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6 Attorney For Plaintiff Jennifer Chiba

FILED
LOS ANGELES SUPERIOR COURT
SEP 23 2008
JOHN A. CLARKE, CLERK
BY SHAUNYA WESLEY, DEPUTY

Does Mark Morney

7
8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF LOS ANGELES, CENTRAL DISTRICT

10 BC398671

11 JENNIFER CHIBA, an individual,

Case No.

12 Plaintiff,

COMPLAINT FOR ATTORNEY
MALPRACTICE (PROFESSIONAL
NEGLIGENCE, BREACH OF FIDUCIARY
DUTY AND CONSTRUCTIVE FRAUD)

13 vs.

14 RON GOLD, an individual, OLDMAN,
15 COOLEY, SALLUS, GOLD, BIRNBERG
16 & COLEMAN, L.L.P., a California Limited
17 Liability Partnership, and DOES 1 through
18 100,

DEMAND FOR TRIAL BY JURY

Defendants.

19
20 Plaintiff Jennifer Chiba ("Jennifer" or "Plaintiff") hereby complains against
21 Defendants Ron Gold ("Gold") and Oldman, Cooley, Sallus, Gold, Birnberg & Coleman,
22 ("Oldman Cooley"), and Does 1 through 100 (collectively referred to as "Defendants") as
23 follows:

24 **GENERAL ALLEGATIONS**

25 1. Jennifer was the long-time romantic partner of musician ~~Elliot Smith~~
26 ("Elliott") at the time of his suicide in 2003. The two essentially lived together as husband
27 and wife.

CIT/CASE: BC398671 LEA/DEF#:
RECEIPT #: CCH465980049
DATE PAID: 09/23/08 02:58:25 PM
PAYMENT: \$31.00
RECEIVED:
CHEQUE#:
CASH#:
CHARGE#:
CASH#:
331.00

1 2. When Smith died, his step-mother Marta Greenwald (from whom
2 Elliott was long estranged, and who was made the personal representative of his estate
3 because Elliott had left no instructions to the contrary) opportunistically sought to assert
4 total control over Elliott's assets and affairs. It became clear to Jennifer that Greenwald
5 wanted to take control of Elliott's intellectual property and master tapes (including
6 unreleased work) and maximize their commercial appeal for monetary gain.

7 3. Blindly blaming Jennifer for the tragedy, Greenwald undertook a
8 vindictive campaign to rewrite Elliott's history with Jennifer excised. Part of this effort
9 involved denying her certain legal rights that she would otherwise hold as a result of her
10 relationship with Elliott. Because Greenwald was obviously adamant about cutting
11 Jennifer completely out of the picture, Jennifer was forced to sue Greenwald. The lawsuit
12 sought monetary damages, as it must have, but also involved deeply emotional matters for
13 Jennifer. For one, she felt responsible for protecting the artistic integrity of Elliott's work.
14 In addition, the lawsuit would have essentially been a referendum on the truth and
15 significance of her relationship with Elliot, especially in light of Greenwald's efforts to
16 publicly denigrate it and even accuse Jennifer of his murder.

17 4. Jennifer's claims against Greenwald were very strong, as evidenced in
18 part by Defendants' eagerness to pursue the case on a contingency basis. Indeed, they
19 offered to assert Jennifer's claims against Greenwald, as personal representative of the
20 estate, for 45% of any monetary recovery (after initially taking the case on an hourly
21 basis). On June 17 2004, Chiba hired Defendants to prosecute her clearly meritorious legal
22 claim against Greenwald. Defendants accepted this engagement and agreed to perform
23 these services for Jennifer. Defendants drafted Jennifer's lawsuit and filed it on July 30,
24 2004.

25 5. But incredibly, no judge or jury ever decided the merits of Jennifer's
26 claims. Jennifer was denied her day in court. The reason was Defendants' egregious
27 professional negligence. One example of such malpractice was sloppily adding superfluous
28

1 and untrue allegations to the lawsuit that effectively left it no chance of reaching a jury—
2 when any competent practioner (or anyone who researched applicable law) would have
3 known the allegations would vitiate an otherwise valid claimed. Defendants even failed to
4 realize this mistake as the litigation proceeded, when Greenwald's attorneys were
5 obviously maneuvering to exploit it. Greenwald did in fact exploit Defendants' mistake
6 and a result managed to have the case dismissed without the merits or factual allegations
7 ever being addressed.

8 6. In addition to this and other elements of professional negligence,
9 Defendants went further and actually breached the fiduciary duties of fidelity, care and
10 loyalty they owed to Jennifer. They did so by concealing from her their professional
11 negligence, even as those mistakes appeared more and more likely to destroy her case—
12 and even when they did destroy it. In fact, there was a period of time after Defendants'
13 initial (and ultimately fatal) mistake was out in the open among the attorneys, although
14 never explained to Jennifer, when Defendants could have remedied the situation by
15 performing an embarrassing mea culpa—and asking the trial judge to allow them to amend
16 their papers to remove the mistake. Such request would have been granted under clear
17 statutory and case law, which would have allowed Jennifer's lawsuit to proceed on the
18 merits.

19 7. This option, of which any competent litigator would be aware, would
20 have been advantageous for Jennifer. Essentially, it would have allowed Defendants to go
21 back to the drawing board in order to craft the complaint with the benefit of knowing the
22 applicable law. But there was great risk to Defendants in this strategy: If they had admitted
23 their mistake in this way, they would squarely open themselves to liability for malpractice.

24 8. Not wanting to admit their mistake, Defendants stubbornly stuck by
25 their imprudent allegations even though they knew the allegations were not true and
26 fatal to Jennifer's claims, and instead fiddled with several proposed amendments to the
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1 capacities when the same has been ascertained. Plaintiff is informed and believes, and
 2 thereon alleges, that each fictitiously-named Defendant is responsible in some manner for
 3 the occurrences herein alleged, and that Plaintiff's damages as herein alleged were
 4 proximately caused by their conduct.

5 15. Each of the Defendants acted as an agent for each of the other
 6 Defendants in doing the acts alleged and each Defendant ratified and otherwise adopted
 7 the acts and statements performed, made or carried out by the other Defendants so as to
 8 make them directly and vicariously liable to Plaintiff for the conduct complained of herein.

9 16. At all times mentioned herein, defendant Ron Gold and Does 1
 10 through 50 was the agent and employee of (or a partner in) Defendant Oldman Cooley and
 11 in doing the things herein alleged was acting within the course and scope of such agency.

12 **First Cause Of Action for Professional Negligence**
 13 **(Against All Defendants)**

14 17. Jennifer incorporates herein by this reference paragraphs 1 through 16
 15 as if set forth in full in this cause of action.

16 18. Defendants (and each of them) failed to exercise reasonable care and
 17 skill in undertaking to perform legal services for Jennifer. Some examples of such
 18 malpractice are cited above, but there were others.

19 19. Had Defendants exercised proper care and skill in Jennifer's litigation
 20 against Greenwald, Jennifer would have prevailed and received an received the appropriate
 21 recovery.

22 20. As a proximate result of Defendants' negligence, Jennifer was harmed
 23 according to proof, within the jurisdiction of this Court.

24 **Second Cause Of Action for Breach of Fiduciary Duty**
 25 **(Against All Defendants)**

26 21. Jennifer incorporates herein by this reference paragraphs 1 through 20
 27 as if set forth in full in this cause of action.

28

2025 RELEASE UNDER E.O. 14176

1 22. By virtue of the attorney-client relationship that existed between
2 Jennifer and Defendants, and by virtue of Jennifer's having placed confidence in the
3 fidelity and integrity of Defendants and entrusting Defendants with her meritorious legal
4 claims, a confidential and fiduciary relationship existed between Jennifer and Defendants
5 and Defendants owed Jennifer fiduciary duties under the law.

6 23. Despite having voluntarily accepted the trust and confidence of
7 Jennifer with regard to her meritorious legal claims, and in violation of this relationship of
8 trust and confidence, Defendants abused the trust and confidence of Jennifer, including as
9 alleged above (as an example).

10 24. As a result of Defendants' breaches of fiduciary duties, Defendants
11 benefited in that it became less likely that their lack of reasonable care and competence
12 and failure to know applicable law would come to light.

13 25. As a proximate result of Defendants' breaches of fiduciary duty,
14 Jennifer was harmed according to proof, within the jurisdiction of this Court.

15 26. As a further proximate result of Defendants' malpractice, Jennifer
16 incurred legal fees and costs in amount to be proved .

17 27. In doing the acts alleged herein, Defendants acted with oppression
18 fraud and malice, and Jennifer is entitled to punitive and exemplary damages.

19 **Third Cause Of Action for Constructive Fraud**
20 **(Against All Defendants)**

21 28. Jennifer incorporates herein by this reference paragraphs 1 through 27
22 as if set forth in full in this cause of action.

23 29. Jennifer placed trust and confidence in Defendants until after the
24 demise of her case, when she eventually consulted another attorney.

25 30. Despite having voluntarily accepted the trust and confidence of
26 Jennifer with regard to her meritorious legal claims, and in violation of this relationship of
27

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1 trust and confidence, Defendants abused the trust and confidence of plaintiff by (as an
2 example) concealing from Jennifer their prior professional negligence.

3 31. As a result of Defendants' breaches of fiduciary duties, Defendants
4 benefited in that it became less likely that their lack of reasonable care and competence
5 and failure to know applicable law would come to light. To achieve their goal, Defendants
6 concealed facts by refusing to address direct questions and even affirmatively
7 misrepresented what was going on in the litigation in order to keep Jennifer in the dark.
8 Defendants performed these acts with the intent to induce reliance by Jennifer in the
9 continuing fidelity of Defendants as her attorneys.

10 32. Defendants perform the acts alleged herein with the intent to deceive
11 and defraud Jennifer.

12 33. As a proximate result of Defendants' fraud and constructive fraud,
13 Jennifer was harmed according to proof, within the jurisdiction of this Court.

14 34. As a further proximate result of Defendants' fraud and constructive
15 fraud, Jennifer incurred legal fees and costs in amount to be proved.

16 35. In doing the acts alleged herein, Defendants acted with oppression
17 fraud and malice, and Jennifer is entitled to punitive and exemplary damages.

18 **Fourth Cause of Action for Intentional Infliction of Emotional Distress**
19 **(Against All Defendants)**

20 36. Jennifer incorporates herein by this reference paragraphs 1 through 35
21 as if set forth in full in this cause of action.

22 37. As a result of the actions alleged above, Jennifer suffered serious
23 emotional distress of a kind that an ordinary reasonable person would suffer under the
24 circumstances.

25
26 38. As a proximate and direct result of defendant's willful conduct,
27 Jennifer has suffered extreme emotional distress and other damages, all in an amount
28

Marked copies by: [illegible]

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):
 David Alden Erikson, SBN 189838
 200 North Larchmont Blvd
 Los Angeles, California 90004
 TELEPHONE NO.: 323-465-3100 FAX NO.: 323-465-3177
 ATTORNEY FOR (Name): Plaintiff Jennifer Chiba

FILED CM-010
 LOS ANGELES SUPERIOR COURT
 SEP 23 2008
 JOHN A. CLARKE, CLERK
 BY SHAUNYA WESLEY, DEPUTY

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

CASE NAME:
 Chiba v. Gold

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 1811)

CASE NUMBER:
 BC398671
 JUDGE:
 DEPT:

Items 1-5 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> <input type="checkbox"/> Auto (22)
<input type="checkbox"/> Uninsured motorist (48)
<p>Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort</p> <input type="checkbox"/> Asbestos (04)
<input type="checkbox"/> Product liability (24)
<input type="checkbox"/> Medical malpractice (45)
<input type="checkbox"/> Other PI/PD/WD (23)
<p>Non-PI/PD/WD (Other) Tort</p> <input type="checkbox"/> Business tort/unfair business practice (07)
<input type="checkbox"/> Civil rights (08)
<input type="checkbox"/> Defamation (13)
<input type="checkbox"/> Fraud (16)
<input type="checkbox"/> Intellectual property (19)
<input checked="" type="checkbox"/> Professional negligence (25)
<input type="checkbox"/> Other non-PI/PD/WD tort (35)
<p>Employment</p> <input type="checkbox"/> Wrongful termination (36)
<input type="checkbox"/> Other employment (15) | <p>Contract</p> <input type="checkbox"/> Breach of contract/warranty (06)
<input type="checkbox"/> Collections (09)
<input type="checkbox"/> Insurance coverage (16)
<input type="checkbox"/> Other contract (37)
<p>Real Property</p> <input type="checkbox"/> Eminent domain/inverse condemnation (14)
<input type="checkbox"/> Wrongful eviction (33)
<input type="checkbox"/> Other real property (26)
<p>Unlawful Detainer</p> <input type="checkbox"/> Commercial (31)
<input type="checkbox"/> Residential (32)
<input type="checkbox"/> Drugs (38)
<p>Judicial Review</p> <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) | <p>Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 1800-1812)</p> <input type="checkbox"/> Antitrust/Trade regulation (03)
<input type="checkbox"/> Construction defect (10)
<input type="checkbox"/> Mass tort (40)
<input type="checkbox"/> Securities litigation (25)
<input type="checkbox"/> Environmental/Toxic tort (30)
<input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41)
<p>Enforcement of Judgment</p> <input type="checkbox"/> Enforcement of judgment (20)
<p>Miscellaneous Civil Complaint</p> <input type="checkbox"/> RICO (27)
<input type="checkbox"/> Other complaint (not specified above) (42)
<p>Miscellaneous Civil Petition</p> <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 1800 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:
- | | |
|--|--|
| a. <input type="checkbox"/> Large number of separately represented parties | d. <input type="checkbox"/> Large number of witnesses |
| b. <input type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve | e. <input type="checkbox"/> Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court |
| c. <input type="checkbox"/> Substantial amount of documentary evidence | f. <input type="checkbox"/> Substantial postjudgment judicial supervision |
3. Type of remedies sought (check all that apply):
 a. monetary b. nonmonetary; declaratory or injunctive relief c. punitive
4. Number of causes of action (specify): 2
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: September 22, 2008
 David Alden Erikson
 (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 201.8.) 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 1800 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 complex case, this cover sheet will be used for statistical purposes only.

SHORT TITLE: Chiba v. Gold	CASE NUMBER BC398671
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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 LASC 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 4 HOURS/ DAYS.

Item II. Select 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 Los Angeles Superior Court Local Rule 2.0.

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

- | | |
|---|--|
| 1. Class Actions must be filed in the County 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)	A7100 Motor Vehicle - Personal Injury/Property Damage/Wrongful Death	1., 2., 4.
	Uninsured Motorist (46)	A7110 Personal Injury/Property Damage/Wrongful Death - Uninsured Motorist	1., 2., 4.
Other Personal Injury/Property Damage/Wrongful Death Tort	Asbestos (04)	A6070 Asbestos Property Damage	2.
		A7221 Asbestos - Personal Injury/Wrongful Death	2.
	Product Liability (24)	A7260 Product Liability (not asbestos or toxic/environmental)	1., 2., 3., 4., 8.
	Medical Malpractice (45)	A7210 Medical Malpractice - Physicians & Surgeons	1., 2., 4.
		A7240 Other Professional Health Care Malpractice	1., 2., 4.
Other Personal Injury Property Damage Wrongful Death (23)	A7260 Premises Liability (e.g., slip and fall)	1., 2., 4.	
	A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.)	1., 2., 4.	
	A7270 Intentional Infliction of Emotional Distress	1., 2., 3.	
	A7220 Other Personal Injury/Property Damage/Wrongful Death	1., 2., 4.	
Business Tort (07)	A8029 Other Commercial/Business Tort (not fraud/breach of contract)	1., 2., 3.	
Civil Rights (08)	A8005 Civil Rights/Discrimination	1., 2., 3.	
Defamation (13)	A8010 Defamation (slander/libel)	1., 2., 3.	
Fraud (15)	A8013 Fraud (no contract)	1., 2., 3.	
Intellectual Property (19)	A8016 Intellectual Property	2., 3.	

Non-Personal Injury/Property Damage
 Wrongful Death Tort (Cont'd.)
 Employment
 Contract
 Real Property
 Judicial Review of Unlawful Detainer

SHORT TITLE: Chiba v. Gold	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
Professional Negligence (25)	<input checked="" type="checkbox"/> A6017 Legal Malpractice A6050 Other Professional Malpractice (not medical or legal)	1, 2, 3. 1., 2., 3.
Other (35)	A6026 Other Non-Personal Injury/Property Damage tort	2, 3.
Wrongful Termination (39)	A6037 Wrongful Termination	1., 2., 3.
Other Employment (15)	A6024 Other Employment Complaint Case A6109 Labor Commissioner Appeals	1., 2., 3. 10.
Breach of Contract/Warranty (38) (not Insurance)	A6004 Breach of Rental/Lease Contract (not Unlawful Detainer or wrongful eviction) A6008 Contract/Warranty Breach - Seller Plaintiff (no fraud/negligence) A6019 Negligent Breach of Contract/Warranty (no fraud) A6028 Other Breach of Contract/Warranty (not fraud or negligence)	2., 5. 2., 5. 1., 2., 5. 1., 2., 5.
Collections (39)	A6002 Collections Case-Seller Plaintiff A6012 Other Promissory Note/Collections Case	2., 5., 6. 2., 5.
Insurance Coverage (18)	A6015 Insurance Coverage (not complex)	1., 2., 5., 8.
Other Contract (37)	A6009 Contractual Fraud A6031 Tortious Interference 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)	A7300 Eminent Domain/Condemnation Number of parcels _____	2.
Wrongful Eviction (33)	A6023 Wrongful Eviction Case	2., 6.
Other Real Property (26)	A6018 Mortgage Foreclosure A6032 Quiet Title A6060 Other Real Property (not eminent domain, landlord/tenant, foreclosure)	2., 6. 2., 6. 2., 6.
Unlawful Detainer-Commercial (31)	A6021 Unlawful Detainer-Commercial (not drugs or wrongful eviction)	2., 6.
Unlawful Detainer-Residential (32)	A6020 Unlawful Detainer-Residential (not drugs or wrongful eviction)	2., 6.
Unlawful Detainer-Drugs (38)	A6022 Unlawful Detainer-Drugs	2., 6.
Asset Forfeiture (05)	A6108 Asset Forfeiture Case	2., 6.
Petition re Arbitration (11)	A6115 Petition to Compel/Confirm/Vacate Arbitration	2., 5.

SHORT TITLE: Chiba v. Gold	CASE NUMBER
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Judicial Review (Cont'd.)

Provisionally Complex Litigation

Enforcement of Judgment

Miscellaneous Civil Complaints

Miscellaneous Civil Petitions

A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Writ of Mandate (02)	A8151 Writ - Administrative Mandamus	2., 8.
	A8152 Writ - Mandamus on Limited Court Case Matter	2.
	A8153 Writ - Other Limited Court Case Review	2.
Other Judicial Review (39)	A8150 Other Writ /Judicial Review	2., 8.
Antitrust/Trade Regulation (03)	A8003 Antitrust/Trade Regulation	1., 2., 8.
Construction Defect (10)	A8007 Construction defect	1., 2., 3.
Claims Involving Mass Tort (40)	A8005 Claims Involving Mass Tort	1., 2., 8.
Securities Litigation (28)	A8036 Securities Litigation Case	1., 2., 8.
Toxic Tort Environmental (30)	A8036 Toxic Tort/Environmental	1., 2., 3., 8.
Insurance Coverage Claims from Complex Case (41)	A8014 Insurance Coverage/Subrogation (complex case only)	1., 2., 5., 8.
Enforcement of Judgment (20)	A8141 Sister State Judgment	2., 9.
	A8160 Abstract of Judgment	2., 6.
	A8107 Confession of Judgment (non-domestic relations)	2., 9.
	A8140 Administrative Agency Award (not unpaid taxes)	2., 8.
	A8114 Petition/Certificate for Entry of Judgment on Unpaid Tax	2., 6.
	A8112 Other Enforcement of Judgment Case	2., 8., 9.
RICO (27)	A8033 Racketeering (RICO) Case	1., 2., 8.
Other Complaints (Not Specified Above) (42)	A8030 Declaratory Relief Only	1., 2., 8.
	A8040 Injunctive Relief Only (not domestic/harassment)	2., 8.
	A8011 Other Commercial Complaint Case (non-tort/non-complex)	1., 2., 8.
	A8000 Other Civil Complaint (non-tort/non-complex)	1., 2., 8.
Partnership/Corporation Governance(21)	A8113 Partnership and Corporate Governance Case	2., 8.
Other Petitions (Not Specified Above) (43)	A8121 Civil Harassment	2., 3., 9.
	A8123 Workplace Harassment	2., 3., 9.
	A8124 Elder/Dependent Adult Abuse Case	2., 3., 9.
	A8180 Election Contest	2.
	A8110 Petition for Change of Name	2., 7.
	A8170 Petition for Relief from Late Claim Law	2., 3., 4., 8.
	A8100 Other Civil Petition	2., 9.

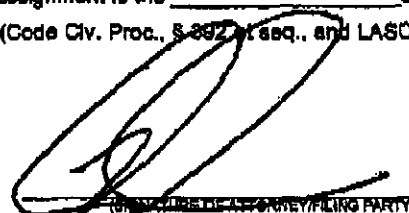
SHORT TITLE Chiba v. Gold	CASE NUMBER
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Item III. Statement of Location: Enter the address of the accident, party's residence or place of business, performance, or other circumstance indicated in Item II., Step 3 on Page 1, as the proper reason for filing in the court location you selected.

REASON: CHECK THE NUMBER UNDER COLUMN C WHICH APPLIES IN THIS CASE			ADDRESS: 1551 Lemoyne Los Angeles, CA 90026
1. <input checked="" type="checkbox"/>	2. <input type="checkbox"/>	3. <input type="checkbox"/>	4. <input type="checkbox"/>
5. <input type="checkbox"/>	6. <input type="checkbox"/>	7. <input type="checkbox"/>	8. <input type="checkbox"/>
9. <input type="checkbox"/>	10. <input type="checkbox"/>		
CITY: Los Angeles	STATE: CA	ZIP CODE: 90068	

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 Mock courthouse in the Central District of the Los Angeles Superior Court (Code Civ. Proc., § 202, et seq., and LASC Local Rule 2.0, subd. (b), (c) and (d)).

Dated: September 22, 2008



(PRINT NAME 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 form CM-010.
4. Complete Addendum to Civil Case Cover Sheet form CIV 109, 03-04 (use latest revision)
5. Payment in full of the filing fee, unless fees have been waived.
6. Signed order appointing the Guardian ad Litem, JC form 982(a)(27), if the plaintiff or petitioner is a minor under 18 years of age, or if required by Court.
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.

CIVIL CASE COVER SHEET ADDENDUM AND STATEMENT OF LOCATION
 FORM NO. 109 03-04 (DRAFT REV. 01/06)
 LASC APPROVED