

EXHIBIT 1
TO MORTON DECLARATION ISO
NOTICE OF REMOVAL

**SUMMONS
(CITACION JUDICIAL)**

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

**NOTICE TO DEFENDANT:
(AVISO AL DEMANDADO):**

WORDPRESS FOUNDATION, a California corporation,
AUTOMATTIC, INC., a Delaware corporation, and DOES 1-10

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

ALEXANDRE FAYCAL JOUDE, and DANIEL JOUDE

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): San Francisco Superior Court
400 McAllister St.,
San Francisco, CA 94102

CASE NUMBER:
(Número) **CGC-14-538193**

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):
Patricia McCoy Smith, Esq., 177 Post St., Suite 700, San Francisco, CA 94108. (415) 433-1700

DATE: March 24, 2014
(Fecha) **MAR 24 2014** CLERK OF THE COURT Clerk, by Victoria Gonzalez, Deputy (Secretario) (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)).



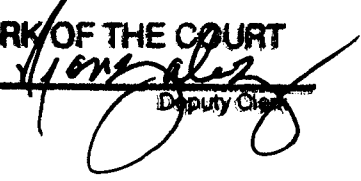
- NOTICE TO THE PERSON SERVED:** You are served
- as an individual defendant.
 - as the person sued under the fictitious name of (specify):
 - on behalf of (specify):

under: <input type="checkbox"/> CCP 416.10 (corporation)	<input type="checkbox"/> CCP 416.60 (minor)
<input type="checkbox"/> CCP 416.20 (defunct corporation)	<input type="checkbox"/> CCP 416.70 (conservatee)
<input type="checkbox"/> CCP 416.40 (association or partnership)	<input type="checkbox"/> CCP 416.90 (authorized person)
<input type="checkbox"/> other (specify):	
 - by personal delivery on (date):

1 PATRICIA MCCOY SMITH (SBN: 129290)
2 patsmith@dhillonsmith.com
3 JOHN-PAUL S. DEOL (SBN: 284893)
4 jpdeol@dhillonsmith.com
5 DHILLON & SMITH LLP
6 177 Post Street, Suite 700
7 San Francisco, CA 94108
8 Telephone: (415) 433-1700
9 Facsimile: (415) 520-6593

F I L E D
Superior Court of California
County of San Francisco

MAR 24 2014

CLERK OF THE COURT
By: 
Deputy Clerk

7 Attorneys for Plaintiffs Alexandre Fayçal Joude
8 and Daniel Joude

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **COUNTY OF SAN FRANCISCO - UNLIMITED JURISDICTION**

12 ALEXANDRE FAYÇAL JOUDE and
13 DANIEL JOUDE,

14 Plaintiffs,

15 v.

16 WORDPRESS FOUNDATION, a California
17 corporation, and AUTOMATTIC, INC., a
18 Delaware corporation, and DOES 1-10

19 Defendants.

Case No.: **CGC-14-538193**

**PLAINTIFFS ALEXANDRE FAYÇAL
JOUDE AND DANIEL JOUDE
COMPLAINT FOR INJUNCTIVE AND
DECLARATORY RELIEF**

1 Alexandre Fayçal Joude and Daniel Joude (“the Joudes” or “Plaintiffs”), by and
2 through their attorneys, file this Complaint against WordPress Foundation
3 (“WordPress”), Automattic, Inc. (“Automattic”), and Does 1-10 and, upon information
4 and belief, allege as follows:

5 1. This is an action by the Joude’s for declaratory and injunctive relief
6 directing Defendants WordPress, Automattic, Inc. and Does 1-10 to remove a blog that
7 purports to be authored by them in order to prevent irreparable harm to the Joude’s
8 personal and professional reputations.

9 **THE PARTIES**

10 2. Upon information and belief, Defendant WordPress Foundation is a
11 corporation incorporated under the laws of the State of California with its current
12 principal place of business in San Francisco County, California. Upon information and
13 belief, Defendant WordPress is involved in hosting, designing, and/or maintaining the
14 blog at issue on its website, <http://www.wordpress.com>.

15 3. Upon information and belief, Defendant Automattic, Inc. is a corporation
16 incorporated under the laws of the State of Delaware with its current principal place of
17 business in San Francisco County, California. Upon information and belief, Defendant
18 Automattic hosts, maintains, and administers the Blog at issue on its website,
19 <http://www.wordpress.com>.

20 4. Plaintiffs are unaware of the true names or capacities of the Defendants
21 sued herein under the fictitious names DOES 1 through 10, but pray for leave to amend
22 and serve such fictitiously named Defendants pursuant to California Code of Civil
23 Procedure § 474 once their names and capacities become known.

24 5. Plaintiff Alexandre Fayçal Joude is a private individual, and a French
25 citizen, residing in France.

26 6. Plaintiff Daniel Joude is a private individual, and a French citizen, residing
27 in France.

28 7. Upon information and belief, Defendants WordPress and Automattic are,
and, at all relevant times, were the alter ego of each other, and there exists, and at all

1 relevant times has existed, a unity of interest and ownership between WordPress and
2 Automattic such that any separateness has ceased to and, in fact, never did exist.

3 JURISDICTION AND VENUE

4 8. This Court has jurisdiction over this action pursuant to the California
5 Constitution, Article VI, Section 10, which grants the Superior Court "original
6 jurisdiction in all causes except those given by statute to other courts."

7 9. This Court has jurisdiction over all of the Defendants named in this action
8 because, upon information and belief, each Defendant is either a citizen of California, has
9 sufficient minimum contacts in California, or otherwise intentionally avails itself of
10 conducting business in California so as to render the exercise of jurisdiction over it by the
11 California Courts to be consistent with traditional notions of fair play and substantial
12 justice.

13 10. Venue is proper in this Court because, upon information and belief, one or
14 more of the named Defendants resides, transacts business, or has offices in the County of
15 San Francisco, and the unlawful practices, acts, and omissions alleged herein took place
16 in the County of San Francisco.

17 FACTUAL ALLEGATIONS

18 11. On or about March 4, 2014, the Joude's learned of the existence of a blog
19 called "the Hoodwankers," at the web address <http://thejoudes.wordpress.com>
20 purporting to be authored by Alexandre Fayçal Joude ("the Blog").

21 12. The Blog states, among other things, "I am the leader of the pack: Faisal
22 Hanna Joudi," a name by which Alexandre Fayçal Joude has been known.

23 13. The Blog contains numerous outrageous statements and claims about the
24 Joudes and their family that are false and, if believed by a reader of the blog, are
25 damaging to their personal and professional reputations.

26 14. On March 6, 2014, Alexandre Fayçal Joude sent an e-mail to WordPress,
27 asking the company to remove the Blog.

28 15. On March 12, 2014, on behalf of the Joudes, French attorney Jean-Luc
Imbert obtained an Order from the Tribunal de Grande Instance de Paris (the High Court

1 of Paris) directing WordPress and Automattic to take all necessary measures to remove
2 the Blog immediately. The Order of the High Court of Paris has been conveyed to
3 WordPress and Automattic. Nevertheless, the Blog has not been removed.

4 16. In response to Alexandre Fayçal Joude's March 6, 2014 e-mail, WordPress
5 stated that it was not in a position to "arbitrate content disputes" and would only remove
6 the Blog in response to a United States court order or an order served "via a United
7 States court or enforcement agency."

8 17. WordPress' terms of service page at the web address
9 <http://en.wordpress.com/tos/> states, "By making Content [sic] available, you represent
10 and warrant that . . . your blog is not named in a manner that misleads your readers into
11 thinking that you are another person or company."

12 18. WordPress' complaints page at the web address
13 <http://en.wordpress.com/complaints/> states, "We suspend content for . . . impersonating a
14 private person."

15 19. In spite of the fact that the WordPress webpage prohibits the
16 "impersonation of a private person," and the provision of the French Order to
17 WordPress, to date, WordPress has not removed the offending Blog, insisting that a
18 United States Court Order is necessary to remove it.

19 20. Upon information and belief, because of the content throughout the Blog, it
20 is likely that readers of the Blog will believe the outrageous statements made in the Blog
21 and will also believe that the Blog was authored by Alexandre Fayçal Joude, which is
22 false.

23 21. Alexandre Fayçal Joude never created, posted on, commented on, or edited
24 the Blog.

25 22. Alexandre Fayçal Joude never authorized any individual to create the Blog,
26 to impersonate him, or to make any posts on his behalf.

27 23. Should individuals reading the Blog believe that Alexandre Fayçal Joude
28 authored it and that the Joudes are connected with the acts alleged to be true on the Blog,
the Joude's will suffer irreparable harm to their personal and professional reputations.

1 24. No amount of money will prevent the imminent harm that the Joudes may
2 suffer to their personal and professional reputations, nor would any amount adequately
3 remedy the same. As a result, the Joude’s do not have an adequate remedy at law.

4 **FIRST CAUSE OF ACTION**

5 **Declaratory Relief Regarding the Order of the Tribunal de Grande Instance de Paris**
6 **(Against All Defendants)**

7 25. The Joudes incorporate by reference and re-allege as if fully stated herein
8 the allegations set out in the preceding paragraphs.

9 26. On March 12, 2014, the Tribunal de Grande Instance de Paris issued a valid
10 Order (“the French Order”), directing WordPress and Automattic, “to take all necessary
11 or useful measures for the immediate removal of the blog entitled ‘Alexandre Fayçal
12 Joude/ the Hoodwankers’ and ‘Danny Joude/ The Hoodwankers.’” *See Exhibits A and B.*

13 27. While WordPress and Automattic do not dispute the validity of the French
14 Order, they have taken the position that they will not “arbitrate content disputes” and
15 that they will only remove the Blog in response to a United States Court Order or the
16 order of a foreign court served “via a United States Court or enforcement agency.”

17 28. Because of Defendants’ refusal to comply with the French Order, the Joudes
18 allege that there is now an actual controversy as to the domestic enforceability of the
19 French Order.

20 29. A judicial decision on the domestic enforcement of the French Order and
21 the rights and duties thereunder is now necessary and appropriate so that Defendants
22 will agree to remove the Blog.

23 30. The Joudes request declaratory relief in order to establish that WordPress
24 and Automattic are bound by the March 12, 2014 Order of the Tribunal de Grande
25 Instance de Paris, ordering them to remove and/or take down the Blog.

1 **SECOND CAUSE OF ACTION**

2 **Declaratory Relief Regarding WordPress' Terms of Service and Complaints Websites**
3 **(Against All Defendants)**

4 31. The Joudes incorporate by reference and re-allege as if fully stated herein
5 the allegations set out in the preceding paragraphs.

6 32. Defendants' terms of service page at the web address
7 <http://en.wordpress.com/tos/> states, "By making Content [sic] available, you represent
8 and warrant that . . . your blog is not named in a manner that misleads your readers into
9 thinking that you are another person or company."

10 33. Defendants' complaints page at the web address
11 <http://en.wordpress.com/complaints/> states, "We suspend content for . . . impersonating a
12 private person."

13 34. On March 6, 2014, Plaintiff Alexandre Fayçal Joude sent an e-mail to
14 Defendants asking them to remove the Blog. Defendants responded by stating that they
15 were not in a position to "arbitrate content disputes" and would only remove the Blog in
16 response to a United States court order or an order served via a United States court or
17 enforcement agency.

18 35. Based upon Defendants response to Plaintiff Alexandre Fayçal Joude's
19 March 6, 2014 e-mail and Defendants refusal to remove the Blog in keeping with
20 Defendants own, stated policy, the Joudes allege that there is an actual controversy as to
21 Defendants obligation to remove and/or take down the Blog.

22 36. A judicial decision on Defendants obligation to remove and/or take down
23 the Blog under their own policies is now necessary and appropriate so that Defendants
24 will agree to remove the Blog.

25 37. The Joudes request declaratory relief to establish that WordPress and
26 Automattic are bound to comply with their Terms of Service and Complaints website
27 stated policy to suspend any content that impersonates a private person.
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THIRD CAUSE OF ACTION

Misappropriation of Likeness

(Against All Defendants)

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4 38. The Joudes incorporate by reference and re-allege as if fully stated herein
5 the allegations set out in the preceding paragraphs.

6 39. In creating, maintaining, posting on, commenting on, hosting and/or
7 editing the Blog, Defendants used the Joudes names, likenesses, and identities without
8 the permission of either Alexandre Fayçal Joude or Daniel Joude.

9 40. Upon information and belief, in creating, maintaining, posting on,
10 commenting on, hosting and/or editing the Blog, Defendants gained, among other
11 advantages, a commercial benefit by using the names, likenesses, and identities of
12 Alexandre Fayçal Joude and Daniel Joude.

13 41. Upon information and belief, the Joudes have suffered harm to their
14 reputations on account of the statements made in the Blog.

15 42. Defendants conduct was a substantial factor in causing the Joudes harm
16 and will continue to cause them additional harm in the future if the Blog is not ordered to
17 be removed.

18 43. The Joudes privacy interests outweigh the public interest served by
19 Defendants use of their names, likenesses, and identities on the Blog because there is no
20 public interest served by such use.

PRAYER FOR RELIEF

21 WHEREFORE, Plaintiffs Alexandre Fayçal Joude and Daniel Joude pray for the
22 following relief:

23 44. Declaratory relief establishing that Defendants are bound by the March 12,
24 2014 order of the Tribunal de Grande Instance de Paris ordering them to remove and/or
25 take down the Blog;

26 45. Declaratory relief establishing that Defendants are bound to enforce their
27 obligations stated on and agreed to on their Terms of Service and Complaints website to
28 suspend any content that impersonates a private person;

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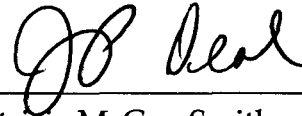
46. Preliminary, permanent and mandatory injunctive relief directing Defendants', their officers, agents, and all those acting in concert with them, to remove and/or take down the Blog; and

47. For such other and further relief as the Court may deem equitable and appropriate.

Date: March 24, 2014

DHILLON & SMITH LLP

By:



Patricia McCoy Smith
John-Paul S. Deol
Attorneys for Plaintiffs
Alexandre Fayçal Joude and Daniel Joude

EXHIBIT A

ORDONNANCE

Christian HOURS
Vice-Président
Délégué par le Président du Tribunal
de Grande Instance de Paris.

Nous, Juge auprès du Tribunal de Grande Instance de PARIS,

Vu les dispositions de la Loi n° 2004-575 en date du 21 juin 2004,

Vu la requête qui précède, les motifs sus-énoncés et les pièces à l'appui,

Donnons acte à Messieurs Alexandre Fayçal JOUDE et Danny JOUDE de la présentation de leur requête,

Ordonnons aux sociétés WORDPRESS.COM, 60 29th Street, San Francisco, Californie 94110, USA et / ou AUTOMATTIC, 132 Hawthorne Street, Californie 94107, USA, de prendre toutes mesures nécessaires ou utiles au retrait immédiat du blog intitulé « Alexandre Fayçal Joude / the Hoodwankers » et « Danny Joude / The Hoodwankers » ;

Disons que cette ordonnance devra être exécutée dans un délai d'au plus trois (3) mois ;

Disons qu'en cas de difficulté, il nous en sera référé.

Fait en notre Cabinet, au Palais de Justice de PARIS, le ^{12 mars} ----- 2014.



EXHIBIT B

ORDER

Christian HOURS
Vice President
Delegated by the President of the
High Court of Paris

We, a judge with the High Court of PARIS,
Given the provisions of Law No 2004-575 dated June 21st, 2004,
Given the preceding request, the grounds set out above and the supporting items,

Acknowledge Mr. Alexandre Fayçal JOUDE and Mr. Danny JOUDE in the presentation
of their request,

Order the companies WORDPRESS.COM, 60 29th Street, San Francisco, California
94110, USA and/or AUTOMATTIC, 132 Hawthorne Street, California 94107, USA, to
take all necessary or useful measures for the immediate removal of the blog entitled
"Alexandre Fayçal Joude/ the Hoodwankers" and "Danny Joude/ The
Hoodwankers";

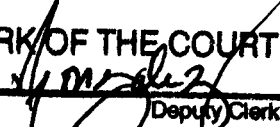
State that this order must be executed in a time period of three (3) months at the
maximum;

State that in the event of difficulty, it will be referred to us.

Given at our Office, at the Palace of Justice of PARIS, March 12th, 2014

(seal)
HIGH COURT OF PARIS
- S 035 -

(illegible signature)

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Patricia McCoy Smith (129290), John-Paul Singh Deol (284893) Dhillon & Smith LLP 177 Post Street, Suite 700 San Francisco, CA 94108 TELEPHONE NO.: (415) 433-1700 FAX NO.: (415) 520-6593 ATTORNEY FOR (Name): Plaintiffs Alexandre Faycal Joude and Daniel Joude	FOR COURT USE ONLY <b style="font-size: 2em;">FILED Superior Court of California County of San Francisco MAR 24 2014 CLERK OF THE COURT BY:  Deputy Clerk
SUPERIOR COURT OF CALIFORNIA, COUNTY OF San Francisco STREET ADDRESS: 400 McAllister St. MAILING ADDRESS: CITY AND ZIP CODE: San Francisco, CA 94102 BRANCH NAME: Civic Center Courthouse	CASE NUMBER: <b style="font-size: 1.5em;">CGC-14-538193 JUDGE: DEPT:
CASE NAME: Alexandre Faycal Joude, et al. v. WordPress Foundation, et al.	CIVIL CASE COVER SHEET <input checked="" type="checkbox"/> Unlimited (Amount demanded exceeds \$25,000) <input type="checkbox"/> Limited (Amount demanded is \$25,000 or less) Complex Case Designation <input type="checkbox"/> Counter <input type="checkbox"/> Joinder Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)

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

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

Auto Tort <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46) 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) 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 type="checkbox"/> Professional negligence (25) <input checked="" type="checkbox"/> Other non-PI/PD/WD tort (35) Employment <input type="checkbox"/> Wrongful termination (36) <input type="checkbox"/> Other employment (15)	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 (18) <input type="checkbox"/> Other contract (37) Real Property <input type="checkbox"/> Eminent domain/Inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (26) Unlawful Detainer <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38) 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 (39)	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) Enforcement of Judgment <input type="checkbox"/> Enforcement of judgment (20) Miscellaneous Civil Complaint <input type="checkbox"/> RICO (27) <input type="checkbox"/> Other complaint (not specified above) (42) 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): Three (3)

5. This case is is not a class action suit.

6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)

Date: March 24, 2014
 John-Paul S. Deol 

(TYPE OR PRINT NAME)

(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

NOTICE

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