11950 SAN VICENTE BLVD. SUITE 220 GREGORY 2 LOS ANGELES, CA 90049 County of Los Angeles 310-820-2211 3 FSC: 10/06/2015 TRIAL: 10/22/2015 OSC: 04/24 APR 22 2014 2017 4 Sherri R. Carter, Executive Officer/Clerk COUNTY OF LOS ANGELES 5 SUPERIOR COURT OF THE STATE OF CALIFORN 6 7 JOEL D. JOSEPH, Case No.: BC543455 8 Plaintiff, 9 10 TRADER JOE'S COMPANY COMPLAINT FOR MORE THAN 11 \$25,000; INJUNCTIVE RELIEF Defendant SOUGHT. 12 13 Plaintiff, on behalf of the general public who purchased fresh produce or meat that was 14 mislabeled as to country of origin in the past three years in California from a Trader Joe's store, 15 alleges as follows against defendant Trader Joe's Company on information and belief, formed 16 after an inquiry reasonable under the circumstances: 17 18 I. JURISDICTION AND VENUE 19 1. This Court has jurisdiction over all causes of action asserted herein pursuant to 20 the California Constitution, Article VI, §10, because this case is a cause not given by statute to 21 other trial courts. .22 This Court has jurisdiction over defendant because it is a corporations that is 2. 23 authorized to conduct, and in fact does conduct, substantial business in the State of California. ٩ 24 Venue is proper in this County as the acts upon which this action is ba 3. 25 occurred in this County. Plaintiff resides here and operates an office in this County, Defendant operates more than 17 stores in Los Angeles County. Thus, defendants' liability arose in this 26 27 County. 28 U ٩ خل

JOEL D. JOSEPH, PRO PER

LEA/DEF#:

90024

II. INTRODUCTION

- 4. This is a private Attorney General action brought on behalf of the general public.
- 5. Plaintiff Joseph purchased many grocery items from Trader Joe's Company, from its stores at 1000 Glendon Ave, Los Angeles, CA 90024, 11755 W Olympic Blvd, Los Angeles, CA 90064 and 3212 Pico Blvd, Santa Monica, CA 90405 during the past year, including lettuce, spinach and meat products.
- 6. Many of these products were labeled "Product of USA and Mexico," some meat products are labeled "Product of Australia, USA, Nicaragua and New Zealand" and similar labels that are inaccurate, misleading and not in compliance with California and Federal law.
- 7. Mr. Joseph is chairman and founder of the Made in the USA Foundation, a non-profit organization that promotes American-made products.
- 8. Title 19 U.S.C. §1304 provides that all imported products must include a country of origin marking in a "conspicuous place as legibly, indelibly and permanently as the nature of the article (or container) will permit."
- 9. The Federal Country of Origin Labeling Act, and regulations implemented thereunder, provides that fresh produce and meat must be labeled with a single country of origin. The Farm Security and Rural Investment Act of 2002 (2002 Farm Bill) (Pub. L. 107–171), the 2002 Supplemental Appropriations Act (2002 Appropriations) (Pub. L. 107–206), and the Food, Conservation and Energy Act of 2008 (2008 Farm Bill) (Pub. L. 110–234) amended the Agricultural Marketing Act of 1946 (Act) (7 U.S.C. 1621 et seq.) to require retailers to notify their customers of the country of origin of covered commodities. Covered commodities include muscle cuts of beef (including veal), lamb, chicken, goat, and pork; ground beef, ground lamb, ground chicken, ground goat, and ground pork; wild and farm-raised fish and shellfish; perishable agricultural commodities; macadamia nuts; pecans; ginseng; and peanuts. 7 CFR Parts 60 and 65.
- 10. This private Attorney General action is brought by the named plaintiff to remedy violations of California's state consumer protection statutes.

III. PARTIES

- 11. Plaintiff Joel D. Joseph is California resident and citizen.
- 12. Trader Joe's Company is a California corporation.

IV. Factual Summary

- 13. Most consumers believe that "Made in U.S.A." products are higher quality products than imported products.
- 14. The Supreme Court of California ruled that consumers have a right to know where products are coming from and have the right to sue if product labels are inaccurate or misleading. Kwikset Corporation v. Superior Court, 51 Cal. 4th 310 (2011).
- 15. Plaintiff and 80% of the general public, desires to purchase American-made groceries. When plaintiff purchased his groceries at Trader Joe's there was no way that he knew the country of origin of the meat and produce. Plaintiff is bringing this case to compel Trader Joe's to label its meat and produce as required by the Country of Origin Labeling Act and California State law.

V. FIRST CAUSE OF ACTION

Commission of Unlawful Business Acts and Practices

- 16. Plaintiff, on behalf of the general public realleges as if fully set forth herein, each and every allegation contained in ¶¶1-15 herein, and further alleges as follows.
- 17. The marketing, sale and/or offering for sale by defendant of the deceptively labeled groceries and meat as detailed above constitute unlawful, unfair and/or fraudulent business acts or practices in violation of, *inter alia*, Business & Professions Code §§17200, *et seq*. Plaintiff is therefore entitled to the relief set forth below.
- 18. Specifically, defendant has violated Business & Professions Code §17200's proscription against engaging in an "unlawful" business act or practice by the following:
 - a. Violating U.S. Customs laws, 19 U.S.C. §1304;
 - b. Violating the Country of Origin Labeling Act and regulations implemented under
 it;

- c. The policies, acts and practices alleged herein were intended to result in the sale of Trader Joe's produces to the consuming public and violated and continue to violate the Consumers Legal Remedies Act, California Civil Code §§1750, et seq., by violating at least Civ. Code §1770(a)(4), (5), (7), (9) and (16), as defendant's acts and practices use deceptive representations or designations of country of origin, constitute misrepresentations that the products in question have approval, characteristics, benefits or uses which they do not have, that the products in question are of a particular standard, quality or grade when they are of another, that defendant advertise the products in question with intent not to sell them as advertised and that the products in question constitute products which are supposed to be supplied in accordance with previous representations when they are not.
- d. As a result of the foregoing, pursuant to California Business & Professions Code §17203, plaintiff, on behalf of the general public seeks an Order of this Court requiring defendant to immediately cease such acts of unfair competition and enjoining defendant from continuing to falsely advertise or conduct business via the unlawful, fraudulent or unfair business acts and practices and untrue and misleading labeling complained of herein and from failing to fully disclose the true nature of their misrepresentations, and ordering defendant to engage in a corrective advertising or informational campaign.
- e. Plaintiff additionally requests an Order from the Court requiring that defendant implement a full product replacement program and/or requiring the payment or return of any monies wrongfully acquired, saved or retained by defendant by means of such acts of unfair competition so as to restore to any persons in interest any and all monies which were acquired and obtained by means of such acts of unfair competition and/or as may be necessary to prevent the use or employment of any practice which constitutes unfair competition, as well as imposing an asset freeze or a constructive trust over such monies.

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VI. SECOND CAUSE OF ACTION

Commission of Unfair Business Acts Practices

- 19. Plaintiff, on behalf of the general public realleges as if fully set forth herein, each and every allegation contained in ¶1-18 herein, and further alleges as follows.
- 20. The marketing, sale and/or offering for sale by defendant of the deceptively mislabeled produce and meat as detailed above constitute unlawful, unfair and/or fraudulent business acts or practices in violation of, *inter alia*, Business & Professions Code §§17200, et seq.
- 21. Specifically, defendant has engaged in an "unfair" business act or practice in that the justification for selling the mislabeled produce and meat at issue here. Such conduct also offends public policy, is immoral, unscrupulous, unethical and offensive, and causes substantial injury to consumers.
- 22. As a result of the foregoing, pursuant to California Business & Professions Code §17203, plaintiff, on behalf of the general public, seeks an Order of this Court for the relief in the form of compensatory damages.

THIRD CAUSE OF ACTION:

Commission of Fraudulent Business Acts and Practices

- 23. Plaintiff, on behalf of the general public, realleges as if fully set forth herein, each and every allegation contained in ¶¶1-22 herein, and further alleges as follows.
- 24. The marketing, sale and/or offering for sale by defendant of the deceptively mislabeled meat and produce as detailed above constitute unlawful, unfair and/or fraudulent business acts or practices in violation of, *inter alia*, Business & Professions Code §§17200, et seq.

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25. Specifically, defendants have engaged in a "fraudulent" business act or practice in that the representations and omissions of material fact as described above have a likelihood of deceiving the general public.

26. As a result of the foregoing, pursuant to California Business & Professions Code §17203, plaintiff, on behalf of the general public and the class they represent, seeks an Order of this Court for the relief set forth above.

VIII. FOURTH CAUSE OF ACTION:

Commission of Untrue and Misleading Advertising

- 27. Plaintiff, on behalf of the general public, realleges as if fully set forth herein, each and every allegation contained in ¶1-26 herein, and further alleges as follows.
- 28. California Business & Professions Code §17500 prohibits various deceptive practices in connection with the dissemination in any manner of representations for the purpose of inducing, or which are likely to induce, directly or indirectly, the purchase of the products at issue to the consuming public.
- 29. The policies, acts and practices alleged herein were intended to, and did, induce the public to buy these mislabeled products and violate this section, in violation of California Business & Professions Code §17500, defendant caused to be made, published, disseminated, circulated or placed before the public, advertisements and/or labels concerning the products at issue which contained country of origin statements which were untrue, deceptive, misleading or omitted material facts and which by the exercise of reasonable care should have been known by defendant to be untrue, deceptive or misleading.
- 30. The above-described acts and practices conducted by defendant still continue to this day and present a threat to the general public.

1 31. As a result of the foregoing, pursuant to California Business & Professions 2 Code §17535, plaintiff, on behalf of the general public, seeks an Order of this Court for 3 the relief set forth in above. 4 IX. PRAYER FOR RELIEF 5 WHEREFORE plaintiff on behalf of the general public, prays for judgment 6 against defendant as follows: 7 A. For damages; 8 B. For an Order imposing the equitable relief requiring defendant to label 9 imported and domestic products with a single country of origin; 10 C. For an Order requiring an asset freeze and imposing a constructive trust over 11 all ill-gotten monies; 12 D. For an injunction against sales of produce and meat that are not marked with 13 the correct country of origin marking; 14 E. For pre- and post-judgment interest; 15 F. For attorneys' fees and for costs of suit pursuant to, inter alia, California Code 16 of Civil Procedure §1021.5; and 17 G. For such other and further relief as this Court may deem just and proper. 18 19 20 21 1950 San Vidente Blvd., Suite 220 Los Angeles, CA 90049 22 (310) 820-2211 23 24 25 26 27 28

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ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Ber	number, and address):	FOR COURT USE ONLY			
JOELD. JOSEPH PRO PER					
11950 SAN VICENTE BLVD., SUITE 220 TELEPHONE NO.: 310-922-1856	FILED Superior Court of California County of Los Angeles				
ATTORNEY FOR (Name):	· · · · · · · · · · · · · · · · · · ·	APR 22 2014			
SUPERIOR COURT OF CALIFORNIA, COUNTY OF STREET ADDRESS: 111. N. HILL STREE	SUPERIOR COURT OF CALIFORNIA COUNTY OF STREET ADDRESS: 111. N. HILL STREET				
STANLEY MOSK	MAILING ADDRESS: LOS ANGELES CA 90012 CITY AND ZIP CODE: STANLEY MOSK				
BRANCH NAME: CASE NAME: JOEL D. JOSEPH v. TRADER JOE'	S COMPANY				
CIVIL CASE COVER SHEET	Complex Case Designation	CASE NUMBER:			
✓ Unlimited Limited	Counter Joinder	BC543455			
(Amount (Amount demanded is		JUDGE:			
exceeds \$25,000) \$25,000 or less)	Filed with first appearance by defen (Cal. Rules of Court, rule 3.402)				
Items 1–6 bel	ow must be completed (see instructions	on page 2).			
1. Check one box below for the case type tha					
Auto Tort	Contract	Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400–3.403)			
Auto (22)	Breach of contract/warranty (06)				
Uninsured motorist (46)	Rule 3.740 collections (09) Other collections (09)	Antitrust/Trade regulation (03) Construction defect (10)			
Other Pi/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort	Insurance coverage (18)	Mass tort (40)			
Asbestos (04)	Other contract (37)	Securities litigation (28)			
Product liability (24)	Real Property	Environmental/Toxic tort (30)			
Medical malpractice (45)	Eminent domain/Inverse	Insurance coverage claims arising from the			
Other PI/PD/WD (23)	condemnation (14)	above listed provisionally complex case			
Non-Pl/PD/WD (Other) Tort	Wrongful eviction (33)	types (41)			
Business tort/unfair business practice (07	Other real property (26)	Enforcement of Judgment			
Civil rights (08)	Unlawful Detainer	Enforcement of judgment (20)			
Defamation (13)	Commercial (31)	Miscellaneous Civil Complaint			
Fraud (16)	Residential (32)	RICO (27)			
intellectual property (19)	Drugs (38)	Other complaint (not specified above) (42)			
Professional negligence (25)	Judiciał Review	Miscellaneous Civil Petition			
Other non-PI/PD/WD tort (35)	Asset forfeiture (05)	Partnership and corporate governance (21)			
Employment	Petition re: arbitration award (11)	Other petition (not specified above) (43)			
Wrongful termination (36)	Writ of mandate (02) Other judicial review (39)				
Other employment (15) 2. This case is is not com		Rules of Court. If the case is complex, mark the			
2. This case is is is not comfactors requiring exceptional judicial management	agement:				
a. Large number of separately repre	·	er of witnesses			
b. Extensive motion practice raising	, .,,,,,	n with related actions pending in one or more courts			
issues that will be time-consumir	~	nties, states, or countries, or in a federal court			
c. Substantial amount of document	ary evidence f. L Substantial	postjudgment judicial supervision			
 Remedies sought (check all that apply): Number of causes of action (specify): 	a. monetary b. nonmonetary	; declaratory or injunctive relief c punitive			
	ass action suit.				
6. If there are any known related cases, file	and serve a notice of related case. (You	ı may use form CM-015.)			
Date: APRIL 22, 2014	0.	100 100			
JOEL D. JOSEPH		la file			
(TYPE OR PRINT NAME)	NOTICE ((SIGNATURE OF PARTY OF ATTORNEY FOR PARTY)			
gnder the Probate Code, Family Code, or	e first paper filed in the action or proceed r Welfare and Institutions Code). (Cal. R	ling (except small claims cases or cases filed tules of Court, rule 3.220.) Failure to file may result			
ather parties to the action of proceeding	st seq. of the California Rules of Court, y	ou must serve a copy of this cover sheet on all			
Unless this is a collections case under ru	le 3.740 or a complex case, this cover s	heet will be used for statistical purposes only.			



SHORT TITLE:
JOSEPH v. TRADER JOE'S COMPANY

CASE NUMBER

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 civ	ril case filings in the Los Angeles Superior Court.
Item I. Check the types of hearing and fill in the estimated length of	
JURY TRIAL? YES CLASS ACTION? YES LIMITED CASE?	YES TIME ESTIMATED FOR TRIAL 1 HOURS! 1 DAYS
Item II. Indicate the correct district and courthouse location (4 steps	s – If you checked "Limited Case", skip to Item III, Pg. 4):
Step 1: After first completing the Civil Case Cover Sheet form, fi case in the left margin below, and, to the right in Column A , the C	* *
Step 2: Check one Superior Court type of action in Column B b	elow which best describes the nature of this case.
Step 3: In Column C, circle the reason for the court location checked. For any exception to the court location, see Local Rule	
Applicable Reasons for Choosing Courthous	e Location (see Column C below)
 Class actions must be filed in the Stanley Mosk Courthouse, central district. May be filed in central (other county, or no bodily injury/property damage). Location where cause of action arose. Location where bodily injury, death or damage occurred. Location where performance required or defendant resides. 	6. Location of property or permanently garaged vehicle. 7. Location where petitioner resides. 8. Location wherein defendant/respondent functions wholly. 9. Location where one or more of the parties reside. 10. Location of Labor Commissioner Office

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

	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
25	Auto (22)	☐ A7100 Motor Vehicle - Personal Injury/Property Damage/Wrongful Death	1., 2., 4.
Auto	Uninsured Motorist (46)	☐ A7110 Personal Injury/Property Damage/Wrongful Death – Uninsured Motorist	1., 2., 4.
. A	Asbestos (04)	□ A6070 Asbestos Property Damage □ A7221 Asbestos - Personal Injury/Wrongful Death	2. 2.
· G Property ath Tort	Product Liability (24)	☐ A7260 Product Liability (not asbestos or toxic/environmental)	1., 2., 3., 4., 8.
al Injury/ P	Medical Malpractice (45)	☐ A7210 Medical Malpractice - Physicians & Surgeons ☐ A7240 Other Professional Health Care Malpractice	1., 4. 1., 4.
【 〇 こ メ こ こ メ か 巳 Other Personal Injury/ Pro Damage/ Wrongful Death	Other Personal Injury Property Damage Wrongfu! Death (23)	 □ A7250 Premises Liability (e.g., slip and fall) □ A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.) □ A7270 Intentional Infliction of Emotional Distress ☑ A7220 Other Personal Injury/Property Damage/Wrongful Death 	1., 4. 1., 4. 1., 3. 1., 4.

LACIV 109 (Rev. 03/11) LASC Approved 03-04 CIVIL CASE COVER SHEET ADDENDUM
AND STATEMENT OF LOCATION

Local Rule 2.0

Page 1 of 4

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JOSEPH v. TRADER JOE'S COMPANY

CASE NUMBER

	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
[Business Tort (07)	☐ A6029 Other Commercial/Business Tort (not fraud/breach of contract)	1., 3.
operty th Tori	Civil Rights (08)	☐ A6005 Civil Rights/Discrimination	1., 2., 3.
iry/ Pr	Defamation (13) A6010 Defamation (stander/libel)		1., 2., 3.
Non-Personal Injury/ Property Damage/ Wrongful Death Tort	Fraud (16)	□ A6013 Fraud (no contract)	1., 2., 3.
. IO ≸		☐ A6017 Legal Malpractice	1., 2., 3.
on-Pe amag	Professional Negligence (25)	☐ A6050 Other Professional Malpractice (not medical or legal)	1., 2., 3.
	Other (35)	☑ A6025 Other Non-Personal Injury/Property Damage tort	2.,3.
Employment	Wrongful Termination (36)	□ A6037 Wrongful Termination	1., 2., 3.
loya		☐ A6024 Other Employment Complaint Case	1., 2., 3.
Emg	Other Employment (15)	☐ A6109 Labor Commissioner Appeals	10.
		☐ A6004 Breach of Rental/Lease Contract (not unlawful detainer or wrongful eviction)	2., 5.
	Breach of Contract/ Warranty (06)	☐ A6008 Contract/Warranty Breach -Seller Plaintiff (no fraud/negligence)	2., 5.
	(not insurance)	☐ A6019 Negligent Breach of Contract/Warranty (no fraud)	1., 2., 5.
ĺ		☐ A6028 Other Breach of Contract/Warranty (not fraud or negligence)	1., 2., 5.
벙		☐ A6002 Collections Case-Seller Plaintiff	2., 5., 6.
Contract	Collections (09)	☐ A6012 Other Promissory Note/Collections Case	2., 5.
	Insurance Coverage (18)	☐ A6015 Insurance Coverage (not complex)	1., 2., 5., 8.
Ī		☐ A6009 Contractual Fraud	1., 2., 3., 5.
	Other Contract (37)	☐ A6031 Tortious Interference	1., 2., 3., 5.
ļ		A6027 Other Contract Dispute(not breach/insurance/fraud/negligence)	1., 2., 3., 8.
	Eminent Domain/Inverse Condemnation (14)	A7300 Eminent Domain/Condemnation Number of parcels	2.
operty	Wrongful Eviction (33)	☐ A6023 Wrongful Eviction Case	2., 6.
Real Pro		Cl A6018 Mortgage Foreclosure	2., 6.
ු සී ේ	Other Real Property (26)	☐ A5032 Quiet Title	2., 6.
<u> </u>		☐ A6060 Other Real Property (not eminent domain, landlord/tenant, foreclosure)	2., 6.
· Age	Unlawful Detainer-Commercial (31)	☐ A6021 Unlawful Detainer-Commercial (not drugs or wrongful eviction)	2., 6.
(√ Detaine	Unlawful Detainer-Residential (32)	☐ A6020 Unlawful Detainer-Residential (not drugs or wrongful eviction)	2., 6.
ろってで Uniawful Detaine	Unlawful Detainer- Post-Foreclosure (34)	☐ A6020FUnlawful Detainer-Post-Foreclosure	2., 6.
~ 5 ©	Unlawful Detainer-Drugs (38)	☐ A6022 Unlawful Detainer-Drugs	2., 6.

SHORT TITLE:
JOSEPH v. TRADER JOE'S COMPANY

CASE NUMBER

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

LASC Approved 03-04

SHORT TITLE: JOSEPH v. TRADER JOE'S COMPANY	CASE NUMBER
OOOLI II V. ITADER SOE S COMPANY	

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.			ADDRESS: 1000 GLENDON AVENUE
☑1. □2. □3. □4. □5. □6. □7. □8. □9. □10.		9. □10.	
CITY: LOS ANGELES	STATE:	ZIP CODE: 90024	

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 LOS ANGELES 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: APRIL 22, 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.
- 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.
- 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.
- 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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