- Partnership and Corporate Governance (21)
- Other Petition (*not specified above*) (43)
  - Civil Harassment
  - Workplace Violence
  - Elder/Dependent Adult Abuse
  - Election Contest
  - Petition for Name Change
  - Petition for Relief from Late Claim
  - Other Civil Petition

SHORT TITLE: DENISE BERTONE

CASE NUMBER

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

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

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

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

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

Applicable Reasons for Choosing Court Filing Location (Column C)

- 1. Class actions must be filed in the Stanley Mosk Courthouse, Central District.
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:

DENISE BERTONE

CASE NUMBER

Non-Personal Injury/Property  
Damage/Wrongful Death Tort

Employment

Contract

Real Property

Unlawful Detainer

A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C 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 <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	1, 2, 3
Wrongful Termination (36)	<input type="checkbox"/> A6037 Wrongful Termination	1, 2, 3
Other Employment (15)	<input checked="" type="checkbox"/> A6024 Other Employment Complaint Case <input type="checkbox"/> A6109 Labor Commissioner Appeals	1, 2, 3 10
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 <input type="checkbox"/> A6034 Collections Case-Purchased Debt (Charged Off Consumer Debt Purchased on or after January 1, 2014)	5, 6, 11 5, 11 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 <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, 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 <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)	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

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SHORT TITLE:

DENISE BERTONE

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
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
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, 5, 11 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/Change of Gender <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, 8 2, 9

Judicial Review

Provisionally Complex Litigation

Enforcement of Judgment

Miscellaneous Civil Complaints

Miscellaneous Civil Petitions

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SHORT TITLE: DENISE BERTONE	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 type="checkbox"/> 3. <input type="checkbox"/> 4. <input type="checkbox"/> 5. <input type="checkbox"/> 6. <input type="checkbox"/> 7. <input type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10. <input type="checkbox"/> 11.		<b>ADDRESS:</b> 500 WEST TEMPLE STREET, SUITE 383
<b>CITY:</b> LOS ANGELES	<b>STATE:</b> CA	<b>ZIP CODE:</b> 90012

**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: MAY 9, 2017

  
 \_\_\_\_\_  
 (SIGNATURE OF ATTORNEY/FILING PARTY)

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

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

05/11/2017