BC699288	
T/CASE:	A,'DEF#:

RECEIPT #; CCH524880020
DATE PAID: 03/23/18 08:46 AM
PAYMENT: \$435.00
RECEIVED: \$435.00
CHECK: \$0.00
CASH: \$0.00
CARD: \$0.00

香香香色,花色,克香

The second of th

#### PLAINTIFF ALLEGES AS FOLLOWS:

- 1. Plaintiff "Jane Doe" ("Plaintiff" or "Jane") is a resident of the State of California.
- 2. Defendant Russell W. Simmons is the founder of Def Jam Recordings. Def Jam was one of the most successful music labels of all time, releasing music by LL Cool Jay, Run DMC, Beastie Boys, Public Enemy, Jay Z, 50 Cent and Kayne West, among many others.
- 3. Simmons immense wealth and history of sexual assaults are relevant to the amount of punitive damages that must be assessed against Simmons for his sexual assault. Simmons was reportedly paid more than \$100,000,000 for his stake in Def Jam when it was sold to a major label. Simmons was reportedly paid another Nine Figure amount when he sold his clothing line.
- 4. Simmons is a dangerous sexual predator who has repeatedly raped and sexually assaulted women over the decades. A partial list of women who have courageously revealed that they have been raped and sexually assaulted by one of the most powerful men in the music industry over the last several decades, include Sherri Hines (raped by Simmons in 1983), Lisa Kirk (sexually assaulted by Simmons in 1988), Toni Sallie (raped by Simmons in 1988 and sexually assaulted by Simmons the following year), Keri Khalighi (in 1991 Simmons forces her to perform oral sex on him when she was 17), Jenny Lumet (raped by Simmons in 1991), Tina B (raped by Simmons in 1991), Drew Dixon (raped by Simmons in 1995), Natashia Williams-Blach (attempted sexual assault in 1996), Jennifer Jarosik (raped by Simmons in 2016).
- 5. Since only a small percentage of victims of sexual assault disclose that they have been victimized, this list of women is likely only a very small portion of

those that have actually been raped and otherwise assaulted by Simmons.

- 6. In interviews, Simmons has "apologized" for his long history of rape and sexual assault, by characterizing his predations as mere "thoughtlessness" a lack of candor and self-awareness which demonstrates a failure to acknowledge the utter inhumanity he has demonstrated toward women his entire adult life.
- 7. The true names and capacities, whether individual, corporate, associate, or otherwise of Defendants DOES 1-50, inclusive, are unknown to plaintiff who, therefore, sues the DOE defendants by fictitious names. Plaintiff is informed and believes and thereon alleges that each of the defendants designated as a DOE is legally responsible in some manner for the events and happenings herein referred to and legally caused the injuries and damages to Plaintiff as alleged herein.
- 8. Plaintiff will amend this complaint to insert the true names and capacities of the DOE defendants when they become known.
- 9. At all times mentioned herein, defendants, and each of them, were the agents, employees, principals, subsidiaries, co-conspirators, successors and/or predecessors of each of the other defendants and were at all times acting within the course and scope of said relationship, and each defendant was fully aware of the conduct of the remaining defendants, and all defendants authorized, ratified, and approved the acts of each other.

### **VENUE**

10. Venue is proper in this judicial district pursuant to California Code of Civil Procedure section 395 since Defendant recently moved to Los Angeles County from New Jersey and resides in Los Angeles, County.

# **GENERAL ALLEGATIONS: DEFENDANT RAPES PLAINTIFF**

- 11. Jane attended a concert of a Rap and Hip-Hop artists associated with Defendant. She was chaperoning her son (who was in elementary school at the time and a fan of the Def Jam acts). During the concert, Simmons approached Jane and invited her and her son to come backstage and meet the artists. They did. Simmons then invited Jane to go to the "after party" at the (now closed) Clarion hotel where he was staying after dropping her son off at home with a babysitter. They socialized at the hotel bar until Simmons asked Jane to show him local clubs. They went to the CoCo Palms nightclub and then returned to the hotel with the intention of continuing to socialize at the bar. Simmons said he had to get something from his room and asked Jane to accompany him. She was reluctant, but Simmons insisted it was not an invitation to have sexual relations since he was dating a well-known model.
- After entering the room, Simmons shut the door and said "I am going to f\_\_\_\_k you." Plaintiff said she had no intention of having sexual relations with Simmons but he replied "I am going to f\_\_\_\_k you or I'm going to f\_\_\_k your son. You decide." Jane was shocked that Simmons would threaten her -- let alone threaten to rape her young son. Simmons threw her on the bed and raped her. There is at least one witness who saw Jane leaving the hotel room in tears and Jane told several people about the rape at or near the time of the assault. Therefore, there is substantial independent corroboration of the horrific event.

COMPLAINT FOR RAPE

. 4 -

· 28

# **FIRST CAUSE OF ACTION**

(Forcible Rape against Simmons and DOES 1-25)

- 13. Plaintiff realleges as if fully set forth herein paragraphs 1-13 above.
- 14. Simmons raped Jane Doe.
- 15. Jane Doe did not consent to any sexual contact with Simmons. In fact, Simmons lied to plaintiff shortly before raping her in order to persuade Jane Doe to accompany him to his hotel room where the rape occurred.
- 16. As a result of the rape, plaintiff has suffered special and general damages in an amount to be proven at trial.
- 17. Simmons' conduct was malicious and oppressive justifying an award of punitive damages pursuant to California Civil Code section 3294. Given Simmons wealth and history of rape and sexual misconduct, punitive damages of at least \$10,000,000 are requested since any lesser amount will be insufficient to punish the defendant and deter his future sexual misconduct.

# **SECOND CAUSE OF ACTION**

(Intentional Infliction of Emotional Distress and DOES 1-25)

- 18. Plaintiff realleges as if fully set forth herein paragraphs 1-15 above.
  - 19. Simmons conduct was outrageous.
  - 20. Simmons conduct was intended to cause Jane Doe emotional distress.
- 21. Jane Doe suffered severe emotional distress and Simmons conduct was substantial factor in causing the emotional distress.
- 22. Simmons' conduct was malicious and oppressive justifying an award of punitive damages pursuant to California Civil Code section 3294. Given Simmons wealth and history of rape and sexual misconduct, punitive damages of at

5

6

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

least \$10,000,000 are requested since any lesser amount will be insufficient to punish the defendant and deter his future sexual misconduct.

## THIRD CAUSE OF ACTION

(Negligent Infliction of Emotional Distress and DOES 1-25)

- 23. Plaintiff realleges as if fully set forth herein paragraphs 1- 20 above.
  - 24. Simmons conduct was negligent.
  - 25. Simmons conduct caused Jane Doe emotional distress.
- 26. Jane Doe suffered severe emotional distress and Simmons conduct was substantial factor in causing the emotional distress.

### PRAYER FOR RELIEF:

- 1. General, special and punitive damages in an amount to be proven at trial but of at least \$10,000,000;
  - 2. Costs of suit;
  - 3. Such other relief as the court deems appropriate.

Dated: March 22, 2018

MASTROIANNI LAW FIRM

A. Douglas Mastroianni For Plaintiff Jane Doe

ATOOREY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):  A Douglas Mastroiann (150438) 609 Rolling Hills Way, Suite 200 Rattorney For (Name): Plaintiff Superior Court of California County of Los Angeles STREET ADDRESS: 11 I North Hill Street MALING ADDRESS: CITY AND 2IP CODE: LOS Angeles, CA 90012 BRANCHAMME: DOE v. Simmons  CIVIL CASE COVER SHEET  Unlimited (Amount demanded is exceeds \$25,000 or less) Rems 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 Tort Auto Tort Breach of contract/warranty (06) Other PIPPDAWD (Personal Injury/Property Damage/Wrongful Death) Tort  Assensible (45) Defamation (13)  Non-PIPPDAWD (23) Non-PIPPDAWD (21) Defamation (13)  Wind State Countract Street (13) Wrongful eviction (33) Unlawful Detainer Unlawful Detainer  Word defined defined and defined and defined and the contract of Judgment (20) Windwit Detainer  FILE D  Superior Court of California Country of Los Angeles  MAR 2 3 2018  Sherri R. Carter, Executive Officer/Cler By  MAR 2 3 2018  Sherri R. Carter, Executive Officer/Cler By  MAR 2 3 2018  Sherri R. Carter, Executive Officer/Cler By  MAR 2 3 2018  Sherri R. Carter, Executive Officer/Cler By  MAR 2 3 2018  Sherri R. Carter, Executive Officer/Cler By  MAR 2 3 2018  Sherri R. Carter, Executive Officer/Cler By  MAR 2 3 2018  Sherri R. Carter, Executive Officer/Cler By  JUDGE: OEPT:  Rems 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: Contract  Securities 14, 14, 14, 14, 14, 14, 14, 14, 14, 14,
FILED Rolling Hills Way, Suite 200 Rolling Hills Estates, CA 90274  TELEPHONE NO.: (213) 915-7316 ATTORNEY FOR (Name): Plaintiff  SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS Angeles STREET ADDRESS: 11 1 North Hill Street MALING ADDRESS: CITY AND ZIP CODE: LOS Angeles, CA 90012 BRANCH NAME: Central  CASE NAME: DOE V. Simmons  CIVIL CASE COVER SHEET V Untimited Limited (Amount (Amount (Amount demanded is exceeds \$25,000) \$25,000 or less)  Illems 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) Uninsured motorist (46) Other PIPDWD (Personal Injury/Property Damage/Wrongful Death) Tort Assessos (04) Product liability (24) Real Property Moses Soto  CASE NUMSER: BC 6 9 9 2 8 8  Sherri R. Carter, Executive Officer/Cler By Moses Soto  CASE NUMSER: BC 6 9 9 2 8 8  CASE NUMSER: CAPTER JOYAN AS A 1 COUNTY OF THE AS A 1 COUNTY OF
Rolling Hills Estates, ČA 90274  TELEPHONE NO: (213) 915-7316 ATTORNEY FOR (Nome): Plaintiff SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS Angeles STREET ADDRESS: 111 North Hill Street MALLING ADDRESS: CITY AND ZIP CODE: LOS Angeles, CA 90012 BRANCH NAME: Central  CASE NAME: DOE v. Simmons  CIVIL CASE COVER SHEET  Unlimited (Amount (Amount (Amount (Amount (Amount (Amount (Amount (Amount (Amount (Cal. Rules of Court, rule 3.402))  Ilems 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) Uninsured motorist (46) Uninsured motorist (46) Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort Assets (45) Product liability (24) Medical malpractice (45) Discrete Conference (45) Monage
TELEPHONE NO: (213) 915-7316 FAX NO: ATTORNEY FOR (Name): Plaintiff SUPERIOR COURT of CALIFORNIA, COUNTY OF LOS Angeles STREET ADDRESS: 111 North Hill Street MALING ADDRESS: CITY AND ZIP CODE: LOS Angeles, CA 90012 BRANCH NAME: Central CASE NAME: DOE v. Simmons  CIVIL CASE COVER SHEET Unlimited (Amount demanded is exceeds \$25,000) \$25,000 or less) (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) Uninsured motorist (46) Other PIIPD/WD (Personal Injury/Property Damage/Wrongful Death) Tort Assessos (04) Product flability (24) Property Damage/Wrongful Death) Tort Moses Socious Provisionally Complex Civil Litigation (Cal. Rules of Court, rule 3.402) Construction defect (10) Mass tort (40) Securities Illigation (28) Environmental/Toxic tort (30) Insurance coverage (18) Non-PIIPD/WD (23) Non-PIIPD/WD (20ter) Tort Superior Court of California Countr of Los Angeles  MAR 2 3 2018 Sherri R. Carter, Executive Officer/Cler By  Carter, Executive Officer/Cler By  Carter, Executive Officer/Cler By  Carter, Executive Officer/Cler By  Deputy Moses Soto  CASE NUMBER: Carter, Executive Officer/Cler By  Deputy Moses Soto  CASE NUMBER: Carter, Executive Officer/Cler By  Deputy Moses Soto  CASE NUMBER: Carter, Executive Officer/Cler By  Deputy Moses Soto  CASE NUMBER: Carter, Executive Officer/Cler By  Deputy Moses Soto  CASE NUMBER: Carter, Executive Officer/Cler By  Deputy Moses Soto  CASE NUMBER: By  Deputy Moses Soto  CASE NUMBER: By  By  Carter, Executive Officer/Cler By  Deputy Moses Soto  CASE NUMBER: By  By  Carter, Executive Officer/Cler By  Deputy Moses Soto  CASE NUMBER: By  By  Carter, Executive Officer/Cler By  Deputy Moses Soto  CASE NUMBER: By  By  Carter, Executive Officer/Cler By  Deputy Moses Soto  CASE NUMBER: By  By  Carter, Executive Officer/Cler By
ATTORNEY FOR (Name): Plaintiff SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS Angeles STREET ADDRESS: 111 North Hill Street MAILING ADDRESS: CITY AND ZIP CODE: LOS Angeles, CA 90012 BRANCH NAME: Central  CASE NAME: DOE v. Simmons  CIVIL CASE COVER SHEET V Unlimited (Amount demanded is exceeds \$25,000) \$25,000 or less)  Cander I I Check one box below for the case type that best describes this case: Auto Tort Auto Tor
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles  STREET ADDRESS: 111 North Hill Street MALING ADDRESS: CITY AND ZIP CODE: Los Angeles, CA 90012 BRANCH NAME: DOE V. Simmons  CIVIL CASE COVER SHEET Vullimited (Amount (Amount (Amount (Amount demanded is exceeds \$25,000) \$25,000 or less)  Illems 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) Sherri R. Carter, Executive Officer/Cler By
STREET ADDRESS: CITY AND ZIP CODE: LOS Angeles, CA 90012 BRANCH MAME: Central  CASE NAME: DOE v. Simmons  CIVIL CASE COVER SHEET  Unlimited  (Amount (Amount demanded is exceeds \$25,000 or less)  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 Damager/Wrongful Death) Tort  Asbestos (04)  Product liability (24)  Real Property  Business tort/unfair business practice (07)  Non-PI/PD/WD (23)  Non-PI/PD/WD (23)  Non-PI/PD/WD (23)  Non-PI/PD/WD (20)  Business tort/unfair business practice (07)  Other real property (26)  Unlawful Detainer  MAR 2 3 2018  Sherri R. Carter, Executive Officer/Cler By  Moses Soto  CASE NUMBER:  CASE NUMBER:  CASE NUMBER:  BC 6 9 9 2 8 8  CASE NUMBER:  CASE NUMBER:  CASE NUMBER:  DUJUGE:  DEPT:  DEPT:  CASE NUMBER:  DOET:  DEPT:  CASE NUMBER:  CASE NUMBER:  By  Moses Soto  CASE NUMBER:  CASE NUMBER:  By  Moses Soto  CASE NUMBER:  DEPT:  DEPT:  CASE NUMBER:  DEPT:  DEPT:  CASE NUMBER:  DEPT:  CASE NUMBER:  By  Moses Soto  CASE NUMBER:
MALING ADDRESS: CITY AND ZIP CODE: LOS Angeles, CA 90012 BRANCH NAME: Central  CASE NAME: DOE v. Simmons  CIVIL CASE COVER SHEET  Unlimited Limited (Amount demanded is exceeds \$25,000) \$25,000 or less)  Ilems 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 Contract Breach of contract/warranty (06) Auto (22) Breach of contract/warranty (06) Uninsured motorist (46) Rule 3,740 collections (09) Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort Breach of contract (37) Asbestos (04) Other collections (09) Mass tort (40) Product liability (24) Real Property Environmental/Toxic tort (30) Medical malpractice (45) Eminent domain/Inverse condemnation (14) Wrongful eviction (33) Non-PI/PD/WD (Other) Tort Dinawful Detainer  Sherri R. Carter, Executive Offficer/Cler By Moses Sato  CASE NUMBER:  CASE NUMBER: By Moses Sato  CASE NUMBER: By JUDGE: DEM SHOR Wing 18 (18 ) 9 2 8 8   CASE NUMBER: By Moses Sato  CASE NUMBER: By
CASE NAME: DOE v. Simmons  CIVIL CASE COVER SHEET  Unlimited  (Amount demanded is exceeds \$25,000) \$25,000 or less)  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)  Unisured motorist (46)  Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort  Asbestos (04)  Product liability (24)  Medical malpractice (45)  Non-PI/PD/WD (23)  Non-PI/PD/WD (23)  Non-PI/PD/WD (23)  Non-PI/PD/WD (26)  Business tort/unfair business practice (07)  Unlawful Detainer  Sherri R. Carter, Executive Officer/Cler  By  CASE NUMBER:  CASE NUMBER:  CASE NUMBER:  CASE NUMBER:  CASE NUMBER:  CASE NUMBER:  DUJUGE:  OCASE NUMBER:  OCASE NUMBER:  CASE NUMBER:  OCASE NUMBER:  OCAS NUMBER:  OCAS NUMBER:  OCAS NUMBER:  OCAS NUMBER:  O
BRANCH NAME: Central  CASE NAME: DOE v. Simmons  CIVIL CASE COVER SHEET  Unlimited
CASE NAME: DOE v. Simmons  CIVIL CASE COVER SHEET  Unlimited   Limited   Counter   Joinder   Judge:  Amount   Amount   Call Rules of Court, rule 3.402   Call 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   Contract   Provisionally Complex Civil Lititgation (Cal. Rules of Court, rule 3.402    Uninsured motorist (46)   Rule 3.740 collections (09)   Antitrust/Trade regulation (03)    Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort   Insurance coverage (18)   Mass tort (40)    Product liability (24)   Real Property   Eminent domain/Inverse   Condemnation (14)   Medical malpractice (45)   Eminent domain/Inverse   Condemnation (14)   Mon-PI/PD/WD (Other) Tort   Monspile viction (33)   Unlawful Detainer   Enforcement of judgment (20)
CASE NAME:  DOE v. Simmons  CIVIL CASE COVER SHEET  Unlimited
CIVIL CASE COVER SHEET  Untimited (Amount demanded is exceeds \$25,000) \$25,000 or less)  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   Breach of contract/warranty (06)   Cal. Rules of Court, rules 3.402   Dept:    Items 1-6 below must be completed (see instructions on page 2).    Check one box below for the case type that best describes this case:  Auto Tort   Breach of contract/warranty (06)   Cal. Rules of Court, rules 3.400-3.403      Uninsured motorist (46)   Rules 3.740 collections (09)   Antitrust/Trade regulation (03)    Other PI/PD/MD (Personal Injury/Property Damage/Wrongful Death) Tort   Insurance coverage (18)   Mass tort (40)      Asbestos (04)   Other collections (09)   Environmental/Toxic tort (30)      Medical malpractice (45)   Eminent domain/Inverse condemnation (14)   Wrongful eviction (33)      Non-PI/PD/WD (Other) Tort   Wrongful eviction (33)   Unlawful Detainer   Enforcement of judgment (20)
Unlimited (Amount (Amount demanded is exceeds \$25,000) \$25,000 or less)    Counter
Unlimited (Amount demanded demanded is exceeds \$25,000) \$25,000 or less)  Iltems 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 ilability (24)  Real Property Medical malpractice (45)  Proly insurance coverage (18)  Medical malpractice (45)  Proly insurance coverage (18)  Medical malpractice (45)  Eminent domain/Inverse condemnation (14)  Wrongful eviction (33)  Non-PI/PD/WD (Other) Tort  Business torl/unfair business practice (07)  Unlawful Detainer  Counter  Judge:  DEPT:  DEPT:  DEPT:  Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400~3.403)  (Cal. Rules of Court. rules 3.400~3.403  (Cal. Rules of Court. rules 4.000  (Ca
(Amount demanded is exceeds \$25,000) \$25,000 or less)    Counter
demanded exceeds \$25,000 or less)    Cal. Rules of Court, rule 3.402   DEPT:
Exceeds \$25,000   \$25,000 or less   (Cal. Rules of Court, rule 3.402)   DEPT:    Ilterns 1-6 below must be completed (see instructions on page 2).    Check one box below for the case type that best describes this case:   Auto Tort
Items 1–6 below must be completed (see instructions on page 2).    Check one box below for the case type that best describes this case:   Auto Tort
Auto Tort  Auto (22)  Description  Auto (22)  Description  Asbestos (04)  Product ilability (24)  Medical malpractice (45)  Other PI/PD/WD (23)  Non-PI/PD/WD (Other) Tort  Business tort/unfair business practice (07)  Auto (22)  Breach of contract/warranty (06)  Breach of contract/warranty (06)  Rule 3.740 collections (09)  Other collections (09)  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)
Auto Tort  Auto (22)  Description  Auto (22)  Description  Asbestos (04)  Product ilability (24)  Medical malpractice (45)  Other PI/PD/WD (23)  Non-PI/PD/WD (Other) Tort  Business tort/unfair business practice (07)  Auto (22)  Breach of contract/warranty (06)  Breach of contract/warranty (06)  Rule 3.740 collections (09)  Other collections (09)  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)
Uninsured motorist (46)  Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort  Insurance coverage (18)  Other collections (09)  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)  Rule 3.740 collections (09)  Other collections (09)  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)
Uninsured motorist (46)  Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort  Asbestos (04) Product ilability (24) Medical malpractice (45) Non-PI/PD/WD (Other) Tort  Business tort/unfair business practice (07)  Civil rights (08)  Rule 3.740 collections (09) Other collections (09) 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)
Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort Insurance coverage (18) Asbestos (04) Product ilability (24) Medical malpractice (45) Other PI/PD/WD (23) Non-PI/PD/WD (Other) Tort Business tort/unfair business practice (07) Civil rights (08)  Other collections (09) Insurance coverage (18)  Other contract (37) 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)
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)  Display and the property insurance coverage (18)  Wass tort (40)  Securities litigation (28)  Environmental/Toxic tort (30)  Insurance coverage (18)  Mass tort (40)  Securities litigation (28)  Environmental/Toxic tort (30)  Insurance coverage (18)  Mass tort (40)  Securities litigation (28)  Environmental/Toxic tort (30)  Insurance coverage (18)  Mass tort (40)  Securities litigation (28)  Environmental/Toxic tort (30)  Insurance coverage (18)  Mass tort (40)  Securities litigation (28)  Environmental/Toxic tort (30)  Insurance coverage (18)  Other real property  Environmental/Toxic tort (30)  Insurance coverage (18)  Environmental/Toxic tort (30)  Insurance coverage (18)  Securities litigation (28)  Environmental/Toxic tort (30)  Insurance coverage (18)  Insurance coverag
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)  Other contract (37)  Real Property  Eminent domain/Inverse condemnation (14)  Wrongful eviction (33)  Other real property (26)  Unlawful Detainer  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)
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)  Real Property  Eminent domain/Inverse condemnation (14)  Wrongful eviction (33)  Unlawful Detainer  Sectimes inigation (25)  Environmental/Toxic tort (30)  Insurance coverage claims arising from the above listed provisionally complex case types (41)  Enforcement of Judgment  Enforcement of judgment (20)
Medical malpractice (45)  Cither PI/PD/WD (23)  Non-PI/PD/WD (Other) Tort  Business tort/unfair business practice (07)  Civil rights (08)  Medical malpractice (45)  Eminent domain/Inverse condemnation (14)  Wrongful eviction (33)  Unlawful Detainer  Enforcement of Judgment  Enforcement of judgment (20)
V Other PI/PD/WD (23) condemnation (14) above listed provisionally complex case types (41)  Non-PI/PD/WD (Other) Tort Wrongful eviction (33) types (41)  Business tort/unfair business practice (07) Unlawful Detainer Enforcement of judgment (20)
Non-PI/PD/WD (Other) Tort
Business tort/unfair business practice (07)  Unlawfut Detainer  Enforcement of Judgment  Enforcement of judgment (20)
Civil rights (08) Unlawful Detainer Enforcement of judgment (20)
Defamation (13) Commercial (31) Miscellaneous Civil Complaint
1 [ ]
Fraud (16) Residential (32) RICO (27)
Intellectual property (19)  Urugs (38)  Uther complaint (not specified above) (42)
Professional negligence (25)  Judicial Review  Miscellaneous Civil Petition
Other non-PI/PD/WD tort (35)  Asset forfeiture (05)  Partnership and corporate governance (21)
Employment Petition re: arbitration award (11) Other petition (not specified above) (43)
Wrongful termination (36) Writ of mandate (02)
Other employment (15) Other judicial review (39)
2. This case is 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 e. Coordination with related actions pending in one or more cour
issues that will be time-consuming to resolve 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. v monetary b. nonmonetary; declaratory or injunctive relief, c. v punitive
4. Number of causes of action (specify): (1) Rape; (2) IIED; (3) NIED
5 <sub>65</sub> This case is v is not a class action suit.
This case is 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.)
6 If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)
Fig. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)  Date: March 22, 2018
Date: March 22, 2018 A: Douglas Mastroianni
Date: March 22, 2018 A: Douglas Mastroianni  (SIGNATURE OF PARTY)  ONLY OF THE PARTY OF ATTORNEY FOR PARTY)
Date: March 22, 2018  A: Douglas Mastroianni  (SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)  NOTICE  (SPlaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed)
Date: March 22, 2018  A: Douglas Mastroianni  (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 "Qunder the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result
Date: March 22, 2018  All Douglas Mastroianni  (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 "Qunder the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
Date: March 22, 2018 All Douglas Mastroianni  (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.
Date: March 22, 2018  A: Douglas Mastroianni  (YPE OR PRINT NAME)  NOTICE
Date: March 22, 2018 All Douglas Mastroianni  (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.

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

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

# 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.
- 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 wherein 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).

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

Auto Tort

Cther Personal Injury/ Property Damagel Wrongful Death Tort

CIVIL CASE COVER SHEET ADDENDUM
AND STATEMENT OF LOCATION

Local Rule 2.3 Page 1 of 4 Δ

SHORT TITLE: DOE v. Simmons CASE NUMBER

	· · · · · · · · · · · · · · · · · · ·		
	A Civil Case Cover Sheet Category No.	<b>B</b> Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
	Business Tort (07)	☐ A6029 Other Commercial/Business Tort (not fraud/breach of contract)	1, 2, 3
operty h Tort	Civil Rights (08)	□ A6005 Civil Rights/Discrimination	1, 2, 3
ry/Pro	Defamation (13)	□ A6010 Defamation (slander/libel)	1, 2, 3
al Inju ongfu	Fraud (16)	□ A6013 Fraud (no contract)	1, 2, 3
Non-Personal Injury/ Property Damage/ Wrongful Death Tort	Professional Negligence (25)	□ A6017 Legal Malpractice □ A6050 Other Professional Malpractice (not medical or legal)	1, 2, 3
žä	Other (35)	□ A6025 Other Non-Personal Injury/Property Damage tort	1, 2, 3
ent	Wrongful Termination (36)	☐ A6037 Wrongful Termination	1, 2, 3
Employment	Other Employment (15)	□ A6024 Other Employment Complaint Case □ A6109 Labor Commissioner Appeals	1, 2, 3 10
	Breach of Contract/ Warranty (06) (not insurance)	□ A6004 Breach of Rental/Lease Contract (not unlawful detainer or wrongful eviction) □ A6008 Contract/Warranty Breach -Seller Plaintiff (no fraud/negligence) □ A6019 Negligent Breach of Contract/Warranty (no fraud)	2, 5 2, 5 1, 2, 5 1, 2, 5
Contract	Collections (09)	□ A6028 Other Breach of Contract/Warranty (not fraud or negligence) □ A6002 Collections Case-Seller Plaintiff □ A6012 Other Promissory Note/Collections Case □ 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)	☐ A6015 Insurance Coverage (not complex)	1, 2, 5, 8
	Other Contract (37)	□ A6009 Contractual Fraud □ A6031 Tortious Interference □ A6027 Other Contract Dispute(not breach/insurance/fraud/negligence)	1, 2, 3, 5 1, 2, 3, 5 1, 2, 3, 8, 9
	Eminent Domain/Inverse Condemnation (14)	A7300 Eminent Domain/Condemnation Number of parcels	2, 6
operty	Wrongful Eviction (33)	☐ A6023 Wrongful Eviction Case	2, 6
言發 Real Proper	Other Real Property (26)	□ A6018 Mortgage Foreclosure □ A6032 Quiet Title □ A6060 Other Real Property (not eminent domain, landlord/tenant, foreclosure)	2, 6 2, 6 2, 6
გე ეგე "*. <b>ნ</b>	Unlawful Detainer-Commercial (31)	☐ A6021 Unlawful Detainer-Commercial (not drugs or wrongful eviction)	6, 11
និទីខិ Unlawful Detainer	Unlawful Detainer-Residential (32)	☐ A6020 Unlawful Detainer-Residential (not drugs or wrongful eviction)	6, 11
∯ awful [	Unlawful Detainer- Post-Foreclosure (34)	☐ A6020F Unlawful Detainer-Post-Foreclosure	2, 6, 11
Ë	Unlawful Detainer-Drugs (38)	□ A6022 Unlawful Detainer-Drugs	2, 6, 11

CIVIL CASE COVER SHEET ADDENDUM AND STATEMENT OF LOCATION

Local Rule 2.3 Page 2 of 4

SHORT TITLE: DOE v. Simmons CASE NUMBER

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

LACIV 109 (Rev 2/16) LASC Approved 03-04 CIVIL CASE COVER SHEET ADDENDUM AND STATEMENT OF LOCATION

Local Rule 2.3

Page 3 of 4

		·	
SHORT TITLE:	DOE v. Simmons		CASE NUMBER

**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:		⊒ 10. l⁄3 11.	ADDRESS: 1211 Laurel Way
CITY: Beverly Hills	STATE:	ZIP CODE: 90201	

Step 5: Certification of Assignment: I certify that this case is properly filed in the Central 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: 3-22-18



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

- 1. Original Complaint or Petition.
- 2. If filing a Complaint, a completed Summons form for issuance by the Clerk.
- 3. Civil Case Cover Sheet, Judicial Council form CM-010.
- Civil Case Cover Sheet Addendum and Statement of Location form, LACIV 109, LASC Approved 03-04 (Rev. 02/16).
- 5. Payment in full of the filing fee, unless there is court order for waiver, partial or scheduled payments.
- 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.