

FSC: 03 / 2 2 / 2019 TRIAL: 04 / 08 / 2019 OSC: 10 / 06 / 2020

1 THE TRIAL LAW OFFICES OF
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3 BRADLEY I. KRAMER (SBN 234351)
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5 Beverly Hills, California 90211
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FILED
Superior Court of California
County of Los Angeles

OCT 11 2017

Sherril R. Carter, Executive Officer/Clerk
By M. Soto, Deputy
Moses Soto

8 Attorneys for Plaintiffs
9 HEATHER ROSE

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 FOR THE COUNTY OF LOS ANGELES -CENTRAL DISTRICT

D-93
LANDIN

12 HEATHER ROSE, an individual,

) Case No. **BC 679283**

13 Plaintiff,

) COMPLAINT FOR:

14 vs.

) 1. PROFESSIONAL NEGLIGENCE

15 KENNETH HUGHES, M.D.; and DOES 1-
16 100,

) REQUEST FOR TRIAL BY JURY

17 Defendants.
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CIT/CASE: BC679283
LEA/DEF#: RECEIPT #: CCH24880104
DATE PAID: 10/11/17 12:30 PM
PAYMENT: \$435.00 310
RECEIVED: CHECK: \$0.00
CASH: \$0.00
CHANGE: \$0.00
CARD: \$435.00

COMPLAINT FOR DAMAGES

FILED

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Plaintiff Heather Rose ("Ms. Rose") hereby complains and alleges as follows:

THE PARTIES

1. At all times herein mentioned, Ms. Rose was an individual residing in the county of Hudson, New Jersey.

2. Plaintiff is informed and believes and based thereon alleges, that Kenneth Hughes, M.D. ("Dr. Hughes") is a physician residing in, and doing business in the County of Los Angeles, California.

3. The true names and capacities, whether individual, plural, corporate, partnership, associate, or otherwise, of the defendants named herein as DOES 1 through 100, inclusive, are unknown to Plaintiff who therefore sues such defendants by such fictitious names. Plaintiff is informed and believes, and based upon such information and belief alleges, that each of the defendants designated herein as DOES 1 through 100 is legally responsible in some manner for the events and happenings herein referred to, and negligently, tortuously, and unlawfully, proximately caused injury and damages to Plaintiff as alleged herein. Plaintiff will seek leave of Court to amend this Complaint to show defendants' true names and capacities after the same have been ascertained.

4. Plaintiff is informed and believes and based thereon alleges, that each defendant was the agent and employee of each other defendant, and in doing the things hereinafter alleged, acted within the scope and course of such agency and employment, and that each defendant has ratified and approved the acts of each other defendant.

5. The events giving rise to the causes of action alleged herein occurred in the State of California, County of Los Angeles, as that is where defendants do business, and where the relevant incident occurred.

GENERAL ALLEGATIONS

6. By way of background, sometime in or around mid-2017, Ms. Rose determined that she was interested in having some cosmetic surgery procedures performed on her to enhance

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1 her appearance. As an example, she had toned arms and very little skin that she wanted
2 tightened.

3 7. Ms. Rose discovered Dr. Hughes through an online website, and following
4 extensive email correspondence with Dr. Hughes, on or about August 21, 2017, Dr. Hughes
5 agreed to perform "bodytite" liposuction on Ms. Rose's arms (\$5500), abdomen (\$5500),
6 posterior thighs (\$3500), and anterior thighs and knees (\$5000), for a total of \$20,500. Ms. Rose
7 also consented to Dr. Hughes performing "bodytite" liposuction of her pubic area (\$1000) and
8 axilla (\$2000), and thigh lift revisions (\$7500), however Dr. Hughes indicated that he would
9 only perform the latter procedures after performing the former procedures, and these
10 latter procedures would only be performed after discussing such procedures with Ms. Rose
11 following the completion of the initial procedures. Ms. Rose was told that she would be under
12 local anesthesia during the entirety of the operation(s), and accordingly agreed to discuss the
13 latter procedures following the completion of the original procedures, but while she was
14 still under local anesthesia.

15 8. Instead, however, of being placed under local anesthesia, Dr. Hughes placed Ms.
16 Rose under general anesthesia from the onset of the surgery and never discussed or confirmed
17 her consent for the latter procedures with her as was promised. Rather, Ms. Rose awoke to
18 discover that Dr. Hughes had proceeded with all of the surgeries without having a discussion
19 about the latter procedures with her.

20 9. The total charge to Ms. Rose for all of the procedures was \$31,500, which was
21 paid to Dr. Hughes in full.

22 10. Upon returning home and as time went on Ms. Rose noticed burns, 6 incisions on
23 both arms, and stitches in her knees, abdomen and arms that were supposed to be dissolving
24 stitches which never dissolved. Many incisions were made when only one was to be made with a
25 small cannula. Moreover, when Dr. Hughes performed the upper thigh lift, he stitched Ms.
26 Rose's outer vaginal lips differently creating vaginal displacement.

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11. Dr. Hughes did not use any drains or garment compression devices on Ms. Rose during or after the surgery, and cleared Ms. Rose to fly immediately after surgery. Dr. Hughes did mention that maybe Ms. Rose should wait to fly until the next day, but assured Ms. Rose that she would be fine.

12. Within days of returning home, Ms. Rose ended up with a serious bacterial infection, which had to be treated.

13. As of the date of this filing, Ms. Rose has been left with waves in her legs, which are noticeably larger than prior to surgery, and which has resulted in her knees being difficult to see. Her arms are lumpy and she has seromas due to the bacterial infection. She is also dealing with nerve damage and horrific scarring. She has significant physical pain as well as psychological trauma, and now suffers from PTSD as a result of the procedures Dr. Hughes performed, as well as his unethical and bullying email correspondence.

FIRST CAUSE OF ACTION

For Professional Negligence

(Against All Defendants)

14. Plaintiff repeats and alleges each and every allegations set forth in Paragraphs 1 through 13, inclusive as though fully set forth herein.

15. During all periods of time during which Ms. Rose was a patient of Defendants, the Defendants, and each of them, agreed to perform and undertook to perform for Ms. Rose all services necessary to Ms. Rose's care, which included, but was not limited to, observation, examination, evaluation, diagnosis, care and treatment of Ms. Rose, and in so doing, the Defendants, and each of them, established a relationship with Ms. Rose, giving rise to each Defendants' duty to Ms. Rose to provide skillful management of her health condition, including but not limited to observation, evaluation, examination, diagnosis, care and treatment of Ms. Rose.

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16. Defendants and each of them breached their duty to Ms. Rose to provide skillful management of her health condition, including but not limited to observation, examination, diagnosis, care and treatment.

17. At all times herein mentioned, Defendants and each of them so negligently and carelessly cared for, treated and rendered medical services upon the person and body of Ms. Rose and so negligently and carelessly operated, managed, controlled and conducted their services, activities and supervision in connection with Ms. Rose's care and treatment that as a direct and proximate result thereof Ms. Rose was caused to and did suffer the injuries herein alleged.

18. During said periods of time herein above alleged, Defendants and each of them, were negligent, careless and unskillful in their management of the health of Ms. Rose, including but not limited to the observation, examination, diagnosis, care and treatment that were or should have been provided to Ms. Rose.

19. The negligence of Defendants and each of them, includes but is not limited to the following: (1) failing to properly perform surgery on Ms. Rose; (2) failing to properly counsel Ms. Rose on the ramifications and/or risks of the procedures; and (3) failing to otherwise treat her condition in an appropriate manner.

20. As a direct and legal result of the aforesaid negligence, carelessness and unskillfulness of Defendants, and each of them, Ms. Rose suffered grave physical and emotional injuries. Plaintiff is informed and believes and therefore alleges that said injuries would not have occurred if not for the negligence of Defendants.

21. As a further, direct and legal result of said negligence, carelessness and unskillfulness of the Defendants, and each of them, Plaintiff is entitled to recover prejudgment interest under California Code of Civil Procedure §998 and California Civil Code §3291.

PRAYER FOR RELIEF

10/11/2017

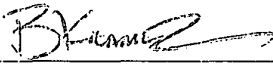
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WHEREFORE, Plaintiff prays for judgment against Defendants, and each of them, as follows:

- 1. For general damages according to proof;
- 2. For special damages according to proof;
- 3. For legal interest on judgment from the filing of this complaint to the date of judgment;
- 4. For costs of suit;
- 5. And, for any other and further relief as the Court deems just and proper.

DATED: October 10, 2017

THE TRIAL LAW OFFICES OF
BRADLEY I. KRAMER, M.D., ESQ.
BRADLEY I. KRAMER

By: 
BRADLEY I. KRAMER
Attorneys for Plaintiff HEATHER ROSE

10/11/2017

CM-010

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):
 Bradley I. Kramer (SBN 234351)
 The Trial Law Offices of Bradley I. Kramer, M.D., Esq.
 8840 Wilshire Blvd., Suite 350
 Beverly Hills, CA 90211
 TELEPHONE NO.: (310) 289-2600 FAX NO.: (866) 289-2771
 ATTORNEY FOR (Name): Plaintiff Heather Rose

SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles
 STREET ADDRESS: 111 N. Hill St.
 MAILING ADDRESS:
 CITY AND ZIP CODE: Los Angeles, CA 90012
 BRANCH NAME: Stanley Mosk Courthouse

FOR COURT USE ONLY

FILED
 Superior Court of California
 County of Los Angeles

OCT 11 2017

Sherri R. Carter, Executive Officer/Clerk
 By M. Soto, Deputy
 Moses Soto

CASE NAME:
 Heather Rose v. Kenneth Hughes, M.D., et al.

CIVIL CASE COVER SHEET
 Unlimited (Amount demanded exceeds \$25,000) Limited (Amount demanded is \$25,000 or less)

Complex Case Designation
 Counter Joinder
 Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)

CASE NUMBER:
BC 679283
 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:

<input type="checkbox"/> Auto Tort <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46) <input type="checkbox"/> Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort <input type="checkbox"/> Asbestos (04) <input type="checkbox"/> Product liability (24) <input type="checkbox"/> Medical malpractice (45) <input type="checkbox"/> Other PI/PD/WD (23) <input type="checkbox"/> Non-PI/PD/WD (Other) Tort <input type="checkbox"/> Business tort/unfair business practice (07) <input type="checkbox"/> Civil rights (08) <input type="checkbox"/> Defamation (13) <input type="checkbox"/> Fraud (16) <input type="checkbox"/> Intellectual property (19) <input checked="" type="checkbox"/> Professional negligence (25) <input type="checkbox"/> Other non-PI/PD/WD tort (35) <input type="checkbox"/> Employment <input type="checkbox"/> Wrongful termination (36) <input type="checkbox"/> Other employment (15)	<input type="checkbox"/> Contract <input type="checkbox"/> Breach of contract/warranty (06) <input type="checkbox"/> Rule 3.740 collections (09) <input type="checkbox"/> Other collections (09) <input type="checkbox"/> Insurance coverage (13) <input type="checkbox"/> Other contract (37) <input type="checkbox"/> Real Property <input type="checkbox"/> Eminent domain/Inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (26) <input type="checkbox"/> Unlawful Detainer <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38) <input type="checkbox"/> Judicial Review <input type="checkbox"/> Asset forfeiture (05) <input type="checkbox"/> Petition re: arbitration award (11) <input type="checkbox"/> Writ of mandate (02) <input type="checkbox"/> Other judicial review (33)	<input type="checkbox"/> Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403) <input type="checkbox"/> Antitrust/Trade regulation (03) <input type="checkbox"/> Construction defect (10) <input type="checkbox"/> Mass tort (40) <input type="checkbox"/> Securities litigation (28) <input type="checkbox"/> Environmental/Toxic tort (30) <input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41) <input type="checkbox"/> Enforcement of Judgment <input type="checkbox"/> Enforcement of judgment (20) <input type="checkbox"/> Miscellaneous Civil Complaint <input type="checkbox"/> RICO (27) <input type="checkbox"/> Other complaint (not specified above) (42) <input type="checkbox"/> Miscellaneous Civil Petition <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> Other petition (not specified above) (43)
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2. This case is is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:
- | | |
|--|--|
| a. <input type="checkbox"/> Large number of separately represented parties | d. <input type="checkbox"/> Large number of witnesses |
| b. <input type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve | e. <input type="checkbox"/> Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court |
| c. <input type="checkbox"/> Substantial amount of documentary evidence | f. <input type="checkbox"/> Substantial postjudgment judicial supervision |
3. Remedies sought (check all that apply): a. monetary b. nonmonetary; declaratory or injunctive relief c. punitive
4. Number of causes of action (specify): 1
5. This case is is not a class action suit.
6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)

Date: October 10, 2017
 Bradley I. Kramer, M.D., Esq.

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

NOTICE

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

Form Adopted for Mandatory Use
 Judicial Council of California
 CM-010 (Rev. July 1, 2007)

CIVIL CASE COVER SHEET

Cal. Rules of Court, rules 2.30, 3.220, 3.400-3.403, 3.740;
 Cal. Standards of Judicial Administration, std. 3.10
 www.courtinfo.ca.gov

SHORT TITLE: Heather Rose v. Kenneth Hughes, M.D., et al.	CASE NUMBER
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**CIVIL CASE COVER SHEET ADDENDUM AND
STATEMENT OF LOCATION
(CERTIFICATE OF GROUNDS FOR ASSIGNMENT TO COURTHOUSE LOCATION)**

This form is required pursuant to 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 4 _____ 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)

- | | |
|---|---|
| <ol style="list-style-type: none"> 1. Class actions must be filed in the Stanley Mosk Courthouse, central district. 2. May be filed in central (other county, or no bodily injury/property damage). 3. Location where cause of action arose. 4. Location where bodily injury, death or damage occurred. 5. Location where performance required or defendant resides. | <ol style="list-style-type: none"> 6. Location of property or permanently garaged vehicle. 7. Location where petitioner resides. 8. Location wherein defendant/responent functions wholly. 9. Location where one or more of the parties reside. 10. Location of Labor Commissioner Office. |
|---|---|

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

	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Auto Tort	Auto (22)	<input type="checkbox"/> A7100 Motor Vehicle - Personal Injury/Property Damage/Wrongful Death	1., 2., 4.
	Uninsured Motorist (46)	<input type="checkbox"/> A7110 Personal Injury/Property Damage/Wrongful Death – Uninsured Motorist	1., 2., 4.
Other Personal Injury/Property Damage/Wrongful Death Tort	Asbestos (04)	<input type="checkbox"/> A6070 Asbestos Property Damage <input type="checkbox"/> A7221 Asbestos - Personal Injury/Wrongful Death	2. 2.
	Product Liability (24)	<input type="checkbox"/> A7260 Product Liability (not asbestos or toxic/ environmental)	1., 2., 3., 4., 8.
	Medical Malpractice (45)	<input checked="" type="checkbox"/> A7210 Medical Malpractice - Physicians & Surgeons <input type="checkbox"/> A7240 Other Professional Health Care Malpractice	1., 4. 1., 4.
	Other Personal Injury Property Damage Wrongful Death (23)	<input type="checkbox"/> A7250 Premises Liability (e.g., slip and fall) <input type="checkbox"/> A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.) <input type="checkbox"/> A7270 Intentional Infliction of Emotional Distress <input type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death	1., 4. 1., 4. 1., 3. 1., 4.

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SHORT TITLE: Heather Rose v. Kenneth Hughes, M.D., et al.	CASE NUMBER
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	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Non-Personal Injury/Property Damage/Wrongful Death Tort	Business Tort (07)	<input type="checkbox"/> A6029 Other Commercial/Business Tort (not fraud/breach of contract)	1., 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.
Employment	Other (35)	<input 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.
Contract	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(no: 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.
Real Property	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	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.

LA CIV 109 (Rev. 03/11)
LASC Approved 03-04

**CIVIL CASE COVER SHEET ADDENDUM
AND STATEMENT OF LOCATION**

Local Rule 2.0
Page 2 of 4

SHORT TITLE: Heather Rose v. Kenneth Hughes, M.D., et al.	CASE NUMBER
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	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Judicial Review	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.
Provisionally Complex Litigation	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.
Enforcement of Judgment	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	2., 9.
		<input type="checkbox"/> A6160 Abstract of Judgment	2., 6.
		<input type="checkbox"/> A6107 Confession of Judgment (non-domestic relations)	2., 9.
		<input type="checkbox"/> A6140 Administrative Agency Award (not unpaid taxes)	2., 8.
		<input type="checkbox"/> A6114 Petition/Certificate for Entry of Judgment on Unpaid Tax	2., 8.
<input type="checkbox"/> A6112 Other Enforcement of Judgment Case	2., 8., 9.		
Miscellaneous Civil Complaints	RICO (27)	<input type="checkbox"/> A6033 Racketeering (RICO) Case	1., 2., 8.
	Other Complaints (Not Specified Above) (42)	<input type="checkbox"/> A6030 Declaratory Relief Only	1., 2., 8.
		<input type="checkbox"/> A6040 Injunctive Relief Only (not domestic/harassment)	2., 8.
		<input type="checkbox"/> A6011 Other Commercial Complaint Case (non-tort/non-complex)	1., 2., 8.
<input type="checkbox"/> A6000 Other Civil Complaint (non-tort/non-complex)	1., 2., 8.		
Miscellaneous Civil Petitions	Partnership Corporation Governance (21)	<input type="checkbox"/> A6113 Partnership and Corporate Governance Case	2., 8.
	Other Petitions (Not Specified Above) (43)	<input type="checkbox"/> A6121 Civil Harassment	2., 3., 9.
		<input type="checkbox"/> A6123 Workplace Harassment	2., 3., 9.
		<input type="checkbox"/> A6124 Elder/Dependent Adult Abuse Case	2., 3., 9.
		<input type="checkbox"/> A6190 Election Contest	2.
		<input type="checkbox"/> A6110 Petition for Change of Name	2., 7.
		<input type="checkbox"/> A6170 Petition for Relief from Late Claim Law	2., 3., 4., 8.
<input type="checkbox"/> A6100 Other Civil Petition	2., 9.		

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SHORT TITLE: Heather Rose v. Kenneth Hughes, M.D., et al.	CASE NUMBER
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Item III. Statement of Location: Enter the address of the accident, party's residence or place of business, performance, or other circumstance indicated in Item II., Step 3 on Page 1, as the proper reason for filing in the court location you selected.

REASON: Check the appropriate boxes for the numbers shown under Column C for the type of action that you have selected for this case. <input type="checkbox"/> 1. <input type="checkbox"/> 2. <input type="checkbox"/> 3. <input checked="" type="checkbox"/> 4. <input type="checkbox"/> 5. <input type="checkbox"/> 6. <input type="checkbox"/> 7. <input type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10.		ADDRESS: 12732 W. Washington Blvd.
CITY: Los Angeles	STATE: CA	ZIP CODE: 90066

Item IV. Declaration of Assignment: I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that the above-entitled matter is properly filed for assignment to the Stanley Mosk courthouse in the Central District of the Superior Court of California, County of Los Angeles [Code Civ. Proc., § 392 et seq., and Local Rule 2.0, subs. (b), (c) and (d)].

Dated: October 10, 2017


 (SIGNATURE OF ATTORNEY/FILING PARTY)

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

1. Original Complaint or Petition.
2. If filing a Complaint, a completed Summons form for issuance by the Clerk.
3. Civil Case Cover Sheet, Judicial Council form CM-010.
4. Civil Case Cover Sheet Addendum and Statement of Location form, LACIV 109, LASC Approved 03-04 (Rev. 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.

LACIV 109 (Rev. 03/11)
 LASC Approved 03-04

LACIV 109 (Rev. 03/11)
LASC Approved 03-04

**CIVIL CASE COVER SHEET ADDENDUM
AND STATEMENT OF LOCATION**

Local Rule 2.0
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