

COPY

SUM-100

SUMMONS (CITACION JUDICIAL)

NOTICE TO DEFENDANT: COUNTY OF LOS ANGELES, a
(**AVISO AL DEMANDADO:**) municipal corporation, and DOES 1
through 100, inclusive

FOR COURT USE ONLY
(SOLO PARA USO DE LA CORTE)

CONFORMED COPY
ORIGINAL FILED
Superior Court Of California
County Of Los Angeles

MAR 25 2014

Sherri R. Carter, Executive Officer/Clerk
By: Kristina Vargas, Deputy

YOU ARE BEING SUED BY PLAINTIFF: GUADALUPE LOPEZ
(**LO ESTÁ DEMANDANDO EL DEMANDANTE**):

NOTICE! You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), or by contacting your local court or county bar association. **NOTE:** The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case. **¡AVISO!** Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información a continuación.

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California, (www.sucorte.ca.gov) o poniéndose en contacto con la corte o el colegio de abogados locales. **AVISO:** Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 ó más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desechar el caso.

The name and address of the court is:
(El nombre y dirección de la corte es):

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES - CENTRAL DISTRICT
111 NORTH HILL STREET
LOS ANGELES, CALIFORNIA 90012

CASE NUMBER
(Número del Caso) **DC540387**

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is:

(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):

GREGORY W. SMITH (SBN 134385)/DIANA WANG WELLS (SBN 284215) (310) 777-7894 (310) 777-7895
LAW OFFICES OF GREGORY W. SMITH
9100 WILSHIRE BOULEVARD, SUITE 345E
BEVERLY HILLS, CALIFORNIA 90212
FAX

DATE:

(Fecha)

SHERRI R. CARTER

Clerk, by
(Secretario)

Kristina Vargas

Deputy
(Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)

(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010)).

NOTICE TO THE PERSON SERVED: You are served

1. ☐ as an individual defendant.
2. ☐ as the person sued under the fictitious name of (specify):
3. ☐ on behalf of (specify):

under: CCP 416.10 (corporation) CCP 416.60 (minor)
CCP 416.20 (defunct corporation) CCP 416.70 (conservatee)
CCP 416.40 (association or partnership) CCP 416.90 (authorized person)

other (specify):

4. by personal delivery on (date):

(SEAL)

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GREGORY W. SMITH (SBN 134385)
DIANA WANG WELLS (SBN 284215)
LAW OFFICES OF GREGORY W. SMITH
9100 Wilshire Boulevard, Suite 345E
Beverly Hills, California 90212
Telephone: (310) 777-7894
Telecopier: (310) 777-7895

JASON M. WYMOND (SBN 235426)
23670 Hawthorne Boulevard, Suite 100
Torrance, California 90505
Telephone: (310) 975-5535
Telecopier: (310) 672-4544

Attorneys for Plaintiff
GUADALUPE LOPEZ

UNLIMITED JURISDICTION

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

GUADALUPE LOPEZ,

Plaintiff,

vs.

COUNTY OF LOS ANGELES, a municipal
corporation, and DOES 1 through 100,
inclusive,

Defendants.

CASE NO. BC540387

COMPLAINT FOR DAMAGES:

1. **SEXUAL
HARASSMENT/HOSTILE
WORK ENVIRONMENT IN
VIOLATION OF CALIFORNIA
FAIR EMPLOYMENT AND
HOUSING ACT**
2. **RETALIATION IN VIOLATION OF
CALIFORNIA FAIR
EMPLOYMENT AND HOUSEING
ACT**

DEMAND FOR JURY TRIAL

GENERAL ALLEGATIONS

1. At all times relevant hereto, GUADALUPE LOPEZ ("Plaintiff") is, and at all times relevant, a resident of the County of Riverside, State of California, and Plaintiff is, and at all times relevant, a competent adult.

2. At all times relevant hereto, Plaintiff was and is currently a Deputy Sheriff

1 employed by the Los Angeles County Sheriff's Department and has been so employed
2 since July 10, 2003.

3 3. Plaintiff is informed and believes and thereon alleges that, at all times
4 relevant hereto, Defendant Los Angeles County Sheriff's Department ("Defendant" or
5 "Department"), was an entity engaged as a matter of commercial actuality in purposeful
6 economic activity within the County of Los Angeles, State of California and at all times
7 relevant hereto, operated the Los Angeles County Sheriff's Department, which is an
8 administrative agency of Los Angeles County.
9

10 4. Plaintiff is informed and believes and thereupon alleges that Defendants
11 DOES 1 through 100, inclusive, and each of them, were at all times relevant hereto,
12 residents of the County of Los Angeles, State of California, and were agents, partners,
13 and/or joint venturers of Defendants and/or each other, acting as supervisors, managers,
14 administrators, owners, and/or directors or in some other unknown capacity.
15

16 5. The true names and capacities of Defendants DOES 1 through 100, and
17 each of them, whether individual, corporate, associate or otherwise, are unknown to
18 Plaintiffs at this time, who therefore sue said Defendants by such fictitious names.
19 Plaintiff will file DOE amendments, and/or ask leave of court to amend this complaint to
20 assert the true names and capacities of these Defendants when they have been
21 ascertained. Plaintiff is informed and believes, and upon such information and belief
22 alleges, that each Defendant herein designated as a DOE was and is in some manner,
23 negligently, wrongfully, or otherwise, responsible and liable to Plaintiff for the injuries and
24 damages hereinafter alleged, and that Plaintiff's damages as herein alleged were
25 proximately caused by their conduct.
26

27 6. Plaintiff is informed and believes, and thereupon alleges, that at all times
28

1 material herein the Defendants, and each of them, were the agents, servants, and
2 employees, or ostensible agents, servants, or employees of each other Defendant, and as
3 such, were acting within the course and scope of said agency and employment or
4 ostensible agency and employment, except on those occasions when Defendants were
5 acting as principals, in which case, said Defendants, and each of them, were negligent in
6 the selection, hiring, and use of the other Defendants.

7
8 7. Plaintiff is further informed and believes, and there upon alleges, that at all
9 times relevant hereto, Defendants, and each of them, acted in concert and in furtherance
10 of the interests of each other Defendant.

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

14
15 **FACTS APPLICABLE TO ALL CAUSES OF ACTION**

16 9. Plaintiff is a Hispanic female sheriff's deputy employed by the Los Angeles
17 County Sheriff's Department. Plaintiff has been subjected to sexual harassment and
18 retaliation by male deputies of the Los Angeles Sheriff's Department ("LASD") as set forth
19 below.

20 10. Plaintiff began her career as a Deputy Sheriff with the Los Angeles Sheriff's
21 Department in 2003. Plaintiff was initially assigned to Los Angeles County Jail. On or
22 about May 19, 2011, Plaintiff transferred to East LA Station (hereinafter "East LA") where
23 Plaintiff began her training to become a patrol officer. Plaintiff was initially trained by Field
24 Training Officer Eric Valdez (hereinafter "FTO Valdez"), whom would eventually become
25 known to Plaintiff as the "Godfather" of East LA.
26
27
28

1 11. During training, Plaintiff was made aware by other female deputies that it
2 was expected of "female" trainees of FTO Valdez to "submit" and provide sexual favors for
3 male training officers and their associates. Plaintiff was made to understand that she was
4 expected to be "One of the Girls" which included drinking, partying, and the fulfillment of
5 the "sexual needs" of her male training officers and their associates, including, but not
6 limited to, the performance of oral sex.

7
8 12. Plaintiff was additionally informed many of these deputies were members
9 and associates of an East LA Station clique/gang called the "Banditos," with an estimated
10 membership of 80 sheriff's deputies, notorious for their efforts to exert control over the
11 East LA station, its deputies and operations. The Banditos clique/gang is similar to others
12 currently under investigation by the LASD for activities inconsistent with Department
13 policies and a myriad other misconduct not limited to the treatment of inmates, but also
14 violations of Department policy directed towards other deputies not favored by the
15 Banditos clique/gang.

16
17 13. Plaintiff was informed and believes that deputies at East LA become
18 tattooed members of the Banditos by earning their way in by performing "initiation task"
19 during the probationary period. Probationers are usually called "Prospects" or "Puppies."
20 Once accepted, new members go through the initiation rituals that require new inductees
21 to obtain a numbered tattoo of a skeleton with a sombrero, bullet sash, and a pistol
22 demonstrating membership in the clique/gang. Posters, pictures, and other items relating
23 to the Banditos are posted throughout the East LA station.

24
25 14. Plaintiff was subjected to continual unwanted, uninvited, and unwarranted
26 sexual harassment, including sexually derogatory comments, sexual overtures and
27 innuendo from other male deputies at East LA, many of whom were members, prospects
28

1 or associates of the Banditos. Plaintiff was constantly asked if she wanted to "party" with
2 other male deputies. During this same period, Plaintiff was made aware by Deputy
3 Ortega that there were sexually explicit photos of other female deputies having oral sex
4 with male field training officers and members of the Banditos.

5 15. FTO Valdez systematically delegated Plaintiff's training to other deputies at
6 East LA. During Plaintiff's first two weeks of training, FTO Valdez assigned her to work a
7 shift with Deputy Christopher Wargo. Deputy Wargo was a prospect associate of the
8 Banditos. During the shift, Plaintiff witnessed Deputy Wargo "purchase 12 reports." This
9 apparently meant that Deputy Wargo would take over the responsibility of writing the
10 arrest reports for the arresting deputies as part of his initiation. Deputy Wargo was
11 engaging in the writing of arrest reports that were essentially fabricated. When Plaintiff
12 asked Deputy Wargo what was going on and why the arresting deputies were not writing
13 their own reports, Plaintiff was told that she was a trainee and to mind her own business.
14

15 16. During her training period, Plaintiff began to experience sexually harassing
16 and intimidating behavior from other male deputies. Plaintiff was constantly asked if she
17 wanted to "party" with associates and members of the "Banditos". Plaintiff was told by
18 Deputy Joshua Smilor (Bandito associate), that, "[She] needed to "submit" to the program
19 of FTO Eric Valdez kids!" Deputy Smilor also told Plaintiff that she was expected to call
20 her FTO Valdez "Daddy." It was made clear to Plaintiff that her ability to complete her
21 probationary period at East LA was dependent upon her compliance and that by failing to
22 submit to the program, Plaintiff's probation could be extended indefinitely.
23

24 17. In an attempt to further intimidate, humiliate, and apparently educate
25 Plaintiff, Deputy Benjamin Zaredini (Bandito associate), followed Plaintiff into the garage
26 area at East LA, and then he kicked over a garbage can and yelled over to Plaintiff, in
27
28

1 front of inmates working in the garage, "Hey trainee, why don't you come over here and
2 clean up the "fucking mess" you made?" One of the inmates whom had witnessed the
3 incident offered to assist Plaintiff in picking up the garbage.

4 18. Plaintiff had no interest in participating in the demeaning, ritualistic traditions
5 and culture of the Banditos and their associates at East LA. Plaintiff made it known that
6 she was not interested in "partying," and that family, career, and education were her
7 priorities. Plaintiff is a well-educated female Deputy Sheriff and having completed her
8 Bachelors and Masters degrees and her first year of law school, Plaintiff was preparing
9 herself for advancement within the Department.
10

11 19. Approximately halfway through Plaintiff's training she was removed from
12 FTO Valdez as her training officer and, she was assigned to Field Training Officer Edwin
13 Hernandez (Hereinafter FTO Hernandez) for the remainder of her training period.
14

15 20. It soon became apparent to Plaintiff that FTO Hernandez was not in favor
16 with FTO Valdez or any of FTO Valdez's trainee associates at East LA. It was apparent to
17 Plaintiff that there was a power struggle within the East LA station and those associated
18 with FTO Hernandez were ostracized by members of the group associated with FTO
19 Valdez – primarily consisting of "Bandito" members, probationers, associates and female
20 deputies who associated with the clique/gang, usually considering themselves "One of the
21 Girls" in reference to their association.
22

23 21. On or about November 2011, Plaintiff was accosted by Deputy Andrew
24 Hernandez, also a known associate of the Banditos, in the hallway just as she was exiting
25 the East LA women's locker room. Deputy Hernandez began leering and pointing down at
26 Plaintiff's breast and said to a second male deputy, "Look at these!" "What do you think
27 bro?" Deputy Hernandez then began taunting Plaintiff by telling her, "What are you going
28

1 to do about it?" "What are you going to do?" Plaintiff was shocked, frightened, and
2 humiliated by Deputy Hernandez's brazen and sexually inappropriate behavior directed
3 towards her.

4 22. On or about December 23, 2011, Deputy Eduardo Sanchez, (Bandito
5 associate) began cursing at Plaintiff and demanded that Plaintiff "meet up with him."
6 Plaintiff knew the sexual implications of what Deputy Sanchez was asking and informed
7 Deputy Sanchez that she would not meet with him alone. Deputy Sanchez continued to
8 harass Plaintiff and said, "I don't understand why you don't want to meet up, are you
9 worried about your reputation?" Approximately two days later, Plaintiff encountered
10 Deputy Sanchez again at East LA and he again cursed and berated Plaintiff because she
11 would not "meet up" alone with him.
12

13 23. In late December 2011, Plaintiff was given a priority call. Deputy
14 Christopher Wargo (Bandito associate) became enraged by how Plaintiff handled the call.
15 Deputy Wargo drove to the location of Plaintiff's call and blocked Plaintiff's patrol car so
16 she could not move the vehicle. Deputy Wargo ordered Plaintiff to park across from the
17 location of the call. Deputy Wargo then ordered Plaintiff out of her patrol car and took
18 Plaintiff to the rear of the car where he leaned over her and began screaming and
19 admonishing Plaintiff. Aware of Deputy Wargo's capacity for violence, Plaintiff feared for
20 her safety. As Plaintiff tried to move around Deputy Wargo in order to reenter her patrol
21 car, Deputy Wargo blocked her movement, and in a very threatening and aggressive
22 manner Deputy Wargo told Plaintiff, "You are a product of Valdez (FTO Valdez), and he is
23 a "God" at East LA Station, and if you don't "submit" to the program, you "will" have
24 problems here!"
25
26

27 24. On or about January 2012, Plaintiff again encountered Deputy Andrew
28

1 Hernandez (Bandito associate) while servicing a call. Deputy Hernandez began cursing
2 at Plaintiff while she was interviewing a crime victim. At the end of the call, Deputy
3 Hernandez followed Plaintiff to her patrol car and slammed his hands down on the driver's
4 side door and said to Plaintiff, "What the fuck is wrong with you?" "You meet up with us
5 when we tell you to!" When Plaintiff did not provide a sufficient answer, Deputy
6 Hernandez yelled at Plaintiff, "Fuck you!" "You are on your own!" The aggressive and
7 demeaning treatment of Plaintiff continued to escalate from verbal threats to actual
8 physical violence against her.
9

10 25. On or about January 16, 2012, Deputy Zaredini (Bandito associate) and
11 Plaintiff crossed paths at East LA station in the hallway just outside the Watch Duty's
12 door. Plaintiff was carrying a "loaded shotgun" and Deputy Zaredini approached Plaintiff,
13 dipped his shoulder, and attempted to knock Plaintiff to the ground. So violent and
14 deliberate was the collision initiated by Deputy Zaredini that Plaintiff fell backwards into
15 the wall, while still trying to maintain control of the shotgun, and hit the back of her head
16 against the wall.
17

18 26. Plaintiff's treatment at East LA Station continued to deteriorate. In direct
19 contravention to Department procedure and policy, Plaintiff was placed in peril when she
20 was denied proper backup when she responded to calls, and at other times she did not
21 receive backup at all. Plaintiff was told not to respond to calls even when she was the
22 assigned assisting unit.
23

24 27. On or about March 6, 2012, a Sheriff's Department Personnel Transfer
25 Request was posted in the report writing room at East LA with Plaintiff's name on it. FTO
26 Hernandez brought the "phony" transfer request to Sergeant Jennifer Barsh. Plaintiff was
27 on patrol and ordered back to the station by Sergeant Barsh at which time Plaintiff
28

1 informed Sergeant Barsh of the sexually explicit and violent behavior that she had been
2 subjected to by male deputies at East LA, specifically those associated with FTO Valdez
3 and the Banditos.

4 28. March 8, 2012, Sergeant Barsh filed a Policy of Equality Report ("POE") on
5 Plaintiff's behalf mentioning that Plaintiff was a "strong female" and informed Captain
6 Henry Romero of the threats, harassment, and workplace violence that Plaintiff had been
7 subjected to at East LA, and that Plaintiff was in fear for her safety and very fearful of
8 retaliation from those deputies implicated in Plaintiff's POE. Captain Romero offered
9 Plaintiff to transfer, but Plaintiff did not feel she had done anything to warrant such
10 treatment. Further, because of the culture in the LACSD, if Plaintiff was transferred to
11 another area, Plaintiff would be subjected to ostracism and taunting by deputies for
12 moving to another area. Plaintiff remained at the East LA station, but was moved to day
13 shift in an impotent gesture that was supposed to provide Plaintiff a reprieve from the
14 harassment perpetrated by those deputies on her current shift.

15 29. Deputies Christopher Wargo, Benjamin Zaredini, Andrew Hernandez, and
16 Eduardo Sanchez were implicated in Plaintiff's POE and subsequently placed on loan to
17 other stations pending the outcome of the POE investigation. The change in Plaintiff's
18 shift in conjunction with the loan of the implicated officers had little deterrent effect on the
19 continued harassment from other associates of the Banditos, in that FTO Valdez and FTO
20 Christopher Valente, who were also implicated in Plaintiff's POE, remained at East LA for
21 the duration of the investigation.

22 30. Subsequent to filing the POE, Plaintiff was subjected to multiple acts of
23 retaliation, in that: [1] On or about March 26, 2012, Deputy Zaredini ran Plaintiff's vehicle
24 off the road; [2] Plaintiff was not provided adequate time to prepare her administrative
25

1 paperwork, supervisors at the station refused to sign off on Plaintiff's reports, and
2 detectives refused to file or investigate her cases; [3] Plaintiff was regularly sent on calls
3 minutes before the end of her shift; [4] On or about August 10, 2012, Deputy Krautkramer,
4 upset with the felony DUI arrest of Deputy Christopher Wargo, whom had been loaned out
5 to another station pending Plaintiff's POE, pulled alongside Plaintiff in the rear parking lot
6 of the East LA station and used his vehicle to spray dirt in Plaintiff's face and on Plaintiff's
7 uniform; [5] Dispatch refused to respond to Plaintiff's calls or provide Plaintiff backup or
8 assistance; [6] On or about October 25, 2012, Plaintiff's car was vandalized and her tire
9 was punctured while in the parking lot at East LA.
10

11 31. On or about December 27, 2012, without notifying Plaintiff, the Department
12 returned to East LA station those deputies implicated in Plaintiff's POE complaint whom
13 had been loaned to other stations pending the determination of the POE complaint. In so
14 doing, the Department violated its own policy by failing to notifying Plaintiff in writing within
15 (30) days of the determination of the Plaintiff's POE complaint, which was apparently
16 rendered by the Department's Equity Oversight Panel almost two weeks earlier on
17 December 13, 2012. (Plaintiff was not notified until approximately 75 days later.)
18

19 32. Immediately after seeing the deputies had been returned to East LA, Plaintiff
20 began to suffer extreme fear and anxiety, chest pains and shortness of breath. Plaintiff
21 immediately left East LA and drove herself to the emergency room at Kaiser-Riverside
22 where she was treated for a stress-induced pre-heart attack condition, and as a result,
23 Plaintiff was placed on medical leave by her treating emergency room doctor. While on
24 medical leave, Plaintiff lost overtime, sick time, vacation time and pay that could impact
25 her pension.
26

27 33. Plaintiff attempted to return to work on February 2, 2013, but was again
28

1 subjected to the same intimidation and retaliatory harassment by those same deputies
2 and their associates at East LA. On February 3, 2013, Plaintiff was again placed on leave
3 by her treating physician, though Plaintiff's leave did not stop the retaliation.

4 34. April 10, 2013, Plaintiff found a dead rat under the driver-side door of her
5 car, a clear message that she was considered a "Rat" for filing her POE. The following
6 day, eggs were thrown at Plaintiff's vehicle and "fuck you" was written on the rear window
7 of Plaintiff's vehicle.
8

9 35. Plaintiff has achieved the necessary level of experience, educational
10 requirements, and requisite qualifications to promote the rank of Sergeant, and in June
11 2013, Plaintiff signed up to take the Sergeant's exam and received her examination date
12 for July 2013. However, because of the continued stress, retaliatory harassment,
13 Plaintiff's legitimate fear for her own safety, and the Department's disinterest and inability
14 to provide any semblance of adequate security for Plaintiff in the current climate at East
15 LA, Plaintiff was constructively precluded from being able to take the promotional
16 sergeant's examination.
17

18 36. On or about August 8, 2013, Plaintiff was taken off disability by her treating
19 doctor and cleared to return to work. Plaintiff contacted the "Back to Work Unit," but was
20 told that they could not help her and advised her to contact the Station Director. Plaintiff
21 then spoke with Sergeant Betty Lascono. Sergeant Lascono placed Plaintiff on the
22 schedule to return to work at East LA on August 9, 2013. Plaintiff was contacted once
23 again by Sergeant Lascano and told to report to work on August 11, 2013.
24

25 37. Plaintiff was extremely apprehensive in that she did not want to be placed
26 back in the hostile environment of East LA, so that same day, August 9, 2013, Plaintiff
27 contacted her union, ALADS, for assistance. Plaintiff was immediately told that they could
28

1 not assist her. Later that same afternoon, Plaintiff was contacted by Union
2 Representative Julie Patrelli ("Patrelli"). Patrelli informed Plaintiff that East LA Captain
3 James Wolak was willing to send Plaintiff to Cerritos Station. Plaintiff informed Patrelli
4 that she would go anywhere except for East LA. At the end of the conversation, Plaintiff
5 was under the impression she would be going to Cerritos Station.

6
7 38. Patrelli called Plaintiff for a second time and informed her that she would not
8 be going to Cerritos Station, but that she would be going to the County Services Bureau –
9 USC Hospital location, and that she, Patrelli would call Plaintiff on Monday, August 11,
10 2013 for her schedule at USC Hospital.

11 39. Plaintiff never received a return call back from Patrelli. Plaintiff eventually
12 contacted Patrelli and she, Patrelli, informed Plaintiff that Captain Wolak could not send
13 her to County Services Bureau at USC Hospital. Patrelli then scheduled a meeting with
14 Division Commander Henry Romero (formerly Plaintiff's Captain at East LA). Plaintiff
15 requested that Patrelli accompany her to the meeting, but Patrelli refused to accompany
16 Plaintiff or to send any other union representation with Plaintiff. Patrelli then stated to
17 Plaintiff, "You should be grateful that Commander Romero is willing to meet with you!"
18

19 40. On August 14, 2013, Plaintiff met with Commander Romero and
20 Commander Walker. Both were aware of Plaintiff's POE and the hostile environment
21 Plaintiff had encountered at East LA, especially Commander Romero since on March 8,
22 2012, he was personally handed a copy of Plaintiff's POE complaint in his capacity as
23 Plaintiff's then Captain at East LA Station, the very day Plaintiff's POE was filed with the
24 Intake Specialist Unit by Sergeant Jennifer Barsh.

25
26 41. Once again Plaintiff was asked by Commander Romero where she wanted
27 to go. A "legitimate" Sheriff's Department Transfer Request form was produced by
28

1 Commander Romero's secretary listing Plaintiff's choices of San Dimas Station or Walnut
2 Station. Plaintiff requested a copy of the transfer request form, but Commander Romero
3 refused to provide Plaintiff with a copy. Commander Romero then informed Plaintiff that
4 she would be placed on loan to Century Station pending the approval of her transfer to
5 San Dimas or Walnut.

6
7 42. Upon arrival at Century Station, Plaintiff was assigned to the Youth Activity
8 League, a position where Plaintiff could be warehoused with no possibility to advance in
9 her career. Plaintiff's Lieutenant at Century Station, Lieutenant Infante had previously
10 been a Lieutenant at East LA and was intimately aware of Plaintiff's POE complaint and
11 Plaintiff's difficulties with her prior superiors and the Banditos at East LA. Lieutenant
12 Infante made it known to Plaintiff's Sergeant at Century Station, Sergeant De La Rosa,
13 that he, Infante, did not want Plaintiff at Century Station.

14
15 43. On December 3, 2013, Plaintiff was informed by Sergeant De La Rosa that if
16 she, Plaintiff, wanted to stay at Century Station, she would have to complete a transfer
17 request immediately. Plaintiff was informed by Commander Gooden and Chief Goran that
18 if she did not put in the transfer that she would have to go back to East LA. Captain
19 Chavez at Century Station had already signed the transfer and Plaintiff signed the transfer
20 "Under Protest". She did not understand what was going on or what had happened to her
21 previously filed transfer to San Dimas or Walnut. It appeared that the Department was
22 engaging in a form of retaliation and discrimination by subjecting Plaintiff to a form of
23 "freeway therapy."

24
25 44. Plaintiff attempted to contact Commander Romero to inquire as to the status
26 of her transfer that he had put in for her on August 14, 2013, but he was not available.
27 Plaintiff went to Area Command and requested a copy of her transfer that was supposed
28

1 to have been filed by Commander Romero. Plaintiff discovered that the transfer was still
2 in her file and signed by both Commander Romero and Captain Wolak, but the transfer
3 was never filed or placed in the system for processing.

4 45. Plaintiff was then instructed by Sergeant De La Rosa to execute a new
5 transfer application and put Century Station as her first choice followed by San Dimas and
6 Walnut, and that if she did not sign the transfer, she would be sent back to East LA.
7 Under duress and out of fear and apprehension of being sent back to East LA, Plaintiff
8 signed the transfer to Century Station. However, as of the date of this complaint,
9 Plaintiff's transfer has not been processed and Plaintiff remains assigned to East LA, but
10 on loan to Century Station.
11

12 **FIRST CAUSE OF ACTION**

13 **FOR SEXUAL HARASSMENT (HOSTILE WORK ENVIRONMENT) IN VIOLATION OF**

14 **THE CALIFORNIA FAIR EMPLOYMENT**

15 **AND HOUSING ACT AGAINST DEFENDANTS, AND EACH OF THEM**

16 46. Plaintiff incorporates the allegations set forth in paragraphs 1 through 45 as
17 if set forth in full herein.
18

19 47. During the term of Plaintiff's employment, Plaintiff was subjected to
20 discrimination, including but not limited to, sexual harassment, including, *inter alia*, a
21 hostile work environment. The hostile work environment consisted of sexual harassment
22 directed at Plaintiff. The harassing conduct was unwelcome and sufficiently severe or
23 pervasive that it had the purpose or effect of altering the conditions of Plaintiff's
24 employment and creating an intimidating, hostile, abusive, or offensive working
25 environment. The environment created by the conduct would have been perceived as
26 intimidating, hostile, abusive, or offensive by a reasonable man in the same position as
27
28

1 the Plaintiff, and the environment created was perceived by the Plaintiff as intimidating,
2 hostile, abusive, or offensive. The hostile work environment caused Plaintiff injury,
3 damage, loss, or harm.

4 48. The harassment included, but was not limited to, the above mentioned verbal
5 and physical harassment, epithets, derogatory comments, and/or slurs, as well as other
6 harassment.

7
8 49. Said actions and conduct of Defendants, and each of them, consisting of the
9 aforementioned unwelcome sexual conduct and sexual discrimination based on Plaintiff's
10 gender, resulted in a hostile work environment and unlawful employment practices
11 pursuant to *California Government Code* Sections 12940, et seq.

12 50. The aforesaid acts and conduct of Defendants, and each of them,
13 constituted unlawful employment practices. Such violations were a substantial factor in
14 causing damages and injuries to Plaintiff's as set forth below.

15
16 51. Plaintiff has duly filed a new administrative complaint with the California
17 Department of Fair Employment and Housing ("DFEH") substantially alleging the acts and
18 conduct of the County as herein above described. The DFEH issued a "right-to-sue"
19 notice on or about June 24, 2013. A true and correct copy of said notice is attached
20 hereto as Exhibit "1."

21
22 52. As a legal result of the conduct of Defendants, and each of them, Plaintiff
23 has suffered and will continue to suffer physical, mental, and emotional injuries, pain,
24 distress, suffering, anguish, fright, nervousness, grief, anxiety, worry, shame, mortification,
25 injured feelings, shock, humiliation and indignity, as well as other unpleasant physical,
26 mental, and emotional reactions, damages to reputation, and other non-economic
27 damages, in a sum to be ascertained according to proof.

1 53. As a further legal result of the conduct of Defendants, and each of them,
2 Plaintiff was required, and/or in the future may be required, to engage the services of
3 health care providers, and incurred expenses for health care, services, supplies,
4 medicines, health care appliances, modalities, and/or other related expenses in a sum to
5 be ascertained according to proof.

6 54. As a further legal result of the conduct of Defendants, and each of them,
7 Plaintiff has suffered loss of earnings, past and future, including but not limited, to,
8 reimbursement of vacation and sick pay, loss of overtime, loss of ability to promote to the
9 rank of sergeant, and pension loss all according to proof.

11 55. As a further legal result of the conduct of Defendants, and each of them,
12 Plaintiff is entitled to attorneys' fees and costs in an amount according to proof.

13 56. As a further legal result of the conduct of Defendants, and each of them,
14 Plaintiff is entitled to prejudgment interest pursuant to *California Civil Code* Section 3287
15 and/or any other provision of law providing for prejudgment interest.

17 **SECOND CAUSE OF ACTION**

18 **FOR RETALIATION IN VIOLATION OF THE CALIFORNIA FAIR EMPLOYMENT**

19 **AND HOUSING ACT AGAINST DEFENDANTS, AND EACH OF THEM**

20 57. Plaintiff incorporates the allegations set forth in paragraphs 1 through 56 as
21 if set forth in full herein.

22 58. Plaintiff suffered retaliation for reluctantly reporting to her supervisors about
23 being subjected to severe and continuous sexual harassment, and discrimination based
24 on her gender. Plaintiff was retaliated against for causing the filing of a Policy of Equality
25 Report regarding unlawful conduct and implicating the aforementioned male deputies at
26 East LA for gender discrimination, and has been subjected to a series of retaliatory
27 adverse employment actions including, but not limited to, the following.

28 59. Plaintiff's schedule and shift starting times were continually and punitively

1 manipulated to cause Plaintiff as much grief and consternation as possible. Supervisors
2 engaged in retaliatory indifference and refused Plaintiff enough time to complete her
3 paperwork and refused to sign off on her completed reports. When Detectives discovered
4 case files assigned to them belonged to Plaintiff, they refused to investigate her cases.

5 60. Plaintiff was promised and then was punitively denied transfer out of East
6 LA. In fact, Plaintiff's signed transfer prepared August 14, 2013 by Commander Romero's
7 office, which included Plaintiff's only choices of San Dimas Station or Walnut Station.
8 However, the transfer was never filed or processed by Commander Romero or the
9 Department. Plaintiff was told she would only be placed on "loan" to Century Station
10 pending the approval of her transfer to San Dimas or Walnut.

11 61. While awaiting approval of her transfer, Plaintiff was threatened with a return
12 back to East LA if she did not alter her previous transfer request and place Century
13 Station as her first choice. Under duress, and in order to avoid being sent back to the
14 peril of East LA, Plaintiff was forced to sign a transfer to Century Station, though as of the
15 date of this complaint, the transfer has not been processed and Plaintiff remains assigned
16 to East LA, but on loan to Century Station.

17 62. It is well known in the Sherriff's Department that Century Station's Youth
18 Activity League assignment is used as a "dumping ground" for experienced deputies the
19 Department considers "troublemakers." Furthermore, as a direct result of the
20 Department's retaliatory conduct, Plaintiff's ability to promote to the rank of sergeant or be
21 moved to any coveted assignments and advance in the Department has been completely
22 destroyed.

23 63. Plaintiff's life was and is put in jeopardy by deputies that have, and will in the
24 future, refuse to back her up and provide support while she is working the field.

25 64. Said actions and conduct of the Department, consisting of the
26 aforementioned retaliation against Plaintiff, constituted unlawful employment practices
27 under California *Government Code* section 12940(h).

28 65. The aforementioned unlawful employment practices on the part of

1 the Department were a substantial factor in causing damages and injuries to Plaintiff.

2 66. As a result of the aforesaid unlawful acts of the Department, Plaintiff has lost
3 and will continue to lose income, in an amount to be proven at time of trial. Plaintiff claims
4 such amount as damages together with prejudgment interest pursuant to California *Civil*
5 *Code* section 3287 and/or any other provision of law providing for prejudgment interest.

6 67. As a result of the aforesaid unlawful acts of the Department, Plaintiff was,
7 personally humiliated and had become mentally upset, distressed and aggravated.
8 Plaintiff claims general damages for such mental distress and aggravation in an amount of
9 be proven at time of trial.

10 68. As a result of the unlawful conduct of the Department, Plaintiff was required
11 to retain attorneys and is entitled to attorneys' fees pursuant to *Government Code* section
12 12965.

13 69. Plaintiff has duly filed a new administrative complaint with the California
14 Department of Fair Employment and Housing ("DFEH") substantially alleging the acts and
15 conduct of the County as herein above described. The DFEH issued a "right-to-sue"
16 notice on or about June 24, 2013. A true and correct copy of said notice is attached
17 hereto as Exhibit "1."

18 19 PRAYER

20 **WHEREFORE**, Plaintiff seeks judgment against Defendants, and each of them, as
21 follows:

22 1. On each cause of action, for physical, mental, and emotional injuries, pain,
23 distress, suffering, anguish, fright, nervousness, grief, anxiety, worry, shame, mortification,
24 injured feelings, shock, humiliation and indignity, as well as other unpleasant physical,
25 mental, and emotional reactions, damages to reputation, and other non-economic
26 damages, in a sum to be ascertained according to proof;
27

28 2. On each cause of action, for health care, services, supplies, medicines,

1 health care appliances, modalities, and other related expenses in a sum to be ascertained
2 according to proof;

3 3. On each cause of action, for loss of wages, income, earnings, earning
4 capacity, benefits, and other economic damages in a sum to be ascertained according to
5 proof;

6 4. Other actual, consequential, and/or incidental damages in a sum to be
7 ascertained according to proof;

8 5. Attorney fees and costs of suit pursuant to *California Government Code*
9 Section 12965(b), C.C.P. 1021.5, and other authorities;

10 6. Costs of suit herein incurred;

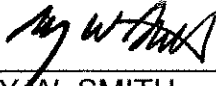
11 7. Pre-judgment interest;

12 8. Such other and further relief as the Court may deem just and proper.
13
14

15 Dated: March 24, 2014

LAW OFFICES OF GREGORY W. SMITH

16
17 By:



GREGORY W. SMITH
DIANA WANG WELLS
Attorneys for Plaintiff
GUADALUPE LOPEZ

EXHIBIT “1”



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
800-884-1684 | Videophone 916-226-5285 | TDD 800-700-2320
www.dfeh.ca.gov | email: contact.center@dfeh.ca.gov

Jun 24, 2013

Guadalupe Lopez
9100 Wilshire Blvd. Suite 345E
Los Angeles, CA 90212

RE: Notice of Case Closure and Right to Sue

DFEH Matter Number: 133215-57331

Right to Sue: Lopez / County of Los Angeles [Sheriff's Department],

Dear Guadalupe Lopez:

This letter informs you that the above-referenced complaint was filed with the Department of Fair Employment and Housing (DFEH) has been closed effective Jun 24, 2013 because an immediate Right to Sue notice was requested. DFEH will take no further action on the complaint.

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

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

Sincerely,

Department of Fair Employment and Housing

Enclosures

cc: County of Los Angeles , County of Los Angeles Agent for Service for County of Los Angeles [Sheriff's Department],

**SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES
NOTICE OF CASE ASSIGNMENT - UNLIMITED CIVIL CASE (NON-CLASS ACTION)**

Case Number _____

BC540387

THIS FORM IS TO BE SERVED WITH THE SUMMONS AND COMPLAINT

Your case is assigned for all purposes to the judicial officer indicated below. There is additional information on the reverse side of this form.

ASSIGNED JUDGE	DEPT	ROOM	ASSIGNED JUDGE	DEPT	ROOM
Hon. Daniel Buckley	1	534	Hon. Malcolm H. Mackey	55	515
Hon. Barbara A. Meiers	12	636	Hon. Michael Johnson	56	514
Hon. Terry A. Green	14	300	Hon Rolf M. Treu	58	516
Hon. Richard Fruin	15	307	Hon. Michael L. Stern	62	600
Hon. Rita Miller	16	306	Hon. Mark Mooney	68	617
Hon. Richard E. Rico	17	309	Hon. William F. Fahey	69	621
Hon. Kevin C. Brazile	20	310	Hon. Soussan G. Bruguera	71	729
Hon. Robert L. Hess	24	314	Hon. Ruth Ann Kwan	72	731
Hon. Yvette M. Palazuelos	28	318	Hon. Rafael Ongkeko	73	733
Hon. Barbara Scheper	30	400	Hon. Teresa Sanchez-Gordon	74	735
Hon. Mary H. Strobel	32	406			
Hon. Michael P. Linfield	34	408			
Hon. Gregory Alarcon	36	410	Hon. Emilie H. Elias	324	CCW
Hon. Maureen Duffy-Lewis	38	412	Hon. Elihu M. Berle*	323	CCW
Hon. Michelle R. Rosenblatt	40	414			
Hon. Holly E. Kendig	42	416			
Hon. Mel Red Recana	45	529			
Hon. Frederick C. Shaller	46	500			
Hon. Debre Katz Weintraub	47	507			
Hon. Elizabeth Allen White	48	506			
Hon. Deirdre Hill	49	509			
Hon. John L. Segal	50	508			
Hon. Mitchell L. Beckloff	51	511			
Hon. Susan Bryant-Deason	52	510			
Hon. Steven J. Kleifield	53	513			
Hon. Ernest M. Hiroshige	54	512	OTHER		

***Complex**

All cases designated as complex (other than class actions) are initially assigned to Judge Elihu M. Berle in Department 323 of the Central Civil West Courthouse (600 S. Commonwealth Ave., Los Angeles 90005). This assignment is for the purpose of assessing whether or not the case is complex within the meaning of California Rules of Court, rule 3.400. Depending on the outcome of that assessment, the case may be reassigned to one of the judges of the Complex Litigation Program or reassigned randomly to a court in the Central District.

Given to the Plaintiff/Cross-Complainant/Attorney of Record on

MAR 25 2014

By **SHERRI R. CARTER**, Executive Officer/Clerk
Kristina Vargas, Deputy Clerk

INSTRUCTIONS FOR HANDLING UNLIMITED CIVIL CASES

The following critical provisions of the Chapter Three Rules, as applicable in the Central District, are summarized for your assistance.

APPLICATION

The Chapter Three Rules were effective January 1, 1994. They apply to all general civil cases.

PRIORITY OVER OTHER RULES

The Chapter Three Rules shall have priority over all other Local Rules to the extent the others are inconsistent.

CHALLENGE TO ASSIGNED JUDGE

A challenge under Code of Civil Procedure section 170.6 must be made within **15** days after notice of assignment for all purposes to a judge, or if a party has not yet appeared, within 15 days of the first appearance.

TIME STANDARDS

Cases assigned to the Individual Calendaring Court will be subject to processing under the following time standards:

COMPLAINTS: All complaints shall be served within 60 days of filing and proof of service shall be filed within 90 days of filing.

CROSS-COMPLAINTS: Without leave of court first being obtained, no cross-complaint may be filed by any party after their answer is filed. Cross-complaints shall be served within 30 days of the filing date and a proof of service filed within 60 days of the filing date.

A Status Conference will be scheduled by the assigned Independent Calendar Judge no later than 270 days after the filing of the complaint. Counsel must be fully prepared to discuss the following issues: alternative dispute resolution, bifurcation, settlement, trial date, and expert witnesses.

FINAL STATUS CONFERENCE

The Court will require the parties at a status conference not more than 10 days before the trial to have timely filed and served all motions in limine, bifurcation motions, statements of major evidentiary issues, dispositive motions, requested jury instructions, and special jury instructions and special jury verdicts. These matters may be heard and resolved at this conference. At least 5 days before this conference, counsel must also have exchanged lists of exhibits and witnesses and have submitted to the court a brief statement of the case to be read to the jury panel as required by Chapter Eight of the Los Angeles Superior Court Rules.

SANCTIONS

The court will impose appropriate sanctions for the failure or refusal to comply with Chapter Three Rules, orders made by the Court, and time standards or deadlines established by the Court or by the Chapter Three Rules. Such sanctions may be on a party or if appropriate on counsel for the party.

This is not a complete delineation of the Chapter Three Rules, and adherence only to the above provisions is therefore not a guarantee against the imposition of sanctions under Trial Court Delay Reduction. Careful reading and compliance with the actual Chapter Rules is absolutely imperative.

VOLUNTARY EFFICIENT LITIGATION STIPULATIONS

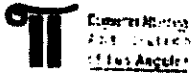


Superior Court of California
County of Los Angeles



Los Angeles County
Bar Association
Litigation Section

Los Angeles County
Bar Association Labor and
Employment Law Section



Consumer Attorneys
Association of Los Angeles



Southern California
Defense Council



Association of
Business Trial Lawyers



California Employment
Lawyers Association

The Early Organizational Meeting Stipulation, Discovery Resolution Stipulation, and Motions in Limine Stipulation are voluntary stipulations entered into by the parties. The parties may enter into one, two, or all three of the stipulations; however, they may not alter the stipulations as written, because the Court wants to ensure uniformity of application. These stipulations are meant to encourage cooperation between the parties and to assist in resolving issues in a manner that promotes economic case resolution and judicial efficiency.

The following organizations endorse the goal of promoting efficiency in litigation and ask that counsel consider using these stipulations as a voluntary way to promote communications and procedures among counsel and with the court to fairly resolve issues in their cases.

◆ Los Angeles County Bar Association Litigation Section ◆

◆ Los Angeles County Bar Association
Labor and Employment Law Section ◆

◆ Consumer Attorneys Association of Los Angeles ◆

◆ Southern California Defense Council ◆

◆ Association of Business Trial Lawyers ◆

◆ California Employment Lawyers Association ◆

NAME AND ADDRESS OF ATTORNEY OR PARTY WITHOUT ATTORNEY:		STATE BAR NUMBER	Reserved for Clerk's File Stamp
TELEPHONE NO.: E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name):		FAX NO. (Optional):	
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES			
COURTHOUSE ADDRESS:			
PLAINTIFF:			
DEFENDANT:			CASE NUMBER
STIPULATION – EARLY ORGANIZATIONAL MEETING			

This stipulation is intended to encourage cooperation among the parties at an early stage in the litigation and to assist the parties in efficient case resolution.

The parties agree that:

1. The parties commit to conduct an initial conference (in-person or via teleconference or via videoconference) within 15 days from the date this stipulation is signed, to discuss and consider whether there can be agreement on the following:
 - a. Are motions to challenge the pleadings necessary? If the issue can be resolved by amendment as of right, or if the Court would allow leave to amend, could an amended complaint resolve most or all of the issues a demurrer might otherwise raise? If so, the parties agree to work through pleading issues so that a demurrer need only raise issues they cannot resolve. Is the issue that the defendant seeks to raise amenable to resolution on demurrer, or would some other type of motion be preferable? Could a voluntary targeted exchange of documents or information by any party cure an uncertainty in the pleadings?
 - b. Initial mutual exchanges of documents at the "core" of the litigation. (For example, in an employment case, the employment records, personnel file and documents relating to the conduct in question could be considered "core." In a personal injury case, an incident or police report, medical records, and repair or maintenance records could be considered "core.");
 - c. Exchange of names and contact information of witnesses;
 - d. Any insurance agreement that may be available to satisfy part or all of a judgment, or to indemnify or reimburse for payments made to satisfy a judgment;
 - e. Exchange of any other information that might be helpful to facilitate understanding, handling, or resolution of the case in a manner that preserves objections or privileges by agreement;
 - f. Controlling issues of law that, if resolved early, will promote efficiency and economy in other phases of the case. Also, when and how such issues can be presented to the Court;
 - g. Whether or when the case should be scheduled with a settlement officer, what discovery or court ruling on legal issues is reasonably required to make settlement discussions meaningful, and whether the parties wish to use a sitting judge or a private mediator or other options as

SHORT TITLE:	CASE NUMBER:
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discussed in the "Alternative Dispute Resolution (ADR) Information Package" served with the complaint;

- h. Computation of damages, including documents not privileged or protected from disclosure, on which such computation is based;
 - i. Whether the case is suitable for the Expedited Jury Trial procedures (see information at www.lasuperiorcourt.org under "Civil" and then under "General Information").
2. The time for a defending party to respond to a complaint or cross-complaint will be extended to _____ (INSERT DATE) for the complaint, and _____ (INSERT DATE) for the cross-complaint, which is comprised of the 30 days to respond under Government Code § 88616(b), and the 30 days permitted by Code of Civil Procedure section 1054(a), good cause having been found by the Civil Supervising Judge due to the case management benefits provided by this Stipulation.
 3. The parties will prepare a joint report titled "Joint Status Report Pursuant to Initial Conference and Early Organizational Meeting Stipulation, and if desired, a proposed order summarizing results of their meet and confer and advising the Court of any way it may assist the parties' efficient conduct or resolution of the case. The parties shall attach the Joint Status Report to the Case Management Conference statement, and file the documents when the CMC statement is due.
 4. References to "days" mean calendar days, unless otherwise noted. If the date for performing any act pursuant to this stipulation falls on a Saturday, Sunday or Court holiday, then the time for performing that act shall be extended to the next Court day

The following parties stipulate:

Date:

_____	>	_____
(TYPE OR PRINT NAME)		(ATTORNEY FOR PLAINTIFF)
Date: _____		
_____	>	_____
(TYPE OR PRINT NAME)		(ATTORNEY FOR DEFENDANT)
Date: _____		
_____	>	_____
(TYPE OR PRINT NAME)		(ATTORNEY FOR DEFENDANT)
Date: _____		
_____	>	_____
(TYPE OR PRINT NAME)		(ATTORNEY FOR DEFENDANT)
Date: _____		
_____	>	_____
(TYPE OR PRINT NAME)		(ATTORNEY FOR _____)
Date: _____		
_____	>	_____
(TYPE OR PRINT NAME)		(ATTORNEY FOR _____)
Date: _____		
_____	>	_____
(TYPE OR PRINT NAME)		(ATTORNEY FOR _____)

NAME AND ADDRESS OF ATTORNEY OR PARTY WITHOUT ATTORNEY:		STATE BAR NUMBER	Reserved for Clerk's File Stamp
TELEPHONE NO.: E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name):		FAX NO. (Optional):	
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES			
COURTHOUSE ADDRESS:			
PLAINTIFF:			
DEFENDANT:			
STIPULATION – DISCOVERY RESOLUTION			CASE NUMBER:

This stipulation is intended to provide a fast and informal resolution of discovery issues through limited paperwork and an informal conference with the Court to aid in the resolution of the issues.

The parties agree that:

1. Prior to the discovery cut-off in this action, no discovery motion shall be filed or heard unless the moving party first makes a written request for an Informal Discovery Conference pursuant to the terms of this stipulation.
2. At the Informal Discovery Conference the Court will consider the dispute presented by parties and determine whether it can be resolved informally. Nothing set forth herein will preclude a party from making a record at the conclusion of an Informal Discovery Conference, either orally or in writing.
3. Following a reasonable and good faith attempt at an informal resolution of each issue to be presented, a party may request an Informal Discovery Conference pursuant to the following procedures:
 - a. The party requesting the Informal Discovery Conference will:
 - i. File a Request for Informal Discovery Conference with the clerk's office on the approved form (copy attached) and deliver a courtesy, conformed copy to the assigned department;
 - ii. Include a brief summary of the dispute and specify the relief requested; and
 - iii. Serve the opposing party pursuant to any authorized or agreed method of service that ensures that the opposing party receives the Request for Informal Discovery Conference no later than the next court day following the filing.
 - b. Any Answer to a Request for Informal Discovery Conference must:
 - i. Also be filed on the approved form (copy attached);
 - ii. Include a brief summary of why the requested relief should be denied;

SHORT TITLE:	CASE NUMBER:
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- iii. Be filed within two (2) court days of receipt of the Request; and
 - iv. Be served on the opposing party pursuant to any authorized or agreed upon method of service that ensures that the opposing party receives the Answer no later than the next court day following the filing.
- c. No other pleadings, including but not limited to exhibits, declarations, or attachments, will be accepted.
- d. If the Court has not granted or denied the Request for Informal Discovery Conference within ten (10) days following the filing of the Request, then it shall be deemed to have been denied. If the Court acts on the Request, the parties will be notified whether the Request for Informal Discovery Conference has been granted or denied and, if granted, the date and time of the Informal Discovery Conference, which must be within twenty (20) days of the filing of the Request for Informal Discovery Conference.
- e. If the conference is not held within twenty (20) days of the filing of the Request for Informal Discovery Conference, unless extended by agreement of the parties and the Court, then the Request for the Informal Discovery Conference shall be deemed to have been denied at that time.
4. If (a) the Court has denied a conference or (b) one of the time deadlines above has expired without the Court having acted or (c) the Informal Discovery Conference is concluded without resolving the dispute, then a party may file a discovery motion to address unresolved issues.
5. The parties hereby further agree that the time for making a motion to compel or other discovery motion is tolled from the date of filing of the Request for Informal Discovery Conference until (a) the request is denied or deemed denied or (b) twenty (20) days after the filing of the Request for Informal Discovery Conference, whichever is earlier, unless extended by Order of the Court.
- It is the understanding and intent of the parties that this stipulation shall, for each discovery dispute to which it applies, constitute a writing memorializing a "specific later date to which the propounding [or demanding or requesting] party and the responding party have agreed in writing," within the meaning of Code Civil Procedure sections 2030.300(c), 2031.320(c), and 2033.290(c).
6. Nothing herein will preclude any party from applying *ex parte* for appropriate relief, including an order shortening time for a motion to be heard concerning discovery.
7. Any party may terminate this stipulation by giving twenty-one (21) days notice of intent to terminate the stipulation.
8. References to "days" mean calendar days, unless otherwise noted. If the date for performing any act pursuant to this stipulation falls on a Saturday, Sunday or Court holiday, then the time for performing that act shall be extended to the next Court day.

SHOW TITLE:	CASE NUMBER:
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The following parties stipulate:

Date:

(TYPE OR PRINT NAME)

Date:

(TYPE OR PRINT NAME)

Date:

(TYPE OR PRINT NAME)

Date:

(TYPE OR PRINT NAME)

Date:

(TYPE OR PRINT NAME)

Date:

(TYPE OR PRINT NAME)

Date:

(TYPE OR PRINT NAME)

➤

(ATTORNEY FOR PLAINTIFF)

➤

(ATTORNEY FOR DEFENDANT)

➤

(ATTORNEY FOR DEFENDANT)

➤

(ATTORNEY FOR DEFENDANT)

➤

(ATTORNEY FOR _____)

➤

(ATTORNEY FOR _____)

➤

(ATTORNEY FOR _____)

NAME AND ADDRESS OF ATTORNEY OR PARTY WITHOUT ATTORNEY:	STATE BAR NUMBER	Reserved for Clerk's File Stamp
TELEPHONE NO.: E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name):	FAX NO. (Optional):	
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES		
COURTHOUSE ADDRESS:		
PLAINTIFF:		
DEFENDANT:		
INFORMAL DISCOVERY CONFERENCE (pursuant to the Discovery Resolution Stipulation of the parties)		COURT NUMBER:

1. This document relates to:

☐ Request for Informal Discovery Conference
☐ Answer to Request for Informal Discovery Conference
2. Deadline for Court to decide on Request: _____ (insert date 10 calendar days following filing of the Request).
3. Deadline for Court to hold Informal Discovery Conference: _____ (insert date 20 calendar days following filing of the Request).
4. For a Request for Informal Discovery Conference, briefly describe the nature of the discovery dispute, including the facts and legal arguments at issue. For an Answer to Request for Informal Discovery Conference, briefly describe why the Court should deny the requested discovery, including the facts and legal arguments at issue.

NAME AND ADDRESS OF ATTORNEY OR PARTY WITHOUT ATTORNEY:		STATE BAR NUMBER	Reserved for Clerk's File Stamp
TELEPHONE NO.: E-MAIL ADDRESS (Optional): ATTORNEY FOR (State):		FAX NO. (Optional):	
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES			
COURTHOUSE ADDRESS:			
PLAINTIFF:			
DEFENDANT:			CASE NUMBER
STIPULATION AND ORDER – MOTIONS IN LIMINE			

This stipulation is intended to provide fast and informal resolution of evidentiary issues through diligent efforts to define and discuss such issues and limit paperwork.

The parties agree that:

1. At least ____ days before the final status conference, each party will provide all other parties with a list containing a one paragraph explanation of each proposed motion in limine. Each one paragraph explanation must identify the substance of a single proposed motion in limine and the grounds for the proposed motion.
2. The parties thereafter will meet and confer, either in person or via teleconference or videoconference, concerning all proposed motions in limine. In that meet and confer, the parties will determine:
 - a. Whether the parties can stipulate to any of the proposed motions. If the parties so stipulate, they may file a stipulation and proposed order with the Court.
 - b. Whether any of the proposed motions can be briefed and submitted by means of a short joint statement of issues. For each motion which can be addressed by a short joint statement of issues, a short joint statement of issues must be filed with the Court 10 days prior to the final status conference. Each side's portion of the short joint statement of issues may not exceed three pages. The parties will meet and confer to agree on a date and manner for exchanging the parties' respective portions of the short joint statement of issues and the process for filing the short joint statement of issues.
3. All proposed motions in limine that are not either the subject of a stipulation or briefed via a short joint statement of issues will be briefed and filed in accordance with the California Rules of Court and the Los Angeles Superior Court Rules.

SHORT TITLE:	CASE NUMBER:
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The following parties stipulate:

Date:

(TYPE OR PRINT NAME)

Date:

(TYPE OR PRINT NAME)

Date:

(TYPE OR PRINT NAME)

Date:

(TYPE OR PRINT NAME)

Date:

(TYPE OR PRINT NAME)

Date:

(TYPE OR PRINT NAME)

Date:

(TYPE OR PRINT NAME)

➤ _____
(ATTORNEY FOR PLAINTIFF)

➤ _____
(ATTORNEY FOR DEFENDANT)

➤ _____
(ATTORNEY FOR DEFENDANT)

➤ _____
(ATTORNEY FOR DEFENDANT)

➤ _____
(ATTORNEY FOR _____)

➤ _____
(ATTORNEY FOR _____)

➤ _____
(ATTORNEY FOR _____)

THE COURT SO ORDERS.

Date: _____

JUDICIAL OFFICER