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FILED
 Superior Court Of California
 County Of Los Angeles

MAY 07 2014

Sherri K. Varuch, Executive Officer/Clerk

By Jodi Lam Deputy

BY FAX

SUPERIOR COURT FOR THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

BC 545181

CLAUDIA MORALES and MOCHA GUNARATNA, each individually and on behalf of all others similarly situated,

Plaintiffs,

vs.

KRAFT FOODS GROUP, INC. and DOES 1 through 100, inclusive,

Defendants.

Case No.

CLASS ACTION COMPLAINT

1. FALSE AND MISLEADING ADVERTISING IN VIOLATION OF BUSINESS AND PROFESSIONS CODE § 17200, *et seq.*
2. FALSE AND MISLEADING ADVERTISING IN VIOLATION OF BUSINESS AND PROFESSIONS CODE § 17500, *et seq.*
3. VIOLATION OF CALIFORNIA CIVIL CODE § 1750, *et seq.* (Consumers Legal Remedies Act)

DEMAND FOR JURY TRIAL

Plaintiffs Claudia Morales and Mocha Gunaratna ("Plaintiffs"), each individually and on behalf of all other similarly situated purchasers of Kraft Natural Cheese, Shredded Cheese, Cheddar Fat Free (the "Class"), bring this lawsuit against Kraft Foods Group, Inc. ("Kraft" and/or "Defendant") and Does 1 through 100, inclusive (sometimes collectively referred to hereinafter as "Defendants") upon personal knowledge as to Plaintiffs' own acts, and as to all other matters upon

CLASS ACTION COMPLAINT

ORIGINAL

1 information and belief. Plaintiffs seek damages, restitution and injunctive relief on behalf of a
2 California class of consumers who within the last four years purchased Kraft Natural Cheese -
3 Shredded Cheese - Cheddar Fat Free sold by Kraft, which was labeled and otherwise advertised as
4 "natural" or "all natural" despite containing artificial ingredients, flavor and/or coloring (the
5 "Product"). The Kraft Natural Cheese - Shredded Cheese - Cheddar Fat Free Product is one of a
6 variety of "Kraft Natural Cheese" products sold and distributed by Kraft.

7 INTRODUCTION

8
9 1. For many consumers, and certainly those who are conscious of and concerned about
10 what they eat, seeking out natural food products, as opposed to highly processed, artificial food
11 products, is important. Reliance on food labels is therefore crucial to such discerning, health
12 conscious consumers. But that is not to say that a marketing term just slapped on the front of a
13 package without any meaning is going to suffice. Still, although federal and California laws
14 require truthfulness in food labeling and advertising, too many producers of food products are
15 simply violating labeling and advertising laws because they understand that health claims drive
16 sales.

17 2. Plaintiffs bring this class action against one such manufacturer, Kraft, who is
18 among the world's leading producers of food products. Kraft has realized that, based on the
19 public's concern about natural and healthy foods, there is a financial benefit to be derived in
20 selling products claiming to be natural or healthy or to have ingredients or nutritional profiles
21 consistent with such characteristics. Accordingly, Defendant has labeled and advertised its food
22 products as natural even though such claims are in violation of California and federal advertising
23 laws.

24 3. Plaintiffs seek to secure injunctive relief and restitution for the Class against
25 Defendants for false and misleading advertising in violation of Business & Professions Code
26 section 17200, *et seq.*, Business & Professions Code section 17500, *et seq.* and Civil Code section
27 1750, *et seq.* Defendants made and continue to make false and misleading statements in their
28 advertising of the Product. Specifically, Defendants label the Kraft Natural Cheese - Shredded

1 Cheese - Cheddar Fat Free as "natural" and market it as such, despite that the Product contains
2 "artificial color."

3 4. The false and misleading labeling and advertising of the alleged "natural" Product
4 violate the California Consumers Legal Remedies Act, particularly California Civil Code sections
5 1770(a)(5) and 1770(a)(7). As such, Defendants have committed *per se* violations of Business &
6 Professions Code section 17200, *et seq.*, Business & Professions Code section 17500, *et seq.* and
7 Civil Code section 1750, *et seq.*

8 5. On January 20, 2014, Plaintiff Claudia Morales effectuated written notice to
9 Defendant Kraft via certified U.S. mail pursuant to Civil Code section 1750, *et seq.*, which set
10 forth Plaintiff's contentions concerning the Product's fraudulent advertising and outlined
11 Plaintiff's demand for substantiation of the above-referenced claims and relief. (See Plaintiff's
12 Letter to Defendant Kraft, dated January 20, 2014, a true and correct copy of which is attached
13 hereto as Exhibit I.)

14 6. Defendant refused to make the proposed modifications to its labeling and
15 advertising of the Product and has, in effect, refused to comply with California advertising laws.

16 JURISDICTION AND VENUE

17 7. This Court has jurisdiction over all causes of action asserted herein pursuant to the
18 California Constitution, Article VI, section 10, because this case is a cause not given by statute to
19 other trial courts.

20 8. Plaintiffs have standing to bring this action pursuant to Business & Professions
21 Code section 17200, *et seq.*

22 9. Out-of-state participants can be brought before this Court pursuant to the provisions
23 of Code of Civil Procedure section 395.5.

24 10. Defendant is subject to personal jurisdiction in California based upon sufficient
25 minimum contacts which exist between it and California.

26 11. Venue is proper in this Court because Defendant conducts business in Los Angeles
27 County, Defendant receives substantial compensation from sales in Los Angeles County, and
28 Defendant made numerous misrepresentations which had a substantial effect in Los Angeles

1 County, including, but not limited to, print media, and internet advertisements, and on the
2 Product's packaging and labeling.

3 12. The amount in controversy in this action does not exceed \$5,000,000. Therefore,
4 the federal court does not have jurisdiction over this action pursuant to the Class Action Fairness
5 Act of 2005 under 28 U.S.C. Sections 1332(d), 1453, and 1711-1715.

6 **PARTIES**

7 13. Plaintiff Claudia Morales is an individual residing in Los Angeles, California.
8 Plaintiff Mocha Gunaratna is an individual residing in Los Angeles, California. Plaintiffs each
9 purchased the Product, respectively, within the last four years of the filing of this Complaint.
10 When purchasing the Product, Plaintiffs relied upon the labeling, advertising and other
11 promotional material, which states the Product is "natural", which were prepared and approved by
12 Defendants and their agents and disseminated through its packaging, label, and national
13 advertising media, containing the misrepresentations alleged herein and designed to encourage
14 consumers to purchase the Product.

15 14. Defendant Kraft is a corporation organized and existing under the laws of the State
16 of Delaware, with a principal place of business located at Three Lakes Drive, Northfield, Illinois
17 60093. Kraft offers the Product for sale at stores and retailers as well as through the internet,
18 throughout the nation, including the State of California. Kraft, directly and through its agents,
19 has substantial contacts with and receives substantial benefits and income from and through the
20 State of California. Kraft is the owner and distributor of the Product and is the company that
21 created and/or authorized the false, misleading, and deceptive advertisements and packaging for
22 the Product.

23 15. The true names and capacities, whether individual, corporate, associate or otherwise
24 of certain manufacturers, distributors, and/or their alter egos sued herein as DOES 1 through 100
25 inclusive are presently unknown to Plaintiffs who therefore sue these Defendants by fictitious
26 names. Plaintiffs will seek leave of this Court to amend the Complaint to show their true names
27 and capacities when the same have been ascertained. Plaintiffs are informed and believe and
28 based thereon allege that DOES 1 through 100 were authorized to do and did business in San

1 Joaquin County. Plaintiffs are further informed and believe and based thereon allege that DOES 1
2 through 100 were and/or are, in some manner or way, responsible for and liable to Plaintiffs for
3 the events, happenings, and damages hereinafter set forth below.

4 16. Plaintiffs are informed and believe and based thereon allege that at all times
5 relevant herein each of the Defendants was the agent, servant, employee, subsidiary, affiliate,
6 partner, assignee, successor-in-interest, alter ego, or other representative of each of the remaining
7 Defendants and was acting in such capacity in doing the things herein complained of and alleged.

8 17. In committing the wrongful acts alleged herein, Defendants planned and
9 participated in and furthered a common scheme by means of false, misleading, deceptive, and
10 fraudulent representations to induce members of the public to purchase the Product. Defendants
11 participated in the making of such representations in that each did disseminate or cause to be
12 disseminated said misrepresentations.

13 18. Defendants, upon becoming involved with the manufacture, distribution,
14 advertising, marketing, and sale of the Product, knew or should have known that the claims about
15 the Product and, in particular, the claims suggesting and outright stating that the Product is
16 "natural" when it contains artificial coloring. Indeed, since the first time that the Product was
17 advertised, Defendants have been aware that they have been falsely representing the
18 characteristics and effects of the Product. Defendants affirmatively misrepresented the nature and
19 characteristics of the Product in order to convince a certain subsection of the public to purchase
20 and use the Product, resulting in profits of hundreds of thousands of dollars or more to
21 Defendants, all to the damage and detriment of the consuming public. Thus, in addition to the
22 wrongful conduct herein alleged as giving rise to primary liability, Defendants further aided and
23 abetted and knowingly assisted each other in breach of their respective duties and obligations as
24 herein alleged.

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CLASS ACTION ALLEGATIONS

19. Plaintiffs bring this action on their own behalves and on behalf of all other persons similarly situated. The Class which Plaintiffs seek to represent comprises:

All persons who purchased the Product in the State of California for personal use and not for resale during the time period of May 7, 2010 through the present.

Said definition may be further defined or amended by additional pleadings, evidentiary hearings, a class certification hearing, and orders of this Court.

20. The Class is comprised of many thousands of persons throughout the State of California. The class is so numerous that joinder of all members is impracticable and the disposition of their claims in a class action will benefit the parties and the Court.

21. There is a well-defined community of interest in the questions of law and fact involved affecting the parties to be represented in that the Class was exposed to the same false and misleading advertising and omissions. The questions of law and fact common to the Class predominate over questions which may affect individual Class members. Common questions of law and fact include, but are not limited to, the following:

- a. Whether Defendants' conduct is an unlawful business act or practice within the meaning of Business and Professions Code section 17200, *et seq.*;
- b. Whether Defendants' conduct is a fraudulent business act or practice within the meaning of Business and Professions Code section 17200, *et seq.*;
- c. Whether Defendants' advertising is untrue or misleading within the meaning of Business and Professions Code section 17500, *et seq.*;
- d. Whether Defendants made false and misleading representations in their advertising and labeling of the Product;
- e. Whether Defendants knew or should have known that the representations were false; and
- f. Whether Defendants represented that the Product has characteristics, benefits, uses, or quantities which it does not have.

05/07/2014

1 22. Plaintiffs' claims are typical of the claims of the proposed Class, as the
2 representations and omissions made by Defendants are uniform and consistent and are contained
3 in advertisements and on packaging that was seen and relied on by Plaintiffs and members of the
4 class.

5 23. Plaintiffs will fairly and adequately represent and protect the interests of the
6 proposed Class. Plaintiffs have retained competent and experienced counsel in class action and
7 other complex litigation.

8 24. Plaintiffs and the Class have suffered injury in fact and have lost money as a result
9 of Defendants' false, deceptive, and misleading representations.

10 25. Plaintiffs would not have purchased the Product but for the representations by
11 Defendants about the Product.

12 26. The Class is identifiable and readily ascertainable. Notice can be provided to such
13 purchasers using techniques and a form of notice similar to those customarily used in class
14 actions, and by internet publication, radio, newspapers, and magazines.

15 27. A class action is superior to other available methods for fair and efficient
16 adjudication of this controversy. The expense and burden of individual litigation would make it
17 impracticable or impossible for proposed members of the Class to prosecute their claims
18 individually.

19 28. The trial and the litigation of Plaintiffs' claims are manageable.

20 29. Defendants have acted on grounds generally applicable to the entire Class, thereby
21 making final injunctive relief and/or corresponding declaratory relief appropriate with respect to
22 the Class as a whole. The prosecution of separate actions by individual Class members would
23 create the risk of inconsistent or varying adjudications with respect to individual member of the
24 Class that would establish incompatible standards of conduct for Defendants.

25 30. Absent a class action, Defendants will likely retain the benefits of their wrongdoing.
26 Because of the small size of the individual Class members' claims, few, if any, Class members
27 could afford to seek legal redress for the wrongs complained of herein. Absent a representative
28

1 action, the Class members will continue to suffer losses and Defendants will be allowed to
2 continue these violations of law and to retain the proceeds of their ill-gotten gains.

3 **FACTS AND DEFENDANTS' COURSE OF CONDUCT**

4 31. As the growing concern over health and food safety has become more prevalent
5 among the consuming public, so, too, have the incidences of false and misleading claims about
6 such products. It is becoming more commonly known that certain claims on food packaging
7 implies that a food is healthier, safer or produced to higher ethical standards. The term "natural"
8 or "all-natural" is one such claim.

9 32. In an effort to capitalize on consumers' increasing desire and willingness to pay
10 more for healthier, less processed foods, manufacturers, including Kraft, routinely make false
11 and/or misleading claims about the benefits and characteristics of a product and advertise their
12 products as though they maintain characteristics they do not have and that the manufacturer
13 cannot validate with competent and reliable scientific evidence so as to make receiving the
14 intended benefit illusory and, in some cases, unsafe.

15 33. Defendants' labeling and claims about the Product as "natural" lead people to
16 believe that the Product is indeed natural. At a minimum, therefore, the public is led to believe
17 the Product has no *artificial* ingredients or characteristics. The public is further led to believe the
18 Product will be healthier, safer and/or produced to a higher standard. These claims are false,
19 deceptive, and misleading, as the Product contains artificial color.

20 34. Contrary to the implications of the term "natural" on food products, artificial food
21 coloring is not considered healthy or safe. Among the health concerns regarding artificial food
22 coloring are that it could cause everything from hyperactivity in children, to allergic reactions, to
23 asthma complications, or cancer.

24 a. In the 1970s, the Food and Drug Administration ("FDA") famously banned Red
25 Dye No. 2 after some studies found that large doses could cause cancer in rats.

26 b. In 2007, a British study published in *The Lancet* concluded that consuming artificial
27 coloring and preservatives in food can increase hyperactivity in kids. The results of
28 the 2007 study compelled the European Food Standards Agency to urge companies

1 to voluntarily remove artificial coloring from food products. The Center for
2 Science in the Public Interest links food colorings to hyperactivity and behavior
3 problems in children, and has been urging the FDA to ban certain dyes that they
4 believe cause these issues.

5 c. Although the U.S. is behind other countries on its artificial dye policies, the U.K.'s
6 Food Standards Agency has imposed a voluntary ban on several dyes because of
7 their potential harm. And although they turned down a more widespread ban, the
8 European Parliament agreed to place warning labels on all European-produced
9 foods containing one of six artificial colorings.

10 35. During the course of their false, misleading, and deceptive advertising campaign,
11 Defendants have sold hundreds of thousands of units or more of the Product based upon
12 Defendants' false promises. Plaintiffs and the Class have suffered injury in fact and have lost
13 money as a result of Defendants' false representations.

14 **FIRST CAUSE OF ACTION**

15 **FALSE AND MISLEADING ADVERTISING IN VIOLATION OF BUSINESS &**

16 **PROFESSIONS CODE § 17200, et seq.**

17 (By Plaintiffs against all Defendants)

18 36. Plaintiffs repeat and reallege the allegations set forth in the preceding paragraphs
19 and incorporates the same as if set forth herein at length.

20 37. This cause of action is brought pursuant to Business and Professions Code section
21 17200, *et seq.*, on behalf of Plaintiffs and a Class consisting of all persons residing in the State of
22 California who purchased the Product for personal use and not for resale.

23 38. Defendants in their advertising and packaging of the Product make false and
24 misleading statements regarding the quality and characteristics of the Product, particularly that it
25 is "natural".

26 39. Defendants' claims about the Product lead people, including Plaintiffs, to believe
27 that the Product is natural, in that, at a minimum, it does not contain artificial coloring.
28

1 40. Defendants do not have any reasonable basis for the claims about the Product made
2 in Defendants' advertising and on Defendants' packaging or label because the Product indeed
3 contains artificial coloring.

4 41. Defendants knew that the claims that they made and continue to make about the
5 Product are false, and misleading.

6 42. As alleged in the preceding paragraphs, the misrepresentations by Defendants of the
7 material facts detailed above constitute an unfair, unlawful, and fraudulent business practice
8 within the meaning of California Business & Professions Code section 17200.

9 43. In addition, Defendants' use of various forms of advertising media to advertise, call
10 attention to, or give publicity to the sale of goods or merchandise which are not as represented in
11 any manner constitutes unfair competition, unfair, deceptive, untrue or misleading advertising,
12 and an unlawful business practice within the meaning of Business & Professions Code sections
13 17200 and 17531, which advertisements have deceived and are likely to deceive the consuming
14 public, in violation of Business & Professions Code section 17200.

15 44. There were reasonably available alternatives to further Defendants' legitimate
16 business interests, other than the conduct described herein.

17 45. All of the conduct alleged herein occurs and continues to occur in Defendants'
18 business. Defendants' wrongful conduct is part of a pattern or generalized course of conduct
19 repeated on thousands of occasions daily.

20 46. Pursuant to Business & Professions Code sections 17203 and 17535, Plaintiffs and
21 the members of the Class seek an order of this Court enjoining Defendants from continuing to
22 engage, use, or employ their practice of advertising the sale and use of the Product. Likewise,
23 Plaintiffs and the members of the Class seek an order requiring Defendants to disclose such
24 misrepresentations, and additionally request an order awarding Plaintiffs and the Class restitution
25 of the money wrongfully acquired by Defendants by means of Defendants' failure to disclose the
26 existence and significance of said misrepresentations.

27 47. Plaintiffs and the Class have suffered injury in fact and have lost money or property
28 as a result of Defendants' false representations.

1 48. Plaintiffs would not have purchased the Product but for the representations by
2 Defendants about the Product.

3 **SECOND CAUSE OF ACTION**

4 **FALSE AND MISLEADING ADVERTISING IN VIOLATION OF BUSINESS &**

5 **PROFESSIONS CODE § 17500, et seq.**

6 (By Plaintiffs against all Defendants)

7 49. Plaintiffs repeat and reallege the allegations set forth in the preceding paragraphs
8 and incorporates the same as if set forth herein at length.

9 50. This cause of action is brought pursuant to Business and Professions Code section
10 17500, *et seq.*, on behalf of Plaintiffs and the Class consisting of all persons residing in the State
11 of California who purchased the Product for personal use and not for resale.

12 51. Defendants in their advertising and packaging of the Product make false and
13 misleading statements regarding the quality and characteristics of the Product, particularly that it
14 is "natural".

15 52. Defendants' claims about the Product lead people, including Plaintiffs, to believe
16 that the Product is natural, in that, at a minimum, it does not contain artificial coloring.

17 53. Defendants do not have any reasonable basis for the claims about the Product made
18 in Defendants' advertising and on Defendants' packaging or label because the Product indeed
19 contains artificial coloring.

20 54. Defendants knew that the claims that they made and continue to make about the
21 Product are false and misleading.

22 55. Plaintiff would not have purchased the Product but for the representations by
23 Defendants about the Product.

24 56. Plaintiff and the Class have suffered injury in fact and have lost or property as a
25 result of Defendants' false representations.

26 57. As alleged in the preceding paragraphs, the misrepresentations by Defendants of the
27 material facts detailed above constitutes an unfair, unlawful, and fraudulent business practice
28 within the meaning of California Business & Professions Code section 17500.

1 58. In addition, Defendants' use of various forms of advertising media to advertise, call
2 attention to, or give publicity to the sale of goods or merchandise which are not as represented in
3 any manner constitutes unfair competition, unfair, deceptive, untrue or misleading advertising,
4 and an unlawful business practice within the meaning of Business & Professions Code sections
5 17200 and 17531, which advertisements have deceived and are likely to deceive the consuming
6 public, in violation of Business & Professions Code section 17500.

7 59. Pursuant to Business & Professions Code sections 17203 and 17535, Plaintiffs and
8 the members of the Class seek an order of this Court enjoining Defendants from continuing to
9 engage, use, or employ their practice of advertising the sale and use of the Product. Likewise,
10 Plaintiffs and the members of the Class seek an order requiring Defendants to disclose such
11 misrepresentations, and additionally request an order awarding Plaintiffs and the Class restitution
12 of the money wrongfully acquired by Defendants by means of responsibility attached to
13 Defendants' failure to disclose the existence and significance of said misrepresentations.

14 **THIRD CAUSE OF ACTION**

15 **VIOLATION OF CALIFORNIA CIVIL CODE § 1750, et seq.**

16 (By Plaintiffs against all Defendants)

17 60. Plaintiffs repeat and reallege the allegations set forth in the preceding paragraphs
18 and incorporates the same as if set forth herein at length.

19 61. This cause of action is brought pursuant to Civil Code section 1750, *et seq.*, the
20 Consumers Legal Remedies Act, on behalf of Plaintiffs and a Class consisting of all persons
21 residing in the State of California who purchased the Product for personal use and not for resale.

22 62. The Class consists of thousands of persons, the joinder of whom, is impracticable.

23 63. There are questions of law and fact common to the class, which questions are
24 substantially similar and predominate over questions affecting the individual members, including
25 but not limited to: (a) Whether Defendants represented that the Product has characteristics,
26 benefits, uses, or quantities which they do not have; (b) Whether the existence, extent, and
27 significance of the major misrepresentations regarding the purported benefits, characteristics, and
28

1 efficacy of the Product violate the Act; and (c) Whether Defendants knew of the existence of these
2 misrepresentations.

3 64. The policies, acts, and practices heretofore described were intended to result in the
4 sale of the Product to the consuming public, and violated and continue to violate section
5 1770(a)(5) of the Act by representing that the Product has characteristics, benefits, uses, or
6 quantities which it does not have.

7 65. Defendants fraudulently deceived Plaintiffs and the Class by representing that the
8 Product has certain characteristics, benefits, uses, and qualities which it does not have. In doing
9 so, Defendants intentionally misrepresented and concealed material facts from Plaintiffs and the
10 Class, specifically by claiming that the Product is "natural" when in fact it contains artificial
11 coloring. Said misrepresentations and concealment were done with the intention of deceiving
12 Plaintiffs and the Class and depriving them of their legal rights and money.

13 66. Defendants' claims about the Product lead people, including Plaintiffs, to believe
14 that the Product does not contain artificial coloring.

15 67. Defendants knew that they could not back the claims concerning the Product's
16 purported "natural" quality.

17 68. Defendants' actions as described hereinabove were done with conscious disregard
18 of Plaintiff's rights, and Defendants were wanton and malicious in their concealment of same.

19 69. Plaintiff and the Class have suffered injury in fact and have lost or property as a
20 result of Defendants' false representations.

21 70. The Product as purchased by the Plaintiffs and the Class was and is unsatisfactory
22 and worth less than the amount paid for.

23 71. Plaintiffs would not have purchased the Product but for the representations by
24 Defendants about the products.

25 72. Pursuant to section 1780(a) of the Act, Plaintiffs seek injunctive relief in the form
26 of an order enjoining the above-described wrongful acts and practices of Defendants, including,
27 but not limited to, an order:
28

- 1 A. Enjoining Defendants from continuing to make the statements set forth
2 above;
- 3 B. Enjoining Defendants from continuing to offer for sale any unit of the
4 Product that contains any false, misleading, and/or unsubstantiated
5 statements and claims on its packaging and/or its label, including, without
6 limitation, those statements and claims set forth above;
- 7 C. Enjoining Defendants from continuing to use the packaging and label that
8 it presently uses for the Product; and
- 9 D. Enjoining Defendants from distributing such false advertising and
10 misrepresentations.

11 73. Plaintiffs shall be irreparably harmed if such an order is not granted.

12 **PRAYER FOR RELIEF**

13 WHEREFORE, Plaintiffs, individually and on behalf of all others similarly situated, pray
14 for judgment and relief on all Causes of Action as follows:

- 15 A. An order certifying that the action may be maintained as a Class Action;
- 16 B. For an award of restitutionary damages in an amount according to proof at
17 trial, but which does not exceed \$5,000,000;
- 18 C. An order enjoining Defendants from pursuing the policies, acts, and
19 practices complained of herein and requiring Defendants to pay restitution
20 to Plaintiffs and all members of the Class;
- 21 D. For pre-judgment interest from the date of filing this suit;
- 22 E. Reasonable attorney fees;
- 23 F. Costs of this suit; and
- 24 G. Such other and further relief as the Court may deem necessary or
25 appropriate.

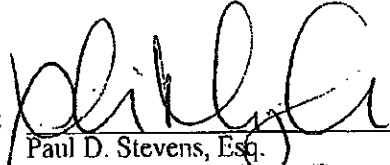
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1 DATED: May 7, 2014

MILSTEIN ADELMAN LLP

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3
4 By:


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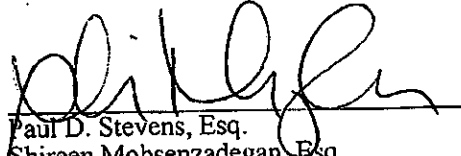
11 **JURY TRIAL DEMANDED**

12 Plaintiff demands a jury trial on all triable issues.

13
14 DATED: May 7, 2014

MILSTEIN ADELMAN, LLP

15
16 By:


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22 *Attorneys for Plaintiff Claudia Morales
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CM-010

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Paul D. Stevens, State Bar No. 207107 Shireen Mohsenzadegan, State Bar No. 237882 2800 Donald Douglas Loop North Santa Monica, California 90405 TELEPHONE NO.: (310) 396-9600 FAX NO.: (310) 396-9635 ATTORNEY FOR (Name): CLAUDIA MORALES and MOCHA GUNARATNA		FOR COURT USE ONLY FILED Superior Court Of California County Of Los Angeles MAY 07 2014 JUDGE: _____ By: <u>Judi Lara</u> Deputy
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 Courthouse		
CASE NAME: CLAUDIA MORALES v. KRAFT FOODS GROUP, INC.		
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)
		CASE NUMBER: BC 545131 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 P/DP/DWD (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 P/DP/DWD (23) Non-P/DP/DWD (Other) Tort <input checked="" 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-P/DP/DWD 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. ☐ 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): 1 (B&P Code § 17200); 2 (B&P Code § 17500); 3 (CC Code § 1750)
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: May 7, 2014
 Shireen Mohsenzadegan

(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.

Page 1 of 2

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

CIVIL CASE COVER SHEET

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

ORIGINAL

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

Auto (22)—Personal Injury/Property Damage/Wrongful Death
Uninsured Motorist (46) (*if the case involves an uninsured motorist claim subject to arbitration, check this item instead of Auto*)

Other P/PPD/WD (Personal Injury/Property Damage/Wrongful Death) Tort

Asbestos (04)
Asbestos Property Damage
Asbestos Personal Injury/Wrongful Death
Product Liability (*not asbestos or toxic/environmental*) (24)
Medical Malpractice (45)
Medical Malpractice—Physicians & Surgeons
Other Professional Health Care Malpractice
Other P/PPD/WD (23)
Premises Liability (e.g., slip and fall)
Intentional Bodily Injury/PPD/WD (e.g., assault, vandalism)
Intentional Infliction of Emotional Distress
Negligent Infliction of Emotional Distress
Other P/PPD/WD

Non-P/PPD/WD (Other) Tort

Business Tort/Unfair Business Practice (07)
Civil Rights (e.g., discrimination, false arrest) (*not civil harassment*) (08)
Defamation (e.g., slander, libel) (13)
Fraud (16)
Intellectual Property (19)
Professional Negligence (25)
Legal Malpractice
Other Professional Malpractice (*not medical or legal*)
Other Non-P/PPD/WD Tort (35)
Employment
Wrongful Termination (36)
Other Employment (15)

Contract

Breach of Contract/Warranty (06)
Breach of Rental/Lease
Contract (*not unlawful detainer or wrongful eviction*)
Contract/Warranty Breach—Seller Plaintiff (*not fraud or negligence*)
Negligent Breach of Contract/Warranty
Other Breach of Contract/Warranty
Collections (e.g., money owed, open book accounts) (09)
Collection Case—Seller Plaintiff
Other Promissory Note/Collections Case
Insurance Coverage (*not provisionally complex*) (18)
Auto Subrogation
Other Coverage
Other Contract (37)
Contractual Fraud
Other Contract Dispute

Real Property

Eminent Domain/Inverse Condemnation (14)
Wrongful Eviction (33)
Other Real Property (e.g., quiet title) (26)
Writ of Possession of Real Property
Mortgage Foreclosure
Quiet Title
Other Real Property (*not eminent domain, landlord/tenant, or foreclosure*)

Unlawful Detainer

Commercial (31)
Residential (32)
Drugs (38) (*if the case involves illegal drugs, check this item; otherwise, report as Commercial or Residential*)

Judicial Review

Asset Forfeiture (05)
Petition Re: Arbitration Award (11)
Writ of Mandate (02)
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

Provisionally Complex Civil Litigation (Cal. Rules of Court Rules 3.400–3.403)

Antitrust/Trade Regulation (03)
Construction Defect (10)
Claims Involving Mass Tort (40)
Securities Litigation (28)
Environmental/Toxic Tort (30)
Insurance Coverage Claims (*arising from provisionally complex case type listed above*) (41)

Enforcement of Judgment

Enforcement of Judgment (20)
Abstract of Judgment (Out of County)
Confession of Judgment (*non-domestic relations*)
Sister State Judgment
Administrative Agency Award (*not unpaid taxes*)
Petition/Certification of Entry of Judgment on Unpaid Taxes
Other Enforcement of Judgment Case

Miscellaneous Civil Complaint RICO (27)

Other Complaint (*not specified above*) (42)
Declaratory Relief Only
Injunctive Relief Only (*non-harassment*)
Mechanics Lien
Other Commercial Complaint Case (*non-tort/non-complex*)
Other Civil Complaint (*non-tort/non-complex*)

Miscellaneous Civil Petition

Partnership and Corporate Governance (21)
Other Petition (*not specified above*) (43)
Civil Harassment
Workplace Violence
Elder/Dependent Adult Abuse
Election Contest
Petition for Name Change
Petition for Relief From Late Claim
Other Civil Petition

CM-010 (Rev. July 1, 2007)

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CIVIL CASE COVER SHEET

For your protection and privacy, please press the Clear This Form button after you have printed the form.

Save This Form

Print This Form

Clear This Form

SHORT TITLE: CLAUDIA MORALES vs. KRAFT FOOD GROUP, INC.	CASE NUMBER BC 545131
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**CIVIL CASE COVER SHEET ADDENDUM AND
STATEMENT OF LOCATION
(CERTIFICATE OF GROUNDS FOR ASSIGNMENT TO COURTHOUSE LOCATION)**

This form is required pursuant to Local Rule 2.0 in all new civil case filings in the Los Angeles Superior Court.

Item I. Check the types of hearing and fill in the estimated length of hearing expected for this case:

JURY TRIAL? ☐ YES CLASS ACTION? ☒ YES LIMITED CASE? ☐ YES TIME ESTIMATED FOR TRIAL 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 type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death	1., 4. 1., 4. 1., 3. 1., 4.

ORIGINAL

BY FAX

SHORT TITLE: CLAUDIA MORALES vs. KRAFT FOOD GROUP, INC.	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 checked="" 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 <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	Unlawful Detainer-Commercial (31)	<input type="checkbox"/> A6021 Unlawful Detainer-Commercial (not drugs or wrongful eviction)
	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.

SHORT TITLE: CLAUDIA MORALES vs. KRAFT FOOD GROUP, INC.	CASE NUMBER
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	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Judicial Review	Asset Forfeiture (05)	<input type="checkbox"/> A6108 Asset Forfeiture Case	2., 6.
	Petition re Arbitration (11)	<input type="checkbox"/> A6115 Petition to Compel/Confirm/Vacate Arbitration	2., 5.
	Writ of Mandate (02)	<input type="checkbox"/> A6151 Writ - Administrative Mandamus <input type="checkbox"/> A6152 Writ - Mandamus on Limited Court Case Matter <input type="checkbox"/> A6153 Writ - Other Limited Court Case Review	2., 8. 2. 2.
	Other Judicial Review (39)	<input type="checkbox"/> A6150 Other Writ /Judicial Review	2., 8.
Provisionally Complex Litigation	Antitrust/Trade Regulation (03)	<input type="checkbox"/> A6003 Antitrust/Trade Regulation	1., 2., 8.
	Construction Defect (10)	<input type="checkbox"/> A6007 Construction Defect	1., 2., 3.
	Claims Involving Mass Tort (40)	<input type="checkbox"/> A6006 Claims Involving Mass Tort	1., 2., 8.
	Securities Litigation (28)	<input type="checkbox"/> A6035 Securities Litigation Case	1., 2., 8.
	Toxic Tort Environmental (30)	<input type="checkbox"/> A6036 Toxic Tort/Environmental	1., 2., 3., 8.
	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.
	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.

SHORT TITLE: CLAUDIA MORALES vs. KRAFT FOOD GROUP, INC.	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.		ADDRESS: 2800 Donald Douglas Loop North
CITY: Santa Monica	STATE: CA	ZIP CODE: 90405

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

Dated: May 7, 2014


 (SIGNATURE OF ATTORNEY/FILING PARTY)

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

1. Original Complaint or Petition.
2. If filing a Complaint, a completed Summons form for issuance by the Clerk.
3. Civil Case Cover Sheet, Judicial Council form CM-010.
4. Civil Case Cover Sheet Addendum and Statement of Location form, LACIV 109, LASC Approved 03-04 (Rev. 03/11).
5. Payment in full of the filing fee, unless fees have been waived.
6. A signed order appointing the Guardian ad Litem, Judicial Council form CIV-010, if the plaintiff or petitioner is a minor under 18 years of age will be required by Court in order to issue a summons.
7. Additional copies of documents to be conformed by the Clerk. Copies of the cover sheet and this addendum must be served along with the summons and complaint, or other initiating pleading in the case.