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

JUL 29 2015

Sherri R. Carter, Executive Officer/Clerk  
By M. Soto, Deputy  
Moses Soto

Attorneys for Plaintiff James Woods

D-49 DEIRORE Hill

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES**

JAMES WOODS, an individual,

Case No.: **BC 5 8 9 7 4 6**

Plaintiff,

**COMPLAINT FOR:**

vs.

- (1) **DEFAMATION**
- (2) **INVASION OF PRIVACY BY FALSE LIGHT**

JOHN DOE a/k/a "Abe List" and DOES 2 through 10, inclusive,

Defendants.

**JURY TRIAL DEMANDED**

Plaintiff JAMES WOODS ("Woods" or "Plaintiff") alleges as follows:

**NATURE OF THE CASE**

1. This action arises from the publication of a malicious and fabricated statement by a cowardly individual who hides behind the Twitter name "Abe List" ("AL") to falsely accuse and humiliate others who dare to harbor opinions different from his own. On July 15, 2015, over the line by falsely accusing actor James Woods of being a "cocaine addict" on the social media site Twitter, a message sent to *thousands* of AL's followers and *hundreds of thousands* of Mr. Woods' followers. In fact, Woods is not now, nor has he ever been, a cocaine addict, and AL had no reason to

ORIGINAL

COMPLAINT

RECEIVED # 10482488099  
DATE PAID: 7/29/15 04:18 PM  
FURNISHED: \$35.00  
RECEIVED: 310  
CHECK  
DASH: \$0.00  
CHANGE: \$0.00  
CASH: \$0.00

CIT/CASE: EC589746  
LEADER#: 1

1 believe otherwise. Rather, AL's outrageous claim is the culmination of a malicious on-line campaign by  
2 AL to discredit and damage Woods' reputation, a campaign which began as early as December 2014.  
3 Although AL's rantings against Woods began with childish name calling, it has clearly escalated beyond  
4 the protections of free speech, and AL must now be held to account for the millions in damages he has  
5 caused.

6 2. By this lawsuit, Woods intends to unmask and reveal AL for the liar he is and to recover  
7 in excess of \$10 million in damages caused by AL's outrageous conduct. For over forty-five years,  
8 Woods (68) has worked tirelessly to build a career and reputation as one of the most hard-working,  
9 prolific and recognizable actors of our time. He has also devoted significant time and money to  
10 numerous philanthropic causes. AL's reckless and malicious behavior, through the worldwide reach of  
11 the internet, has now jeopardized Woods' good name and reputation on an international scale. AL, and  
12 anyone else using social media to propagate lies and do harm, should take note. They are not  
13 impervious to the law.

14  
15 **THE PARTIES**

16 3. Plaintiff James Woods is a world-renowned, award-winning, actor that has appeared in  
17 over 130 films and television series including *The Onion Field*, *Once Upon a Time in America*,  
18 *Salvador*, *Casino*, *Nixon*, *Hercules*, *Shark*, and *White House Down*. He has twice been nominated for an  
19 Academy Award, has won three Emmy Awards and a Golden Globe Award. In addition to his  
20 professional accomplishments, Woods is involved with numerous philanthropic causes including,  
21 without limitation, the America Heart Association, the Los Angeles Shelter for LGBTQ Youth and the  
22 Rhode Island Foundation (where he set up a charitable fund in Honor of his late brother Michael J.  
23 Woods). In 1997, he was honored with the Silver Circle Award for his charity work with the Venice  
24 Family Clinic, a local organization dedicated to providing quality health care to people in need. He was  
25 also the recipient of an American Heart Association Award for its Stroke Awareness Campaign.

1           4.       Woods is informed and believes, and based thereon alleges, that the anonymous,  
2 fictitiously named John Doe a/k/a "Abe List" defendant ("John Doe" or "AL") is an individual and  
3 resident of the County of Los Angeles, State of California. In the unlikely event that AL is not a  
4 resident of Los Angeles County, AL has advanced his intentionally tortious, harmful and fraudulent  
5 schemes in the County of Los Angeles, State of California, where he has engaged in conduct to harm a  
6 California citizen.

7           5.       Woods is ignorant of the true names and capacities of Defendants sued herein as John  
8 Doe and Does 2 through 10, inclusive, and therefore sues said Defendants by such fictitious names.  
9 Woods will amend this Complaint to allege the true names and capacities of such fictitiously named  
10 Defendants when the same have been ascertained. Woods is informed and believes, and based thereon  
11 alleges, that each of the fictitiously named Defendants is responsible in some manner for the  
12 occurrences, acts and omissions alleged herein, and that Woods' damages have been, and will be,  
13 proximately caused by their conduct. Among other things, Does 2 through 10 may be held directly  
14 liable for the defamatory posting by AL by virtue of having knowingly assisted AL in the publication of  
15 the false and defamatory statement and/or having knowingly republished the false statement without  
16 having any reason to believe in its accuracy. For convenience, each allegation regarding AL shall apply  
17 to each of the Doe Defendants 2 through 10. AL and Doe Defendants 2 through 10 are sometimes  
18 hereinafter collectively referred to as "Defendants," as the context so indicates.

19           6.       Woods is informed and believes, and based thereon alleges, that Defendants, and each of  
20 them, were the agents, employees, partners, joint venturers, co-conspirators, owners, principals, and/or  
21 employers of the remaining Defendants, and each of them, and are, and at all times herein mentioned  
22 were, acting within the course and scope of that agency, employment, partnership, conspiracy,  
23 ownership or joint venture. Woods is further informed and believes, and based thereon alleges, that the  
24 acts and conduct alleged herein were known to, authorized and/or ratified by the officers, directors, and  
25 managing agents of Defendants, and each of them.

1 FIRST CAUSE OF ACTION

2 (Defamation Against All Defendants)

3 7. Woods repeats, re-alleges, adopts and incorporates each and every allegation contained in  
4 paragraphs 1 through 6, inclusive, as though fully set forth herein.

5 8. Woods' claims arise out of and are for damages with respect to a false and defamatory  
6 statement which was initially published on or about July 15, 2015 by an unidentified anonymous person  
7 who created and who operates a Twitter account under the name "Abe List" (the "AL Twitter  
8 Account"). The owner of the AL Twitter Account has *thousands* of followers and, since at least  
9 December 2014, has undertaken to engage his followers with a campaign of childish name-calling  
10 targeted against Woods. In the past, AL has referred to Woods with such derogatory terms as "prick,"  
11 "joke," "ridiculous," "scum" and "clown-boy."

12 9. On July 15, 2015, and for the sole and intentional purpose of harming Woods, AL  
13 concocted and posted on the AL Twitter Account the outrageous, baseless, false and defamatory  
14 statement "cocaine addict James Woods still sniffing and spouting" (hereinafter, the "False Statement").  
15 In doing so, AL intended to, and did, convey to thousands of AL's followers and others with access to  
16 the internet the false claim that Woods is addicted to cocaine, a controlled substance.

17 10. Woods is informed and believes, and on that basis alleges, an unidentified person  
18 operates and utilizes the AL Twitter Account which is displayed at or with the uniform resource locator  
19 ("URL") < <https://mobile.twitter.com/abelisted?p=s>>, and which is continually maintained and is  
20 included in and appears prominently in current Google.com and other search engine results. Indeed, a  
21 search on Google.com for "Abe List James Woods" yields the outrageous statements from the AL  
22 Twitter Account as the top two results, including one that calls Woods "a ridiculous scum clown-boy."

23 11. AL published, and/or caused to be published or authorized to be published, the False  
24 Statement on the AL Twitter Account and in current (as of the date of this Complaint) Google.com  
25 search engine results, causing the False Statement to be viewed *thousands of times* and possibly even  
26 *hundreds of thousands* of times. AL posted the False Statement in response to a Twitter post by Woods.

1 Thus, the False Statement has been seen not only by Defendants' thousands of followers, but possibly by  
2 Woods' 238, 512 followers on his Twitter account—and even more since it is accessible to anyone that  
3 does a Google search. In short, the False Statement has been published for *hundreds of thousands* of  
4 people to see, which includes friends, family, potential employers, business associates, colleagues, and  
5 fans of Woods.

6 12. The above-pled misconduct by AL constitutes the tort of defamation.

7 13. Woods is informed and believes, and based thereon alleges, that Defendants intentionally  
8 portrayed Woods in the above manner knowing that the depiction was false, without any reasonable  
9 grounds for believing it to be true.

10 14. Persons who read the False Statement posted to the AL Twitter Account by Defendants  
11 and with use of Woods' name as part of the False Statement, reasonably understood the references to  
12 “@RealJamesWoods” and “James Woods” to be references to the actor James Woods herein.

13 15. The AL Twitter Account contains the False Statement of the Defendants and contains a  
14 fabricated, false, malicious and defamatory statement of fact of and concerning Woods as alleged  
15 hereinabove.

16 16. The AL Twitter Account, which is based on and comprised of the False Statement from  
17 Defendants, is libelous on its face and is defamation per se, because it claims that Woods has engaged in  
18 criminal conduct. As such, the False Statement clearly exposes Woods to hatred, contempt, ridicule and  
19 obloquy, and/or causes Woods to be shunned or avoided, and has a tendency to injure him in his  
20 personal life and occupation.

21 17. As a direct and proximate result of the aforementioned acts by Defendants, and each of  
22 them, Defendants have caused harm to Woods, which includes, but is not limited to general and special  
23 damages in an amount not presently known but believed to be not less than Ten Million Dollars  
24 (\$10,000,000), including damage to Woods' reputation and standing in the community as a result of  
25 Defendants' actions.

26 18. Woods is informed and believes and based thereon alleges that the aforementioned acts  
27

1 of Defendants were done intentionally or with a conscious disregard of Woods' rights, and with the  
2 intent to vex, injure or annoy Woods, such as to constitute oppression, fraud, or malice thus entitling  
3 Woods to exemplary and punitive damages in an amount appropriate to punish or set an example of  
4 Defendants, and each of them, and to deter such conduct in the future, which amount will be proved at  
5 trial.

6 **SECOND CAUSE OF ACTION**

7 **(Invasion of Privacy by False Light Against All Defendants)**

8 19. Woods repeats, re-alleges, adopts and incorporates each and every allegation contained in  
9 paragraphs 1 through 18 inclusive, as though fully set forth herein.

10 20. The above-pled misconduct by Defendants, or any of them, constitutes the tort of  
11 invasion of privacy by false light, in that Defendants have placed Woods before the public in a false and  
12 outrageous light, which is highly offensive to Woods, and have thereby violated Woods' right of  
13 privacy.

14 21. As is alleged hereinabove, Defendants, and each of them, made and caused to be  
15 published the False Statement of and concerning Woods, and disseminated it to third parties around the  
16 world via the Internet. Defendants either knew that the False Statement was false, or published the False  
17 Statement with reckless disregard of the falsity of the False Statement and the false light that Woods  
18 would be placed as a result thereof. To the extent that the trier of fact finds that this False Statement is  
19 not defamatory, Woods is informed and believes and based thereon alleges that Defendants intended to  
20 depict Woods in a false, fictionalized and sensationalized light in order to benefit themselves through  
21 some cowardly form of revenge for having expressed his personal views and/or for the sole purpose of  
22 harming Woods.

23 22. The false light in which Defendants, and each of them, have placed Woods by virtue of  
24 the False Statement would be highly offensive to a reasonable person. By publishing and/or  
25 disseminating the False Statement on websites, including on the AL Twitter Account, and in internet  
26 search engine results published or displayed nationwide or worldwide, and by publishing the False  
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1 Statement in the manner and context in which it has been published, Defendants have outrageously and  
2 without any basis whatsoever falsely represented and implied that Woods is, among other false things, a  
3 “cocaine addict.”

4 23. Woods is embarrassed and distressed that family, friends, fans, potential employers,  
5 business associates and the general public, saw this False Statement in the manner and context in which  
6 the False Statement was published with the false representation and inference, which is alleged herein.  
7 In fact, Woods has *over 238,512 people* that follow his Twitter account, all of which had access to the  
8 False Statement.

9 24. As a direct and proximate result of said wrongful conduct by Defendants, and each of  
10 them, Woods suffered shame, mortification, hurt feelings, emotional distress, embarrassment,  
11 humiliation, and injury to his peace of mind (although not severe, disabling emotional distress), all to  
12 Woods’ general damage in an amount not presently known but believed to be not less than Ten Million  
13 Dollars (\$10,000,000), including damage to Woods’ reputation and standing in the community as a  
14 result of Defendants’ actions. When Woods ascertains the exact amount of said damages, he will seek  
15 leave of Court to amend this Complaint to set forth said amount.

16 25. As a further direct and proximate result of said wrongful conduct by Defendants, and  
17 each of them, Woods has suffered general and special damages including, but not limited to, damage to  
18 his business, profession, reputation, character and property, which will most likely result in loss of  
19 employment, loss or reduction in earnings and profits in an amount which has yet to be ascertained, and  
20 will result in Woods not been given certain jobs. When Woods ascertains the exact amount of said  
21 damages, he will seek leave of Court to amend this Complaint to set forth said amount.

22 26. Woods is informed and believes, and based thereon alleges, that the aforementioned acts  
23 of Defendants, and each of them, were done intentionally or with a conscious disregard of Woods’  
24 rights, and with the intent to vex, injure or annoy Woods, such as to constitute oppression, fraud, or  
25 malice, and that they had knowledge of, or acted in reckless disregard of the rights of Woods, and the  
26 false light in which Woods would be placed, thus entitling Woods to exemplary and punitive damages in  
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1 an amount appropriate to punish or set an example of Defendants, and each of them, and to deter such  
2 conduct in the future, which amount will be proved at trial.

3  
4 **PRAYER FOR RELIEF**

5 WHEREFORE, Plaintiff Woods respectfully requests the following relief:  
6

7 **AS TO THE FIRST CAUSE OF ACTION:**

8 1. General and special damages against Defendants, and each of them, jointly and severally,  
9 in an amount not less than Ten Million Dollars (\$10,000,000), or according to proof, together with  
10 interest thereon at the legal rate;

11 2. Exemplary and punitive damages in an amount sufficient to punish and deter Defendants,  
12 the exact sum in an amount to be determined as appropriate to the Court;  
13

14 **AS TO THE SECOND CAUSE OF ACTION:**

15 3. General and special damages against Defendants, and each of them, jointly and severally,  
16 in an amount not less than Ten Million Dollars (\$10,000,000), or according to proof, together with  
17 interest thereon at the legal rate;

18 4. Exemplary and punitive damages in an amount sufficient to punish and deter Defendants,  
19 the exact sum in an amount to be determined as appropriate to the Court;  
20

21 **AS TO ALL CAUSES OF ACTION:**

22 17. For costs of the suit incurred;

23 18. For attorneys' fees, if allowed by law;

24 19. For pre-judgment interest on all such damages at the legal rate; and

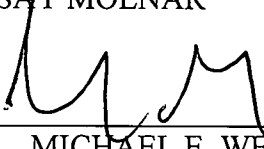
25 20. For such other and further relief as the Court may deem just and proper.  
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Dated: July 29, 2015

LAVELY & SINGER  
PROFESSIONAL CORPORATION  
MICHAEL E. WEINSTEN  
EVAN N. SPIEGEL  
LINDSAY MOLNAR

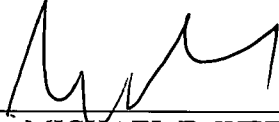
By:   
MICHAEL E. WEINSTEN  
Attorneys for Plaintiff James Woods

**REQUEST FOR A JURY TRIAL**

Plaintiff hereby requests a trial by jury in the above action.

Dated: July 29, 2015

LAVELY & SINGER  
PROFESSIONAL CORPORATION  
MICHAEL E. WEINSTEN  
EVAN N. SPIEGEL  
LINDSAY MOLNAR

By:   
MICHAEL E. WEINSTEN  
Attorneys for Plaintiff James Woods

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ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):

MICHAEL E. WEINSTEN (BAR NO. 155680)
EVAN N. SPIEGEL, ESQ. (BAR NO. 198071)
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FOR COURT USE ONLY

FILED
Superior Court of California
County of Los Angeles

JUL 29 2015

Sherril K. Carter, Executive Officer/Clerk
By: [Signature] Deputy
Moses Soto

ATTORNEY FOR (Name): Plaintiff James Woods

SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles

STREET ADDRESS: 111 North Hill Street

MAILING ADDRESS: 111 North Hill Street

CITY AND ZIP CODE: Los Angeles, CA 90012

BRANCH NAME: Stanley Mosk Courthouse

CASE NAME: JAMES WOODS v. JOHN DOE a/k/a "Abe List" and DOES 2 through 10

CASE NUMBER:

BC 5 8 9 7 4 6

JUDGE:

DEPT:

CIVIL CASE COVER SHEET

[X] 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)

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

1. Check one box below for the case type that best describes this case:

Auto Tort

[ ] Auto (22)
[ ] Uninsured motorist (46)

Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort

[ ] Asbestos (04)
[ ] Product liability (24)
[ ] Medical malpractice (45)
[ ] Other PI/PD/WD (23)

Non-PI/PD/WD (Other) Tort

[ ] Business tort/unfair business practice (07)
[ ] Civil rights (08)
[X] Defamation (13)
[ ] Fraud (16)
[ ] Intellectual property (19)
[ ] Professional negligence (25)
[ ] Other non-PI/PD/WD tort (35)

Employment

[ ] Wrongful termination (36)
[ ] Other employment (15)

Contract

[ ] Breach of contract/warranty (06)
[ ] Rule 3.740 collections (09)
[ ] Other collections (09)
[ ] Insurance coverage (18)
[ ] Other contract (37)

Real Property

[ ] Eminent domain/Inverse condemnation (14)
[ ] Wrongful eviction (33)
[ ] Other real property (26)

Unlawful Detainer

[ ] Commercial (31)
[ ] Residential (32)
[ ] Drugs (38)

Judicial Review

[ ] Asset forfeiture (05)
[ ] Petition re: arbitration award (11)
[ ] Writ of mandate (02)
[ ] Other judicial review (39)

Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403)

[ ] Antitrust/Trade regulation (03)
[ ] Construction defect (10)
[ ] Mass tort (40)
[ ] Securities litigation (28)
[ ] Environmental/Toxic tort (30)
[ ] Insurance coverage claims arising from the above listed provisionally complex case types (41)

Enforcement of Judgment

[ ] Enforcement of judgment (20)

Miscellaneous Civil Complaint

[ ] RICO (27)
[ ] Other complaint (not specified above) (42)

Miscellaneous Civil Petition

[ ] Partnership and corporate governance (21)
[ ] Other petition (not specified above) (43)

2. This case [ ] is [X] is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:

- a. [ ] Large number of separately represented parties d. [ ] Large number of witnesses
b. [ ] Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve e. [ ] Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court
c. [ ] Substantial amount of documentary evidence f. [ ] Substantial postjudgment judicial supervision

3. Remedies sought (check all that apply): a. [X] monetary b. [ ] nonmonetary; declaratory or injunctive relief c. [X] punitive

4. Number of causes of action (specify): Two - Defamation and Invasion of Privacy by False Light

5. This case [ ] is [X] 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: 7/29/2015

MICHAEL E. WEINSTEN (BAR NO. 155680)

(TYPE OR PRINT NAME)

(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

NOTICE

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
File this cover sheet in addition to any cover sheet required by local court rule.
If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

ORIGINAL

**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 PI/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 PI/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 PI/PD/WD

## Non-PI/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-PI/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

SHORT TITLE:

Woods v. John Doe a/k/a "Abe List" et al.

CASE NUMBER

BC 5 8 9 7 4 6

**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.**

**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 <sup>5</sup> \_\_\_\_\_ HOURS/ DAYS

**Item II.** Indicate the correct district and courthouse location (4 steps – If you checked "Limited Case", skip to Item III, Pg. 4):

**Step 1:** After first completing the Civil Case Cover Sheet form, find the main Civil Case Cover Sheet heading for your case in the left margin below, and, to the right in Column **A**, the Civil Case Cover Sheet case type you selected.

**Step 2:** Check one Superior Court type of action in Column **B** below which best describes the nature of this case.

**Step 3:** In Column **C**, circle the reason for the court location choice that applies to the type of action you have checked. For any exception to the court location, see Local Rule 2.3.

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

- |  |  |
|--|--|
| 1. Class actions must be filed in the Stanley Mosk Courthouse, central district. | 6. Location of property or permanently garaged vehicle.    |
| 2. May be filed in central (other county, or no bodily injury/property damage).  | 7. Location where petitioner resides.                      |
| 3. Location where cause of action arose.   | 8. Location wherein defendant/respondent functions wholly. |
| 4. Location where bodily injury, death or damage occurred.                       | 9. Location where one or more of the parties reside.       |
| 5. Location where performance required or defendant resides.                     | 10. Location of Labor Commissioner Office                  |
|  | 11. Mandatory Filing Location (Hub Case)                   |

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

<b>A</b> Civil Case Cover Sheet Category No.	<b>B</b> Type of Action (Check only one)	<b>C</b> Applicable Reasons - See Step 3 Above
Auto (22)	<input type="checkbox"/> A7100 Motor Vehicle - Personal Injury/Property Damage/Wrongful Death	1., 2., 4.
Uninsured Motorist (46)	<input type="checkbox"/> A7110 Personal Injury/Property Damage/Wrongful Death – Uninsured Motorist	1., 2., 4.
Asbestos (04)	<input type="checkbox"/> A6070 Asbestos Property Damage <input type="checkbox"/> A7221 Asbestos - Personal Injury/Wrongful Death	2. 2.
Product Liability (24)	<input type="checkbox"/> A7260 Product Liability (not asbestos or toxic/environmental)	1., 2., 3., 4., 8.
Medical Malpractice (45)	<input type="checkbox"/> A7210 Medical Malpractice - Physicians & Surgeons <input type="checkbox"/> A7240 Other Professional Health Care Malpractice	1., 4. 1., 4.
Other Personal Injury Property Damage Wrongful Death (23)	<input type="checkbox"/> A7250 Premises Liability (e.g., slip and fall) <input type="checkbox"/> A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.) <input type="checkbox"/> A7270 Intentional Infliction of Emotional Distress <input type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death	1., 4. 1., 4. 1., 3. 1., 4.

Auto  
TortOther Personal Injury/ Property  
Damage/ Wrongful Death Tort

SHORT TITLE:

Woods v. John Doe a/k/a "Abe List" et al.

CASE NUMBER

Non-Personal Injury/Property  
Damage/Wrongful Death Tort

Employment

Contract

Real Property

Unlawful Detainer

<b>A</b> Civil Case Cover Sheet Category No.	<b>B</b> Type of Action (Check only one)	<b>C</b> Applicable Reasons - See Step 3 Above
Business Tort (07)	<input type="checkbox"/> A6029 Other Commercial/Business Tort (not fraud/breach of contract)	1., 3.
Civil Rights (08)	<input type="checkbox"/> A6005 Civil Rights/Discrimination	1., 2., 3.
Defamation (13)	<input checked="" type="checkbox"/> A6010 Defamation (slander/libel)	1., 2., 3.
Fraud (16)	<input type="checkbox"/> A6013 Fraud (no contract)	1., 2., 3.
Professional Negligence (25)	<input type="checkbox"/> A6017 Legal Malpractice <input type="checkbox"/> A6050 Other Professional Malpractice (not medical or legal)	1., 2., 3. 1., 2., 3.
Other (35)	<input type="checkbox"/> A6025 Other Non-Personal Injury/Property Damage tort	2., 3.
Wrongful Termination (36)	<input type="checkbox"/> A6037 Wrongful Termination	1., 2., 3.
Other Employment (15)	<input type="checkbox"/> A6024 Other Employment Complaint Case <input type="checkbox"/> A6109 Labor Commissioner Appeals	1., 2., 3. 10.
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)	2., 5., 6, 11 2., 5, 11 5, 6, 11
Insurance Coverage (18)	<input type="checkbox"/> A6015 Insurance Coverage (not complex)	1., 2., 5., 8.
Other Contract (37)	<input type="checkbox"/> A6009 Contractual Fraud <input type="checkbox"/> A6031 Tortious Interference <input type="checkbox"/> A6027 Other Contract Dispute(not breach/insurance/fraud/negligence)	1., 2., 3., 5. 1., 2., 3., 5. 1., 2., 3., 8.
Eminent Domain/Inverse Condemnation (14)	<input type="checkbox"/> A7300 Eminent Domain/Condemnation      Number of parcels _____	2.
Wrongful Eviction (33)	<input type="checkbox"/> A6023 Wrongful Eviction Case	2., 6.
Other Real Property (26)	<input type="checkbox"/> A6018 Mortgage Foreclosure <input type="checkbox"/> A6032 Quiet Title <input type="checkbox"/> A6060 Other Real Property (not eminent domain, landlord/tenant, foreclosure)	2., 6. 2., 6. 2., 6.
Unlawful Detainer-Commercial (31)	<input type="checkbox"/> A6021 Unlawful Detainer-Commercial (not drugs or wrongful eviction)	2., 6.
Unlawful Detainer-Residential (32)	<input type="checkbox"/> A6020 Unlawful Detainer-Residential (not drugs or wrongful eviction)	2., 6.
Unlawful Detainer- Post-Foreclosure (34)	<input type="checkbox"/> A6020F Unlawful Detainer-Post-Foreclosure	2., 6.
Unlawful Detainer-Drugs (38)	<input type="checkbox"/> A6022 Unlawful Detainer-Drugs	2., 6.

SHORT TITLE:

Woods v. John Doe a/k/a "Abe List" et al.

CASE NUMBER

	<b>A</b> Civil Case Cover Sheet Category No.	<b>B</b> Type of Action (Check only one)	<b>C</b> Applicable Reasons - See Step 3 Above
<b>Judicial Review</b>	Asset Forfeiture (05)	<input type="checkbox"/> A6108 Asset Forfeiture Case	2., 6.
	Petition re Arbitration (11)	<input type="checkbox"/> A6115 Petition to Compel/Confirm/Vacate Arbitration	2., 5.
	Writ of Mandate (02)	<input type="checkbox"/> A6151 Writ - Administrative Mandamus <input type="checkbox"/> A6152 Writ - Mandamus on Limited Court Case Matter <input type="checkbox"/> A6153 Writ - Other Limited Court Case Review	2., 8. 2. 2.
	Other Judicial Review (39)	<input type="checkbox"/> A6150 Other Writ /Judicial Review	2., 8.
	<b>Provisionally Complex Litigation</b>	Antitrust/Trade Regulation (03)	<input type="checkbox"/> A6003 Antitrust/Trade Regulation
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., 9.
		<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"/> A6000 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		2., 7.	
<input type="checkbox"/> A6170 Petition for Relief from Late Claim Law		2., 3., 4., 8.	
<input type="checkbox"/> A6100 Other Civil Petition	2., 9.		

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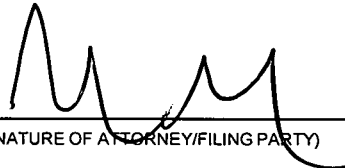
CASE NUMBER

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

<b>REASON: Check the appropriate boxes for the numbers shown under Column C for the type of action that you have selected for this case.</b>  <input type="checkbox"/> 1. <input checked="" type="checkbox"/> 2. <input checked="" 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: 1049 Havenhurst Drive
CITY: Los Angeles	STATE: CA	ZIP CODE: 90046

**Item IV. Declaration of Assignment:** I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that the above-entitled matter is properly filed for assignment to the Stanley Mosk courthouse in the Central Judicial \_\_\_\_\_ District of the Superior Court of California, County of Los Angeles [Code Civ. Proc., § 392 et seq., and Local Rule 2.3, subd.(a).

Dated: 7/29/2015



(SIGNATURE OF ATTORNEY/FILING PARTY)

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

1. Original Complaint or Petition.
2. If filing a Complaint, a completed Summons form for issuance by the Clerk.
3. Civil Case Cover Sheet, Judicial Council form CM-010.
4. Civil Case Cover Sheet Addendum and Statement of Location form, LACIV 109, LASC Approved 03-04 (Rev. 03/15).
5. Payment in full of the filing fee, unless fees have been waived.
6. A signed order appointing the Guardian ad Litem, Judicial Council form CIV-010, if the plaintiff or petitioner is a minor under 18 years of age will be required by Court in order to issue a summons.
7. Additional copies of documents to be conformed by the Clerk. Copies of the cover sheet and this addendum must be served along with the summons and complaint, or other initiating pleading in the case.

07/29/2015