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FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

NOV 05 2013

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FSC: 04 / 2 / 2015 TRIAL: 05 / 05 / 2015 OSC: 11 / 07 / 2016
SUPERIOR COURT OF CALIFORNIA

COUNTY OF LOS ANGELES, CENTRAL DISTRICT

CRYSTAL DIXON, as guardian *ad litem* for
DONNOVAN HILL, a minor, and CRYSTAL
DIXON, individually,

Plaintiffs,

vs.

POP WARNER LITTLE SCHOLARS, INC., a
non-profit corporation; ORANGE EMPIRE
CONFERENCE, INC., a non-profit corporation;
LAKEWOOD POP WARNER, a non-profit
corporation; SALVADOR P. and JANE DOE
HERNANDEZ, husband and wife; MANUEL
and JANE DOE MARTINEZ, husband and
wife; REGINALD C. and JANE DOE
NETTLES, husband and wife; KEVIN and
JANE DOE GODDARD, husband and wife;
JIM and JANE DOE CUNNINGHAM, husband
and wife; ROBERTO CARLOS and JANE
DOE GONZALEZ, husband and wife;
ROBERT T. and JANE DOE ESPINOSA,
husband and wife; DOES 1 through 20; and
BLACK CORPORATIONS 1 through 10.

Defendants.

Case No. BC 526842

COMPLAINT

1. Negligence
2. Respondeat Superior
3. Negligent Training, Supervision, and Retention
4. Negligent Infliction of Emotional Distress

DEMAND FOR JURY TRIAL

BY FAX

RECEIPT #: CCH439933119
DATE PAID: 11/05/13 03:52 PM
PAYMENT: \$435.00
RECEIVED:
CHECK: \$435.00
CASH: \$0.00
CHANGE: \$0.00
CARD: \$0.00

CIT/CASE: BC526842
LER/DEF#:

11/05/2013

1 Plaintiff Crystal Dixon, for herself and her minor son, Plaintiff Donovan Hill, and through
2 undersigned counsel, respectfully submits the following Complaint for personal injuries.

3 I. INTRODUCTION

4 1. This case arises from the severe and permanent injuries Plaintiff Donovan Hill, a
5 thirteen year-old boy, suffered while playing in a youth league football game sponsored and
6 supervised by Defendants Pop Warner Little Scholars, Inc., Orange Empire Conference, Inc., and
7 Lakewood Pop Warner. Donovan was rendered a quadriplegic after attempting to tackle his
8 opponent using a negligent tackling technique he was taught and instructed to use by his coaches,
9 Defendants Hernandez, Martinez, Nettles, Goddard, Cunningham, and Does 1-20. His mother,
10 Crystal Dixon, was in the stands that day and witnessed her son's catastrophic injury.

11 2. Even though Pop Warner rules and the football industry as a whole prohibit the
12 head-first tackling that injured Donovan, his coaches taught him the technique, insisted he use it
13 despite his complaints, and refused to intervene and correct Donovan when he repeatedly
14 employed the tackling technique in practices and games. Likewise, Pop Warner and its related
15 entities and agents, including Defendants Gonzalez and Espinosa, failed to properly supervise and
16 monitor the coaches to ensure they complied with and enforced the rules.

17 3. Because of Defendants' negligent conduct, Donovan was seriously and
18 permanently injured, and his mother and primary caregiver, Crystal Dixon, suffered serious
19 emotional distress. Donovan will require assistance for the remainder of his now-diminished life.

20 II. JURISDICTION AND VENUE

21 4. This Court has subject matter jurisdiction over this action because it is a court of
22 general jurisdiction with the authority to hear and decide claims arising under California statutory
23 and common law. Cal. Const. art. VI, § 10; Cal. Civ. Proc. Code § 410.10 (West 2013).

24 5. This Court has personal jurisdiction over Plaintiffs because they reside in California.
25 This Court has personal jurisdiction over Defendants because the corporate Defendants are
26 incorporated in California or conduct substantial business in California, and the individual
27 Defendants reside in California.
28

1 6. Venue is proper in this Court because the action is for personal injury and this Court
2 is in Los Angeles County, where the corporate Defendants conduct substantial business and many
3 of the individual Defendants reside. Cal. Civ. Proc. Code § 395.5 (West 2013); L.R. 2.3(a)(1)(A).

4 III. PARTIES

5 7. Plaintiff Donovan Hill is a fifteen-year-old boy who resides with his mother and
6 guardian *ad litem*, Plaintiff Crystal Dixon, in Los Alamitos, California in Orange County.

7 8. Plaintiff Crystal Dixon, a single woman, is Plaintiff Donovan Hill's mother and
8 guardian *ad litem* who resides with her son in in Los Alamitos, California in Orange County.

9 9. Defendant Pop Warner Little Scholars, Inc. is a non-profit corporation providing
10 youth football and cheer and dance programs for participants in 42 states, including California, and
11 several countries around the world.¹ Pop Warner is incorporated and headquartered in
12 Pennsylvania. On information and belief, over 285,000 children ages five to fifteen participate in
13 Pop Warner football leagues, and the program has produced over two-thirds of the players now in
14 the National Football League.²

15 10. Defendant Orange Empire Conference, Inc. ("OEC") is a non-profit corporation
16 headquartered in Huntington Beach, California, in Orange County, and incorporated under the laws
17 of California. The OEC is a Pop Warner Little Scholars, Inc. organization in the Wescon Region,
18 providing football, cheerleading, and scholastic programs for children ages five to fifteen through
19 its various member associations since 1986.³ The OEC boundaries encompass all of Orange County
20 and much of Los Angeles County.

21 11. Defendant Lakewood Pop Warner is a non-profit corporation headquartered in
22 Lakewood, California, in Los Angeles County, and incorporated under the laws of California. It is
23 a Pop Warner Little Scholars, Inc. organization in the Wescon Region and a member association of
24

25
26 ¹ The Official Website of Pop Warner Little Scholars, Inc., POPWARNER.COM, http://www.popwarner.com/-About_Us.htm (last visited November 3, 2013).

27 ² Anahad O'Connor, *Trying to Reduce Head Injuries, Youth Football Limits Practices*, N.Y. TIMES, June 14, 2012, at A1.

28 ³ Orange Empire Conference, Inc., <http://24.199.21.46/oecweb/index.html> (last visited November 3, 2013).

1 Defendant OEC, providing football, cheerleading, and scholastic programs for children ages five to
2 fifteen. Lakewood Pop Warner included Donovan's football team, the Lakewood Black Lancers.

3 12. On information and belief, Defendants Salvador P. and Jane Doe Hernandez are a
4 married couple who, at all times relevant to this Complaint, resided in Long Beach, California in
5 Los Angeles County. Mr. Hernandez was the head coach of Donovan's football team in 2011. The
6 true name of Jane Doe Hernandez is unknown and will be amended once it is ascertained by
7 Plaintiffs.

8 13. On information and belief, Defendants Manuel and Jane Doe Martinez are a married
9 couple who, at all times relevant to this Complaint, resided in Long Beach, California in Los
10 Angeles County. Mr. Martinez was an assistant coach for Donovan's football team in 2011. The
11 true name of Jane Doe Martinez is unknown and will be amended once it is ascertained by
12 Plaintiffs.

13 14. On information and belief, Defendants Reginald C. and Jane Doe Nettles are a
14 married couple who, at all times relevant to this Complaint, resided in Orange County, California.
15 On information and belief, Mr. Nettles was an assistant coach for Donovan's football team in
16 2011. The true name of Jane Doe Nettles is unknown and will be amended once it is ascertained by
17 Plaintiffs.

18 15. On information and belief, Defendants Kevin and Jane Doe Goddard are a married
19 couple who, at all times relevant to this Complaint, resided in California at an address still
20 unknown to Plaintiffs. On information and belief, Mr. Goddard was an assistant coach for
21 Donovan's football team in 2011. The true name of Jane Doe Goddard is unknown and it, along
22 with Defendants' address, will be amended once it is ascertained by Plaintiffs.

23 16. On information and belief, Defendant Jim and Jane Doe Cunningham are a married
24 couple who, at all times relevant to this Complaint, resided in California at an address still
25 unknown to Plaintiffs. On information and belief, Mr. Cunningham was an assistant coach for
26 Donovan's football team in 2011. The true name of Jane Doe Cunningham is unknown and it,
27 along with Defendants' address, will be amended once it is ascertained by Plaintiffs.
28

17. On information and belief, Defendant Roberto Carlos and Jane Doe Gonzalez are a married couple who, at all times relevant to this Complaint, resided in Long Beach, California in Los Angeles County. On information and belief, Mr. Gonzalez was the President and Athletic Director for Lakewood Pop Warner in 2011. The true name of Jane Doe Gonzalez is unknown and will be amended once it is ascertained by Plaintiffs.

18. On information and belief, Defendant Robert T. and Jane Doe Espinosa are a married couple who, at all times relevant to this Complaint, resided in Brea, California, in Orange County. On information and belief, Mr. Espinosa was an assistant commissioner for Defendant OEC during the 2011 season. The true name of Jane Doe Espinosa is unknown and will be amended once it is ascertained by Plaintiffs.

19. Defendants Does 1 through 20 are individuals sued by fictitious names because their true names or capacities are still unknown to Plaintiffs. Plaintiffs will amend the Complaint to include their proper names once ascertained.

20. Defendants Black Corporations 1 through 10 are sued by fictitious names because their true names or capacities are still unknown to Plaintiffs. Plaintiffs will amend the Complaint to include their proper names once ascertained.

IV. FACTUAL ALLEGATIONS

A. Donnovan's Pop Warner Football Team

21. In or around August 2011, Plaintiff Donovan Hill enrolled in Defendant Lakewood Pop Warner to play on the Lakewood Black Lancers Midget football team. The Midget team comprised the oldest and largest boys in any Pop Warner football league, including boys twelve to fifteen years old within the weight range 105 to 170 pounds.

22. Donovan was one of the Lakewood Black Lancers' better players. He was a two-way athlete, playing both running back on offense and safety on defense. Because of his talents, it was typical for Donovan to participate in nearly every play of every game.

23. Defendant Lakewood Pop Warner was a member association of Defendant OEC in the Westcon Region of Defendant Pop Warner Little Scholars, Inc. (collectively, "Defendant Pop

1 Warner Entities"). Defendant Pop Warner Entities includes any unknown but related entities,
2 designated for now as Black Corporations 1 through 10.

3 24. Defendants Salvador Hernandez, Manuel Martinez, Reginald Nettles, Kevin
4 Goddard, and Jim Cunningham (collectively, "Defendant Coaches") were Donovan's coaches on
5 the Lakewood Black Lancers Midget football team for the 2011 season. Defendant Coaches
6 includes any unknown coaches, designated for now as Does 1 through 20.

7 25. On information and belief, Defendant Roberto Carlos Gonzalez was the President
8 and Athletic Director for Defendant Lakewood Pop Warner during the 2011 season. On
9 information and belief, Mr. Gonzalez was present at many, if not all, of Donovan's games and
10 practices that year.

11 26. On information and belief, Defendant Robert Espinosa was an agent or employee of
12 Defendant Pop Warner Entities tasked with monitoring and supervising Defendant Coaches to
13 ensure they complied with safety standards and rules during the 2011 season. On information and
14 belief, Defendant Robert Espinosa observed Defendant Coaches' football practices and instruction
15 and Donovan's football playing at practices and games.

16 27. Does 1 through 20 and Black Corporations 1 through 10 are unknown persons or
17 entities who are responsible for the instruction or oversight of Donovan, his coaches, the league,
18 or Donovan's football play.

19 **B. In Practice Defendant Coaches Taught And Encouraged Donovan To Use**
20 **Dangerously Negligent Tackling Technique, And Then Reinforced The Improper**
21 **Technique By Failing To Correct Or Reprimand Donovan When They Observed**
22 **Him Repeatedly Using It In Practice And Games**

23 28. The 2011 football season ran from approximately August to the end of October,
24 followed by championship games in November.

25 29. Donovan's team typically practiced three times a week for approximately three
26 hours each practice. There, Defendant Coaches instructed Donovan and his teammates on all
27 aspects of tackle football.
28

1 30. Proper football tackling technique according to Defendant Pop Warner Entities'
2 online training course is to keep the head up and slide it to the outside of an opponent's body
3 before making contact, so as to lead with the shoulder rather than the head.

4 31. Leading with your head while tackling, often referred to as "face tackling," occurs
5 when a defensive player initiates contact with a ball carrier with the front of his helmet. This
6 practice, along with "spearing"—launching at an opponent with the top of the helmet—are both
7 widely prohibited in football at all levels.

8 32. The 2011 Pop Warner Little Scholars Official Rules expressly prohibited face
9 tackling or spearing techniques, stating:

10 If such techniques or any others forbidden by the National Federation or
11 NCAA rulebooks are taught by Pop Warner coaches, said coaches shall be
 dismissed from the program, upon being found guilty following a hearing.

12 33. The 2011 Pop Warner Little Scholars Official Rules also stressed the importance of
13 proper blocking and tackling in football, saying "[i]t is the responsibility of every Pop Warner
14 coach to be fully informed of, and abide by, all such rules of the governing body (National
15 Federation or NCAA) under whose jurisdiction his state falls, and to review [the rules] every year."
16 (Emphasis added.)

17 34. Contrary to these rules, Defendant Coaches taught and coached Donovan to lead
18 with his head when tackling opponents and promoted the face tackling technique in both practice
19 and games. Defendant Hernandez insisted that Donovan tackle in this manner.

20 35. As evident in numerous game films, Donovan consistently tackled head-first
21 throughout the 2011 season. Defendant Hernandez admitted this in an interview with ESPN for its
22 show *Outside The Lines*.

23 36. Defendant Coaches regularly observed Donovan tackling in an incorrect and
24 dangerous manner in practices and at games, but, on information and belief, never corrected
25 Donovan's technique.

26 37. Defendant Coaches tolerated this prohibited practice by observing Donovan use
27 this tackling technique over and over again in practice and in games without reprimanding or
28

1 punishing him. On information and belief, Defendant Coaches never benched Donovan from a
2 practice or game—or even verbally threatened to do so—to deter his head-first tackling.

3 38. On information and belief, Defendant Coaches encouraged and promoted such
4 technique by directly ordering the head-first tackling and even lauding it as “tough.”

5 39. During one-on-one hitting drills at a practice during the 2011 season, Donovan
6 expressed concern to Defendant Hernandez about head-first tackling, saying he was afraid it would
7 injure him. In response Defendant Hernandez chastised Donovan for “whining,” reaffirmed that
8 Donovan should tackle head-first, and sent him to the back of the practice line to continue drills.
9 On information and belief, another one of Donovan’s teammates, Anselm Umeh, also complained
10 that day to Defendant Coaches about the danger of head-first tackling.

11 40. Shortly after this reprimand, Donovan attempted another tackling drill under
12 Defendant Hernandez’s instruction and suffered mild injury his neck. Defendant Coaches knew or
13 should have known of the neck injury Donovan sustained that day.

14 41. Rylee Isbell, Donovan’s teammate, and Defendant Martinez later confirmed this
15 practice incident involving Donovan in their interviews for *Outside The Lines*.

16 42. Defendant Martinez also confirmed in his interview that Donovan and his
17 teammates were taught to use face tackling against opponents.

18 **C. Defendant Pop Warner Entities And Its Agents Failed To Properly Train And**
19 **Supervise Defendant Coaches It Knew Or Should Have Known Were Negligent**

20 43. Defendant Pop Warner Entities required all head coaches, including Defendant
21 Hernandez, to pass an online coaching education course every three years. The course provided
22 video clips depicting the proper technique for tackling.

23 44. On information and belief, head coach Defendant Hernandez did not complete the
24 required coaching education course for the 2011 season and was delinquent in taking his required
25 coaching education course.

26 45. And even though the 2011 Pop Warner Little Scholars Official Rules expressly
27 require each coach, including assistant coaches, to review the rules every year and “to be fully
28

1 informed of, and abide by, all such rules," upon information and belief, Defendant Coaches did not
2 do so. Defendant Martinez admits this in his *Outside The Lines* interview.

3 46. As the supervisory bodies responsible for Defendant Coaches' conduct, Defendant
4 Pop Warner Entities, Defendant Gonzalez, and Defendant Espinosa knew or should have known
5 that Defendant Coaches were noncompliant with the rules and engaging in prohibited and
6 dangerous coaching techniques.

7 47. On information and belief, Defendant Pop Warner Entities, Defendant Gonzalez,
8 and Defendant Espinosa did not check to ensure Defendant Hernandez complied with required
9 educational courses, nor did they ensure Defendant Coaches were familiar and compliant with the
10 rules each year.

11 48. On information and belief, Defendant Pop Warner Entities, Defendant Gonzalez,
12 and Defendant Espinosa did not check to ensure Defendant Coaches were teaching proper, safe
13 tackling techniques while correcting, discouraging, or penalizing those athletes not complying with
14 tackling rules. Upon information and belief, there were no safeguards or protections to ensure
15 coaches were enforcing the rules relating to safe tackling.

16 49. On information and belief, Defendant Coaches, including Defendant Hernandez,
17 were not first-time Pop Warner coaches in the 2011 season. Defendant Pop Warner Entities,
18 Defendant Gonzalez, and Defendant Espinosa therefore knew or should have known that
19 Defendant Coaches used unreasonable and dangerous football techniques, did not comply with
20 coaching standards and applicable football rules, did not prohibit unsafe practices, and did not
21 follow organizational directives.

22 50. On information and belief, Defendant Pop Warner Entities, Defendant Gonzalez,
23 and Defendant Espinosa never reprimanded, suspended, or fired any Defendant Coaches for failure
24 to review, be informed of, and abide by Pop Warner football rules.

25 **D. Donnovan Is Paralyzed While Tackling An Opponent Using The Negligent Technique**
26 **Taught To Him And Promoted By Defendant Coaches**
27
28

1 51. On the evening of November 6, 2011, Donovan and his team were playing in the
2 Division I Midget Orange Bowl championship game against the Saddleback Valley Wolverines at
3 Laguna Hills High School in Laguna Hills, California.

4 52. In the second half of the game, Donovan told his coaches he was fatigued and
5 wanted to sit out from play. Defendant Coaches objected to his request, telling Donovan they
6 needed him to play so the team would win the game.

7 53. Defendant Coaches did not permit Donovan to sit out of the game even though he
8 was fatigued. Instead, he was sent back into the game as a substitute for another defensive player
9 pulled by Defendant Coaches.

10 54. On a scrimmage play in the third quarter, while playing in the defensive linebacker
11 position, Donovan attempted to tackle the opposing ball carrier to prevent him from entering the
12 end zone. As Donovan approached contact with his opponent, he dropped his head down, kept his
13 arms at his side, and initiated the tackle head-first.

14 55. Upon contact with the opposing player, Donovan immediately went limp and
15 dropped to the field, unmoving. Donovan told those gathered around him that he could not feel his
16 legs.

17 56. Donovan was rushed by ambulance to Mission Hospital Regional Medical Center
18 in Mission Viejo, California.

19 57. There, doctors determined Donovan had suffered a catastrophic spinal cord injury
20 resulting in quadriplegia.

21 **E. Donovan's Post-Injury Treatment**

22 58. Following his stay at Mission Hospital, Donovan was transferred to Children's
23 Hospital Los Angeles for rehabilitation. After his release, he continued with physical therapy for a
24 minimum of two hours, three times per week. His physical therapy typically comprised balance and
25 core strength training using the standing frame, bike, and elliptical machines.

26 59. As a quadriplegic, Donovan has minimal use of his arms, and no independent
27 movement from the nipple-level down.
28

1 60. Donnovan's paralysis requires him to use a catheter and a colostomy bag, and he
2 suffers from pressure sores because of constant confinement to his bed and wheelchair.

3 61. Donnovan is cared for by his mother with whom he shares a small apartment. He
4 does not have the facilities or transportation appropriate for someone with his injuries.

5 62. Donnovan's life expectancy is diminished because of his injuries, as is his future
6 earning capacity.

7
8 **F. The Impact On Crystal After Witnessing Donovan's Injury**

9 63. Donnovan's mother, Plaintiff Crystal Dixon, was sitting in the stands at the Division
10 I Midget Orange Bowl championship game watching Donovan play on November 6, 2011.

11 64. Crystal witnessed Donovan attempt to tackle his opponent and, in doing so, suffer
12 a catastrophic spinal cord injury resulting in immediate paralysis.

13 65. Witnessing her son's catastrophic injury has affected Crystal's life drastically. She
14 now suffers from depression and anxiety, both of which require regular medication. When she is
15 not at work Donovan needs her constant care, and so any life she had outside of assisting him has
16 all but disappeared. It has also affected Crystal's employment at Vons Grocery, where she has
17 worked for approximately fifteen years. Working in customer service, she often finds it difficult to
18 focus on tasks, unexpectedly breaks down emotionally, and experiences a shortened temper and
19 dramatic mood swings. Physically, Crystal feels as though her body is breaking down.

20 **IV. CAUSES OF ACTION**

21 **FIRST CAUSE OF ACTION**
22 **(Negligence – Defendant Coaches)**

23 66. Plaintiffs incorporate by reference all allegations in the foregoing paragraphs.

24 67. Defendant Coaches had a duty to exercise reasonable care in training, instructing,
25 and coaching Donovan regarding playing football generally and with respect to his tackling
26 technique.
27
28

1 termination of Defendant Coaches was the reasonable and appropriate action under the
2 circumstances.

3 80. As a direct and proximate result of Defendant Pop Warner Entities, Defendant
4 Gonzalez, and Defendant Espinosa's alleged negligent training, supervision, and retention of
5 Defendant Coaches, Plaintiff Donovan Hill was seriously and permanently injured, and suffered,
6 and continues to suffer, economic and non-economic damage.

7 **FOURTH CAUSE OF ACTION**

8 **(Negligent Infliction of Emotional Distress – All Defendants)**

9 81. Plaintiffs incorporate by reference all allegations in the foregoing paragraphs.

10 82. Defendants engaged in the negligent conduct alleged herein which caused injury to
11 Donovan.

12 83. Plaintiff Crystal Dixon was present at the scene of Donovan's injury and was
13 aware that he was injured.

14 84. Plaintiff Crystal Dixon suffered serious emotional distress in witnessing her son's
15 catastrophic injury and immediate paralysis, and the serious emotional distress Crystal suffered
16 was not an abnormal response to the circumstances, in that a reasonable person could not cope with
17 the mental distress caused by witnessing such an event.

18 85. Plaintiff Crystal Dixon's serious emotional distress was directly and proximately
19 caused by Defendants' alleged negligent conduct.

20 **PRAYER FOR RELIEF**

21 WHEREFORE, Plaintiff Crystal Dixon, for herself and her minor son, Plaintiff Donovan
22 Hill, pray for judgment against Defendants as follows:

- 23 A. For all compensatory damages suffered due to Defendants' conduct;
24 B. For all consequential damages suffered due to Defendants' conduct;
25 C. For exemplary or punitive damages;
26 D. For the maximum interest provided by law, including but not limited to, Cal. Civ.
27 Code § 3291;
28 E. Attorney's fees;

1 F. Costs of suit; and

2 G. For such other and further relief as the Court deems proper and just.

3 **JURY TRIAL DEMANDED**

4 Plaintiffs demand a trial by jury on all issues triable of right by jury.

5
6 DATED: November 5, 2013

HAGENS BERMAN SOBOL SHAPIRO LLP

7
8 By ELT

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Attorneys for Plaintiffs

SHORT TITLE:

Crystal Dixon, et al. v. Pop Warner Little Scholars, Inc., et al.

CASE NUMBER

BC 526842

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

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

Item I. Check the types of hearing and fill in the estimated length of hearing expected for this case:

JURY TRIAL? ☒ YES CLASS ACTION? ☐ YES LIMITED CASE? ☐ YES TIME ESTIMATED FOR TRIAL 7 ☐ HOURS/ ☒ DAYS

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

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

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

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

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

1. Class actions must be filed in the Stanley Mosk Courthouse, central district.
2. May be filed in central (other county, or no bodily injury/property damage).
3. Location where cause of action arose.
4. Location where bodily injury, death or damage occurred.
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

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

A Civil Case Cover Sheet Category Number	B Type of Action (Check only one)	C Applicable Reason (See Step 3 above)
Auto (22)	<input type="checkbox"/> A7100 Motor Vehicle - Personal Injury/Property Damage/Wrongful Death	1., 2., 4.
Uninsured Motorist (46)	<input type="checkbox"/> A7110 Personal Injury/Property Damage/Wrongful Death – Uninsured Motorist	1., 2., 4.
Asbestos (04)	<input type="checkbox"/> A6070 Asbestos Property Damage <input type="checkbox"/> A7221 Asbestos - Personal Injury/Wrongful Death	2. 2.
Product Liability (24)	<input type="checkbox"/> A7260 Product Liability (not asbestos or toxic/environmental)	1., 2., 3., 4., 8.
Medical Malpractice (45)	<input type="checkbox"/> A7210 Medical Malpractice - Physicians & Surgeons <input type="checkbox"/> A7240 Other Professional Health Care Malpractice	1., 4. 1., 4.
Other Personal Injury Property Damage Wrongful Death (23)	<input type="checkbox"/> A7250 Premises Liability (e.g., slip and fall) <input type="checkbox"/> A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.) <input type="checkbox"/> A7270 Intentional Infliction of Emotional Distress <input checked="" type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death	1., 4. 1., 4. 1., 3. 1. (4)

BY FAX

SHORT TITLE:

Crystal Dixon, et al. v. Pop Warner Little Scholars, Inc., et al.

CASE NUMBER

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

SHORT TITLE:

Crystal Dixon, et al. v. Pop Warner Little Scholars, Inc., et al.

CASE NUMBER

A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons (See Step 3 Above)
Asset Forfeiture (05)	<input type="checkbox"/> A6108 Asset Forfeiture Case	2., 6.
Petition re Arbitration (11)	<input type="checkbox"/> A6115 Petition to Compel/Confirm/Vacate Arbitration	2., 5.
Writ of Mandate (02)	<input type="checkbox"/> A6151 Writ - Administrative Mandamus	2., 8.
	<input type="checkbox"/> A6152 Writ - Mandamus on Limited Court Case Matter	2.
	<input type="checkbox"/> A6153 Writ - Other Limited Court Case Review	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.
	<input type="checkbox"/> A6007 Construction Defect	1., 2., 3.
	<input type="checkbox"/> A6006 Claims Involving Mass Tort	1., 2., 8.
	<input type="checkbox"/> A6035 Securities Litigation Case	1., 2., 8.
	<input type="checkbox"/> A6036 Toxic Tort/Environmental	1., 2., 3., 8.
	<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	2., 9.
	<input type="checkbox"/> A6160 Abstract of Judgment	2., 6.
	<input type="checkbox"/> A6107 Confession of Judgment (non-domestic relations)	2., 9.
	<input type="checkbox"/> A6140 Administrative Agency Award (not unpaid taxes)	2., 8.
	<input type="checkbox"/> A6114 Petition/Certificate for Entry of Judgment on Unpaid Tax	2., 8.
	<input type="checkbox"/> A6112 Other Enforcement of Judgment Case	2., 8., 9.
RICO (27)	<input type="checkbox"/> A6033 Racketeering (RICO) Case	1., 2., 8.
Other Complaints (Not Specified Above) (42)	<input type="checkbox"/> A6030 Declaratory Relief Only	1., 2., 8.
	<input type="checkbox"/> A6040 Injunctive Relief Only (not domestic/harassment)	2., 8.
	<input type="checkbox"/> A6011 Other Commercial Complaint Case (non-tort/non-complex)	1., 2., 8.
	<input type="checkbox"/> A6000 Other Civil Complaint (non-tort/non-complex)	1., 2., 8.
Partnership Corporation Governance (21)	<input type="checkbox"/> A6113 Partnership and Corporate Governance Case	2., 8.
Other Petitions (Not Specified Above) (43)	<input type="checkbox"/> A6121 Civil Harassment	2., 3., 9.
	<input type="checkbox"/> A6123 Workplace Harassment	2., 3., 9.
	<input type="checkbox"/> A6124 Elder/Dependent Adult Abuse Case	2., 3., 9.
	<input type="checkbox"/> A6190 Election Contest	2.
	<input type="checkbox"/> A6110 Petition for Change of Name	2., 7.
	<input type="checkbox"/> A6170 Petition for Relief from Late Claim Law	2., 3., 4., 8.
	<input type="checkbox"/> A6100 Other Civil Petition	2., 9.

SHORT TITLE:

Crystal Dixon, et al. v. Pop Warner Little Scholars, Inc., et al.

CASE NUMBER

Item III. Statement of Location: Enter the address of the accident, party's residence or place of business, performance, or other circumstance indicated in Item II., Step 3 on Page 1, as the proper reason for filing in the court location you selected.

REASON: Check the appropriate boxes for the numbers shown under Column C for the type of action that you have selected for this case. <input type="checkbox"/> 1. <input type="checkbox"/> 2. <input type="checkbox"/> 3. <input checked="" type="checkbox"/> 4. <input type="checkbox"/> 5. <input type="checkbox"/> 6. <input type="checkbox"/> 7. <input type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10.		ADDRESS: See attachment.
CITY:	STATE:	ZIP CODE:

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

Dated: November 5, 2013

ELT
 (SIGNATURE OF ATTORNEY/FILING PARTY)

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

1. Original Complaint or Petition.
2. If filing a Complaint, a completed Summons form for issuance by the Clerk.
3. Civil Case Cover Sheet, Judicial Council form CM-010.
4. Civil Case Cover Sheet Addendum and Statement of Location form, LACIV 109, LASC Approved 03-04 (Rev. 03/11).
5. Payment in full of the filing fee, unless fees have been waived.
6. A signed order appointing the Guardian ad Litem, Judicial Council form CIV-010, if the plaintiff or petitioner is a minor under 18 years of age will be required by Court in order to issue a summons.
7. Additional copies of documents to be conformed by the Clerk. Copies of the cover sheet and this addendum must be served along with the summons and complaint, or other initiating pleading in the case.

ATTACHMENT TO CIVIL CASE COVER SHEET ADDENDUM**List of Defendants**

POP WARNER LITTLE SCHOLARS, INC., a non-profit corporation, incorporated and headquartered in Langhorne, Pennsylvania in Bucks County;

ORANGE EMPIRE CONFERENCE, INC., a non-profit corporation, incorporated and headquartered in Huntington Beach, California in Orange County;

LAKEWOOD POP WARNER, a non-profit corporation, incorporated and headquartered in Lakewood, California in Los Angeles County;

SALVADOR P. and JANE DOE HERNANDEZ, husband and wife, residing in Long Beach, California in Los Angeles County;

MANUEL and JANE DOE MARTINEZ, husband and wife, residing in Long Beach, California in Los Angeles County;

REGINALD C. and JANE DOE NETTLES, husband and wife, residing in Orange County, California;

KEVIN and JANE DOE GODDARD, husband and wife, residing in California, address unknown;

JIM and JANE DOE CUNNIGHAM, husband and wife, residing in California, address unknown;

ROBERTO CARLOS and JANE DOE GONZALEZ, husband and wife; residing in Long Beach, California in Los Angeles County;

ROBERT T. and JANE DOE ESPINOSA, husband and wife, residing in Brea, California in Orange County; and

DOES 1 through 20; and BLACK CORPORATIONS 1 through 10.

11/05/2013

11/05/2013

Ace Attorney Service (213) 623-7627

1 of 2 CM-010

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):

Elaine T. Byszewski, (#222304)

Hagens Berman Sobol Shapiro LLP

301 North Lake Avenue, Pasadena, California 91101

TELEPHONE NO.: 213-330-7150

FAX NO.: 213-330-7152

ATTORNEY FOR (Name): Crystal Dixon and Donovan Hill

SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles

STREET ADDRESS: 111 N. Hill Street

MAILING ADDRESS:

CITY AND ZIP CODE: Los Angeles, California 90012

BRANCH NAME: Stanley Mosk Central District on Hill Street

CASE NAME:

Crystal Dixon, et al. v. Pop Warner Little Scholars, Inc., 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)

FOR COURT USE ONLY

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

NOV 05 2013

BY *[Signature]*
BY L. JOHNSON, DEPUTY

CASE NUMBER:

BC 526842

JUDGE:

DEPT:

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

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

Auto Tort

☐ 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): 4 total - Negligence (3), Negligent Infliction of Emotional Distress (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:

Elaine T. Byszewski

(TYPE OR PRINT NAME)

(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

NOTICE

Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.

File this cover sheet in addition to any cover sheet required by local court rule.

If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.

Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

BY FAX

INSTRUCTIONS ON HOW TO COMPLETE THE COVER SHEET

To Plaintiffs and Others Filing First Papers. If you are filing a first paper (for example, a complaint) in a civil case, you must complete and file, along with your first paper, the *Civil Case Cover Sheet* contained on page 1. This information will be used to compile statistics about the types and numbers of cases filed. You must complete items 1 through 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	Contract	Provisionally Complex Civil Litigation (Cal. Rules of Court Rules 3.400-3.403)
Auto (22)—Personal Injury/Property Damage/Wrongful Death	Breach of Contract/Warranty (06)	Antitrust/Trade Regulation (03)
Uninsured Motorist (46) (if the case involves an uninsured motorist claim subject to arbitration, check this item instead of Auto)	Breach of Rental/Lease Contract (not unlawful detainer or wrongful eviction)	Construction Defect (10)
	Contract/Warranty Breach—Seller Plaintiff (not fraud or negligence)	Claims Involving Mass Tort (40)
	Negligent Breach of Contract/Warranty	Securities Litigation (28)
Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort	Other Breach of Contract/Warranty	Environmental/Toxic Tort (30)
Asbestos (04)	Collections (e.g., money owed, open book accounts) (09)	Insurance Coverage Claims (arising from provisionally complex case type listed above) (41)
Asbestos Property Damage	Collection Case—Seller Plaintiff	Enforcement of Judgment
Asbestos Personal Injury/Wrongful Death	Other Promissory Note/Collections Case	Enforcement of Judgment (20)
Product Liability (not asbestos or toxic/environmental) (24)	Insurance Coverage (not provisionally complex) (18)	Abstract of Judgment (Out of County)
Medical Malpractice (45)	Auto Subrogation	Confession of Judgment (non-domestic relations)
Medical Malpractice—Physicians & Surgeons	Other Coverage	Sister State Judgment
Other Professional Health Care Malpractice	Other Contract (37)	Administrative Agency Award (not unpaid taxes)
Other PI/PD/WD (23)	Contractual Fraud	Petition/Certification of Entry of Judgment on Unpaid Taxes
Premises Liability (e.g., slip and fall)	Other Contract Dispute	Other Enforcement of Judgment Case
Intentional Bodily Injury/PD/WD (e.g., assault, vandalism)	Real Property	Miscellaneous Civil Complaint
Intentional Infliction of Emotional Distress	Eminent Domain/Inverse Condemnation (14)	RICO (27)
Negligent Infliction of Emotional Distress	Wrongful Eviction (33)	Other Complaint (not specified above) (42)
Other PI/PD/WD	Other Real Property (e.g., quiet title) (26)	Declaratory Relief Only
Non-PI/PD/WD (Other) Tort	Writ of Possession of Real Property	Injunctive Relief Only (non-harassment)
Business Tort/Unfair Business Practice (07)	Mortgage Foreclosure	Mechanics Lien
Civil Rights (e.g., discrimination, false arrest) (not civil harassment) (08)	Quiet Title	Other Commercial Complaint Case (non-tort/non-complex)
Defamation (e.g., slander, libel) (13)	Other Real Property (not eminent domain, landlord/tenant, or foreclosure)	Other Civil Complaint (non-tort/non-complex)
Fraud (16)	Unlawful Detainer	Miscellaneous Civil Petition
Intellectual Property (19)	Commercial (31)	Partnership and Corporate Governance (21)
Professional Negligence (25)	Residential (32)	Other Petition (not specified above) (43)
Legal Malpractice	Drugs (38) (if the case involves illegal drugs, check this item; otherwise, report as Commercial or Residential)	Civil Harassment
Other Professional Malpractice (not medical or legal)	Judicial Review	Workplace Violence
Other Non-PI/PD/WD Tort (35)	Asset Forfeiture (05)	Elder/Dependent Adult Abuse
Employment	Petition Re: Arbitration Award (11)	Election Contest
Wrongful Termination (36)	Writ of Mandate (02)	Petition for Name Change
Other Employment (15)	Writ—Administrative Mandamus	Petition for Relief From Late Claim
	Writ—Mandamus on Limited Court Case Matter	Other Civil Petition
	Writ—Other Limited Court Case Review	
	Other Judicial Review (39)	
	Review of Health Officer Order	
	Notice of Appeal—Labor Commissioner Appeals	