

Downtown L.A. Law Group
3460 Wilshire Blvd., ST. #950
Los Angeles, CA 90010

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FILED
Superior Court of California
County of Los Angeles

FEB 14 2018

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

**FILED BY FAX
(CRC 2005)**

8 **SUPERIOR COURT OF CALIFORNIA**
9 **FOR THE COUNTY OF SAN BERNARDINO**

11 MARCIA ENOS, an individual,
12
13 Plaintiff,

14 v.

15 ESTELA MATA, AS TRUSTEE FOR
16 HUCANA TRUST; NORTH BAY LODGE
17 CONDOMINIUM OWNERS ASSOCIATION,
18 a corporation; AIRBNB, INC. a corporation;
19 and DOES 1-25, inclusive,
20
21 Defendants.

Case No. **BC 6 9 3 9 4 0**

Judge:
Dept.:

(UNLIMITED CIVIL ACTION)
(DEMAND EXCEEDS \$25,000)

COMPLAINT FOR DAMAGES

1. NEGLIGENCE
2. PREMISES LIABILITY

[JURY TRIAL DEMANDED]

22
23 COMES NOW, Plaintiff, MARCIA ENOS, and alleges against Defendants, and each
24 of them, as follows:

25 1. Plaintiff is informed and believes, and based upon such information and belief
26 alleges that at all times relevant hereto Defendant, ESTELA MATA, is a Trustee for the
27 HUCANA TRUST, a business entity organized and existing under and by virtue of the laws
28

02/14/2018

CIT/CASE: BC693940
LEA/DEF#:

RECEIPT #: CCH524880040
DATE PAID: 02/14/18 09:52 AM
PAYMENT: \$435.00 310

RECEIVED:
CHECK: \$435.00
CASH: \$0.00
CHANGE: \$0.00
CARD: \$0.00

D-93

FSC: 07 / 31 / 2019 TRAIL: 08 / 14 / 2019 OSC: 02 / 16 / 2021

Handwritten notes and stamps, including a date stamp that appears to be 02/14/2018 and some illegible text.

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1 of the State of California with its principal place of business in the County of San
2 Bernardino.

3 2. Plaintiff is informed and believes, and based upon such information and belief
4 alleges that at all times relevant hereto Defendant, NORTH BAY LODGE CONDOMINIUM
5 OWNERS ASSOCIATION, is a non-profit corporation organized and existing under and by
6 virtue of the laws of the State of California, the Stirling-Davis Common Interest
7 Development Act, with its principal pace of business in the County of San Bernardino.

8 3. Plaintiff is informed and believes, and based upon such information and belief
9 alleges that at all times relevant hereto Defendant, AIRBNB, INC., was and is a Delaware
10 Corporation leasing short-term rental properties under and by virtue the laws in the State of
11 California, with its principal place of business in San Francisco.

12 4. Defendants DOES 1-25, inclusive, are sued herein under fictitious names,
13 their true names and capacities being unknown to Plaintiff. Plaintiff will amend this
14 complaint to allege their true names and capacities when ascertained. Plaintiff is informed
15 and believes and thereon alleges that each of the fictitiously named Defendants is responsible
16 in some manner for the occurrences herein alleged, and that Plaintiff's damages as herein
17 alleged were proximately caused by those Defendants.

18 5. DEFENDANTS, ESTELA MATA, as Trustee for the HUCANA TRUST,
19 NORTH BAY CONDOMINIUM OWNERS ASSOCIATION, AIRBNB, INC. and
20 DEFENDANTS DOES 1-25, inclusive, are, and at all times herein mentioned were
21 individuals, corporations, sole proprietors, shareholders, associations, partners and
22 partnerships, joint venturers, and/or business entities unknown, primarily residing and doing
23 business in the county of San Bernardino, State of California. At all times herein mentioned,
24 said Defendants were the owners, lessors, sub-lessors, managing agents, landlords, renters,
25 managers, operators, marketers, inspectors, maintainers and controllers, of a condominium
26 rental property located at 27400 Sugar Pine Drive, Lake Arrowhead, CA 92352 (hereinafter
27 referred to as "THE SUBJECT PREMISES"), to which building the general public is invited
28 to come.

1 6. At all times herein mentioned, Defendants, and each of the them were the
 2 agents, servants, and employees of their co-defendants, and in doing the things hereinafter
 3 alleged were acting in the scope of their authority as agents, servants, and employees, and
 4 with permission and consent of their co-defendants. Plaintiff is further informed and
 5 believes, and thereon alleges, that each of the Defendants herein gave consent to, ratified, and
 6 authorized the acts alleged herein to each of the remaining Defendants.

7
 8 **FIRST CAUSE OF ACTION**
 9 **NEGLIGENCE**
 10 **(Against All Defendants)**

11
 12 7. Plaintiff re-alleges each and every allegation contained in the above
 13 Paragraphs 1 through 6, and by this reference incorporates said paragraphs as though fully set
 14 forth herein.

15 8. On or about December 25, 2016, Plaintiff was lawfully on the premises of
 16 Defendant ESTELA MATA, as Trustee for the HUCANA TRUST located within the
 17 NORTH BAY CONDOMINIUM OWNERS ASSOCIATION's common interest
 18 development, leased short-term by AIRBNB, INC.

19 9. As a short-term renter of the condominium unit owned by the HUCANA
 20 TRUST located within the NORTH BAY CONDOMINIUM OWNERS ASSOCIATION's
 21 common interest development, leased by AIRBNB, INC. it was foreseeable that Plaintiff,
 22 MARCIA ENOS, would walk on the area of the condominium unit and adjacent common
 23 area.

24 10. Defendants, and each of them, had a duty to act as a reasonably prudent
 25 person would act under the circumstances.

26 11. At all times herein mentioned, defendants, and each of them, had sole and
 27 exclusive custody and control of the aforesaid condominium unit and adjacent common area
 28 and activities occurring at said condominium unit and adjacent common areas, and owed a

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1 duty to this plaintiff and others lawfully on said premises to keep said premises in a good and
2 safe condition; contrary thereto, defendants, and each of them, were negligent, careless and
3 reckless in the ownership, care, control, maintenance, operation, leasing, management,
4 caretaking, repairing, contracting, and subcontracting of said premises, in that they caused
5 and permitted said premises to be and remain in a dangerous and unsafe condition in that
6 defendants, and each of them, caused or permitted structures and/or components and/or other
7 parts of said condominium unit and adjacent common area to be and remain uncleared of
8 unnatural accumulations of ice, snow, and to be otherwise deficient. In addition, defendants,
9 and each of them were negligent, careless and reckless in that they failed to properly warn of
10 the dangerous condition, and in that they failed to properly protect the area of said dangerous
11 condition.

12 12. Plaintiff MARCIA ENOS was walking near a car driven by her husband.
13 While stepping forward the Plaintiff had to traverse ground that was covered with
14 unnaturally built-up ice and hardened snow.

15 13. The Plaintiff slipped and fell on the unnaturally accumulated ice and snow
16 resulting in personal injuries, including, but not limited to, a fractured radius.

17 14. Said defendants, and each of them, fully and well knew, or should have
18 known in the exercise of reasonable care, that the structures and/or components and/or other
19 parts of said condominium unit and adjacent common area were in a dangerous and defective
20 and unsafe condition, and a menace to plaintiff and others lawfully on said premises.

21 15. By reason of the aforesaid negligence, carelessness and recklessness of
22 defendants, and each of them, as aforesaid, and as a direct and proximate result thereof, the
23 dangerously untended snow and ice remained on the grounds of the condominium unit and
24 common areas causing plaintiff to sustain the injuries and damages as hereinafter alleged.

25 16. As a direct and proximate result of the negligence, carelessness and
26 recklessness of defendants, and each of them, as aforesaid, plaintiff was hurt in her health,
27 strength and activity, sustaining severe shock and injuries to her person, all of which said
28 injuries have caused, continue to cause, and will in the future cause plaintiff great physical

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1 and emotional pain and suffering; plaintiff is informed and believes, and therefore alleges,
2 that said injuries are permanent in nature, all to his damage in a sum according to proof.

3 17. As a direct and proximate result of the negligence, carelessness and
4 recklessness of defendants and each of them, as aforesaid, plaintiff has been required to
5 obtain medical services, and plaintiff has suffered severe emotional distress.

6
7 **SECOND CAUSE OF ACTION**

8 **PREMISES LIABILITY**

9 **(Against All Defendants)**
10

11 18. Plaintiff re-alleges each and every allegation contained in the above
12 Paragraphs 1 through 6 and 8 through 17, inclusive, and by this reference incorporates said
13 paragraphs as though fully set forth herein.

14 19. Premises liability is based upon general negligence principles addressed
15 herein. However, in addition to defendants' obligations under the laws of general
16 negligence, Defendants ESTELA MATA, as Trustee for the HUCANA TRUST located
17 within the NORTH BAY CONDOMINIUM OWNERS ASSOCIATION, AIRBNB, INC.
18 and DOES 1 through 25, inclusive, owed Plaintiff and all others similarly situated a specific
19 duty of care.

20 20. Defendant, NORTH BAY CONDOMINIUM OWNERS ASSOCIATION,
21 owed a duty of due care with respect to maintaining the common areas of the complex and,
22 as such, the association has a duty to use due care for the residents' safety in the areas under
23 the association's control.

24 21. Defendants, and each of them, knew or should have known of the dangerous
25 condition on the land including, but not limited to, piles of untreated ice and snow that had
26 unnaturally accumulated such as to make the area near the condominium unit and common
27 areas unduly precarious, treacherous and hazardous.
28

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1 22. Defendants, and each of them, breached their duty to the Plaintiff by making
2 no reasonable effort to clear the area by shovel, salt or sand, or other device in such a manner
3 that did not attribute to injuries to others.

4 23. Defendants, and each of them, further breached their duty to the Plaintiff by
5 failing to provide for use by plaintiff any shovel, salt or sand, or other device to clear the area
6 of unnaturally accumulated snow and ice.

7 24. Defendants, and each of them, were in violation of *California Civil Code*
8 §§1941.1(a)(7) requiring the building, grounds, and appurtenances at the time of the
9 commencement of the rental agreement, and all areas under control of the landlord, kept in
10 every part clean, sanitary and free from accumulation of debris, in the instant matter
11 accumulation of piled mounds of snow and ice permitted to unnaturally accumulate for a
12 period of days without effort to clear the dangerous area.

13 25. By reason of the aforesaid negligence, carelessness and recklessness of
14 defendants, and each of them, and as a direct and proximate result thereof, the dangerously
15 untended snow and ice remained on the grounds of the condominium unit and common areas
16 causing plaintiff to sustain the injuries and damages as hereinafter alleged.

17 26. As a direct and proximate result of the negligence, carelessness and
18 recklessness of defendants, and each of them, as aforesaid, plaintiff was hurt in her health,
19 strength and activity, sustaining severe shock and injuries to her person, all of which said
20 injuries have caused, continue to cause, and will in the future cause plaintiff great physical
21 and emotional pain and suffering; plaintiff is informed and believes, and therefore alleges,
22 that said injuries are permanent in nature, all to his damage in a sum according to proof.

23
24 **PRAYER FOR RELIEF**

25
26 WHEREFORE, Plaintiff demands judgment against Defendants as follows:

- 27 1. For general damages in a sum according to proof;
28 2. For medical, hospital, and related expenses according to proof;

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STRIKETHROUGH

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- 3. For loss of future earning capacity according to proof;
- 4. For costs of suit herein incurred;
- 5. For pre-trial interest as allowable by law;
- 6. For such other and further relief as this Court may deem proper.

DATED: February 13, 2018

DOWNTOWN L.A. LAW GROUP


BY: Igor Fradkin, Esq.
John C. Notti, Esq.
Ronald R. Heard, Esq.
Attorney for Plaintiff,
MARCIA ENOS

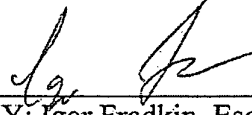
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JURY TRIAL DEMANDED

Plaintiff demands trial by jury of all issues so triable.

DATED: February 13, 2018

DOWNTOWN L.A. LAW GROUP



BY: Agor Fradkin, Esq.
John C. Notti, Esq.
Ronald R. Heard, Esq.
Attorneys for Plaintiff,
MARCIA ENOS

Downtown L.A. Law Group
3460 Wilshire Blvd., ST. #950
Los Angeles, CA 90010

2024/11/20

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):
Igor Fradkin, Esq. (SBN 299491)
Daniel Azizi (SBN 268995)
Downtown L.A. Law Group
3460 Wilshire Blvd., #950, Los Angeles, CA 90010
TELEPHONE NO.: 213-389-3765 FAX NO.: 877-389-2775
ATTORNEY FOR (Name): Plaintiff, MARCIA ENOS

FOR COURT USE ONLY
FILED
Superior Court of California
County of Los Angeles
FEB 14 2018
Sherri R. Carter, Executive Officer/Clerk
By M. Soto, Deputy
Moses Soto

SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles
STREET ADDRESS: 111 North Hill Street
MAILING ADDRESS: 111 North Hill Street
CITY AND ZIP CODE: Los Angeles 90012
BRANCH NAME: Stanley Mosk - Central

CASE NAME:
Marcia Enos v. Estela, as Trustee for Hucana Trust, 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 693940
JUDGE:
DEPT:

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

1. Check one box below for the case type that best describes this case:
- | | | |
|---|--|--|
| Auto Tort
<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 checked="" 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 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) |
|---|--|--|

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): **TWO**
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: February 13, 2018
Igor Fradkin, Esq. (SBN 299491)
(TYPE OR PRINT NAME)

[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.

FILED BY FAX
(CM-010)

INSTRUCTIONS ON HOW TO COMPLETE THE COVER SHEET

To Plaintiffs and Others Filing First Papers. If you are filing a first paper (for example, a complaint) in a civil case, you must complete and file, along with your first paper, the *Civil Case Cover Sheet* contained on page 1. This information will be used to compile statistics about the types and numbers of cases filed. You must complete items 1 through 6 on the sheet. In item 1, you must check one box for the case type that best describes the case. If the case fits both a general and a more specific type of case listed in item 1, check the more specific one. If the case has multiple causes of action, check the box that best indicates the primary cause of action. To assist you in completing the sheet, examples of the cases that belong under each case type in item 1 are provided below. A cover sheet must be filed only with your initial paper. Failure to file a cover sheet with the first paper filed in a civil case may subject a party, its counsel, or both to sanctions under rules 2.30 and 3.220 of the California Rules of Court.

To Parties In Rule 3.740 Collections Cases. A "collections case" under rule 3.740 is defined as an action for recovery of money owed in a sum stated to be certain that is not more than \$25,000, exclusive of interest and attorney's fees, arising from a transaction in which property, services, or money was acquired on credit. A collections case does not include an action seeking the following: (1) tort damages, (2) punitive damages, (3) recovery of real property, (4) recovery of personal property, or (5) a prejudgment writ of attachment. The identification of a case as a rule 3.740 collections case on this form means that it will be exempt from the general time-for-service requirements and case management rules, unless a defendant files a responsive pleading. A rule 3.740 collections case will be subject to the requirements for service and obtaining a judgment in rule 3.740.

To Parties In Complex Cases. In complex cases only, parties must also use the *Civil Case Cover Sheet* to designate whether the case is complex. If a plaintiff believes the case is complex under rule 3.400 of the California Rules of Court, this must be indicated by completing the appropriate boxes in items 1 and 2. If a plaintiff designates a case as complex, the cover sheet must be served with the complaint on all parties to the action. A defendant may file and serve no later than the time of its first appearance a joinder in the plaintiff's designation, a counter-designation that the case is not complex, or, if the plaintiff has made no designation, a designation that the case is complex.

CASE TYPES AND EXAMPLES

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

SHORT TITLE: Enos v. Mata, as Trustee for Hucana Trust, et al.	CASE NUMBER BC 693940
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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 2.3 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 3-5 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 2.3.

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

- | | |
|--|--|
| 1. Class actions must be filed in the Stanley Mosk Courthouse, central district. | 6. Location of property or permanently garaged vehicle. |
| 2. May be filed in central (other county, or no bodily injury/property damage). | 7. Location where petitioner resides. |
| 3. Location where cause of action arose. | 8. Location wherein defendant/respondent functions wholly. |
| 4. Location where bodily injury, death or damage occurred. | 9. Location where one or more of the parties reside. |
| 5. Location where performance required or defendant resides. | 10. Location of Labor Commissioner Office |
| | 11. Mandatory Filing Location (Hub Case) |

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 checked="" 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 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)	1., 4.
		<input type="checkbox"/> A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.)	1., 4.
<input type="checkbox"/> A7270 Intentional Infliction of Emotional Distress		1., 3.	
<input type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death		1., 4.	

SHORT TITLE: Enos v. Mata, as Trustee for Hucana Trust, 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.
	Other (35)	<input type="checkbox"/> A6025 Other Non-Personal Injury/Property Damage tort	2., 3.
Employment	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 <input type="checkbox"/> A6034 Collections Case-Purchased Debt (Charged Off Consumer Debt Purchased on or after January 1, 2014)	2., 5., 6, 11 2., 5, 11 5, 6, 11
	Insurance Coverage (18)	<input type="checkbox"/> A6015 Insurance Coverage (not complex)	1., 2., 5., 8.
	Other Contract (37)	<input type="checkbox"/> A6009 Contractual Fraud <input type="checkbox"/> A6031 Tortious Interference <input type="checkbox"/> A6027 Other Contract Dispute(not breach/insurance/fraud/negligence)	1., 2., 3., 5. 1., 2., 3., 5. 1., 2., 3., 8.
	Eminent Domain/Inverse Condemnation (14)	<input type="checkbox"/> A7300 Eminent Domain/Condemnation Number of parcels_____	2.
Real Property	Wrongful Eviction (33)	<input type="checkbox"/> A6023 Wrongful Eviction Case	2., 6.
	Other Real Property (26)	<input type="checkbox"/> A6018 Mortgage Foreclosure <input type="checkbox"/> A6032 Quiet Title <input type="checkbox"/> A6060 Other Real Property (not eminent domain, landlord/tenant, foreclosure)	2., 6. 2., 6. 2., 6.
	Unlawful Detainer-Commercial (31)	<input type="checkbox"/> A6021 Unlawful Detainer-Commercial (not drugs or wrongful eviction)	2., 6.
Unlawful Detainer	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.

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SHORT TITLE: Enos v. Mata, as Trustee for Hucana Trust, 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"/> A6008 Claims Involving Mass Tort	1., 2., 8.
	Securities Litigation (28)	<input type="checkbox"/> A6035 Securities Litigation Case	1., 2., 8.
	Toxic Tort Environmental (30)	<input type="checkbox"/> A6036 Toxic Tort/Environmental	1., 2., 3., 8.
	Insurance Coverage Claims from Complex Case (41)	<input type="checkbox"/> A6014 Insurance Coverage/Subrogation (complex case only)	1., 2., 5., 8.
Enforcement of Judgment	Enforcement of Judgment (20)	<input type="checkbox"/> A6141 Sister State Judgment <input type="checkbox"/> A6160 Abstract of Judgment <input type="checkbox"/> A6107 Confession of Judgment (non-domestic relations) <input type="checkbox"/> A6140 Administrative Agency Award (not unpaid taxes) <input type="checkbox"/> A6114 Petition/Certificate for Entry of Judgment on Unpaid Tax <input type="checkbox"/> A6112 Other Enforcement of Judgment Case	2., 9. 2., 6. 2., 9. 2., 8. 2., 8. 2., 8., 9.
	RICO (27)	<input type="checkbox"/> A6033 Racketeering (RICO) Case	1., 2., 8.
Miscellaneous Civil Complaints	Other Complaints (Not Specified Above) (42)	<input type="checkbox"/> A6030 Declaratory Relief Only <input type="checkbox"/> A6040 Injunctive Relief Only (not domestic/harassment) <input type="checkbox"/> A6011 Other Commercial Complaint Case (non-tort/non-complex) <input type="checkbox"/> A6000 Other Civil Complaint (non-tort/non-complex)	1., 2., 8. 2., 8. 1., 2., 8. 1., 2., 8.
	Partnership Corporation Governance (21)	<input type="checkbox"/> A6113 Partnership and Corporate Governance Case	2., 8.
Miscellaneous Civil Petitions	Other Petitions (Not Specified Above) (43)	<input type="checkbox"/> A6121 Civil Harassment <input type="checkbox"/> A6123 Workplace Harassment <input type="checkbox"/> A6124 Elder/Dependent Adult Abuse Case <input type="checkbox"/> A6190 Election Contest <input type="checkbox"/> A6110 Petition for Change of Name <input type="checkbox"/> A6170 Petition for Relief from Late Claim Law <input type="checkbox"/> A6100 Other Civil Petition	2., 3., 9. 2., 3., 9. 2., 3., 9. 2. 2., 7. 2., 3., 4., 8. 2., 9.

SHORT TITLE: Enos v. Mata, as Trustee for Hucana Trust, 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 checked="" type="checkbox"/> 1. <input type="checkbox"/> 2. <input type="checkbox"/> 3. <input type="checkbox"/> 4. <input type="checkbox"/> 5. <input type="checkbox"/> 6. <input type="checkbox"/> 7. <input type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10. <input type="checkbox"/> 11.		ADDRESS: At or near 8535 Sunset Blvd.
CITY: West Hollywood	STATE: CA	ZIP CODE: 90069

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 2.3, subd.(a).

Dated: February 13, 2018



 (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. 03/15).
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.

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