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FILED
LOS ANGELES SUPERIOR COURT

JUL 30 2014

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JAC
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8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF LOS ANGELES — CENTRAL DISTRICT

10 **FSC: 01/13/2015 TRIAL: 01/30/2015 OSC: 08/01/2016**

11 SHIRLEY OLIVER, *

12 Plaintiff,

13 vs.

14 APEX DIGITAL, INC., a California corporation;
APEX DIGITAL, LLC, a California limited
15 liability company;
MOTOROLA MOBILITY LLC., a Delaware
16 limited liability company;
TIME WARNER CABLE, INC., a Delaware
17 corporation;
ASN WOODLAND HILLS EAST, LLC, a
18 Delaware limited liability company;
ARCHSTONE PROPERTY MANAGEMENT
19 (CALIFORNIA) INCORPORATED, a Delaware
corporation;
20 ARCHSTONE COMMUNITIES LLC, a Delaware
limited liability company;
21 ARCHSTONE DEVELOPER LLC, a Delaware
limited liability company;
22 OAKWOOD WOODLAND HILLS LESSEE,
LLC, a Delaware limited liability company;
23 OAKWOOD WORLDWIDE LOCAL, LLC, a
Delaware limited liability company;
24 WORLDWIDE CORPORATE HOUSING, L.P., a
California limited partnership; and DOES 1
25 through 100, Inclusive,

26 Defendants.

Case No.: **BC516791**

**COMPLAINT FOR WRONGFUL
DEATH - STRICT PRODUCTS
LIABILITY; NEGLIGENT
PRODUCTS LIABILITY;
NEGLIGENCE**

D92 Amy Hogue

CIT/CASE: BC516791
LEA/DEF#:
RECEIPT #: CCH439933100
DATE PAID: 07/30/13 03:47 PM
PAYMENT: \$435.00 310
RECEIVED:
CHECK: \$435.00
CASH: \$0.00
CHANGE: \$0.00
CARD: \$0.00

07/30/2013

1 COMES NOW Plaintiff, SHIRLEY OLIVER, surviving heir of LAUREN HUMPHREY,
2 deceased, and for causes of action against the defendants, and each of them, alleges:
3

4 **FIRST CAUSE OF ACTION**

5 **(For Wrongful Death Based on Strict Products Liability**

6 **Against APEX DIGITAL, INC., APEX DIGITAL, LLC, MOTOROLA**

7 **MOBILITY LLC, TIME WARNER CABLE, INC. and DOES 1-100)**

8 1. The true names and capacities, whether corporate, associate, individual or
9 otherwise, of defendants DOES 1 through 100, inclusive, are unknown to Plaintiff, who therefore
10 sues said defendants by such fictitious names. Each of the defendants designated herein as a
11 DOE is negligently or otherwise legally responsible in some manner for the events and
12 happenings herein referred to and caused injuries and damages proximately thereby to the
13 decedent LAUREN HUMPHREY, as herein alleged. Plaintiff will ask leave of court to amend
14 this complaint to show their true names and capacities when the same have been ascertained.

15 2. At all times herein mentioned, defendants, and each of them, were the agents,
16 servants, employees, joint venturers, successors-in-interest, assigns, and subsidiaries, each of the
17 other, and at all times pertinent hereto were acting within the course and scope of their authority
18 as such agents, servants, employees, joint venturers, successors-in-interest, assigns, and
19 subsidiaries.

20 3. At all times herein mentioned, defendants APEX DIGITAL, INC. ("APEX
21 INC."), and DOES 1 through 100, inclusive, were and are corporations authorized to do and
22 doing business in the State of California.

23 4. At all times herein mentioned, defendants APEX DIGITAL, LLC ("APEX
24 LLC"), and DOES 1 through 100, inclusive, were and are limited liability companies authorized
25 to do and doing business in the State of California.
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1 5. 10. At all times herein mentioned, defendants MOTOROLA MOBILITY LLC
2 (“MOTOROLA”), and DOES 1 through 100, inclusive, were and are limited liability companies
3 authorized to do and doing business in the State of California.

4 6. At all times herein mentioned, defendants TIME WARNER CABLE, INC.,
5 (“TIME WARNER”) and DOES 1 through 100, inclusive, were and are corporations authorized
6 to do and doing business in the State of California.

7 7. At all times herein mentioned, defendants ASN WOODLAND HILLS EAST
8 LLC (“ASN WOODLAND HILLS”), and DOES 1 through 100, inclusive, were and are limited
9 liability companies authorized to do and doing business in the State of California.

10 8. At all times herein mentioned, defendants ARCHSTONE PROPERTY
11 MANAGEMENT (CALIFORNIA) INCORPORATED (“ARCHSTONE PROPERTY
12 MANAGEMENT”), and DOES 1 through 100, inclusive, were and are corporations authorized
13 to do and doing business in the State of California.

14 9. At all times herein mentioned, defendants ARCHSTONE COMMUNITIES LLC
15 (“ARCHSTONE COMMUNITIES”), and DOES 1 through 100, inclusive, were and are limited
16 liability companies authorized to do and doing business in the State of California.

17 10. At all times herein mentioned, defendants ARCHSTONE DEVELOPER LLC
18 (“ARCHSTONE DEVELOPER”), and DOES 1 through 100, inclusive, were and are limited
19 liability companies authorized to do and doing business in the State of California.

20 11. At all times herein mentioned, defendants OAKWOOD WOODLAND HILLS
21 LESSEE, LLC (“OAKWOOD WOODLAND HILLS”) and DOES 1 through 100, inclusive,
22 were and are limited liability companies authorized to do and doing business in the State of
23 California.

24 12. At all times herein mentioned, defendants OAKWOOD WORLDWIDE LOCAL,
25 LLC (“OAKWOOD WORLDWIDE LOCAL”) and DOES 1 through 100, inclusive, were and
26 are limited liability companies authorized to do and doing business in the State of California.
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1 13. At all times herein mentioned, defendants WORLDWIDE CORPORATE
2 HOUSING, L.P. ("WORLDWIDE CORPORATE") and DOES 1 through 100, inclusive, were
3 and are limited partnerships authorized to do and doing business in the State of California.

4 14. At all times herein mentioned, LAUREN HUMPHREY, deceased, was the loving
5 and dutiful daughter to Plaintiff SHIRLEY OLIVER.

6 15. At all times herein mentioned, defendants APEX INC., APEX LLC,
7 MOTOROLA, TIME WARNER, and DOES 1-100, and each of them, were and are in the
8 business of, and prior to November 13, 2012, did design, manufacture, assemble, inspect, repair,
9 maintain, endorse, draft, test, franchise, supply, sell, lease, distribute, and place into the stream of
10 commerce a certain television and/or cable box equipment.

11 16. The aforementioned products and their component parts were to be used by the
12 general public without inspection or analysis of the hazardous condition and/or nature of said
13 products.

14 17. At the time said products left the hands of defendants; and each of them, the
15 products, and every component part thereof, were defective and unsafe in manufacture and
16 design.

17 18. On or about November 13, 2012, decedent LAUREN HUMPHREY, a resident at
18 22122 Victory Boulevard, Apartment B-309, Woodland Hills, California 91367, also designated
19 as 6331 North Glade Avenue, Building H, Unit 309, Woodland Hills, California 91367 (the
20 "Premises"), was using the above products in a reasonable and foreseeable manner at the
21 Premises. Decedent LAUREN HUMPHREY was unaware that said products were unsafe for
22 their intended use. The defective and unsafe conditions of said products caused a fire to erupt
23 and spread throughout the Premises. The smoke detector installed at the Premises did not
24 activate. LAUREN HUMPHREY became caught in the fire and she subsequently died from
25 carbon monoxide poisoning due to smoke inhalation. The decedent LAUREN HUMPHREY
26 was fatally injured as a direct and legal result of the defective and unsafe conditions of said
27 products and the component parts thereof.
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1 19. Defendants, and each of them, knew or should have known of the defects in the
2 design and manufacture of the aforesaid products, which constituted a hazard for those coming
3 into contact with the aforesaid products and the component parts, and defendants, and each of
4 them, failed to notify, warn, and protect those coming into contact with the aforesaid products,
5 and such failure to warn was one of the legal causes of the accident, fatal injuries and subsequent
6 death of LAUREN HUMPHREY.

7 20. On or about November 13, 2012, LAUREN HUMPHREY died as a direct result
8 of the injuries she sustained in the aforementioned accident and Plaintiff SHIRLEY OLIVER
9 brings this action as a surviving mother of the decedent.

10 21. As a direct and legal result of the acts and omissions of the defendants, and each
11 of them, Plaintiff has been deprived of the love, care, society, comfort, assistance, protection,
12 affection, companionship, guidance, solace, services and support of said decedent, and has
13 thereby sustained, and will continue to sustain, pecuniary loss in a sum as yet unascertained.

14 22. As a further legal result of the acts and omissions of defendants, and each of
15 them, and the death of decedent, Plaintiff has incurred funeral and related expenses in a sum as
16 yet unascertained. Plaintiff will pray leave of court to set forth such amount at the time of trial.

17 23. Plaintiff has been generally damaged in an amount within the jurisdictional limits
18 of this court.

19
20 **SECOND CAUSE OF ACTION**

21 **(For Wrongful Death Based on Negligent Products Liability**

22 **Against APEX DIGITAL, INC., APEX DIGITAL, LLC, MOTOROLA**

23 **MOBILITY LLC, TIME WARNER CABLE, INC. and DOES 1-100)**

24 24. Plaintiff repeats, realleges and repleads all of the First Cause of Action herein and
25 incorporates the same by reference as though here set forth in full.

26 25. At all times herein mentioned, defendants APEX INC., APEX LLC,
27 MOTOROLA, TIME WARNER, and each of them, so negligently, carelessly, recklessly, and
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1 with gross negligence, designed, manufactured, assembled, inspected, repaired, maintained,
2 endorsed, drafted, tested, franchised, supplied, sold, leased, distributed, and placed into the
3 stream of commerce a certain television and/or cable box equipment, and negligently failed to
4 warn relative to the said products and every component part thereof, and otherwise so
5 negligently conducted themselves, so as to directly and legally cause the injuries and damages
6 described herein to Plaintiff.

7 26. At all times herein mentioned, defendants, and each of them, knew, or in the
8 exercise of reasonable care should have known, that a certain television and/or cable box
9 equipment, and every component part thereof were defectively and negligently manufactured,
10 designed, assembled, tested, inspected, fabricated, constructed, distributed, marketed and sold.
11 Defendants, and each of them, failed to take reasonable steps to avoid exposing consumers,
12 including Plaintiff's decedent, LAUREN HUMPHREY, to the dangerous condition of such
13 products, failed to disclose the products' known defects, failed to warn, failed to recall, failed to
14 provide or send subsequent warnings after distribution to consumers, and otherwise so
15 negligently conducted themselves, so as to directly and legally cause the injuries and damages
16 described herein to Plaintiff.

17 27. On or about November 13, 2012, Plaintiff's decedent LAUREN HUMPHREY, a
18 resident at the Premises, was using such products in a reasonable and foreseeable manner at the
19 Premises. Decedent LAUREN HUMPHREY was unaware that said products were unsafe for
20 their intended use. The defective and unsafe conditions of said products caused a fire to erupt
21 and spread throughout the Premises. LAUREN HUMPHREY became caught in the fire and she
22 subsequently died from carbon monoxide poisoning due to smoke inhalation at the Premises.
23 The decedent LAUREN HUMPHREY was fatally injured as a result of the defective nature of
24 the products.

25 28. As a direct and legal result of the acts and omissions of the defendants, and each
26 of them, Plaintiff has been deprived of the love, care, society, comfort, assistance, protection,
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1 affection, companionship, guidance, solace, services and support of said decedent, and has
2 thereby sustained, and will continue to sustain pecuniary loss in a sum as yet unascertained.

3 29. As a further legal result of the acts and omissions of said defendants, and each of
4 them, and the death of decedent, Plaintiff has incurred funeral and related expenses in a sum as
5 yet unascertained. Plaintiff will pray leave of court to set forth such amount at the time of trial.

6 30. Plaintiff has been generally damaged in an amount within the jurisdictional limits
7 of this court.

8
9 **THIRD CAUSE OF ACTION**

10 **(For Wrongful Death Based On Negligence Against ASN WOODLAND HILLS EAST**
11 **LLC, ARCHSTONE PROPERTY MANAGEMENT (CALIFORNIA) INCORPORATED,**
12 **ARCHSTONE COMMUNITIES LLC, ARCHSTONE DEVELOPER LLC, OAKWOOD**
13 **WOODLAND HILLS LESSEE, LLC, OAKWOOD WORLDWIDE LOCAL, LLC,**
14 **WORLDWIDE CORPORATE HOUSING, L.P.,**
15 **and DOES 1-100)**

16 31. Plaintiff repeats, repleads and realleges all of the First and Second Causes of
17 Action and incorporates the same by reference as though here set forth in full.

18 32. At all times herein mentioned, defendants ASN WOODLAND HILLS,
19 ARCHSTONE PROPERTY MANAGEMENT, ARCHSTONE COMMUNITIES,
20 ARCHSTONE DEVELOPER, OAKWOOD WOODLAND HILLS, OAKWOOD
21 WORLDWIDE LOCAL, WORLDWIDE CORPORATE, and DOES 1-100, and each of them,
22 owned, operated, leased, rented, possessed, constructed, maintained, repaired, managed, and
23 controlled the Premises and all of its components, elements, accouterments, contents and
24 fixtures.

25 33. At all times herein pertinent, Plaintiff's decedent, LAUREN HUMPHREY, was
26 lawfully residing at the aforesaid premises as a tenant of the defendants and DOES 1-100, and
27 each of them.
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1 34. On or about November 13, 2012, while Plaintiff's decedent LAUREN
2 HUMPHREY was using said dwelling in a reasonably foreseeable manner, she was injured as a
3 direct result of the negligence of the defendants, and each of them, as described herein.

4 35. On or about November 13, 2012, Plaintiff's decedent LAUREN HUMPHREY
5 was at the aforesaid dwelling for the aforesaid purposes, as which time and place the defendants,
6 and each of them, so carelessly, negligently, unlawfully, and in violation of statute, owned,
7 operated, leased, rented, possessed, maintained and controlled said dwelling and otherwise so
8 conducted themselves to thereby directly and legally cause the injuries and damages hereinafter
9 enumerated. Among other things, the defendants, and each of them, equipped the subject
10 apartment unit occupied by LAUREN HUMPHREY with dangerous, unsafe, and defective
11 equipment and/or appliances, which caused a fire to start in the unit occupied by LAUREN
12 HUMPHREY. Also, defendants, and each of them, negligently installed a certain smoke
13 detector in the unit which failed to activate. Neither decedent LAUREN HUMPHREY nor
14 individuals near the Premises were warned of the fire in the unit. Defendants' conduct caused
15 LAUREN HUMPHREY to die of carbon monoxide poisoning from smoke inhalation.

16 36. At the time of her death, decedent LAUREN HUMPHREY was a loving and
17 dutiful daughter to Plaintiff SHIRLEY OLIVER, who brings this action as a surviving mother to
18 the decedent.

19 37. As a direct and legal result of the acts and omissions of the defendants, and each
20 of them, Plaintiff has been deprived of the love, companionship, comfort, affection, society,
21 solace and loss of support of said decedent, her daughter, and has thereby sustained pecuniary
22 loss in a sum as yet unascertained.

23 38. As a further direct and legal result of the acts and omission of defendants, and
24 each of them, and the death of decedent, Plaintiff has incurred funeral and related expenses in a
25 sum as yet unascertained. Plaintiff will pray leave of court to set forth such amount at the time
26 of trial.

1 39. Plaintiff has been generally damaged in an amount within the jurisdictional limits
2 of this court.

3
4 WHEREFORE, Plaintiff prays judgment against the defendants, and each of them, as
5 follows:

6 1. For general damages in an amount within the jurisdictional limits of this court as
7 provided for by statute;

8 2. For special damages in an amount within the jurisdictional limits of this court as
9 provided for by statute;

10 3. For funeral and related items of expense, according to proof;

11 4. For prejudgment interest according to proof, in the event plaintiff is entitled to it
12 pursuant to C.C.P. § 998;


13 5. For costs of suit incurred herein; and

14 6. For such other and further relief as the court may deem just and proper.

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17 DATED: July 29, 2013

GRASSINI & WRINKLE
A Law Corporation

18
19 By



20 LAWRENCE P. GRASSINI
21 Attorneys for Plaintiff

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23 07/30/2013
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ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):
Lawrence P. Grassini - SBN 49046
Lars C. Johnson - SBN 205712
GRASSINI & WRINKLE
20750 Ventura Boulevard, Suite 221
Woodland Hills, CA 91364
TELEPHONE NO.: 818-348-1717 FAX NO.: 818-348-7921
ATTORNEY FOR (Name): Plaintiff

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JUL 30 2013
JOHN A. CLARKE, CLERK
BY L. JOHNSON, DEPUTY

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES
STREET ADDRESS: 111 North Hill Street
MAILING ADDRESS: Same
CITY AND ZIP CODE: Los Angeles, CA 90012
BRANCH NAME:

CASE NAME: OLIVER v. APEX DIGITAL, INC.

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 516791**
JUDGE:
DEPT:

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

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

2. This case is is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:
- a. Large number of separately represented parties d. Large number of witnesses
- b. Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve e. Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court
- c. Substantial amount of documentary evidence f. 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
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: July 29, 2013
Lars C. Johnson - SBN 205712
(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.

SHORT TITLE: OLIVER v. APEX DIGITAL, INC., et al.

CASE NUMBER

BC516791

**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 10 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)

- | | |
|--|--|
| 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 |

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 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 checked="" type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death	1., 4. 1., 4. 1., 3. 1. 4

	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	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	1., 2., 3., 5.
		<input type="checkbox"/> A6031 Tortious Interference	1., 2., 3., 5.
<input type="checkbox"/> A6027 Other Contract Dispute(not breach/insurance/fraud/negligence)		1., 2., 3., 8.	
Real Property	Eminent Domain/Inverse Condemnation (14)	<input type="checkbox"/> A7300 Eminent Domain/Condemnation Number of parcels _____	2.
	Wrongful Eviction (33)	<input type="checkbox"/> A6023 Wrongful Eviction Case	2., 6.
	Other Real Property (26)	<input type="checkbox"/> A6018 Mortgage Foreclosure	2., 6.
		<input type="checkbox"/> A6032 Quiet Title	2., 6.
<input type="checkbox"/> A6060 Other Real Property (not eminent domain, landlord/tenant, foreclosure)		2., 6.	
Unlawful Detainer	Unlawful Detainer-Commercial (31)	<input type="checkbox"/> A6021 Unlawful Detainer-Commercial (not drugs or wrongful eviction)	2., 6.
	Unlawful Detainer-Residential (32)	<input type="checkbox"/> A6020 Unlawful Detainer-Residential (not drugs or wrongful eviction)	2., 6.
	Unlawful Detainer- Post-Foreclosure (34)	<input type="checkbox"/> A6020F Unlawful Detainer-Post-Foreclosure	2., 6.
	Unlawful Detainer-Drugs (38)	<input type="checkbox"/> A6022 Unlawful Detainer-Drugs	2., 6.

A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Asset Forfeiture (05)	<input type="checkbox"/> A6108 Asset Forfeiture Case	2., 6.
Petition re Arbitration (11)	<input type="checkbox"/> A6115 Petition to Compel/Confirm/Vacate Arbitration	2., 5.
Writ of Mandate (02)	<input type="checkbox"/> A6151 Writ - Administrative Mandamus <input type="checkbox"/> A6152 Writ - Mandamus on Limited Court Case Matter <input type="checkbox"/> A6153 Writ - Other Limited Court Case Review	2., 8. 2. 2.
Other Judicial Review (39)	<input type="checkbox"/> A6150 Other Writ /Judicial Review	2., 8.
Antitrust/Trade Regulation (03)	<input type="checkbox"/> A6003 Antitrust/Trade Regulation	1., 2., 8.
Construction Defect (10)	<input type="checkbox"/> A6007 Construction Defect	1., 2., 3.
Claims Involving Mass Tort (40)	<input type="checkbox"/> A6006 Claims Involving Mass Tort	1., 2., 8.
Securities Litigation (28)	<input type="checkbox"/> A6035 Securities Litigation Case	1., 2., 8.
Toxic Tort Environmental (30)	<input type="checkbox"/> A6036 Toxic Tort/Environmental	1., 2., 3., 8.
Insurance Coverage Claims from Complex Case (41)	<input type="checkbox"/> A6014 Insurance Coverage/Subrogation (complex case only)	1., 2., 5., 8.
Enforcement of Judgment (20)	<input type="checkbox"/> A6141 Sister State Judgment <input type="checkbox"/> A6160 Abstract of Judgment <input type="checkbox"/> A6107 Confession of Judgment (non-domestic relations) <input type="checkbox"/> A6140 Administrative Agency Award (not unpaid taxes) <input type="checkbox"/> A6114 Petition/Certificate for Entry of Judgment on Unpaid Tax <input type="checkbox"/> A6112 Other Enforcement of Judgment Case	2., 9. 2., 6. 2., 9. 2., 8. 2., 8. 2., 8., 9.
RICO (27)	<input type="checkbox"/> A6033 Racketeering (RICO) Case	1., 2., 8.
Other Complaints (Not Specified Above) (42)	<input type="checkbox"/> A6030 Declaratory Relief Only <input type="checkbox"/> A6040 Injunctive Relief Only (not domestic/harassment) <input type="checkbox"/> A6011 Other Commercial Complaint Case (non-tort/non-complex) <input type="checkbox"/> A6000 Other Civil Complaint (non-tort/non-complex)	1., 2., 8. 2., 8. 1., 2., 8. 1., 2., 8.
Partnership Corporation Governance (21)	<input type="checkbox"/> A6113 Partnership and Corporate Governance Case	2., 8.
Other Petitions (Not Specified Above) (43)	<input type="checkbox"/> A6121 Civil Harassment <input type="checkbox"/> A6123 Workplace Harassment <input type="checkbox"/> A6124 Elder/Dependent Adult Abuse Case <input type="checkbox"/> A6190 Election Contest <input type="checkbox"/> A6110 Petition for Change of Name <input type="checkbox"/> A6170 Petition for Relief from Late Claim Law <input type="checkbox"/> A6100 Other Civil Petition	2., 3., 9. 2., 3., 9. 2., 3., 9. 2. 2., 7. 2., 3., 4., 8. 2., 9.

Judicial Review

Provisionally Complex Litigation

Enforcement of Judgment

Miscellaneous Civil Complaints

Miscellaneous Civil Petitions

SHORT TITLE: OLIVER v. APEX DIGITAL, INC., et al.

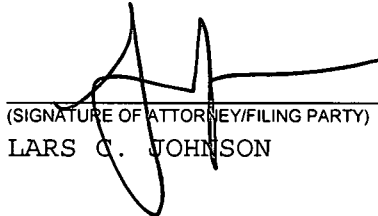
CASE NUMBER

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: 22122 Victory Boulevard Cause of action arose within this jurisdiction
CITY: Woodland Hills	STATE: CA	ZIP CODE: 91367	

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 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: July 29, 2013


 (SIGNATURE OF ATTORNEY/FILING PARTY)
 LARS C. JOHNSON

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.

07/30/2013