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6 Maria Salgado

AL0024  
90027  
39  
Feffer

**FILED**  
Superior Court Of California  
County Of Los Angeles

SEP 22 2017

Herri R. Ch... Executive Officer  
Glorietta Rob... Deputy

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 FOR THE COUNTY OF LOS ANGELES

BC 676828

11 MARIA SALGADO

12 Plaintiffs,

13 vs.

14 SOUTHERN CALIFORNIA  
15 PERMANENTE MEDICAL GROUP;  
16 KAISER PERMANENTE  
17 INTERNATIONAL; GENEVA  
18 GREGORIO BUAN and DOES  
1 through 100, Inclusive,

19 Defendants.

CASE NO.

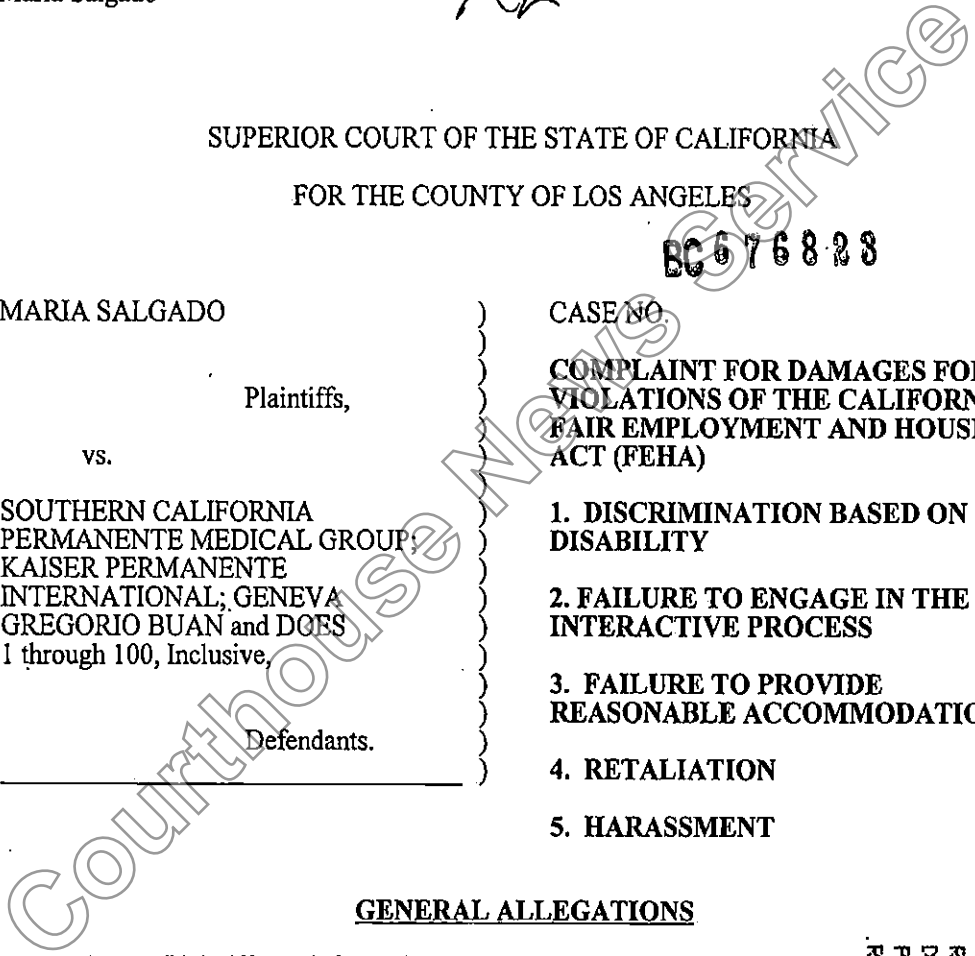
COMPLAINT FOR DAMAGES FOR  
VIOLATIONS OF THE CALIFORNIA  
FAIR EMPLOYMENT AND HOUSING  
ACT (FEHA)

- 1. DISCRIMINATION BASED ON DISABILITY
- 2. FAILURE TO ENGAGE IN THE INTERACTIVE PROCESS
- 3. FAILURE TO PROVIDE REASONABLE ACCOMMODATIONS
- 4. RETALIATION
- 5. HARASSMENT

GENERAL ALLEGATIONS

1. Plaintiffs are informed and believe and thereon allege that at all times herein mentioned, defendants, SOUTHERN CALIFORNIA PERMANENTE MEDICAL GROUP; KAISER PERMANENTE INTERNATIONAL (hereinafter collectively referred to ("KAISER"); and DOES 1 through 100, Inclusive, and each of them, were at all times herein mentioned, corporations engaged, as a matter of commercial actuality, in purposeful economic activity, within the County of Los Angeles, State of California. Defendant At all times herein mentioned, plaintiff MARIA SALGADO was a resident of the State of California.

COMPLAINT FOR DAMAGES  
FOR VIOLATIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT (FEHA)



09/22/2017

CIT/CASE: BC676828  
 LEA/DEF#: #:  
 RECEIVED #: CCH0533059  
 DATE PAID: 09/22/17 03:16 PM  
 PAYMENT: 8435.00  
 RECEIVED: #435.00  
 CHECK: #435.00  
 CASH: #435.00  
 DEPOSIT: #435.00

1           2.     Plaintiffs are informed and believe and thereon allege that defendants GENEVA  
 2 GREGORIO BUAN ("BUAN"), and DOES 41 through 100, and each of them were, at all times  
 3 herein mentioned, residents of the State of California and were managers, officers, supervisors,  
 4 managing agents and/or employees of KAISER PERMANENTE and each of them. Plaintiffs  
 5 further allege that at all times herein mentioned, defendants DOES 41 through 100, were in the  
 6 chain of command over the plaintiffs and had sufficient actual or reasonably perceived power or  
 7 control or direction in the plaintiffs' work environment to significantly affect the plaintiffs'  
 8 employment status.

9           3.     The true names or capacities, whether individual, corporate, associate or  
 10 otherwise, of defendants DOES 1 through 100, inclusive, are unknown to plaintiffs and  
 11 therefore each plaintiff sues these defendants by such fictitious names. Plaintiffs will amend  
 12 this complaint to allege their true names and capacities when ascertained. Plaintiffs are  
 13 informed and believe and based thereon allege that each of these fictitiously named defendants  
 14 is responsible in some manner for the occurrences herein alleged and that plaintiffs' damages as  
 15 herein alleged were proximately caused by their conduct.

16           4.     Plaintiffs are informed and believe and thereon allege that each of the defendants,  
 17 including the fictitiously named defendants, was the agent and employee of each of the  
 18 remaining defendants and in doing some of the things hereinafter alleged, was acting within the  
 19 scope and course of such agency. Plaintiffs further allege that the acts and conduct of said  
 20 defendants, as hereinafter alleged, which were intentional or harassing were not related to  
 21 personnel actions and were neither a risk, an incident, nor a normal part of the plaintiffs'  
 22 employment.

23           5.     During all relevant times mentioned herein, Plaintiff worked as a Licensed  
 24 Vocational Nurse ("LVN") at KAISER in the Hollywood medical facility where she worked in  
 25 the Family Medicine Department. Plaintiff suffered from a foot injury, she had diabetes and a  
 26 stress and anxiety disorder. These conditions impaired various daily life activities and made  
 27 such daily life activities more difficult. Plaintiff was a disabled employee as defined by the  
 28 California Fair Employment and Housing Act.

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1           6. In March of 2015, Plaintiff hurt her foot, which was ultimately diagnosed as  
 2 plantars faciitis and plaintiff had problems with her feet as a result of her diabetes. Plaintiff had  
 3 various evaluations from her treating physicians and plaintiff timely reported all such instances  
 4 of missed work. Plaintiff reported the doctors orders for leave immediately as she received  
 5 them. Plaintiff had several extensions of leave by her doctors and it took several appointments  
 6 to get a diagnosis. Plaintiff's supervisor and department director BUAN gave plaintiff a Level  
 7 one written discipline for calling out on short notice. BUAN and KAISER had a policy that  
 8 LVN's must call out more than 24 hours in advance if they are going to be sick or need medical  
 9 leave. This policy as applied is per se discrimination for disabled employees and for employees  
 10 on intermittent FMLA who don't know, nor can they plan, when they will have difficulty  
 11 because of their disability. Plaintiff provided the Kaiser medical forms documenting her  
 12 treatment and leave ordered by her doctored. That notwithstanding KAISER and BUAN took  
 13 negative employment actions again plaintiff.

14           7. Plaintiff was also advised by a senior RN that she would get a bonus because of the  
 15 short call out and in fact they have a special code "SCL" for these short call instances. This  
 16 caused much stress for plaintiff. Plaintiff had diabetes and she was concerned as she often  
 17 needed to treat with he doctors for her disabling condition. BUAN wrote on the disciplinary  
 18 notice that they would revisit the matter in two months. As such, Plaintiff approached, Victor,  
 19 who was plaintiff's supervisor and the assistant to BUAN, and asks him about the prior  
 20 discipline that he and BUAN had initiated. Victor told plaintiff that her attendance was fine, and  
 21 that he would remove the disiplinary action. However, BUAN interceded and advised Plaintiff  
 22 that the discipline would remain in place for the next year and would be held against her for any  
 23 progression of discipline that may occur. This did not alleviate plaintiff's stress as there did not  
 24 seem to be any effort to accommodate plaintiff's medical condition.

25           8. Then in December of 2015, Plaintiff's incilin pump stopped working and  
 26 plaintiff was put in the hospital for ketoacidosis. Doctors had plaintiff on medical leave for a  
 27 week. At that time her doctors were concerned about plaintiff's continued medical care as  
 28 Plaintiff described the stress that her employer created when she had to take medical leave of

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1 absence. Accordingly, the doctors put plaintiff on intermittent FMLA, and the paperwork  
 2 described 4 times a month eight hours each occurrence. This was for her diabetes and stress and  
 3 anxiety as she was treating with her doctors for stress, anxiety and depression as well. As a  
 4 result, BUAN began requiring extra documentation for doctors appointments and then limiting  
 5 the time when appointments occur. Plaintiff complained as she didn't necessarily know how  
 6 long appointments would take and she was treating at Kaiser and often delayed by the doctors.  
 7 Plaintiff could not insure that her appointments would fit withing the small window of time  
 8 allocated by BUAN. Again, this caused further stress each time plaintiff needed to see her  
 9 doctor. BUAN also would ask plaintiff whether she was treating for psych. or for her diabetes.  
 10 This made plaintiff uncomfortable as BUAN was well aware that plaintiff had FMLA for psych  
 11 and Diabetes. That notwithstanding, plaintiff was required to tell BUAN with whom she was  
 12 treating and thus BUAN would know where plaintiff was within the KAISER facility at all  
 13 times.

14 9. Plaintiff advised BUAN on several occasions that the harassment made her  
 15 uncomfortable. Evidently other workers experienced the same and the union had an all  
 16 department meeting to address the employees' complaints. The memorandum created for that  
 17 meeting included complaints regarding extra documentation to prove doctors appointments,  
 18 limiting time for appointments, mandating return from doctors appointments at specific times,  
 19 employees feeling retaliation and uncomfortable dealing with BUAN, and an "environment of  
 20 fear" under her management. At the meeting various employees voiced their concerns.  
 21 However, after the meeting, Plaintiff was called into BUAN's office. BUAN berated plaintiff  
 22 for agreeing with the other employees. BUAN was making excuses and asserted that employees  
 23 left her department because they lived too far away. Plaintiff stated in the meeting that if  
 24 employees liked to work in the department and they didn't feel oppressed it didn't matter how far  
 25 away they lived. Plaintiff listened to BUAN after the meeting and did not voice any further  
 26 opposition at that time. Despite the Union meeting the harassment and discriminatory conduct  
 27 continued.

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1           10. In August, Plaintiff had further health problems including some physical  
 2 manifestations of her anxiety, which included abdominal problems, dermatological problems, and  
 3 hives. Plaintiff was also having body aches in her neck, shoulders, and back. Plaintiff's  
 4 treating Doctors (Kaiser doctors), were aware of oppressive management Plaintiff experienced.  
 5 They increased plaintiff's FMLA to eight times a month to help Plaintiff get her medical  
 6 treatment. Immediately after the increase in FMLA time, plaintiff had a coworker that began  
 7 harassing her in front BUAN and Victor, and was calling plaintiff "psycho" and "psychotic."  
 8 This made plaintiff very upset as only BUAN and Victor knew about plaintiff's psychological  
 9 condition and treatment and they obviously were telling other employees.

10           11. The day plaintiff was abused by her co-worker, Plaintiff communicated to Plaintiff  
 11 and wrote a text to Victor and BUAN and advised that she can't believe they would do nothing  
 12 while the co-worker, who made disparaging remarks about her psychological condition and  
 13 advised Victor and BUAN that she was going to the union and reporting the entire matter.  
 14 Plaintiff did report the harassment to the Union and the Union representative told plaintiff to tell  
 15 Felicia, about the meeting and that she would be entitled to union representation at meeting also.  
 16 The next week BUAN called Plaintiff into her office and told her that Felicia was bringing a  
 17 harassment complaint with KAISER for calling her about the meeting. Maria explained to  
 18 BUAN she had Felicia's phone number from group texts that all the employees engaged in. This  
 19 was clearly retaliation and plaintiff reasonable believes all such retaliation was orchestrated by  
 20 BUAN. BUAN then told Plaintiff that she had forwarded the matter on to HR who will be  
 21 contacting her. Plaintiff at that time had also complained to the Kaiser Physician in the  
 22 department hoping that the doctor would effectuate some change as the Doctors were the  
 23 managing partners of the organization. Moreover, the treating doctors were also well aware of  
 24 the mistreatment plaintiff was experiencing.

25           12. When the KAISER HR contacted Plaintiff, as BUAN had advised, Plaintiff thought  
 26 HR would be investigating the harassment by Felicia that occurred in front of Victor and Buan.  
 27 Instead, HR start spoke to her about tardies that they asserted had occurred 60 days previously in  
 28 July. The three tardies concerned days when Plaintiff allegedly was two minutes, three minutes

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1 and eight minutes late. Plaintiff did not believe she was late as Plaintiff often arrived early and  
 2 stayed late. Clearly this was further retaliation by BUAN and KAISER. Plaintiff explained that  
 3 KAISER has taken much more time from her because of their oppressive payroll policies.  
 4 KAISER's policy was to take time away from employees and round to the nearest hour if they  
 5 clocked in early or clocked out late. The policy considered a 6 minute window that if an  
 6 employee clocked in early KAISER adjusted up to the beginning of the shift and if they clock  
 7 out late within 6 minutes KAISER adjust took away the time and considered it the top of the  
 8 hour. So KAISER on a regular basis and by its own policy takes time away from its employee  
 9 but would like to use a two minute and three minute tardy as a pretextual means to take action  
 10 (termination in this case) against plaintiff. Plaintiff makes approximately 46 cents a minute.  
 11 The time is diminimus and clearly a pretextual move to terminate Plaintiff right on the heels of  
 12 her complaining of unlawful harassment because of her disability. All such negative  
 13 employment action occurred within a week. Immediately after HR spoke to plaintiff the union  
 14 contacted Plaintiff and advised her that KAISER intended to terminate her employment.

15 13. As a result of these events plaintiff experienced an anxiety attack and advised  
 16 BUAN that she would be out the rest of the day on FMLA as she needed medical attention.  
 17 Upon seeing her Doctor plaintiff was put on medical leave for six weeks. Plaintiff filed a claim  
 18 against BUAN with Dept of Industrial Relations for retaliation.

19 14. On September 28, 2017, plaintiff spoke with a union representative named,  
 20 Edwin, who set up a meeting to speak with the HR representative Craig. At that meeting Craig  
 21 tells Plaintiff that he will release her to be transferred to another Kaiser facility in Baldwin Park  
 22 and that he was not going to pursue termination. However, when plaintiff returned from her  
 23 leave it was a Monday, October 17, 2017. On Wednesday, BUAN advised plaintiff to get find a  
 24 union representative because BUAN was readdressing the tardy issue. Plaintiff advised BUAN  
 25 that the issue was handled through HR. That notwithstanding, BUAN demanded that the  
 26 meeting take place on Friday October 21, 2016. Plaintiff could not communicate with her union  
 27 representative and could not get a hold of Edwin at that time. BUAN demanded that the  
 28 meeting go forward anyway. At the meeting Plaintiff learned that BUAN demanded plaintiff's

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1 termination despite her meeting with the union and the HR representative that had resolved the  
2 entire matter. The instant plaintiff returned to work from her medical disability leave for her  
3 stress and anxiety, BUAN effectuated plaintiff termination. BUAN's conduct amounted to  
4 continuous harassment, discrimination and retaliation because of plaintiff's disability starting  
5 with plaintiff's foot injury and continuing through her termination. All such conduct escalated  
6 into further discrimination and harassment. See Roby v. McKesson Corp., 47 Cal. 4th 686  
7 (2009).

8 **FIRST CAUSE OF ACTION**  
9 **AGAINST DEFENDANT KAISER;**  
10 **AND DOES 1 THROUGH 40 AND EACH OF THEM**  
11 **(DISCRIMINATION BASED ON DISABILITY)**

12 15. Plaintiffs incorporate the allegations set forth in paragraphs 1 through 25 as if set  
13 forth in full herein.

14 16. At all times herein mentioned Government Code §§12940 *et seq.* were in full  
15 force and effect and were binding on defendants KAISER, and DOES 1 through 40 and each of  
16 them. These sections require defendants, and each of them, to refrain from discriminating  
17 against a disabled employee who is fully qualified and able to perform the functions of an  
18 employment position.

19 17. Plaintiff, who were both disabled individual, was qualified to perform the duties  
20 of an employment position with KAISER with, or without, reasonable accommodation, and was  
21 subjected to adverse employment actions by KAISER because of her disability. Said acts and  
22 conduct of KAISER, as have been more fully set forth above, were on the basis of plaintiffs'  
23 disability or, on account of the fact that plaintiff was regarded as disabled by defendant, or on  
24 account of the fact that plaintiff had a record or history of a disability which was known to  
25 KAISER. Said conduct thus constituted violations of Government Code § 12940 *et seq.*

26 18. Administrative charges have been filed on behalf of MARIA SALGADO with  
27 the California Department of Fair Employment and Housing (DFEH) pursuant to Section 12960  
28 of the Government Code on September 17, 2017, substantially alleging the acts and conduct as

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1 hereinabove described. DFEH issued "Right to Sue" notices on September 17, 2017. (True  
2 and correct copies of same are attached hereto as Exhibits "1" and "2" respectively).

3 19. As a result of the aforesaid unlawful acts of said defendants and each of them,  
4 plaintiffs have lost income and benefits in amounts to be proven at time of trial. Plaintiffs claim  
5 such amounts as damages together with prejudgment interest pursuant to California Civil Code  
6 § 3287 and/or any other provision of law providing for prejudgment interest.

7 20. As a result of the aforesaid unlawful acts of said defendants and each of them,  
8 plaintiffs have been personally humiliated and have become mentally upset, distressed and  
9 aggravated. Plaintiffs claim general damages for such mental distress and aggravation in an  
10 amount to be proven at time of trial.

11 21. As a further result of the said acts of the said defendants and each of them,  
12 plaintiffs may employ medical practitioners and physicians for care and may incur medical and  
13 incidental expenses which will be shown according to proof.

14 22. The aforesaid acts directed toward the plaintiffs were carried out by managerial  
15 employees, officers, and directors and were directed and ratified by defendants KAISER with a  
16 conscious disregard of plaintiffs' rights and with the intent to vex, injure, and annoy the  
17 plaintiffs, such as to constitute oppression, fraud or malice under California Civil Code § 3294,  
18 entitling the plaintiffs to punitive damages in a sum which is an amount appropriate to punish  
19 and set an example of KAISER.

20 **SECOND CAUSE OF ACTION**

21 **AGAINST DEFENDANT KAISER;**

22 **AND DOES 1 THROUGH 40 AND EACH OF THEM**

23 **FAILURE TO PROVIDE REASONABLE ACCOMMODATIONS**

24 **[VIOLATION OF GOVERNMENT CODE §12940(m)]**

25 23. Plaintiff incorporates the allegations set forth in paragraphs 1 through 22 as if set  
26 forth in full herein.

27 24. During the period of plaintiff's employment with KAISER Government Code  
28 §12926.1(a), (e) and §12940(m), were in full force and effect and were binding on KAISER.

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1 This section provides, in pertinent part, that it is an unlawful employment practice for an  
2 employer to fail to make reasonable accommodation for the known physical or mental disability  
3 of an employee. These subsections impose a continuing mandatory duty upon employers to  
4 engage in an informal, "interactive process" in order to attempt to identify a reasonable  
5 accommodation so as to allow a disabled employee to continue working.

6 25. As alleged above, KAISER violated these subsections by failing to actively  
7 engage in the interactive process in order to determine a reasonable accommodation for plaintiff.  
8 Among other things plaintiff was terminated as she returned from medical leave and was never  
9 afforded such accommodation as she was not actually allowed to return to work. Moreover,  
10 plaintiff needed certain accommodations to treat with her doctors which defendants disrupted  
11 due to unreasonable requirements just to get to the doctor, and plaintiff was disciplined when  
12 she sought medical leave to treat for her injury to her feet.

13 26. The unlawful employment practices on the part of defendants KAISER, and  
14 DOES 1 through 40 and each of them, were a substantial factor in causing those damages and  
15 injuries to plaintiff as set forth by re-allegation of paragraphs 19 through 22 (in paragraph 35).

16 **THIRD CAUSE OF ACTION**

17 **AGAINST DEFENDANT KAISER**

18 **AND DOES 1 THROUGH 40 AND EACH OF THEM**

19 **FAILURE TO ENGAGE IN THE INTERACTIVE PROCESS**

20 **[VIOLATION OF GOVERNMENT CODE §12940(n)]**

21 27. Plaintiff incorporates the allegations set forth in paragraphs 1 through 26 as if set  
22 forth in full herein.

23 28. During the period of plaintiff's employment with KAISER Government Code  
24 §12926.1(a), (e) and §§12940(m) & (n), were in full force and effect and were binding on  
25 KAISER. Government Code § 12940, subdivision (n), provides, in pertinent part, that it is an  
26 unlawful employment practice for an employer to fail to engage in a timely, good faith,  
27 interactive process with the employee to determine effective, reasonable accommodation(s) for  
28 the employee's known physical or mental disability. This subsection imposes a continuing

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1 mandatory duty upon employers to engage in an informal, "interactive process" in order to  
2 attempt to identify a reasonable accommodation so as to allow a disabled employee to continue  
3 working.

4 29. As alleged above, KAISER violated these subsections by failing to actively  
5 engage in the interactive process in order to determine a reasonable accommodation for plaintiff.

6 30. The unlawful employment practices on the part of defendant KAISER, and each  
7 of them, were a substantial factor in causing those damages and injuries to plaintiff as set forth  
8 by allegation of paragraphs 19 through 22 (in paragraph 27).

9 **FOURTH CAUSE OF ACTION**  
10 **AGAINST DEFENDANT KAISER; XANTOS**  
11 **AND DOES 1 THROUGH 40 AND EACH OF THEM**  
12 **[RETALIATION]**

13 31. Plaintiff incorporates the allegations set forth in paragraphs 1 through 30 as if set  
14 forth in full herein.

15 32. At all times herein mentioned Government Code § 12940(h) was in full force and  
16 effect and was binding on KAISER as well as supervisors and managers employed by KAISER.  
17 These sections require defendant KAISER, and DOES 1 through 40, and each of them, to refrain  
18 from retaliating against an employee for having engaged in an activity that is protected under the  
19 FEHA. Flait v. North American Watch Corp. (1992) 3 Cal.App.4<sup>th</sup> 467, 476. Plaintiff further  
20 alleges that KAISER was aware of plaintiff's disability and became aware the difficulties  
21 plaintiff was having. KAISER put into action the events that lead to negative employment  
22 actions because plaintiff was asserting her rights under FEHA and requesting reasonable  
23 accommodations. Reeves v. Safeway Stores Inc. (2004) 121 Cal.App. 4<sup>th</sup> 95, 113.

24 33. Plaintiff alleges that the aforesaid discrimination, failure to accommodate, and  
25 adverse employment actions were in retaliation for, and were motivated by, plaintiffs having  
26 engaged in the protected activity of asserting rights as disabled individuals which are protected  
27 under the FEHA.

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1 34. The said acts and conduct constituting retaliation by defendants toward plaintiffs  
2 were not normal business or personnel management decisions that were necessary to the  
3 performance of a manager's or supervisor's job.

4 35. The aforesaid actions and conduct of KAISER, and DOES 1 through 40 and each  
5 of them thereby constituted Retaliation toward plaintiff and were in violation of California  
6 Government Code §12940(h).

7 36. As a direct and proximate result of the conduct of said defendants, as aforesaid,  
8 plaintiff has suffered those injuries and damages set forth by re-allegation of paragraphs 31  
9 through 34 (in paragraph 43).

10 **FIFTH CAUSE OF ACTION**  
11 **AGAINST DEFENDANT KAISER and BUAN**  
12 **AND DOES 1 THROUGH 100 AND EACH OF THEM**  
13 **(HARASSMENT - Gov't Code §12940(j))**

14 37. Plaintiff incorporates the allegations set forth in paragraphs 1 through 36 as if set  
15 forth in full herein.

16 38. During the period of Plaintiff's employment with defendants, Government Code  
17 §12926.1(j)(1) and (3), were in full force and effect and were binding on said Defendants. These  
18 subsections impose a continuing mandatory duty upon employers, managers, supervisors and  
19 employees not to harass employees because of a protected class including but not limited to  
20 disability.

21 39. As alleged above, defendants violated these subsections by otherwise engaging in  
22 conduct that was subjectively and objectively harassing to plaintiff who made defendants aware  
23 that such conduct was offensive to him. However, defendants on multiple occasions directed  
24 such offensive conduct towards plaintiff. Such conduct created a hostile work environment.  
25 *Roby v. McKesson* (2009) 47 Cal. 4th 686,

26 40. The unlawful employment practices on the part of Defendants and each of them,  
27 were a substantial factor in causing those damages and injuries to Plaintiff as set forth by  
28 allegation of paragraphs 19 through 22 (in paragraph 37).

1 WHEREFORE, plaintiff MARIA SALGADO seeks judgment against defendants

2 KAISER:

3 1. All economic damages, actual, consequential and incidental losses, including but  
4 not limited to loss of income and benefits, according to proof, together with prejudgment  
5 interest pursuant to California Civil Code § 3287 and/or § 3288;

6 2. General damages for emotional distress and mental suffering in a sum according  
7 to proof;

8 3. Treble damages pertaining to a lawsuit brought because of disability. Civil Code  
9 §3345

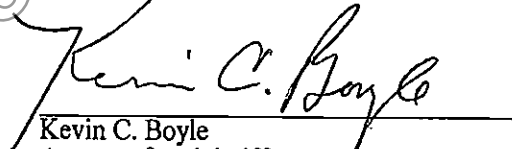
10 4. Exemplary and punitive damages in a sum appropriate to punish said defendants  
11 and set an example for others;

12 5. Attorneys' fees and costs of suit pursuant to Government Code §12965(b);

13 6. Such other and further relief as the Court may deem proper.

14  
15 Dated: September 22, 2017

LAW OFFICES OF KEVIN C. BOYLE



Kevin C. Boyle  
Attorney for plaintiff  
MARIA SALGADO

Courthouse News Service

09/22/2017

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09/22/2017

EXHIBIT 1



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**Co-Respondents:**

SoCal Permanente Medical Group

393 E Walnut St  
Pasadena California 90027

Geneva Gregorio Buan  
4867 W. Sunset Boulevard  
Los Angeles California 93309

Kaiser Permente International

1 Kaiser Plaza  
Oaklang California 94612

Courthouse News Service

Date Filed: September 17, 2017

Date Amended: September 22, 2017

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**Additional Complaint Details:**

Claimant was terminated because of her disability and in retaliation for seeking reasonable accommodation and asserting her rights against discrimination after suffering harassment because of her disability for months.

Courthouse News Service

-7-

Complaint ± DFEH No. 957152-313755

Date Filed: September 17, 2017

Date Amended: September 22, 2017

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09/22/2017



VERIFICATION

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I, **Kevin C. Boyle**, am the Attorney for Complainant in the above-entitled complaint. I have read the foregoing complaint and know the contents thereof. The same is true of my own knowledge, except as to those matters which are therein alleged on information and belief, and as to those matters, I believe it to be true.

On September 17, 2017, I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

**Calabasas, CA**  
**Kevin C. Boyle**

Courthouse News Service

Date Filed: September 17, 2017

Date Amended: September 22, 2017

HS02-1

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EXHIBIT 2



STATE OF CALIFORNIA | Business, Consumer Services and Housing Agency

GOVERNOR EDMUND G. BROWN JR.

**DEPARTMENT OF FAIR EMPLOYMENT & HOUSING**

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758  
800-884-1684 | TDD 800-700-2320  
www.dfeh.ca.gov | email: contact.center@dfeh.ca.gov

DIRECTOR KEVIN KISH

September 17, 2017

Kevin Boyle

**RE: Notice to Complainant or Complainant's Attorney**  
DFEH Matter Number: 957152-313755  
Right to Sue: Salgado / Southern California Permanente Medical Group

Dear Complainant or Complainant's Attorney:

Attached is a copy of your amended complaint of discrimination filed with the Department of Fair Employment and Housing (DFEH) pursuant to the California Fair Employment and Housing Act, Government Code section 12900 et seq.

Pursuant to Government Code section 12962, DFEH will not serve these documents on the employer. You or your attorney must serve the complaint. If you do not have an attorney, you must serve the complaint yourself.

Be advised that the DFEH does not review or edit the complaint form to ensure that it meets procedural or statutory requirements.

Sincerely,

Department of Fair Employment and Housing

09/22/2017

GR



STATE OF CALIFORNIA | Business, Consumer Services and Housing Agency

GOVERNOR EDMUND G. BROWN JR.

**DEPARTMENT OF FAIR EMPLOYMENT & HOUSING**

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758  
800-884-1684 | TDD 800-700-2320  
www.dfeh.ca.gov | email: contact.center@dfeh.ca.gov

DIRECTOR KEVIN KISH

September 17, 2017

RE: **Notice of Filing of Discrimination Complaint**

DFEH Matter Number: 957152-313755

Right to Sue: Salgado / Southern California Permanente Medical Group

To All Respondent(s):

Enclosed is a copy of a complaint of discrimination that has been filed with the Department of Fair Employment and Housing (DFEH) in accordance with Government Code section 12960. This constitutes service of the complaint pursuant to Government Code section 12962. The complainant has requested an authorization to file a lawsuit. This case is not being investigated by DFEH and is being closed immediately. A copy of the Notice of Case Closure and Right to Sue is enclosed for your records.

Please refer to the attached complaint for a list of all respondent(s) and their contact information.

**No response to DFEH is requested or required.**

Sincerely,

Department of Fair Employment and Housing

Courthouse Notice of Service

09/22/2017



STATE OF CALIFORNIA Business, Consumer Services and Housing Agency

GOVERNOR EDMUND G. BROWN JR.

**DEPARTMENT OF FAIR EMPLOYMENT & HOUSING**

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758  
800-884-1684 | TDD 800-700-2320  
www.dfeh.ca.gov | email: contact.center@dfeh.ca.gov

DIRECTOR KEVIN KISH

September 17, 2017

Maria Salgado  
C/o Kevin C. Boyle, esq. 24007 Ventura Blvd. Suite 260  
Calabasas, California 91302

**RE: Notice of Case Closure and Right to Sue**  
DFEH Matter Number: 957152-313755  
Right to Sue: Salgado / Southern California Permanente Medical Group

Dear Maria Salgado,

This letter informs you that the above-referenced complaint was filed with the Department of Fair Employment and Housing (DFEH) has been closed effective September 17, 2017 because an immediate Right to Sue notice was requested. DFEH will take no further action on the complaint.

This letter is also your Right to Sue notice. According to Government Code section 12965, subdivision (b), a civil action may be brought under the provisions of the Fair Employment and Housing Act against the person, employer, labor organization or employment agency named in the above-referenced complaint. The civil action must be filed within one year from the date of this letter.

To obtain a federal Right to Sue notice, you must visit the U.S. Equal Employment Opportunity Commission (EEOC) to file a complaint within 30 days of receipt of this DFEH Notice of Case Closure or within 300 days of the alleged discriminatory act, whichever is earlier.

Sincerely,

Department of Fair Employment and Housing

09/22/2017



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Enclosures

cc: SoCal Permanente Medical Group

Geneva Gregorio Buan

Courthouse News Service

09/22/2017

CM-010

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):  
**Kevin C. Boyle, Esq. (SBN: 190533)**  
 Las Offices of Kevin C. Boyle  
 5000 North Parkway Calabasas, Suite 203  
 Calabasas, California 91302  
 TELEPHONE NO.: (818) 591-1755 FAX NO.: (818) 591-1756  
 ATTORNEY FOR (Name): **Plaintiff MARIA SALGADO**

SUPERIOR COURT OF CALIFORNIA, COUNTY OF **LOS ANGELES**  
 STREET ADDRESS: **111 N. Hill Street**  
 MAILING ADDRESS: **111 N. Hill Street**  
 CITY AND ZIP CODE: **Los Angeles, CA 90012**  
 BRANCH NAME: **Central District - Stanley Mosk Courthouse**

FOR COURT USE ONLY

**FILED**  
 Superior Court Of California  
 County Of Los Angeles

**SEP 22 2017**

here: **R. Carter Executive Officer/Clerk**  
**Deputy**  
 California Revenue

CASE NAME:  
**MARIA SALGADO v SOUTHERN CALIFORNIA PERMANENTE**

**CIVIL CASE COVER SHEET**

**Unlimited** (Amount demanded exceeds \$25,000)  
 **Limited** (Amount demanded is \$25,000 or less)

**Complex Case Designation**

**Counter**  **Joinder**

Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)

CASE NUMBER:  
**BC 676823**

JUDGE:  
 DEPT:

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

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

2. This case  is  is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:
- a.  Large number of separately represented parties  
 b.  Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve  
 c.  Substantial amount of documentary evidence  
 d.  Large number of witnesses  
 e.  Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court  
 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): **8**
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 19, 2017**  
**KEVIN C. BOYLE**  
 (TYPE OR PRINT NAME)

*Kevin C. Boyle*  
 (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.

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 PII/PD/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 PII/PD/WD (23)
Premises Liability (e.g., slip and fall)
Intentional Bodily Injury/PD/WD (e.g., assault, vandalism)
Intentional Infliction of Emotional Distress
Negligent Infliction of Emotional Distress
Other PII/PD/WD

Non-PII/PD/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-PII/PD/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

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SHORT TITLE: SALGADO v SOUTHERN CALIFORNIA PERMANENTE	CASE NUMBER
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**CIVIL CASE COVER SHEET ADDENDUM AND  
STATEMENT OF LOCATION  
(CERTIFICATE OF GROUNDS FOR ASSIGNMENT TO COURTHOUSE LOCATION)**

This form is required pursuant to Local Rule 2.3 in all new civil case filings in the Los Angeles Superior Court.

**Step 1:** After completing the Civil Case Cover Sheet (Judicial Council form CM-010), find the exact case type in Column A that corresponds to the case type indicated in the Civil Case Cover Sheet.

**Step 2:** In Column B, check the box for the type of action that best describes the nature of the case.

**Step 3:** In Column C, circle the number which explains the reason for the court filing location you have chosen.

**Applicable Reasons for Choosing Court Filing Location (Column C)**

1. Class actions must be filed in the Stanley Mosk Courthouse, Central District.
2. Permissive filing in central district.
3. Location where cause of action arose.
4. Mandatory personal injury filing in North District.
5. Location where performance required or defendant resides.
6. Location of property or permanently garaged vehicle.
7. Location where petitioner resides.
8. Location where in defendant/respondent functions wholly.
9. Location where one or more of the parties reside.
10. Location of Labor Commissioner Office.
11. Mandatory filing location (Hub Cases – unlawful detainer, limited non-collection, limited collection, or personal injury).

Auto Tort  
Other Personal Injury/Property Damage/Wrongful Death Tort  
05/22/2017

A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons See Step 3 Above
Auto (22)	<input type="checkbox"/> A7100 Motor Vehicle - Personal Injury/Property Damage/Wrongful Death	1, 4, 11
Uninsured Motorist (46)	<input type="checkbox"/> A7110 Personal Injury/Property Damage/Wrongful Death - Uninsured Motorist	1, 4, 11
Asbestos (04)	<input type="checkbox"/> A6070 Asbestos Property Damage	1, 11
	<input type="checkbox"/> A7221 Asbestos - Personal Injury/Wrongful Death	1, 11
Product Liability (24)	<input type="checkbox"/> A7260 Product Liability (not asbestos or toxic/environmental)	1, 4, 11
Medical Malpractice (45)	<input type="checkbox"/> A7210 Medical Malpractice - Physicians & Surgeons	1, 4, 11
	<input type="checkbox"/> A7240 Other Professional Health Care Malpractice	1, 4, 11
Other Personal Injury/Property Damage/Wrongful Death (23)	<input type="checkbox"/> A7250 Premises Liability (e.g., slip and fall)	1, 4, 11
	<input type="checkbox"/> A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.)	1, 4, 11
	<input type="checkbox"/> A7270 Intentional Infliction of Emotional Distress	1, 4, 11
	<input type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death	1, 4, 11

SHORT TITLE: <b>SALGADO v SOUTHERN CALIFORNIA PERMANENTE</b>	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
<b>Non-Personal Injury/Property Damage/Wrongful Death Tort</b>	Business Tort (07)	<input type="checkbox"/> A6029 Other Commercial/Business Tort (not fraud/breach of contract)	1, 2, 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
	Other (35)	<input type="checkbox"/> A6025 Other Non-Personal Injury/Property Damage tort	1, 2, 3
<b>Employment</b>	Wrongful Termination (36)	<input type="checkbox"/> A6037 Wrongful Termination	1, 2, 3
	Other Employment (15)	<input checked="" type="checkbox"/> A6024 Other Employment Complaint Case <input type="checkbox"/> A6109 Labor Commissioner Appeals	1, 2, 3 10
<b>Contract</b>	Breach of Contract/Warranty (06) (not insurance)	<input type="checkbox"/> A6004 Breach of Rental/Lease Contract (not unlawful detainer or wrongful eviction) <input type="checkbox"/> A6008 Contract/Warranty Breach - Seller Plaintiff (no fraud/negligence) <input type="checkbox"/> A6019 Negligent Breach of Contract/Warranty (no fraud) <input type="checkbox"/> A6028 Other Breach of Contract/Warranty (not fraud or negligence)	2, 5 2, 5 1, 2, 5 1, 2, 5
	Collections (09)	<input type="checkbox"/> A6002 Collections Case - Seller Plaintiff <input type="checkbox"/> A6012 Other Promissory Note/Collections Case <input type="checkbox"/> A6034 Collections Case - Purchased Debt (Charged Off Consumer Debt Purchased on or after January 1, 2014)	5, 6, 11 5, 11 5, 6, 11
	Insurance Coverage (18)	<input type="checkbox"/> A6015 Insurance Coverage (not complex)	1, 2, 5, 8
	Other Contract (37)	<input checked="" 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, 9
	Eminent Domain/Inverse Condemnation (14)	<input type="checkbox"/> A7300 Eminent Domain/Condemnation      Number of parcels _____	2, 6
	Wrongful Eviction (33)	<input type="checkbox"/> A6023 Wrongful Eviction Case	2, 6
<b>Real Property</b>	Other Real Property (26)	<input type="checkbox"/> A6018 Mortgage Foreclosure <input type="checkbox"/> A6032 Quiet Title <input type="checkbox"/> A6080 Other Real Property (not eminent domain, landlord/tenant, foreclosure)	2, 6 2, 6 2, 6
	Unlawful Detainer-Commercial (31)	<input type="checkbox"/> A6021 Unlawful Detainer-Commercial (not drugs or wrongful eviction)	6, 11
	Unlawful Detainer-Residential (32)	<input type="checkbox"/> A6020 Unlawful Detainer-Residential (not drugs or wrongful eviction)	6, 11
<b>Unlawful Detainer</b>	Unlawful Detainer-Post-Foreclosure (34)	<input type="checkbox"/> A6020F Unlawful Detainer-Post-Foreclosure	2, 6, 11
	Unlawful Detainer-Drugs (38)	<input type="checkbox"/> A6022 Unlawful-Detainer-Drugs	2, 6, 11

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SHORT TITLE: <b>SALGADO v SOUTHERN CALIFORNIA PERMANENTE</b>	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)
<b>Judicial Review</b>	Asset Forfeiture (05)	<input type="checkbox"/> A6108 Asset Forfeiture Case	2, 3, 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	2, 8
		<input type="checkbox"/> A6152 Writ - Mandamus on Limited Court Case Matter	2
		<input type="checkbox"/> A6153 Writ - Other Limited Court Case Review	2
Other Judicial Review (39)	<input type="checkbox"/> A6150 Other Writ /Judicial Review	2, 8	
<b>Provisionally Complex Litigation</b>	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
<b>Enforcement of Judgment</b>	Enforcement of Judgment (20)	<input type="checkbox"/> A6141 Sister State Judgment	2, 5, 11
		<input type="checkbox"/> A6160 Abstract of Judgment	2, 6
		<input type="checkbox"/> A6107 Confession of Judgment (non-domestic relations)	2, 9
		<input type="checkbox"/> A6140 Administrative Agency Award (not unpaid taxes)	2, 8
		<input type="checkbox"/> A6114 Petition/Certificate for Entry of Judgment on Unpaid Tax	2, 8
		<input type="checkbox"/> A6112 Other Enforcement of Judgment Case	2, 8, 9
<b>Miscellaneous Civil Complaints</b>	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	1, 2, 8
		<input type="checkbox"/> A6040 Injunctive Relief Only (not domestic/harassment)	2, 8
		<input type="checkbox"/> A6011 Other Commercial Complaint Case (non-tort/non-complex)	1, 2, 8
<input type="checkbox"/> A6009 Other Civil Complaint (non-tort/non-complex)	1, 2, 8		
<b>Miscellaneous Civil Petitions</b>	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	2, 3, 9
		<input type="checkbox"/> A6123 Workplace Harassment	2, 3, 9
		<input type="checkbox"/> A6124 Elder/Dependent Adult Abuse Case	2, 3, 9
		<input type="checkbox"/> A6190 Election Contest	2
		<input type="checkbox"/> A6110 Petition for Change of Name/Change of Gender	2, 7
		<input type="checkbox"/> A6170 Petition for Relief from Late Claim Law	2, 3, 8
		<input type="checkbox"/> A6100 Other Civil Petition	2, 9

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SHORT TITLE: <b>SALGADO v SOUTHERN CALIFORNIA PERMANENTE</b>	CASE NUMBER
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**Step 4: Statement of Reason and Address:** Check the appropriate boxes for the numbers shown under Column C for the type of action that you have selected. Enter the address which is the basis for the filing location, including zip code. (No address required for class action cases).

REASON: <input type="checkbox"/> 1. <input type="checkbox"/> 2. <input type="checkbox"/> 3. <input type="checkbox"/> 4. <input type="checkbox"/> 5. <input type="checkbox"/> 6. <input type="checkbox"/> 7. <input type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10. <input type="checkbox"/> 11.		ADDRESS: 4867 Sunset Boulevard
CITY: Los Angeles	STATE: CA	ZIP CODE: 90027

**Step 5: Certification of Assignment:** I certify that this case is properly filed in the \_\_\_\_\_ District of the Superior Court of California, County of Los Angeles [Code Civ. Proc., §392 et seq., and Local Rule 2.3(a)(1)(E)].

Dated: 9-19-17

*Kevin C. Boyle*  
 \_\_\_\_\_  
 (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. 02/16).
5. Payment in full of the filing fee, unless there is court order for waiver, partial or scheduled payments.
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.

09/22/2017