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FILED
Superior Court of California
County of Los Angeles

MAR 07 2014

6 Attorneys for Plaintiff

Sherri R. Carter, Executive Officer/Clerk
By Cristina Grijalva Deputy
Cristina Grijalva

DIS Richard Truin

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

CENTRAL DISTRICT

BC538659

12 ROCHELLE H. STERLING, as a married
13 woman seeking to protect and recover
14 community property in her individual
15 capacity,
16
17 Plaintiff,
18 vs.
19 V STIVIANO, aka VANESSA MARIA
20 PEREZ, aka MONICA GALLEGOS, aka
21 MARIA MONICA PEREZ GALLEGOS, aka
22 MARIA VALDEZ, an individual; and all
23 Persons Unknown, claiming any legal or
24 equitable right, title, estate, lien or interest in
25 the Property adverse to Plaintiff's title, or any
26 cloud on Plaintiff's title to the Property; and
27 DOES 1 Through 50, inclusive,
28 Defendants.

) CASE NO.
)
) VERIFIED COMPLAINT FOR:
) (1) SET ASIDE OF COMMUNITY
) PROPERTY WITHOUT SPOUSAL
) CONSENT;
) (2) CONVERSION OF COMMUNITY
) PROPERTY;
) (3) CONSTRUCTIVE TRUST OF
) COMMUNITY PROPERTY;
) (4) COMMON COUNT FOR
) COMMUNITY PROPERTY HAD AND
) RECEIVED;
) (5) UNJUST ENRICHMENT;
) (6) ACCOUNTING OF COMMUNITY
) PROPERTY;
) (7) TO QUIET TITLE TO COMMUNITY
) PROPERTY;
) (8) REFORMATION OF DEED;
) (9) DECLARATORY RELIEF;
) (10) DECLARATION THAT CERTAIN
) COMMUNITY PERSONAL
) PROPERTY ARE VOID
)
) JURY TRIAL DEMANDED

CIT/CASE: BC538659
LEA/DEF#:
RECEIPT #: CCH195707056
DATE PAID: 03/07/14 02:07 PM
AMOUNT: \$435.00
310
\$435.00
\$0.00
\$0.00
\$0.00

1 Plaintiff Rochelle H. Sterling, a married woman and the wife of Donald T. Sterling ("D.
2 Sterling"), alleges as follows:

3 **PARTIES**

4 1. Plaintiff is a California resident who resides in Los Angeles County. She has been
5 continuously married to D. Sterling for over fifty years. At all relevant times alleged herein, Plaintiff
6 has been married to D. Sterling.

7 2. Plaintiff is informed and believes and thereon alleges that Defendant V. Stiviano (aka
8 Vanessa Maria Perez, Monica Gallegos, Maria Monica Perez Gallegos, and Maria Valdez) represents
9 herself to be a single woman who, at all material times alleged herein, was an individual residing in
10 or doing business in Los Angeles County.

11 3. Plaintiff is unaware of the true identity, nature and capacity of each of the Defendants
12 designated herein as DOES 1 through 50. Plaintiff is informed and believes, and thereon alleges,
13 that each of the Defendants designated herein as a DOE Defendant are in some manner responsible
14 for the damages and injuries that are alleged in this Complaint. Upon learning the true identity,
15 nature and capacity of the DOE Defendants, Plaintiff will amend this Complaint to allege their true
16 names and capacities. Plaintiff is informed and believes and thereon alleges, that at all times
17 mentioned herein each of the Defendants designated as DOES 1 through 50 was an agent or
18 employee of each remaining Defendant.

19 4. Plaintiff is informed and believes and thereon alleges that at all material times herein,
20 each of the Defendants was the agent, servant and employee of each remaining defendant, and in
21 doing the things hereinafter alleged, was acting in the course and scope of said agency and
22 employment, with the permission and consent of his/her/its co-defendants, and is responsible in
23 some manner for the acts alleged herein and thereby proximately caused injuries and damages to
24 Plaintiff as alleged herein.

25 **GENERAL ALLEGATIONS**

26 5. This lawsuit involves the activities of Defendant Stiviano, who, Plaintiff is informed
27 and believes and thereon alleges, engages in conduct designed to target, befriend, seduce, and then
28 entice, cajole, borrow from, cheat, and/or receive as gifts transfers of wealth from wealthy older men

1 whom she targets for such purpose. Plaintiff is informed and believes and thereon alleges that One
2 such target was D. Sterling.

3 6. Plaintiff is informed and believes and thereon alleges that at all times material hereto,
4 Stiviano knew that D. Sterling was a married man and that the transfers of property and money by D.
5 Sterling to Defendants was done without the knowledge, consent or authorization of his wife.

6 7. Plaintiff is informed and believes and thereon alleges that Defendant Stiviano was
7 first introduced to D. Sterling at the February 2010 Super Bowl game.

8 8. Plaintiff is informed and believes and thereon alleges that commencing in or about
9 2010 and continuing through the present date, Defendant Stiviano initiated and participated in a
10 sexual relationship with D. Sterling.

11 9. Plaintiff is informed and believes and thereon alleges that commencing in or about
12 2010 and continuing through the present date, without the knowledge, consent or authorization of
13 Plaintiff, D. Sterling transferred significant community property, assets, and monies of Plaintiff and
14 D. Sterling to or for the benefit of Defendant Stiviano as part and parcel of their sexual relationship.

15 10. Defendants acted willfully and maliciously with the deliberate intention to injure and
16 damage Plaintiff by obtaining and receiving money and assets known by Defendants to be the
17 community property of Plaintiff and D. Sterling with the knowledge that Plaintiff had not consented
18 to the transfer of community property to Defendants.

19 11. The full extent, nature and amount of community property funds and assets
20 transferred by D. Sterling to Defendants without the authorization or consent of Plaintiff is presently
21 unknown to Plaintiff and an accounting of same is required. Plaintiff did not consent to the transfer
22 or gift of any community property funds, assets or property to Defendants, or any of them, at any
23 time in any amounts whatsoever. By this Complaint, Plaintiff seeks to recover for the benefit of the
24 community all community property and the profits therefrom transferred by D. Sterling to
25 Defendants.

26 12. Plaintiff is informed and believes and thereon alleges that before filing this
27 Complaint, D. Sterling made demand on Defendant Stiviano to return the Property and all
28 community property assets transferred and gifted by him to her and that Defendant Stiviano refused

1 to return the Property and assets as demanded.

2 **FIRST CAUSE OF ACTION**

3 (To Set Aside Transfer of Community Property Without Spousal Consent Against All Defendants)

4 13. Plaintiff hereby incorporates by reference each and every allegation contained in
5 paragraphs 1 through 12, as though fully set forth herein.

6 14. Plaintiff is informed and believes and thereon alleges that commencing in or about
7 2010 and continuing to the present date, D. Sterling regularly provided community property funds to
8 Defendant Stiviano that were used to pay for her upkeep and living expenses, believed to be in an
9 amount of not less than \$240,000 and D. Sterling purchased for Stiviano with community funds
10 various assets all of which are presently unknown, but believed to include a 2012 Ferrari automobile,
11 two Bentley automobiles, and a 2013 Range Rover. The total value of said automobiles are believed
12 to exceed \$500,000. Defendant Stiviano and Defendants DOES 1-50 are wrongfully in possession of
13 said community funds and property and all assets purchased with said community funds, and have
14 converted said community property funds and assets to their own use. Plaintiff did not consent to the
15 transfer or gift of any such community property funds, assets or property to Defendants, or any of
16 them, at any time in any amounts whatsoever.

17 15. Plaintiff is informed and believes and thereon alleges that in or about December 2013,
18 D. Sterling transferred at least \$1,800,000 of community funds to or for the benefit of Defendant
19 Stiviano to acquire a duplex located at 8437 W. 4th Street, Los Angeles, California 90048 (the
20 Property") with the understanding that the Property would be owned by the community and title
21 would vest in the name of Plaintiff and D. Sterling. Plaintiff is informed and believes that D.
22 Sterling either gifted said Property to Stiviano, without the knowledge, consent or authorization of
23 Plaintiff, or, in the alternative, Stiviano fraudulently and wrongfully caused title to the Property to
24 vest in her name. Stiviano and DOES 1-50 are wrongfully in possession of the Property and have
25 converted the Property and the community property funds used to purchase the Property by their
26 wrongful acts. Attached hereto as Exhibit "A" and incorporated herein by this reference is a true and
27 correct copy of the Grant Deed to the Property recorded on December 9, 2013 reflecting legal title to
28 the Property is held in the name of V. Stiviano.

1 16. Plaintiff is informed and believes and thereon alleges that Defendants DOES 1
2 through 50 conspired with and assisted Defendant Stiviano to acquire and convert the community
3 property of Plaintiff and D. Sterling.

4 17. Plaintiff requests that the Court set aside all transfers of community property by D.
5 Sterling to Defendants made without the consent or authorization of Plaintiff as alleged above, deem
6 Defendants constructive trustees of such community property, and require Defendants to return all
7 such community property, all assets acquired with such community property, and all profits and rents
8 therefrom, to Plaintiff on behalf of the community.

9 **SECOND CAUSE OF ACTION**

10 (For Conversation of Community Property By All Defendants)

11 18. Plaintiff hereby incorporates by reference each and every allegation contained in
12 paragraphs 1 through 17, as though fully set forth herein.

13 19. In or about 2010 and continuing through the present date, Defendants, and each of
14 them, converted the community property of Plaintiff, including without limitation: (a) funds believed
15 to be in excess of \$1.8 million provided by D. Sterling to purchase the Property; (b) the Property
16 valued at \$1,800,000; (c) a 2012 Ferrari, two Bentley automobiles and one 2013 Range Rover
17 automobile purchased with community funds provided by D. Sterling worth in excess of \$500,000;
18 and (d) additional sums of community funds, in an amount believed to be not less than \$240,000,
19 provided by D. Sterling to Defendant Stiviano, and used by Defendants to pay their living expenses
20 and to acquire additional assets presently unknown to Plaintiff.

21 20. Plaintiff is informed and believes and thereon alleges DOE Defendants 1 through 50
22 conspired with Defendant Stiviano to convert the community property of Plaintiff and/or to transfer
23 said community property to others who identities are presently unknown.

24 21. Plaintiff has suffered and continues to suffer damages in an amount to be proven at
25 the time of trial, but believed to be in excess of \$2,000,000.

26 22. At the time of each conversion, Plaintiff had the immediate right to possess the
27 Property based on the payment of the purchase price with community funds and the immediate right
28 to possess all funds and assets transferred by D. Sterling to Defendants by virtue of the fact that such

1 funds and assets were the community property of Plaintiff and D. Sterling.

2 23. As a direct and proximate result of Defendants' wrongful acts, Plaintiff has suffered
3 and will continue to suffer damages in an amount to be proven at the time of trial but believed to be
4 in excess of \$2,000,000.

5 **THIRD CAUSE OF ACTION**

6 (For Imposition of a Constructive Trust Against All Defendants)

7 24. Plaintiff hereby incorporates by reference each and every allegation contained in
8 paragraphs 1 through 23, as though fully set forth herein.

9 25. The facts alleged above require the imposition of a constructive trust against
10 Defendants with respect to the Property because Plaintiff has a community property and ownership
11 interest in the Property that was subverted by the gift of such Property by D. Sterling to Stiviano
12 without Plaintiff's consent or authorization, or, alternatively, by reason of Defendants' acts in
13 wrongfully and/or fraudulently causing title to the Property to vest in the Stiviano's name. By
14 engaging in such scheme, Defendants wrongfully acquired the Property by fraud, undue influence,
15 the violation of a trust and other wrongful acts, and are not entitled to ownership of the Property or
16 of any of the assets in their possession acquired with the community property of Plaintiff and D.
17 Sterling.

18 26. Plaintiff together with D. Sterling are the true owners of the Property, which was
19 purchased with community funds of Plaintiff and D. Sterling, as alleged above, and are the true
20 owners of all of the community property funds and assets (and items purchased therewith)
21 transferred to Defendants by D. Sterling.

22 27. By virtue of Defendants' wrongful acts, they hold the Property and all assets in their
23 possession and under their control acquired with the community property of Plaintiff as constructive
24 trustees for the benefit of Plaintiff and the community.

25 28. On information and belief, Plaintiff alleges that Defendants will transfer or conceal
26 funds and assets unless a constructive trust is imposed. Imposition of a constructive trust is fair and
27 equitable as between the parties in view of the unauthorized transfer of Plaintiff's community
28 property to Defendants, the expectations of Plaintiff of joint control over such community property

1 and Defendants' knowledge that D. Sterling was at all times a married man who had not obtained the
2 consent or authorization of his wife to the transfers of community property to Defendants.

3 **FOURTH CAUSE OF ACTION**

4 (For Community Property Had and Received Against All Defendants)

5 29. Plaintiff hereby incorporates by reference each and every allegation contained in
6 paragraphs 1 through 28, as though fully set forth herein.

7 30. In or about 2010 and at various times thereafter, at Los Angeles, California,
8 Defendant Stiviano and DOES 1 through 50 became indebted to Plaintiff for community funds and
9 community property of Plaintiff and D. Sterling in amounts unknown to Plaintiff but believed to be
10 in excess of \$400,000 provided by D. Sterling and received by said Defendants at their request and
11 without the consent or authorization of Plaintiff. In or about December 2013, at Los Angeles,
12 California, Defendant Stiviano and DOES 1 through 50 became indebted to Plaintiff in the sum of
13 not less than \$1,800,000 for community property provided by D. Sterling and received by
14 Defendants used to purchase the Property and to pay expenses associated with the purchase of said
15 Property at their request and without the consent or authorization of Plaintiff.

16 31. Plaintiff is informed and believes and thereon alleges that D. Sterling has demanded
17 payment from Defendants on behalf of Plaintiff.

18 32. No payment has been made by Defendants to Plaintiff, and there is now due and
19 owing the sum of at least \$1,800,000.00, with interest on that amount at the current legal rate from
20 December 9, 2013, and there is now due and owing additional unknown amounts, but believed to be
21 in excess of \$400,000 with interest thereon at the current legal rate, from the date each unauthorized
22 transfer of community property was made by D. Sterling to Defendants, or any of them.

23 **FIFTH CAUSE OF ACTION**

24 (For Unjust Enrichment Against All Defendants)

25 33. Plaintiff hereby incorporates by reference each and every allegation contained in
26 paragraphs 1 through 32, as though fully set forth herein.

27 34. Defendants, and each of them, have received community property funds and assets
28 that were provided by D. Sterling without the consent or authorization of Plaintiff and have

1 wrongfully converted those funds for their own personal use. Defendants wrongfully used
2 community funds provided by D. Sterling to purchase the Property in the name of Defendant
3 Stiviano. Plaintiff is informed and believes and thereon alleges that Defendants have converted
4 additional community funds provided by D. Sterling, also without the consent or authorization of
5 Plaintiff, to pay their own expenses and to acquire assets in their own names.

6 35. Defendants are unjustly retaining the benefit of community property funds and assets
7 that D. Sterling transferred to or for the benefit of Defendants without the consent or authorization of
8 Plaintiff, and at Plaintiff's and the community's expense.

9 36. As a direct and proximate result of the wrongful conduct of Defendants, Plaintiff has
10 suffered, and will continue to suffer, damages in an amount to be proven at the time of trial, but
11 including without limitation: (a) \$1,800,000 in community property funds transferred by D. Sterling
12 to or for the benefit of Defendants used to purchase the Property and funds used to pay expenses
13 associated with the purchase of the Property, without the consent or authorization of Plaintiff; (b)
14 additional sums of community property transferred by D. Sterling to or for the benefit of Defendants,
15 in an amount yet determined, used to acquire assets in the possession, custody and/or control of
16 Defendants, without the consent or authorization of Plaintiff; and (c) additional sums of community
17 property transferred by D. Sterling to or for the benefit of Defendants, in an amount yet determined,
18 used by Defendants to pay their expenses, without the consent or authorization of Plaintiff.

19 **SIXTH CAUSE OF ACTION**

20 (For an Accounting of Community Property Against All Defendants)

21 37. Plaintiff hereby incorporates by reference each and every allegation contained in
22 paragraphs 1 through 36, as though fully set forth herein.

23 38. Plaintiff is informed and believes and thereon alleges that Defendants, and each of
24 them, have possession of and/or converted community property funds and assets transferred to them,
25 or for their benefit, by D. Sterling without the consent or authorization of Plaintiff.

26 39. The exact amounts of the community property of Plaintiff and D. Sterling transferred
27 to Defendants and/or expended by Defendants for their own personal uses are unknown to Plaintiff
28 and can be determined only by an accounting. Plaintiff seeks an accounting of all community

1 property funds and assets transferred or paid by D. Sterling to or for the benefit of Defendants,
2 including an accounting of all real property and personal property, vehicles, jewelry, furniture, art,
3 clothing, and other items acquired with community property funds, and the profits and rents
4 therefrom.

5 **SEVENTH CAUSE OF ACTION**

6 (To Quiet Title Against All Defendants)

7 40. Plaintiff hereby incorporates by reference each and every allegation contained in
8 paragraphs 1 through 39, as though fully set forth herein.

9 41. Plaintiff and D. Sterling are the true owners of the Property located at 8837 West 4th
10 Street, City of Los Angeles, County of Los Angeles, State of California, 90048. The legal
11 description of the Property is as follows: LOT 8 IN BLOCK 43 OF TRACT NO. 7SSS, IN THE
12 CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA AS PER
13 MAP RECORDED IN BOOK 88, PAGE 79 TO 84 INCLUSIVE OF MAPS, IN THE OFFICE OF
14 THE COUNTY RECORDER OF SAID COUNTY.
15 EXCEPTING, HOWEVER, AND EXCEPTING TO SAID GRANTOR THE EXCLUSIVE
16 POSSESSION AND THE USE AND ENJOYMENT IN HIS OWN RIGHT OF THE RENTS,
17 ISSUES AND PROFITS OF SAID REAL PROPERTY FOR AND DURING THE TERM OF HIS
18 NATURAL LIFE; AND FURTHER EXCEPTING TO SAID GRANTOR THE RIGHT TO
19 REVOKE.

20 42. Plaintiff and D. Sterling's right to title in the Property is based on the fact that the
21 Property was purchased with community property funds provided by D. Sterling and gifted to
22 Stiviano, without the consent or authorization of Plaintiff. Plaintiff would not have consented to or
23 authorized the use of community funds for any purchase of the Property for Defendants.

24 43. Plaintiff seeks to quiet title against Defendants, and all persons unknown who claim
25 legal or equitable title, right or interest in the Property, as of December 9, 2013, the time at which,
26 upon information and belief, D. Sterling purported to gift the Property to Stiviano and Defendants
27 wrongfully and/or fraudulently caused title to the Property to vest in the name of Defendant Stiviano.

28 ///

1 44. Plaintiff also seeks to quiet title to all other property, real and personal, whose
2 identities are presently unknown but for which this Complaint will be amended when the identities
3 of such property(s) is ascertained, transferred by D. Sterling to Defendants or purchased by or in
4 favor of Defendants with community property provided by D. Sterling, all without the knowledge,
5 consent, or authorization of Plaintiff.

6 **EIGHTH CAUSE OF ACTION**

7 (Reformation of Deed Against All Defendants)

8 45. Plaintiff hereby incorporates by reference each and every allegation contained in
9 paragraphs 1 through 44, as though fully set forth herein.

10 46. Plaintiff is informed and believes and thereon alleges that D. Sterling entered into an
11 agreement with Defendant Stiviano that the Property would be purchased on behalf of the
12 community and that title to the Property would be vested in the names of Plaintiff and D. Sterling but
13 that Defendants wrongfully caused legal title to the Property to vest in the name of Defendant
14 Stiviano and that D. Sterling purported to gift community funds to or for the benefit of Defendants to
15 purchase the Property without obtaining the consent or authorization of Plaintiff, and that Defendants
16 knew that D. Sterling's wife had not consented to or authorized the use of community property funds
17 to acquire the Property for Stiviano's benefit or in her name.

18 47. These acts contravene the agreement between D. Sterling and Defendant Stiviano.
19 Therefore, the Grant Deed (as recorded) does not presently express the intentions of the parties to the
20 agreement and should be revised so as to express that intention by changing the name of the
21 title-holder from Defendant Stiviano to Plaintiff and D. Sterling, husband and wife as community
22 property.

23 48. Defendants did not provide any consideration for the purchase of the Property, the
24 purchase money having been provided by D. Sterling from community funds. This constitutes a
25 failure of consideration and fraud by the Defendants with respect to the Grant Deed to the Property.
26 The recordation of the Grant Deed was grossly unfair and unconscionable to Plaintiff, as all funds
27 used to acquire the Property was the community property of D. Sterling and Plaintiff and the
28 transaction was consummated without the knowledge, consent or authorization of Plaintiff.

1 49. Plaintiff will suffer substantial harm and injury if the Grant Deed to the Property is
2 not reformed, in that Plaintiff will be deprived of the normal rights and benefits of ownership of the
3 Property and will be unable to exercise her right to sell said Property to third parties.

4 50. Plaintiff hereby demands that the Grant Deed to the Property be reformed to correctly
5 name Plaintiff and D. Sterling husband and wife as community property as owners and title-holders.

6 **NINTH CAUSE OF ACTION**

7 (Declaratory Relief Against All Defendants)

8 51. Plaintiff hereby incorporates by reference each and every allegation contained in
9 paragraphs 1 through 50, as though fully set forth herein.

10 52. A dispute has arisen and now exists between Plaintiff and Defendants in that Plaintiff
11 contends that the community owns the Property, the three automobiles purchased by D. Sterling for
12 Defendants, and all funds and other assets transferred by D. Sterling to Defendant Stiviano in 2010
13 through the present date without the consent or authorization of R. Sterling, and all assets acquired
14 by Defendants with such funds transferred to them by D. Sterling and that Defendants have no right,
15 title or interest in the Property, the automobiles, or in the community funds and assets transferred to
16 them by D. Sterling to the exclusion of Plaintiff's community property interest.

17 53. Plaintiff is informed and believes and thereon alleges that Defendants contend that
18 they are the owners of the Property, the automobiles, and of all funds and assets transferred to them
19 by D. Sterling and that Plaintiff and the community have no ownership interest in same.

20 54. Plaintiff desires a judicial determination of her rights and a declaration that the
21 community property interest in the subject property, funds and assets is superior to that of
22 Defendants and that Plaintiff currently has a community property interest in all such funds, assets
23 and property identified hereinabove.

24 55. A judicial determination is necessary and appropriate at this time under the
25 circumstances in order that Plaintiff may ascertain her and the community's rights in the property
26 and assets transferred by D. Sterling to or for the benefit of Defendants and to settle the uncertainty
27 of Plaintiff's and the community's rights in such property and Plaintiff's duties with relation to such
28 property.

1 UNDER THE SECOND CAUSE OF ACTION:

2 2. For damages according to proof, including general, special and compensatory
3 damages, in the amount of the value of the community property converted by Defendants, believed to
4 be in excess of \$2,500,000, including the \$1,800,000.00 in community funds provided by D. Sterling
5 and used to purchase the Property;

6 3. For interest thereon at the legal rate;

7 UNDER THE THIRD CAUSE OF ACTION:

8 4. For imposition of a constructive trust and for Defendants to: (1) return the Property to
9 Plaintiff on behalf of the community; (2) return to Plaintiff all community property funds and assets
10 provided by D. Sterling for any purpose whatsoever to Defendants, and all assets acquired therewith,
11 to Plaintiff on behalf of the community; (3) return the 2013 Range Rover, 2012 Ferrari and two
12 Bentley automobiles purchased with community funds to Plaintiff on behalf of the community; and
13 (4) return all rents and profits from all such property to Plaintiff for the benefit of the community;.

14 UNDER THE FOURTH CAUSE OF ACTION:

15 5. For general and compensatory damages believed to be in excess of \$2,500,000
16 according to proof at time of trial;

17 6. For interest at the legal rate from and after each date upon which Defendants received
18 community property funds and property, including the community property funds transferred by D.
19 Sterling and used to purchase the Property in December 2013;

20 UNDER THE FIFTH CAUSE OF ACTION:

21 7. For general and compensatory damages believed to be in excess of \$2,500,000
22 according to proof at time of trial;

23 8. For the return of the Property to Plaintiff on behalf of the community;

24 9. For the return to Plaintiff on behalf of the community all community property funds
25 and assets provided by D. Sterling to Defendants, all items purchased by Defendants with such
26 community funds, and all rents and profits from same;

27 10. For interest thereon at the legal rate;

28 ///

1 UNDER THE SIXTH CAUSE OF ACTION:

2 11. For an accounting between Plaintiff and Defendants;

3 12. For an Order for payment to Plaintiff by Defendants of the amount found to be due
4 Plaintiff as a result of the accounting and interest thereon at the legal rate;

5 UNDER THE SEVENTH CAUSE OF ACTION:

6 13. To quiet title to the Property such that Plaintiff and D. Sterling husband and wife as
7 community property are recognized as the title-holders with full rights to the Property, including the
8 right to possession;

9 UNDER THE EIGHTH CAUSE OF ACTION:

10 14. For the Grant Deed to the Property to be revised to remove Defendant Stiviano as the
11 record title-holder to the Property, and to substitute Plaintiff and Donald Sterling as husband and
12 wife as their community property as record and beneficial title-holders to the Property, and for the
13 deed to be re-recorded to reflect such substitution;

14 UNDER THE NINTH CAUSE OF ACTION:

15 15. For a declaration that Plaintiff has a community property interest in the Property and
16 in all community property funds and real and personal property acquired with community funds of
17 Plaintiff and D. Sterling in the possession, custody or control of Defendants;

18 16. For general and compensatory damages believed to be in excess of \$2,500,000
19 according to proof at time of trial;

20 17. For interest thereon at the legal rate;

21 18. For issuance of a temporary restraining order, a preliminary injunction, and a
22 permanent injunction enjoining Defendants from transferring, encumbering or divesting any interest
23 in the Property pending a final judgment in this action;

24 UNDER THE TENTH CAUSE OF ACTION:

25 19. A declaration that the attempted gifts of funds, assets and real and personal property
26 by D. Sterling to Defendants are now, and at all times have been, the community property of Plaintiff
27 and D. Sterling;

28 ///

1 VERIFICATION

2 I, ROCHELLE H. STERLING, declare:

3 I have read the foregoing VERIFIED COMPLAINT FOR: (1) SET ASIDE OF
4 COMMUNITY PROPERTY WITHOUT SPOUSAL CONSENT; (2) CONVERSION OF
5 COMMUNITY PROPERTY; (3) CONSTRUCTIVE TRUST OF COMMUNITY PROPERTY; (4)
6 COMMON COUNT FOR COMMUNITY PROPERTY HAD AND RECEIVED; (5) UNJUST
7 ENRICHMENT; (6) ACCOUNTING OF COMMUNITY PROPERTY; (7) TO QUIET TITLE TO
8 COMMUNITY PROPERTY; (8) REFORMATION OF DEED; (9) DECLARATORY RELIEF; (10)
9 DECLARATION THAT GIFTS OF COMMUNITY PERSONAL PROPERTY ARE VOID and
10 know the contents thereof. The same is true of my own knowledge, except as to those matters which
11 are therein alleged on information and belief, and as to those matters, I believe it to be true.

12 I declare under penalty of perjury under the laws of the State of California that the foregoing
13 is true and correct and that this declaration was executed on March 7, 2014, at Los Angeles,
14 California.

15 
16 ROCHELLE H. STERLING



SECRET

This page is part of your document - DO NOT DISCARD



20131731634



Pages:
0004

Recorded/Filed in Official Records
Recorder's Office, Los Angeles County,
California

12/09/13 AT 08:00AM

| | |
|--------|-------|
| FEES: | 28.00 |
| TAXES: | NFPR |
| OTHER: | 0.00 |
| PAID: | NFPR |



LEADSHEET



201312090130004

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005928217

SEQ:
08

DAR - Title Company (Hard Copy)



THIS FORM IS NOT TO BE DUPLICATED

t21

12/09/13

RA

FIDELITY-VAN NUYS

RECORDING REQUESTED BY:
Fidelity National Title

AND WHEN RECORDED MAIL TO:

V Stiviano
8437 W 4th Street
Los Angeles, CA 90048



2
3

THIS SPACE FOR RECORDER'S USE ONLY

Title Order No.: 48562

Escrow No.: 02-021770-CY

GRANT DEED

THE UNDERSIGNED GRANTOR(S) DECLARE(S)

DOCUMENTARY TRANSFER TAX is \$ **
CITY TRANSFER TAX \$ **

TRANSFER TAX
NOT OF PUBLIC RECORD

- computed on full value of property conveyed, or
- computed on full value less value of liens or encumbrances remaining at time of sale.
- Unincorporated area City of Los Angeles AND

FOR A VALUABLE CONSIDERATION, receipt of which is hereby acknowledged,

YZ Homes, LLC, a California Limited Liability Company

hereby GRANT(s) to: V. Stiviano, a Single Woman

TRANSFER TAX
NOT OF PUBLIC RECORD

the real property in the City of Los Angeles, County of Los Angeles, State of California,
described as:

LEGAL DESCRIPTION ATTACHED HERETO AS EXHIBIT "A" AND MADE A PART
HEREOF

Also Known as: 8437 W. 4th Street, Los Angeles, CA 90048
AP#: 551-033-009

DATED: December 6, 2013

Signature Page attached hereto
and made a part hereof

MAIL TAX STATEMENTS TO PARTY SHOWN BELOW; IF NO PARTY SHOWN, MAIL AS DIRECTED ABOVE:

8

Title Order No.: 48582
Escrow No.: 02-021770-CY

A.P. # 551-033-009

Signature Page

YZ Homes, LLC, a California Limited Liability Company

By:

Zion Zamir, Authorized Signer

By:

Yosef Zamir, Authorized Signer

STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

On DECEMBER 5, 2013

before me, CLIF YOUNG

A Notary Public in and for said State personally appeared

ZION ZAMIR AND

YOSEF ZAMIR

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

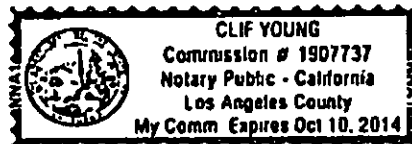
I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature

[Handwritten Signature]

(Seal)



PRELIMINARY REPORT
YOUR REFERENCE: 021770-CY

Fidelity National Title Company
ORDER NO.: 00048562-994-VNO-SI

EXHIBIT A

LEGAL DESCRIPTION

THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AND IS DESCRIBED AS FOLLOWS:

LOT 8 IN BLOCK 43 OF TRACT NO. 7555, IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA AS PER MAP RECORDED IN BOOK 88, PAGE 79 TO 84 INCLUSIVE OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

EXCEPTING, HOWEVER, AND EXCEPTING TO SAID GRANTOR THE EXCLUSIVE POSSESSION AND THE USE AND ENJOYMENT IN HIS OWN RIGHT OF THE RENTS, ISSUES AND PROFITS OF SAID REAL PROPERTY FOR AND DURING THE TERM OF HIS NATURAL LIFE; AND FURTHER EXCEPTING TO SAID GRANTOR THE RIGHT TO REVOKE.

APN: 5511-033-009

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State, County, number, and address):
Laura A. Wasser, Esq. [SBN 173740] Amy L. Rice, Esq. [SBN 112736]
WASSER, COOPERMAN & CARTER, P.C.
2029 Century Park East, Suite 1200
Los Angeles, CA 90067
TELEPHONE NO.: (310) 277-7117 FAX NO.:
ATTORNEY FOR (Name): Plaintiff, Rochelle H. Sterling

FOR COURT USE ONLY
FILED
Superior Court of California
County of Los Angeles
MAR 07 2014

SUPERIOR COURT OF CALIFORNIA, COUNTY OF
STREET ADDRESS: 111 N. Hill Street
MAILING ADDRESS: same as above
CITY AND ZIP CODE: Los Angeles, CA 90012
BRANCH NAME: Central District

Sherri R. Carter, Executive Officer/Clerk
By Cristina Grijalva Deputy
Cristina Grijalva

CASE NAME: Sterling v. Stiviano

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: **BC538659**
JUDGE:
DEPT.:

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

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

2. This case is is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:
- | | |
|--|--|
| a. <input type="checkbox"/> Large number of separately represented parties | d. <input type="checkbox"/> Large number of witnesses |
| b. <input type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve | e. <input type="checkbox"/> Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court |
| c. <input type="checkbox"/> Substantial amount of documentary evidence | f. <input type="checkbox"/> Substantial postjudgment judicial supervision |
3. Remedies sought (check all that apply): a. monetary b. nonmonetary; declaratory or injunctive relief c. punitive
4. Number of causes of action (specify): 10
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: March 7, 2014
Amy L. Rice, Esq.
(TYPE OR PRINT NAME)

WASSER, COOPERMAN & CARTER, P.C.
(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.

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

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:
Sterling v. Stiviano

FILE NUMBER:

BC538659

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)

- Class actions must be filed in the Stanley Mosk Courthouse, central district.
- May be filed in central (other county, or no bodily injury/property damage).
- Location where cause of action arose.
- Location where bodily injury, death or damage occurred.
- Location where performance required or defendant resides.
- Location of property or permanently garaged vehicle.
- Location where petitioner resides.
- Location wherein defendant/respondent functions wholly.
- Location where one or more of the parties reside.
- 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 No. | B Type of Action (Check only one) | C Applicable Reasons - 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 | 2. |
| | <input type="checkbox"/> A7221 Asbestos - Personal Injury/Wrongful Death | 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 | 1., 4. |
| | <input type="checkbox"/> A7240 Other Professional Health Care Malpractice | 1., 4. |
| Other Personal Injury Property Damage Wrongful Death (23) | <input type="checkbox"/> A7250 Premises Liability (e.g., slip and fall) | 1., 4. |
| | <input type="checkbox"/> A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.) | 1., 4. |
| | <input type="checkbox"/> A7270 Intentional Infliction of Emotional Distress | 1., 3. |
| | <input type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death | 1., 4. |

| 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 <input type="checkbox"/> A6050 Other Professional Malpractice (not medical or legal) | 1., 2., 3. 1., 2., 3. |
| Other (35) | <input checked="" type="checkbox"/> A6025 Other Non-Personal Injury/Property Damage tort | 2., 3. |
| Wrongful Termination (36) | <input type="checkbox"/> A6037 Wrongful Termination | 1., 2., 3. |
| Other Employment (15) | <input type="checkbox"/> A6024 Other Employment Complaint Case <input type="checkbox"/> A6109 Labor Commissioner Appeals | 1., 2., 3. 10. |
| Breach of Contract/Warranty (06) (not insurance) | <input type="checkbox"/> A6004 Breach of Rental/Lease Contract (not Unlawful Detainer or wrongful eviction) <input type="checkbox"/> A6008 Contract/Warranty Breach-Seller Plaintiff (no fraud/negligence) <input type="checkbox"/> A6019 Negligent Breach of Contract/Warranty (no fraud) <input type="checkbox"/> A6028 Other Breach of Contract/Warranty (not fraud or negligence) | 2., 5. 2., 5. 1., 2., 5. 1., 2., 5. |
| Collections (09) | <input type="checkbox"/> A6002 Collections Case-Seller Plaintiff <input type="checkbox"/> A6012 Other Promissory Note/Collections Case | 2., 5., 6. 2., 5. |
| Insurance Coverage (18) | <input type="checkbox"/> A6015 Insurance Coverage (not complex) | 1., 2., 5., 8. |
| Other Contract (37) | <input type="checkbox"/> A6009 Contractual Fraud <input type="checkbox"/> A6031 Tortious Interference <input type="checkbox"/> A6027 Other Contract Dispute (not breach/insurance/fraud/negligence) | 1., 2., 3., 5. 1., 2., 3., 5. 1., 2., 3., 8. |
| Eminent Domain/Inverse Condemnation (14) | <input type="checkbox"/> A7300 Eminent Domain/Condemnation Number of parcels | 2. |
| Wrongful Eviction (33) | <input type="checkbox"/> A6023 Wrongful Eviction Case | 2., 6. |
| Other Real Property (26) | <input type="checkbox"/> A6018 Mortgage Foreclosure <input type="checkbox"/> A6032 Quiet Title <input type="checkbox"/> A6060 Other Real Property (not eminent domain, landlord/tenant, foreclosure) | 2., 6. 2., 6. 2., 6. |
| Unlawful Detainer-Commercial (31) | <input type="checkbox"/> A6021 Unlawful Detainer-Commercial (not drugs or wrongful eviction) | 2., 6. |
| Unlawful Detainer-Residential (32) | <input type="checkbox"/> A6020 Unlawful Detainer-Residential (not drugs or wrongful eviction) | 2., 6. |
| Unlawful Detainer-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. |

| 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 <input type="checkbox"/> A6152 Writ - Mandamus on Limited Court Case Matter <input type="checkbox"/> A6153 Writ - Other Limited Court Case Review | 2., 8. 2. 2. |
| Other Judicial Review (39) | <input type="checkbox"/> A6150 Other Writ/Judicial Review | 2., 8. |
| Antitrust/Trade Regulation (03) | <input type="checkbox"/> A6003 Antitrust/Trade Regulation | 1., 2., 8. |
| Construction Defect (10) | <input type="checkbox"/> A6007 Construction Defect | 1., 2., 3. |
| Claims Involving Mass Tort (40) | <input type="checkbox"/> A6006 Claims Involving Mass Tort | 1., 2., 8. |
| Securities Litigation (28) | <input type="checkbox"/> A6035 Securities Litigation Case | 1., 2., 8. |
| Toxic Tort Environmental (30) | <input type="checkbox"/> A6036 Toxic Tort/Environmental | 1., 2., 3., 8. |
| Insurance Coverage Claims from Complex Case (41) | <input type="checkbox"/> A6014 Insurance Coverage/Subrogation (complex case only) | 1., 2., 5., 8. |
| Enforcement of Judgment (20) | <input type="checkbox"/> A6141 Sister State Judgment <input type="checkbox"/> A6160 Abstract of Judgment <input type="checkbox"/> A6107 Confession of Judgment (non-domestic relations) <input type="checkbox"/> A6140 Administrative Agency Award (not unpaid taxes) <input type="checkbox"/> A6114 Petition/Certificate for Entry of Judgment on Unpaid Tax <input type="checkbox"/> A6112 Other Enforcement of Judgment Case | 2., 9. 2., 6. 2., 9. 2., 8. 2., 8. 2., 8., 9. |
| RICO (27) | <input type="checkbox"/> A6033 Racketeering (RICO) Case | 1., 2., 8. |
| Other Complaints (Not Specified Above) (42) | <input type="checkbox"/> A6030 Declaratory Relief Only <input type="checkbox"/> A6040 Injunctive Relief Only (not domestic/harassment) <input type="checkbox"/> A6011 Other Commercial Complaint Case (non-tort/non-complex) <input type="checkbox"/> A6000 Other Civil Complaint (non-tort/non-complex) | 1., 2., 8. 2., 8. 1., 2., 8. 1., 2., 8. |
| Partnership Corporation Governance (21) | <input type="checkbox"/> A6113 Partnership and Corporate Governance Case | 2., 8. |
| Other Petitions (Not Specified Above) (43) | <input type="checkbox"/> A6121 Civil Harassment <input type="checkbox"/> A6123 Workplace Harassment <input type="checkbox"/> A6124 Elder/Dependent Adult Abuse Case <input type="checkbox"/> A6190 Election Contest <input type="checkbox"/> A6110 Petition for Change of Name <input type="checkbox"/> A6170 Petition for Relief from Late Claim Law <input type="checkbox"/> A6100 Other Civil Petition | 2., 3., 9. 2., 3., 9. 2., 3., 9. 2. 2., 7. 2., 3., 4., 8. 2., 9. |

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 checked="" type="checkbox"/> 2. <input type="checkbox"/> 3. <input type="checkbox"/> 4. <input type="checkbox"/> 5. <input type="checkbox"/> 6. <input type="checkbox"/> 7. <input type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10. | | ADDRESS: 8437 W. 4th Street |
| CITY: Los Angeles | STATE: CA | ZIP CODE: 90048 |

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 Los Angeles 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)].

WASSER, COOPERMAN & CARTER, P.C.

Dated: March 7, 2014

(SIGNATURE OF ATTORNEY/FILING PARTY)
AMY L. RICE, ESQ.

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.