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NO FEE - GOV'T CODE 6103

7 Attorneys for Defendant, COUNTY OF LOS ANGELES

8
9 **UNITED STATES DISTRICT COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

11 SARAH JAFARI,
12
13 Plaintiff,
14
15 v.

FEDERAL CASE NO.
STATE CASE NO. 21STCV45482
[Exempt pursuant to *Gov. Code* § 6103]

16 COUNTY OF LOS ANGELES, a
15 municipal entity, KONRAD THIEME,
16 an individual DOES 1-10, Inclusive,
17
18 Defendants.

**NOTICE OF REMOVAL AND
REMOVAL OF ACTION UNDER 28
U.S.C. §§ 1441 AND 1446 ON
BEHALF OF DEFENDANT
COUNTY OF LOS ANGELES;
DECLARATION OF ANAHIT
ISAGHULYAN**

[Filed Concurrently With Notice of
Interested Parties]

19
20
21 TO THE COURT AND ALL PARTIES AND THEIR COUNSEL OF RECORD:
22 PLEASE TAKE NOTE that Defendant COUNTY OF LOS ANGELES
23 (“COLA”) hereby removes this action from the Superior Court of the County of Los
24 Angeles, Central District to the United States District Court, Central District of
25 California. COLA effects this removal pursuant to 28 U.S.C. §§ 1441 and 1446 on
26 the following factual bases:

27 1. On December 14, 2021, Plaintiff SARAH JAFARI (“Plaintiff”) filed a
28 Complaint in the Superior Court of California, County of Los Angeles, Central

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1 District in the action entitled *Sarah Jafari v. County of Los Angeles; et al.*, Case No.
2 21STCV45482. Declaration of Anahit Isaghulyan (“Decl. Isaghulyan”), ¶ 3. The
3 Summons and Complaint are attached as Exhibit “A” to the Declaration of Anahit
4 Isaghulyan.

5 2. Plaintiff served the Summons and Complaint on COLA on December
6 16, 2021. Decl. Isaghulyan, ¶ 4.

7 3. Counsel for COLA is informed and believes that Defendant KONRAD
8 THIEME has not been served with the Summons and Complaint. Decl. Isaghulyan,
9 ¶ 5. Accordingly, joinder of this Notice by Defendant KONRAD THIEME is
10 unnecessary. *See Salveson v. Western States Bankcard Ass’n*, 731 F.2d 1423, 1429
11 (9th Cir. 1984) (superseded on other grounds, *Community Bldg. Co. v. Maryland*
12 *Casualty Co.*, 8 F.2d 678, 678-79 (9th Cir. 1925)). Defense counsel has no
13 knowledge that Defendant KONRAD THIEME has received the Summons or
14 Complaint or is aware of the existence of the Summons or Complaint. Decl.
15 Isaghulyan, ¶ 5.

16 4. In the Complaint, Plaintiff brings a federal civil rights claim pursuant to
17 42 U.S.C. § 1983 claiming violations of Plaintiff’s rights under the Fourth, Fifth and
18 Fourteenth Amendments of the United States Constitution against all Defendants.
19 Decl. Isaghulyan, ¶ 6; Exh. “A.” Thus, this is a federal civil rights action over
20 which this Court has original jurisdiction as to all Defendants. *See* 28 U.S.C. § 1331
21 (“The district courts shall have original jurisdiction of all civil actions arising under
22 the Constitution, laws, or treaties of the United States.”). Accordingly, COLA has
23 the right to remove this case to this Court. *See* 28 U.S.C. § 1441(a) (“...any civil
24 action brought in a State court of which the district courts of the United States have
25 original jurisdiction, may be removed by the defendant or the defendants...”); 28
26 U.S.C. § 1446 (setting forth procedures for removal).

27 5. In the Complaint, Plaintiff also brings state law causes of action for
28 Deprivation of Civil Rights under state code §§ 51 (The Unruh Act), 51.7 (The

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1 Ralph Act), 52.1 (The Bane Act), assault, battery, false imprisonment, and
2 negligence (vicarious and training and supervision). Decl. Isaghulyan, ¶ 7; Exh.
3 “A.” All of Plaintiff’s causes of action brought under federal and state law arise
4 from the same factual allegations: that on April 10, 2021 during a response by
5 Sheriff’s Deputies to a 911 call from Plaintiff’s mother, Plaintiff who suffers from
6 mental health issues, was banging a door against a wall, which led to a physical
7 struggle with the Deputies resulting in Plaintiff’s injuries. Decl. Isaghulyan, ¶ 8;
8 Exh. “A.” When an action originally filed in state court is removed to federal court,
9 the federal tribunal has jurisdiction to determine not only the federal claims, but all
10 pendent state claims which derive “from a common nucleus of operative fact.”
11 *United Mine Workers v. Gibbs*, 383 US 715, 725 (1966); *see also* 28 U.S.C. §§
12 1367(a) and 1441(c).

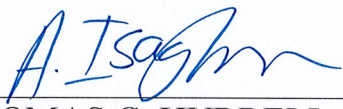
13 6. Venue is proper in this Court as the alleged wrongful conduct occurred
14 in the County of Los Angeles and the named defendants reside therein. 28 U.S.C.
15 §§ 84(c)(2), 1391, 1446.

16 7. This Notice of Removal is being filed with this Court less than 30 days
17 after plaintiff served COLA with the Summons and Complaint, which service was
18 made on December 16, 2021. Decl. Isaghulyan, ¶ 9.

19 8. This Notice of Removal is being contemporaneously filed in this Court
20 as well as the Superior Court of California, County of Los Angeles, Central District.
21 Decl. Isaghulyan, ¶ 10.

22
23 DATED: January 14, 2022

HURRELL CANTRALL LLP

24 By: 
25 _____
26 THOMAS C. HURRELL
27 FARID A. SHARABY
28 ANAHIT ISAGHULYAN
Attorneys for Defendant, COUNTY OF
LOS ANGELES

DECLARATION OF ANAHIT ISAGHULYAN

I, Anahit Isaghulyan, declare:

1. I am an attorney duly licensed to practice before this Court and am an associate with Hurrell Cantrall LLP, attorneys of record for Defendant COUNTY OF LOS ANGELES (“COLA”) herein. The facts set forth herein are of my own personal knowledge and if sworn I could and would testify competently thereto.

2. I make this declaration in support of the Notice of Removal and Removal of Action Under 28 U.S.C. §§ 1441 and 1446 on behalf of Defendant County of Los Angeles.

3. On December 14, 2021, Plaintiff SARAH JAFARI (“Plaintiff”) filed a Complaint in the Superior Court of California, County of Los Angeles, Central District in the action entitled *Sarah Jafari v. County of Los Angeles; et al.*, Case No. 21STCV45482. The Summons and Complaint are attached hereto as Exhibit “A.”

4. Plaintiff served the Summons and Complaint on COLA on December 16, 2021.

5. Upon information and belief, Defendant KONRAD THIEME has not been properly served with the Summons and Complaint. I have no knowledge that Defendant KONRAD THIEME has received the Summons or Complaint or is aware of the existence of the Summons or Complaint.

6. In the Complaint, Plaintiff brings a federal civil rights claim pursuant to 42 U.S.C. § 1983 claiming violations of Plaintiff’s rights under the Fourth, Fifth and Fourteenth Amendments of the United States Constitution.

7. In the Complaint, Plaintiff also brings state law causes of action for Deprivation of Civil Rights under state code §§ 51 (The Unruh Act), 51.7 (The Ralph Act), 52.1 (The Bane Act), assault, battery, false imprisonment, and negligence (vicarious and training and supervision).

8. All of Plaintiff’s causes of action brought under federal and state law arise from the same factual allegations: that on April 10, 2021 during a response by

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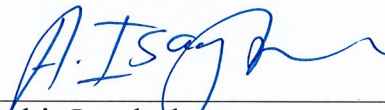
1 Sheriff's Deputies to a 911 call from Plaintiff's mother, Plaintiff who suffers from
2 mental health issues, was banging a door against a wall, which led to a physical
3 struggle with the Deputies resulting in Plaintiff's injuries.

4 9. This Notice of Removal is being filed with this Court less than 30 days
5 after plaintiff served COLA with the Summons and Complaint, which service was
6 made on December 16, 2021.

7 10. This Notice of Removal is being contemporaneously filed in this Court
8 as well as the Superior Court of California, County of Los Angeles, Central District.

9 I declare under penalty of perjury under the laws of the United States of
10 America that the foregoing is true and correct.

11 Executed on January 14, 2022 at Los Angeles, California.

12
13 
14 _____
Anahit Isaghulyan

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EXHIBIT - "A"

SUM-100

**SUMMONS
(CITACION JUDICIAL)**

FOR COURT USE ONLY
(SOLO PARA USO DE LA CORTE)

BOARD OF SUPERVISORS
COUNTY OF LOS ANGELES
FILED

2021 DEC 16 P 3:03

**NOTICE TO DEFENDANT:
(AVISO AL DEMANDADO):**

COUNTY OF LOS ANGELES, a municipal entity; KONRAD
THIEME, an individual, DOES 1-10 inclusive,

**YOU ARE BEING SUED BY PLAINTIFF:
(LO ESTÁ DEMANDANDO EL DEMANDANTE):**

SARAH JAFARI

NOTICE! You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), or by contacting your local court or county bar association. **NOTE:** The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case. **¡AVISO!** Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información a continuación.

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California, (www.sucorte.ca.gov) o poniéndose en contacto con la corte o el colegio de abogados locales. **AVISO:** Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 ó más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desechar el caso.

The name and address of the court is:
(El nombre y dirección de la corte es): Stanley Mosk Courthouse
111 N. Hill Street
Los Angeles, CA 90011

CASE NUMBER:
(Número del Caso): 21STCV45482

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is:
(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):
Vincent Miller, Law Offices, 16255 Ventura Boulevard, Suite 625, CA 91436 213-948-5702

DATE: 12/14/2021 (Fecha) Sherri R. Carter Executive Officer / Clerk of Court Clerk, by R. Perez, Deputy (Secretario) (Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)
(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010)).



NOTICE TO THE PERSON SERVED: You are served

- as an individual defendant.
- as the person sued under the fictitious name of (specify):
- on behalf of (specify): County of Los Angeles municipal entity
under: CCP 416.10 (corporation) CCP 416.60 (minor)
 CCP 416.20 (defunct corporation) CCP 416.70 (conservatee)
 CCP 416.40 (association or partnership) CCP 416.90 (authorized person)
 other (specify):
- by personal delivery on (date): 12/16/21

VINCENT MILLER (SBN 291973)
NICK SAGE (SBN 298972)
The Law Offices of Vincent Miller
16255 Ventura Boulevard, Suite 625
Encino, CA 91436
Telephone: (213) 948-5702
Attorney for Plaintiff Sarah Jafari

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
CENTRAL DISTRICT**

SARAH JAFARI,

) CASE NO: 21STCV45482

Plaintiff,

)

v.

)

PLAINTIFF'S COMPLAINT FOR:

COUNTY OF LOS ANGELES, a municipal
entity; KONRAD THIEME, an individual,
DOES 1-10 inclusive,

)

**1. DEPRIVATION OF CIVIL RIGHTS
UNDER 42 U.S.C. § 1983;**

)

**2. DEPRIVATION OF CIVIL RIGHTS
52.1 (THE BANE ACT), 51, 51.7;**

)

3. ASSAULT

)

4. BATTERY

)

5. FALSE IMPRISONMENT

)

**6. NEGLIGENCE (VICARIOUS AND
TRAINING AND SUPERVISION)**

)

Jury Trial Demanded

)

Plaintiff SARAH JAFARI ("Plaintiff" or "Ms. Jafari") by and through her undersigned attorneys,
hereby prays to this honorable Court for relief and remedy based on the following:

INTRODUCTION

1. Plaintiff is an individual residing in Los Angeles, California, who is mentally disabled and
suffers from a history of psychiatric problems with medical diagnoses of mental illness.

- 1 2. At all times mentioned herein, Defendant, County of Los Angeles (hereinafter, “Los Angeles
2 County” “Defendant County”), a government agency, is in Los Angeles County, California.
3 The Los Angeles County Sheriff’s Department (“LASD”) is a branch of Los Angeles
4 County.
- 5 3. Defendant Konrad Thieme (“Thieme”) and DOE Defendants are employees of the County,
6 and work as deputies for LASD. LASD has long known about Deputy Thieme’s excessively
7 violent and aggressive disposition, and use of excessive force. Given his propensity for
8 overly aggressive policing, combined with the fact that Deputy Thieme is tall with a
9 muscular build, has made it dangerous for residents for the defendant to be out on patrol.
- 10 4. Up until she was violently attacked deputies from the County, Ms. Jafari was functioning in
11 life, and happily living with her mother.
- 12 5. On April 10, 2021, at her mother’s home, Ms. Jafari was banging a door against a wall.
13 Concerned for Ms. Jafari’s well-being, Plaintiff’s mother called the Sheriff’s Department,
14 thinking deputies would act responsibly and come and help make sure that Plaintiff was not a
15 danger to herself.
- 16 6. Unfortunately, when Deputy Thieme and DOE Defendant deputies arrived at the home, they
17 did not act responsibly or appropriately. The deputies mistreated Plaintiff due to her
18 disability. The deputies saw in Plaintiff’s disability caused vulnerabilities an opportunity to
19 violently “toy” with a disabled person, the Plaintiff.
- 20 7. Ms. Jafari was always passive during the encounter with the deputies. As documented on a
21 body camera: Defendant Deputy Thieme and other DOE Defendant deputies approached the
22 diminutive Ms. Jafari. Mr. Jafari walked slowly backwards away from the deputies, with her
23 hands held out so they could see she was of no danger of harm to them. Unfortunately,
24 unprovoked, Deputy Thieme suddenly throat punched Ms. Jafari who yelped in agony as she
25 flew backward to the ground and landed on her back and head. Deputy Thieme and the Doe
26 Defendant Deputies continued their assault on Ms. Jafari who was terrified and continued to
27 be passive, and non-resistant. The Deputies sat on Plaintiff and shocked her body with a
28

1 taser, with no justification. as Plaintiff cried out in intense pain, apparently to the sadistic
2 amusement of the deputies.

3 8. Defendant Thieme then grabbed Ms. Jafari by the hair and tossed her into the back of the
4 patrol car like a rag doll.

5 9. Ms. Jafari was taken to the emergency hospital where she was treated for the injuries caused
6 by the deputies.

7 10. The Defendant Deputies then wrote a false police report, fabricating that Ms. Jafari was
8 somehow a threat or resisting arrest. Based on the deputies' fraudulent allegations, Plaintiff
9 was falsely arrested and thrown in jail.

10 11. The District Attorney dropped the fake charges against Ms. Jafari and refused to participate
11 in the frame up by the Defendant deputies.

12 12. The Defendant deputies returned to the Jafari home and tried to convince Plaintiff's mother
13 to lie and say she had told them prior to their attack on Plaintiff that Ms. Jafari had a knife in
14 her clothes. Plaintiff's mother refused to lie and to provide a convenient cover story for the
15 deputies.

16 13. As a result of the Defendant Thieme and Doe Defendants attack on Plaintiff, she suffered and
17 suffers from a traumatic brain injury, severe psychological pain, and emotional distress.

18 Plaintiff is extremely traumatized by being attacked by cops.

19 14. As a result of the Defendants' attack on Plaintiff and the brain injury the Defendants caused,
20 she soon after suffered seizures and was taken to emergency hospital where she was treated
21 for two weeks.

22 15. Under the circumstances, Plaintiff reasonably fears the deputies will return and resume their
23 terror and murder her.

24 16. In addition to the unprovoked attack on Plaintiff, LASD is infamous for a history of being
25 riddled with deputy gangs and a deputy gang culture that permeates the department and
26 results in many instances of excessive force against disabled residents and minorities. Sheriff
27 Alex Villanueva and LASD have been aware of Defendant Thieme's propensity for overly
28 aggressive policing and use of excessive force. Sheriff Villanueva and LASD did not

1 discipline Deputy Thieme and the Doe Defendants for engaging in excessive force prior to its
2 use of it against Plaintiff.

3 17. Sheriff Villanueva and LASD did not discipline Deputy Thieme and the Doe Defendants for
4 engaging in excessive force against Plaintiff. The Sheriff's Department has a pattern and
5 practice of allowing and encouraging the use of excessive force against County residents, as
6 LASD does not hold deputies accountable for such wrongful conduct.

7 18. Plaintiff's whole life and mental state was upended by the Defendants' attacks on her. She is
8 too terrified to return to her residence with her mother. The Defendants have completely
9 destabilized plaintiff's mental health. Plaintiff lost lost thirty pounds in just two months due
10 to the Defendants' attack and she can no longer function in her mother's home. Plaintiff is so
11 distraught over what was done to her, she is currently incapable of receiving the medical help
12 she needs to try to heal from this nightmare.

13 19. Despite LASD's notoriety for covering up deputy wrongdoing, Deputy Thieme was referred
14 to LASD's Internal Criminal Investigation Bureau "ICIB") for investigation of his criminal
15 conduct towards Ms. Jafari. While it is doubtful LASD will hold Thieme accountable, ICIB
16 deputies acknowledge Thieme has engaged in excessive against Plaintiff and other residents.
17 Despite the history of the District Attorney's Office to refuse to prosecute cops for excessive
18 force, some of Thieme's co-workers hope the District Attorney is examining the case to
19 determine if it will prosecute the Defendants for their crimes against the Plaintiff.

20 20. The use of body cameras is new to LASD. Apparently, the Defendant deputies forgot about
21 the body camera while attacking Ms. Jafari. The video proves without a doubt that the
22 Deputy Defendants are liable and that the Defendant County is liable for their employees'
23 conduct, and that the Defendant deputies lied about the incident.

24 21. The actions of the County and its employees are repugnant. Deputies in LASD who viewed
25 the body camera footage laughed as they watched Ms. Jafari being tortured by the
26 Defendants and yelping in pain.

27 22. During the incident, the Defendant deputies did not approach the Plaintiff with caution. The
28 deputies overreacted to the Plaintiff based on her mental disability and used excessive force.

1 The Defendant violated its own internal procedures in using unreasonable force. Section 3-
2 10/030.00 – Unreasonable Force: Department members shall use only that force which is
3 objectively reasonable. Unreasonable force is that force that is unnecessary or excessive
4 given the totality of the circumstances presented to Department members at the time the force
5 is applied. Department members shall use only that force which is objectively reasonable.
6 Unreasonable force is prohibited. The use of unreasonable force will subject Department
7 members to discipline and/or prosecution. The basis in determining whether force is
8 “unreasonable” shall be consistent with the Supreme Court decision of *Graham v. Connor*,
9 490 U.S. 386 (1989).

10 23. Defendant Thieme and the Doe Defendants are employed by the County. LASD is a division
11 in the County of Los Angeles and the County is liable for all wrongful acts committed by
12 LASD and deputy employees. Sheriff Alex Villanueva is the top official for LASD and he is
13 responsible for managing, supervising, and disciplining all employees in LASD including
14 LASD deputies.
15

16 24. Sheriff Villanueva is the supervisor of all the individual Defendants and is responsible for
17 investigations of unlawful conduct. Sheriff Villanueva is also obligated to take disciplinary
18 action for misconduct and to protect residents, including the Plaintiff, from being
19 discriminated against based on her disability, threats, intimidation, and physical violence by
20 LASD employees. Instead of protecting residents, Sheriff Villanueva and LASD have
21 maintained a pattern and practice of protecting bad cops in the department.
22

23 25. Plaintiff is informed and believes and thereupon alleges that Defendant DOES 1-10, are
24 liable for wrongful conduct, and each of them, whether individual, corporate, associate or
25 otherwise, are still unknown to Plaintiff at this time, who therefore sues said Defendants by
26 such fictitious names. Plaintiffs will further amend her complaint to show the Doe
27 Defendants true names and capacities, together with appropriate charging language, when
28

1 such information has been ascertained. Plaintiff will file DOE amendments, and/or ask leave
2 of court to amend this Complaint to assert the true names and capacities of these Defendants
3 when they have been ascertained.

4
5 26. Plaintiff is informed and believe, and upon, such information and belief allege, that each
6 Defendant designated as a DOE was and is in some manner, negligently, wrongfully, or
7 otherwise responsible and liable to Plaintiff for the injuries and damages hereinafter alleged
8 and that Plaintiff's damages as herein alleged were proximately caused by their conduct.

9
10 27. Plaintiff is further informed and believes, and thereupon alleges, that at all times relevant
11 hereto, Defendants, and each of them, acted in concert and in furtherance of the interests of
12 each other Defendant.

13 28. At all relevant times, Defendants or their predecessors in office have acted or failed to act, as
14 alleged herein, under the color of state law.

15
16 29. The Plaintiff complied with all requirements under the California Tort Claims Act.

17
18 **FIRST CAUSE OF ACTION**
19 **(FOR DEPRIVATION OF CIVIL RIGHTS UNDER 42 U.S.C.§1983 AGAINST THE**
20 **DEFENDANT COUNTY OF LOS ANGELES, DEFENDANT KONRAD THIEME AND**
21 **DOE DEFENDANTS 1-10)**

22 30. Plaintiff repeats and re-alleges as though fully set forth herein each and every allegation
23 contained in paragraphs 1-29 of this complaint.

24 31. Under section 1983 of the United States Code, the County and individual Defendants are
25 liable for subjecting the Plaintiff to conduct that occurred under color of state law, and
26 this conduct deprived Ms. Jafari of her rights, privileges, or immunities guaranteed under the
27 4th, 5th, and 14th Amendments of the Constitution of the United States of America.
28

1 32. Plaintiff is a member of a protected class, suffering from disabilities arising from her mental
2 illnesses. Her mental illnesses and disabilities are transparent and would be obvious to any
3 police officer or deputy confronting or interacting with her, and the Defendant deputies were
4 informed prior to their use of excessive force that she suffered from a mental disability.

5 33. According to 42 U.S.C. § 1983, Civil action for deprivation of rights: every person who,
6 under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory
7 or the District of Columbia, subjects, or causes to be subjected, any citizen of the United
8 States or other person within the jurisdiction thereof to the deprivation of any rights,
9 privileges, or immunities secured by the Constitution and laws, shall be liable to the party
10 injured in an action at law, suit in equity, or other proper proceeding for redress.

11 34. Plaintiff is informed and believes and thereon alleges that Defendant and its employee/agents
12 sheriff's deputies, were and are informed that Plaintiff was and is a vulnerable citizen,
13 suffering from disabilities and mental illness.

14 35. Plaintiff alleges upon information and belief that the Defendant County, as part of the
15 standard of care, has a duty to train its deputies to be sensitive to individuals with disabilities
16 and mental illnesses, to act with care to not antagonize and agitate and target said individuals,
17 and to not discriminate against and harass said individuals based on their disabilities and
18 mental illnesses. Unfortunately, here the Defendant deputies saw Plaintiff's disability as a
19 weakness that made her vulnerable to being bullied by them, and deputies took delight in
20 causing Plaintiff fear and pain.

21 36. When the passive, unarmed Plaintiff backed away from the Individual Defendants and held
22 her arms out and palms up, so they would see she was of no threat, the Defendants,
23 unprovoked, attacked the Plaintiff and throat punched her hard to the ground, with her
24 landing on her back and head. The deputies immediately continued their assault on Plaintiff
25 as she writhed on the ground in pain. The deputies sat on Plaintiff and tased her, to shock her
26 body and hurt Plaintiff further. As she yelped in pain, Defendant Thieme grabbed her by the
27 hair and threw her into the patrol car.

28

1 37. After the incident, Defendant Thieme and Doe Defendant Deputies wrote a false police
2 report and tried to pressure Plaintiff's mother to lie and falsely state that Plaintiff had a knife
3 hidden on her.

4 38. Defendant Thieme and the Doe Defendants falsely arrested Plaintiff on fake charges, but the
5 District Attorney declined to participate in the frame up and refused to prosecute her and
6 dismissed charges.

7 39. The deputies' actions deprived Ms. Jafari of her constitutional rights under the 14th
8 amendment by assaulting her, falsely imprisoning and arresting her. The Defendants made
9 the Plaintiff fear for her life as they terrorized her. Plaintiff reasonably fears the deputies will
10 return to her mother's residence and finish the job they started and murder her.

11 40. Some of the County's own deputies in ICIB found that the Deputies' story did not hold up
12 and was not consistent with what is on the body camera footage. While the Sheriff's office
13 and the District Attorney routinely does not hold deputies accountable for use of excessive
14 force, ICIB referred Deputy Thieme to the District Attorney for possible prosecution for his
15 misconduct in this matter.

16 41. At all times mentioned herein each of the individual Los Angeles County sheriffs' deputies,
17 were working as employees, and acting as agents and servants of the Defendant and Doe
18 Defendants. The sheriff deputies were acting under the color of law at all times.

19 42. The Defendant County is liable by violating its own policies and establishing a custom and
20 practice of engaging in excessive force against disabled and African American and Latino
21 residents. Sheriff Alex Villanueva and LASD has maintained a custom of allowing the
22 existence of deputy gangs and a deputy gang culture that permeates LASD and encourages
23 the use of excessive force against disabled people and minorities. The Sheriff and LASD
24 have failed to hold deputies accountable for excessive force and to investigate use of
25 excessive force. The Ninth Circuit has held that in some cases the plaintiff is entitled to have
26 the jury instructed that evidence of governmental inaction - specifically, failure to investigate
27 and discipline employees in the face of widespread constitutional violations - can support an
28

1 inference that an unconstitutional custom or practice has been unofficially adopted. (Hunter
2 v. County of Sacramento (9th Cir. 2011) 652 F.3d 1225, 1234, fn. 8.) “The [entity] may not
3 be held liable for acts of [employees] unless ‘the action that is alleged to be unconstitutional
4 implements or executes a policy statement, ordinance, regulation, or decision officially
5 adopted and promulgated by that body’s officers’ or if the constitutional deprivation was
6 ‘visited pursuant to governmental “custom” even though such a custom has not received
7 formal approval through the body’s official decision making channels.’ ” (Redman v. County
8 of San Diego (9th Cir. 1991) 942 F.2d 1435, 1443-1444.) • “[A]n act performed pursuant to
9 a ‘custom’ that has not been formally approved by an appropriate decisionmaker may fairly
10 subject a municipality to liability on the theory that the relevant practice is so widespread as
11 to have the force of law.” (Bd. of the County Comm’rs v. Brown (1997) 520 U.S. 397, 404
12 [117 S.Ct. 1382, 137 L.Ed.2d 626].) • “The custom or policy must be a ‘deliberate choice to
13 follow a course of action . . . made from among various alternatives by the official or
14 officials responsible for establishing final policy with respect to the subject matter in
15 question.’ ” (Castro v. County of Los Angeles (9th Cir. 2016) 833 F.3d 1060, 1075 (en
16 banc).) “While a rule or regulation promulgated, adopted, or ratified by a local governmental
17 entity’s legislative body unquestionably satisfies Monell’s policy requirement, a ‘policy’
18 within the meaning of § 1983 is not limited to official legislative action. Indeed, a decision
19 properly made by a local governmental entity’s authorized decisionmaker - i.e., an official
20 who ‘possesses final authority to establish [local government] policy with respect to the
21 [challenged] action’ - may constitute official policy. ‘Authority to make municipal policy
22 may be granted directly by legislative enactment or may be delegated by an official who
23 possesses such authority, and of course whether an official had final policymaking authority
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1 is a question of state law.’ ” (Thompson v. City of Los Angeles (9th Cir. 1989) 885 F.2d
2 1439, 1443.) • “[A] plaintiff can show a custom or practice of violating a written policy;
3 otherwise an entity, no matter how flagrant its actual routine practices, always could avoid
4 liability by pointing to a pristine set of policies.” (Castro, supra, 833 F.3d at p. 1075 fn. 10.)
5 “Appellants need not show evidence of a policy or deficient training; evidence of an informal
6 practice or custom will suffice.” (Nehad v. Browder (9th Cir. 2019) 929 F.3d 1125, 1141.)
7 “As with other questions of state law relevant to the application of federal law, the
8 identification of those officials whose decisions represent the official policy of the local
9 governmental unit is itself a legal question to be resolved by the trial judge before the case is
10 submitted to the jury.” (Jett v. Dallas Independent School Dist. (1989) 491 U.S. 701, 737
11 [109 S.Ct. 2702, 105 L.Ed.2d 598].) • “[I]t is settled that whether an official is a policymaker
12 for a county is dependent on an analysis of state law, not fact.” (Pitts v. County of Kern
13 (1998) 17 Cal.4th 340, 352 [70 Cal.Rptr.2d 823, 949 P.2d 920].) • “Once those officials who
14 have the power to make official policy on a particular issue have been identified, it is for the
15 jury to determine whether their decisions have caused the deprivation of rights at issue by
16 policies which affirmatively command that it occur, or by acquiescence in a longstanding
17 practice or custom which constitutes the ‘standard operating procedure’ of the local
18 governmental entity.” (Jett, supra, 491 U.S. at p. 737.) Gibson v. County of Washoe [(9th
19 Cir. 2002) 290 F.3d 1175, 1186] discussed two types of policies: those that result in the
20 municipality itself violating someone’s constitutional rights or instructing its employees to do
21 so, and those that result, through omission, in municipal responsibility ‘for a constitutional
22 violation committed by one of its employees, even though the municipality’s policies were
23 facially constitutional, the municipality did not direct the employee to take the
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1 unconstitutional action, and the municipality did not have the state of mind required to prove
2 the underlying violation.’ We have referred to these two types of policies as policies of action
3 and inaction.” (Tsao v. Desert Palace, Inc. (9th Cir. 2012) 698 F.3d 1128, 1143.) • “A policy
4 of inaction or omission may be based on failure to implement procedural safeguards to
5 prevent constitutional violations. To establish that there is a policy based on a failure to
6 preserve constitutional rights, a plaintiff must show, in addition to a constitutional violation,
7 ‘that this policy “amounts to deliberate indifference” to the plaintiff’s constitutional right[,]’
8 and that the policy caused the violation, ‘in the sense that the [municipality] could have
9 prevented the violation with an appropriate policy.’ ” (Tsao, supra, 698 F.3d at p.1143). • “To
10 show deliberate indifference, [plaintiff] must demonstrate ‘that [defendant] was on actual or
11 constructive notice that its omission would likely result in a constitutional violation.’ ” (Tsao,
12 supra, 698 F.3d at p. 1145.) • “[P]laintiff may prove . . . deliberate indifference, through
13 evidence of a ‘failure to investigate and discipline employees in the face of widespread
14 constitutional violations.’ Thus, it is sufficient under our case law to prove a ‘custom’ of
15 encouraging excessive force to provide evidence that personnel have been permitted to use
16 force with impunity.” (Rodriguez v. County of Los Angeles (9th Cir. 2018) 891 F.3d 776,
17 803). “Discussing liability of a municipality under the federal Civil Rights Act based on
18 ‘custom,’ the California Court of Appeal for the Fifth Appellate District recently noted, ‘If
19 the plaintiff seeks to show he was injured by governmental “custom,” he must show that the
20 governmental entity’s “custom” was “made by its lawmakers or by those whose edicts or acts
21 may fairly be said to represent official policy.” ’ ” (Bach v. County of Butte (1983) 147
22 Cal.App.3d 554, 569, fn.11 [195 Cal.Rptr. 268].) The federal courts have recognized that
23 local elected officials and appointed department heads can make official policy or create
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1 official custom sufficient to impose liability under section 1983 on their governmental
2 employers.” (Bach, supra, 147 Cal.App.3d at p. 570.)

3 43. The Defendants engaged in unreasonable search and seizure. The unprovoked and unjustified
4 attack on Plaintiff deprived Ms. Jafari of her right to be secure in her person against
5 unreasonable searches and seizures as guaranteed under the 4th Amendment of the United
6 States Constitution and incorporated and made applicable to states and municipalities by the
7 Due Process Clause of the 14th Amendment to the constitution. Plaintiff posed absolutely no
8 danger to the Defendants whose decision to use excessive force against Plaintiff to harm her
9 for her disabilities was objectively unreasonable.
10
11

12 44. The Defendant County’s LASD has a long history of a practice of encouraging,
13 accommodating, and ratifying the use of excessive force against the residents of the County
14 of Los Angeles. The Defendant County has municipal liability for unconstitutional customs,
15 practices, and policies, and for failing to properly train and supervise its employees. The
16 County did not adequately train and supervise the Defendant deputies to prevent the use of
17 excessive force against Plaintiff and other residents. The County employs and retains
18 deputies that it knows violate the constitutional rights of County residents including through
19 the use of excessive force. The County fails to discipline these deputies for their wrongful
20 acts and by not holding them accountable encourages them to continue to engage in
21 excessive force and other wrongful conduct against residents. The customs and practices of
22 unconstitutional policing is directly connected to the assault and battery committed by
23 Defendants here.
24
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26 45. The County is liable for the Defendant deputies’ conduct as the County ratified said conduct,
27 by failing to hold the deputies to account for use of excessive force and other wrongful
28

1 conduct. Sheriff Villanueva and LASD knew of their employees' ongoing unconstitutional
2 conduct. Defendant Thieme has a history of engaging in excessive force and his attack on
3 Plaintiff was predictable. Deputy Thieme has not been disciplined for his use of excessive
4 force on Plaintiff even though individual deputies in ICIB admit that the District Attorney
5 should criminally prosecute Deputy Thieme.
6

7 46. The deputy's actions deprived Ms. Jafari of her constitutional rights under the 14th
8 amendment. Plaintiff had a right to be free from state actions that would deprive her of
9 liberty. The Defendants were deliberately indifferent to the constitutional rights of Ms. Jafari
10 and their unprovoked attack on Ms. Jafari, cruelly harming her because she is disabled,
11 shocks the conscience. The Defendant deprived Plaintiff of her rights by targeting her based
12 on her disabilities and mental illnesses. The Defendants made the Plaintiff fear for her life as
13 they, unprovoked, attacked her. Plaintiff still fears the deputies will come back to her
14 mother's home and murder her. The Defendants arrested the Plaintiff based on the
15 Defendant's fabricated and self-serving reasons, depriving Plaintiff of due process and her
16 freedom. The Plaintiff was later not charged with a criminal act, as the District Attorney
17 refused to participate in the frame up of Plaintiff and cover up of the Defendants' criminal
18 acts.

19 47. Ms. Jafari has suffered and suffers from brain injury and seizures and from severe distress as
20 a result of wrongful treatment by the Defendants whom mentally, emotionally, and
21 physically abused the Plaintiff.
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SECOND CAUSE OF ACTION

**(DEPRIVATION OF CIVIL RIGHTS UNDER STATE CODE §§ 51 (THE UNRUH ACT)
AND 51.7 (THE RALPH ACT) AND 52.1 (THE BANE ACT) AGAINST THE
DEFENDANT COUNTY OF LOS ANGELES, DEFENDANT KONRAD THIEME, AND
DOE DEFENDANTS 1-10)**

48. Plaintiff repeats and re-alleges as though fully set forth herein each and every allegation contained in paragraphs 1-47 of this complaint.

49. Plaintiff is a member of a protected class, suffering from disabilities arising from her mental illnesses. Her mental illnesses and disabilities are transparent and would be obvious to any police officer or deputy confronting or interacting with her.

50. Under California Civil Code Section 51, the Unruh Civil Rights Act, (a) All persons within the jurisdiction of this state are free and equal, and no matter what their sex, race, color, religion, ancestry, national origin, disability, medical condition, genetic information, marital status, sexual orientation, citizenship, primary language, or immigration status are entitled to the full and equal accommodations, advantages, facilities, privileges, or services in all business establishments of every kind whatsoever. To establish a violation of Civil Code section 52.1, the threats have to interfere with a person's rights under the Constitution or the law. If a person or persons, whether or not acting under color of law, interferes by threats, intimidation, or coercion, or attempts to interfere by threats, intimidation, or coercion, with the exercise or enjoyment by any individual or individuals of rights secured by the Constitution or laws of the United States, or of the rights secured by the Constitution or laws of this state ... Civ. Code § 52.1.

51. Civil Code section 51.7, "The Ralph Act," prohibits all violence or intimidation by threat of violence committed against any person or property because of a person's sex, race, color, religion, ancestry, national origin, disability, medical condition, marital status, sexual orientation, or position in a labor dispute or because of the perception that a person has one or more of these characteristics. The Ralph Act *does not limit* its protections to persons with these explicitly enumerated characteristics, but rather notes that the "identification ... of

1 particular bases of discrimination is illustrative.” (Civ. Code, § 51.7, subd. (a).) The civil
2 right protected by the Ralph Act is the right to be free from violence because of a person’s
3 protected characteristic such as race, sex or sexual orientation.

4 52. Similar to the Bane Act, the Ralph Act does not define any of the three operative words
5 “violence,” “intimidation” or “threat.” Words alone can violate the Ralph Act. (See *Long v.*
6 *Valentino* (1989) 216 Cal.App.3d 1287, 1296-98.) The appropriate standard to determine
7 whether the threatened violence was intimidating is ““would a reasonable person, standing in
8 the shoes of the plaintiff, have been intimidated by the actions of the defendant and have
9 perceived a threat of violence?”” (*Winarto v. Toshiba America Electronics Components,*
10 *Inc.* (9th Cir. 2001) 274 F.3d 1276, 1289-90 [because the victim of the threat in that case was
11 a woman, the Ninth Circuit stated that its test would specifically focus on the standard of “the
12 reasonable woman.”].)

13 53. Here, the deputies violated the Bane and Ralph Acts, as well as Unruh Act by not only
14 making threats, but carrying through cruel violence against the passive, unarmed and not
15 resisting Plaintiff. The Defendants attacked her because she was disabled.

16 54. Plaintiff is informed and believes and thereon alleges that Defendant County and its
17 employee/agent sheriff’s deputies were informed that Plaintiff was and is a vulnerable
18 citizen, suffering from disabilities and mental illnesses. On April 10, 2021, the Defendant
19 Deputies observed and were therefore informed that Plaintiff suffered from a mental illness
20 and that she should be treated with caution and was of no threat to them. In fact, it is because
21 of those very disabilities that the individual Defendant Deputies took sadistic pleasure in
22 “toying” with the Plaintiff.

23 55. When the unarmed Plaintiff turned to walk away backwards from the deputies, they throat
24 punched her to the ground, sat on her and tased her, picked her up by the hair and threw her
25 into the patrol car, then wrote a false police report about they did to her. The Deputies
26 attacked Plaintiff and caused her severe pain even though she was passive the whole incident.
27 The deputies forgot the body cameras were on, as the video proves the County and the
28 individual Defendants are liable for what they did to the Plaintiff, who suffered brain injury

1 as result of the attacks, had seizures and was hospitalized because of the attacks, and is
2 destroyed mental because of the attack on her.

3 56. Deputies in the County's own Internal Criminal Investigation Bureau even found that the
4 Deputies' story did not hold up, and Defendant Thieme has been referred to the District
5 Attorney for prosecution. On the other hand, Deputy Thieme has not been held accountable
6 by LASD for this incident and past incident where he used excessive force. Sheriff
7 Villanueva and LASD has known and knows about Thieme's uses of excessive force and yet
8 Defendant Thieme has not been disciplined for his actions. LASD ratified the conduct of
9 Deputy Thieme and other deputies by giving no discipline for the use of excessive force.

10 57. At all times mentioned herein each of the individual Los Angeles County sheriff's deputies,
11 were working as employees, and acting as agents and servants of the Defendant County and
12 Doe Defendants. The sheriff deputies were acting under the color of law at all times.

13 58. Ms. Jafari has suffered and suffers from severe distress over the wrongful treatment by the
14 Defendant which mentally, emotionally, and physically abused the Plaintiff, and caused
15 physical damages, including a brain injury, and pain and emotional damage suffered by
16 Plaintiff.

17
18 THIRD CAUSE OF ACTION FOR

19 ASSAULT

20 (AGAINST DEFENDANTS, DEPUTY KONRAD THIEME, COUNTY OF LOS

21 ANGELES, DOE DEFENDANTS 1-10)

22
23 59. Plaintiff re-alleges and incorporates by reference the allegations in the preceding 58
24 paragraphs.

25 60. The actions of the Defendants easily meet all elements of the civil action for assault: "The
26 essential elements of a cause of action for assault are: (1) defendant acted with intent to cause
27 harmful or offensive contact, or threatened to touch plaintiff in a harmful or offensive
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1 manner; (2) plaintiff reasonably believed she was about to be touched in a harmful or
2 offensive manner or it reasonably appeared to plaintiff that defendant was about to carry out
3 the threat; (3) plaintiff did not consent to defendant's conduct; (4) plaintiff was harmed; and
4 (5) defendant's conduct was a substantial factor in causing plaintiff's harm." *So v. Shin*
5 (2013), Cal.App.4th 652, at 668-69.
6

7 61. Under the laws of the State of California, deputies are only allowed to use reasonable force to
8 effect an arrest, prevent escape or overcome resistance. Here, there was no legitimate basis
9 for an arrest, and Plaintiff was not resisting or trying to escape. The Defendants actions were
10 intentional, as Ms. Jafari was of no threat to them. Ms. Jafari was attacked because she was
11 disabled.
12

13 62. Defendant Thieme and Doe Defendants intended to cause and did cause the Plaintiff to suffer
14 apprehension of an immediate harmful contact. The Plaintiff did not consent to the
15 Defendants' acts.
16

17 63. Immunity does not apply here where the Defendant deputies engaged in excessive force.
18 *Robinson v. Solano County* (9th Cir. 2002) 278 F. 3d 1007, 1016.

19 64. The Defendant County is liable for assault as it is vicariously liable for the wrongful acts of
20 the Defendant deputies. Pursuant to 815.2 (a) and 820 of the California Government Code,
21 which provides that a public entity is liable for the injuries caused by its employees within
22 the scope of the employment if the employees' acts would subject him or her to liability, as it
23 does here. Further, the County ratified the contact of its employees, the Defendant deputies.
24 LASD and the County has clearly ratified the conduct by failing to properly investigate the
25 wrongdoers for assault and battery in this case here, as well as hundreds of excessive force
26 cases where the Sheriff's Department and the District Attorney have never properly
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1 investigated and never held deputies accountable for their conduct. Defendant Thieme is
2 notorious in LASD for engaging in excessive force against residents without consequences
3 and should not have been on patrol at the of the incident.
4

5 65. As a direct, foreseeable, and proximate cause of Defendants' wrongful conduct, the Plaintiff
6 suffered and continues to suffer humiliation, embarrassment, anxiety, mental anguish,
7 traumatic brain injury, permanent physical injury, and severe emotional distress. The Plaintiff
8 was required to and did employ and will in the future employ physicians and health care
9 providers to examine, treat and care for the Plaintiff, and did, and will in the future, incur
10 medical and incidental expenses. The exact amount of full expenses is unknown to the
11 Plaintiff at this time. The Plaintiff has suffered a loss of earnings in an amount which has not
12 yet been determined, but which will be added by amendment when it is ascertained.
13

14 66. Defendants' acts were done knowingly, and willfully, and Plaintiff is entitled to punitive
15 damages from Deputy Thieme and the Doe Defendants in an amount to be determined by
16 proof at trial.
17

18 67. The County is liable for actions of the Defendants.
19

20 FOURTH CAUSE OF ACTION FOR

21 BATTERY

22 (AGAINST DEFENDANTS, DEPUTY KONRAD THIEME, COUNTY OF LOS

23 ANGELES, DOE DEFENDANTS 1-10)
24

25
26 68. Plaintiff re-alleges and incorporates by reference the allegations in the preceding 67
27 paragraphs.
28

1 69. The actions of Defendant Thieme and the Doe Defendants easily meet all elements of a cause
2 of action for civil battery: “The essential elements of a cause of action for battery are: (1)
3 defendant touched plaintiff, or caused plaintiff to be touched, with the intent to harm or
4 offend plaintiff; (2) plaintiff did not consent to the touching; (3) plaintiff was harmed or
5 offended by defendant's conduct; and (4) a reasonable person in plaintiff's position would
6 have been offended by the touching.” *Shin, supra*, at 669.
7

8 70. When the unarmed Plaintiff turned to walk away backwards from the deputies, they throat
9 punched her to the ground, sat on her and tased her, picked her up by the hair and threw her
10 into the patrol car, as Deputy Thieme and the Defendants cruelly took pleasure in humiliating
11 and harming a defenseless, scared woman.
12

13 71. The Plaintiff did not consent to the Defendants’ violent acts which were under the color of
14 state law, in the scope of the deputies’ employment.
15

16 72. Immunity does not apply here where the Defendant deputies engaged in excessive force.
17 *Robinson v. Solano County* (9th Cir. 2002) 278 F. 3d 1007, 1016.

18 73. The Defendant County is vicariously liable for battery under the California Government
19 Code and liable because the County ratified the contact of its employees, the Defendant
20 deputies. LASD and the County has clearly ratified the conduct by failing to properly
21 investigate Deputy Thieme for previous instances of use of excessive force, properly failed to
22 investigate the wrongdoers for assault and battery in this case here (giving them no discipline
23 for their wrongful and sadistic conduct), as well as hundreds of excessive force cases where
24 the Sheriff’s Department and the District Attorney have never properly investigated and
25 never held deputies accountable for their conduct. The Defendant County is vicariously liable
26 for the battery committed by the Defendant deputies, Pursuant to 815.2 (a) and 820 of the
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1 California Government Code, which provides that a public entity is liable for the injuries
2 caused by its employees within the scope of the employment if the employees' acts would
3 subject him or her to liability, as it does here.
4

5 74. Defendant Thieme is notorious in LASD for engaging in excessive force against residents
6 without consequences and it is unconscionable that he was even on patrol when he attacked
7 Plaintiff.

8 75. As a direct, foreseeable, and proximate cause of Defendants' violent acts, the Plaintiff
9 suffered severe mental anguish and physical pain and traumatic brain injury and suffered
10 humiliation, embarrassment, anxiety, mental anguish, and severe emotional distress. The
11 Plaintiff suffered permanent injury and was mentally destroyed by the Defendants' cruel
12 conduct.
13

14 76. The Plaintiff was required to and did employ and will in the future employ physicians and
15 health care providers to examine, treat and care for Plaintiff, and did, and will in the future,
16 incur medical and incidental expenses. The exact amount of full expenses is unknown to the
17 Plaintiff at this time.
18

19 77. Defendants' vicious and violent acts were done knowingly, willfully, and with intent to harm
20 Plaintiff.
21

22 78. The Plaintiff is entitled to punitive damages against the individual Defendants in an amount
23 to be determined by proof at trial.
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1 5TH CAUSE OF ACTION FOR

2 FALSE IMPRISONMENT

3 (AGAINST DEFENDANTS, DEPUTY KONRAD THIEME, COUNTY OF LOS

4 ANGELES, DOE DEFENDANTS 1-10)

5
6 79. Plaintiff re-alleges and incorporates by reference the allegations in the preceding 78
7 paragraphs.

8 80. Every person has the right of protection from bodily restraint or harm, subject to
9 qualifications and restrictions. CC §43. The tort of false imprisonment is "the unlawful
10 violation of the personal liberty of another." *Asgari v City of Los Angeles* (1997) 15 C4th
11 744, 757; *Fermino v Fedco, Inc.* (1994) 7 C4th 701, 715 (quoting Pen C §236). See *City of*
12 *Newport Beach v Sasse* (1970) 9 CA3d 803, 810 (Penal Code definition applies to both
13 criminal and civil proceedings). See also *Wilson v Houston Funeral Home* (1996) 42 CA4th
14 1124, 1135 (tort is willful and wrongful interference with another's freedom of movement).
15

16
17 81. While Deputy Thieme and the Doe Defendants are law enforcement officers and have the
18 right to stop and arrest residents, they need reasonable suspicion and probable cause to do so.
19 Here, there was no reasonable suspicion or probable cause for their actions. The Defendants
20 were called to the home of Plaintiff's mother to assist with Plaintiff, who suffers from a
21 disability, and was hitting a wall with a door at the home. Plaintiff at all times was unarmed
22 and of no threat to the Defendants and made no threatening movement or gesture toward the
23 deputies. The Defendants understood they had no justification for their actions towards
24 Plaintiff and afterward tried to cover it up by breaking the law and writing a false police
25 report.
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1 82. Deputy Thieme and the Doe Defendants deprived Plaintiff of freedom of movement by use
2 of physical force and placed her under unreasonable duress. The Defendants, without
3 provocation, and without reasonable suspicion or probable cause, physically attacked the
4 Plaintiff, throat punched her to the ground, slamming her body onto her back and the back of
5 her head, sat on her even though she was not resisting, and used a taser to shock her body as
6 she yelped in agony. The Defendants then grabbed her by the hair and threw her violently
7 into the patrol car and falsely arrested her, as the deputies lied that Plaintiff presented some
8 kind of threat to them.
9

10
11 83. Deputy Thieme and the Doe Defendants cruelly tortured and detained Plaintiff for a
12 considerable and appreciable amount of time against her will. Plaintiff did not provide
13 consent to be detained and be cruelly attacked and permanently damaged emotionally and
14 physically by the Defendants.
15

16 84. Plaintiff suffered serious harm from the false imprisonment as she suffered a traumatic brain
17 injury and seizures as a result of the attack. Plaintiff also suffered severe emotional distress
18 as she still, reasonably fears, that the Defendants will return to her mother's home and
19 murder her.
20

21 85. Defendants' actions rendered Plaintiff homeless and mentally destroyed as she is afraid to
22 return to her own home. Defendants' wrongful conduct was a substantial factor in causing
23 the harm to the Plaintiff.
24

25 86. As a direct, foreseeable, and proximate cause of Defendants' wrongful conduct, the Plaintiff
26 suffered a traumatic brain injury and continues to suffer permanent physical injury,
27 humiliation, embarrassment, anxiety, mental anguish, and emotional distress. The Plaintiff
28 was required to and did employ and will in the future employ physicians and health care

1 providers to examine, treat and care for the Plaintiff, and did, and will in the future, incur
2 medical and incidental expenses. The exact amount of full expenses is unknown to the
3 Plaintiff at this time.

4
5 87. The County is vicariously liable for actions of the Defendants under the California
6 Government Code as the wrongful acts were committed by the deputy defendants in the
7 scope of their employment as law enforcement officers.

8
9
10 **SIXTH CAUSE OF ACTION**

11 **NEGLIGENCE AGAINST DEFENDANT COUNTY, DEPUTY KONRAD THIEME, DOE**

12 **DEFENDANTS 1-10))**

13 88. Plaintiff repeats and re-alleges as though fully set forth herein each and every allegation
14 contained in paragraphs 1-87 of this Complaint.

15 89. Pursuant to section 815.2 of the California Government Code, given that the employee
16 Deputy Defendants, Defendant Thieme and the Doe Defendants, were acting within the
17 course and scope of their employment, the Defendant County is liable under respondeat
18 superior.

19
20 90. The Defendants breached their duty of care to Plaintiff as they violently attacked and arrested
21 her and harmed her severely. While all the Deputy Defendants are alleged to have engaged in
22 intentionally wrongful conduct, they also made substantial errors in how they handled the
23 incident with the Plaintiff.

24
25 91. Plaintiff was injured as a proximate and direct cause of the Defendants' breach of care.

26 92. The Defendant County was also negligent in its training and supervision practices, as it has
27 maintained a practice and culture where deputies are not held accountable for use of
28 excessive force, and do not receive sufficient training and supervision to protect the

1 constitutional rights of residents, including Plaintiff. Here, Plaintiff was physically,
2 emotionally, and mentally harmed due to the violation of those rights.

3 93. The Defendant County has a duty of care to protect citizens such as the Plaintiff from use of
4 excessive force. The Defendant knew or should have reasonably known that Deputy Thieme,
5 who has a history of use of excessive force, would harm Plaintiff through the use of
6 excessive force.
7

8 94. The Defendant County had a duty a special duty as well as an ordinary duty of care to protect
9 citizens, given that the deputies are armed with weapons, including tasers, that could
10 seriously injure and easily kill the citizens.
11

12 95. Plaintiff is informed and believes, and on that basis alleges, that the Defendant County
13 breached its duty of care, as Thieme, unprovoked, throat punched Plaintiff causing her to hit
14 her head, and he and the Doe Defendants sat on her and tased her and caused traumatic brain
15 injury.
16

17 96. As a direct, foreseeable and proximate cause of Defendant County's negligence and the
18 resulting acts, Plaintiff suffered severe a traumatic brain injury, mental anguish and physical
19 pain and continues to suffer humiliation, embarrassment, anxiety, mental anguish, and
20 emotional distress. Plaintiff was required to and did employ and will in the future employ
21 physicians and health care providers to examine, treat and care for him, and did, and will in
22 the future, incur medical and incidental expenses. The exact amount of full expenses is
23 unknown to Plaintiff at this time.
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1
2 **PRAYER FOR RELIEF**
3

4 WHEREFORE, Plaintiff prays for Judgment against the Defendant as follows:
5

- 6 1. For special damages, including but not limited to, lost earnings, benefits and/or out-of-
7 pocket expenses in an amount according to proof at the time of trial, all in an amount set
8 forth above and/or according to proof at the time of trial;
- 9 2. For further special damages, including but not limited to, lost future earnings, benefits
10 and other prospective damages in an amount set forth above and/or according to proof at
11 the time of trial;
- 12 3. For general damages, including from severe emotional distress, in an amount set forth
13 above and/or according to proof at the time of trial;
- 14 4. For interest: Pre-Judgment and Post-Judgment at the maximum legal rate;
- 15 5. For costs of suit;
- 16 6. For punitive damages against the individual defendants;
- 17 7. For attorney's fees, pursuant to 42 U.S.C section 1988 and the Bane Act and other state
18 statutes;
- 19 8. That Plaintiff be awarded such further legal and equitable relief as the Court deems
20 proper.
21
22

23 Dated this December 14, 2021

24 THE LAW OFFICES OF VINCENT MILLER

25 *Vincent Miller*
26

27 VINCENT MILLER,

28 Attorney for Plaintiff Sarah Jafari

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REQUEST FOR JURY TRIAL

Dated this December 14, 2021

THE LAW OFFICES OF VINCENT MILLER



Vincent Miller

VINCENT MILLER,
Attorney for Plaintiff Sarah Jafari

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Vincent Miller (SBN 291973) The Law Offices of Vincent Miller 16255 Ventura Boulevard, Suite 625 Encino, CA 91436 TELEPHONE NO.: 213-948-5702 FAX NO.: 818-450-0698 ATTORNEY FOR (Name): Plaintiff Sarah Jafari	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles STREET ADDRESS: 111 N. Hill Street MAILING ADDRESS: CITY AND ZIP CODE: Los Angeles, CA 90012 BRANCH NAME: Stanley Mosk Courthouse	
CASE NAME: Jafari v. County of Los Angeles, et al.	
CIVIL CASE COVER SHEET <input checked="" type="checkbox"/> Unlimited (Amount demanded exceeds \$25,000) <input type="checkbox"/> Limited (Amount demanded is \$25,000 or less)	Complex Case Designation <input type="checkbox"/> Counter <input type="checkbox"/> Joinder Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)
	CASE NUMBER: 21STCV45482 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:

Auto Tort <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46) Other PIP/D/W (Personal Injury/Property Damage/Wrongful Death) Tort <input type="checkbox"/> Asbestos (04) <input type="checkbox"/> Product liability (24) <input type="checkbox"/> Medical malpractice (45) <input type="checkbox"/> Other PIP/D/W (23) Non-PI/PD/W (Other) Tort <input type="checkbox"/> Business tort/unfair business practice (07) <input checked="" type="checkbox"/> Civil rights (08) <input type="checkbox"/> Defamation (13) <input type="checkbox"/> Fraud (16) <input type="checkbox"/> Intellectual property (19) <input type="checkbox"/> Professional negligence (25) <input type="checkbox"/> Other non-PI/PD/W tort (35) Employment <input type="checkbox"/> Wrongful termination (36) <input type="checkbox"/> Other employment (15)	Contract <input type="checkbox"/> Breach of contract/warranty (06) <input type="checkbox"/> Rule 3.740 collections (09) <input type="checkbox"/> Other collections (09) <input type="checkbox"/> Insurance coverage (18) <input type="checkbox"/> Other contract (37) Real Property <input type="checkbox"/> Eminent domain/inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (26) Unlawful Detainer <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38) Judicial Review <input type="checkbox"/> Asset forfeiture (05) <input type="checkbox"/> Petition re: arbitration award (11) <input type="checkbox"/> Writ of mandate (02) <input type="checkbox"/> Other judicial review (39)	Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403) <input type="checkbox"/> Antitrust/Trade regulation (03) <input type="checkbox"/> Construction defect (10) <input type="checkbox"/> Mass tort (40) <input type="checkbox"/> Securities litigation (28) <input type="checkbox"/> Environmental/Toxic tort (30) <input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41) Enforcement of Judgment <input type="checkbox"/> Enforcement of judgment (20) Miscellaneous Civil Complaint <input type="checkbox"/> RICO (27) <input type="checkbox"/> Other complaint (not specified above) (42) Miscellaneous Civil Petition <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> Other petition (not specified above) (43)
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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. <input type="checkbox"/> Large number of separately represented parties | d. <input type="checkbox"/> Large number of witnesses |
| b. <input type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve | e. <input type="checkbox"/> Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court |
| c. <input type="checkbox"/> Substantial amount of documentary evidence | f. <input type="checkbox"/> Substantial postjudgment judicial supervision |
3. Remedies sought (check all that apply): a. monetary b. nonmonetary; declaratory or injunctive relief c. punitive
4. Number of causes of action (specify): **6**
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: **December 14, 2021**
Vincent Miller _____
(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.

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

<p>Auto Tort</p> <ul style="list-style-type: none"> Auto (22)—Personal Injury/Property Damage/Wrongful Death Uninsured Motorist (46) <i>(if the case involves an uninsured motorist claim subject to arbitration, check this item instead of Auto)</i> <p>Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort</p> <ul style="list-style-type: none"> Asbestos (04) <ul style="list-style-type: none"> Asbestos Property Damage Asbestos Personal Injury/Wrongful Death Product Liability <i>(not asbestos or toxic/environmental)</i> (24) Medical Malpractice (45) <ul style="list-style-type: none"> Medical Malpractice—Physicians & Surgeons Other Professional Health Care Malpractice Other PI/PD/WD (23) <ul style="list-style-type: none"> 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 <p>Non-PI/PD/WD (Other) Tort</p> <ul style="list-style-type: none"> Business Tort/Unfair Business Practice (07) Civil Rights (e.g., discrimination, false arrest) <i>(not civil harassment)</i> (08) Defamation (e.g., slander, libel) (13) Fraud (16) Intellectual Property (19) Professional Negligence (25) <ul style="list-style-type: none"> Legal Malpractice Other Professional Malpractice <i>(not medical or legal)</i> Other Non-PI/PD/WD Tort (35) <p>Employment</p> <ul style="list-style-type: none"> Wrongful Termination (36) Other Employment (15) 	<p>Contract</p> <ul style="list-style-type: none"> Breach of Contract/Warranty (06) <ul style="list-style-type: none"> Breach of Rental/Lease Contract <i>(not unlawful detainer or wrongful eviction)</i> Contract/Warranty Breach—Seller Plaintiff <i>(not fraud or negligence)</i> Negligent Breach of Contract/Warranty Other Breach of Contract/Warranty Collections (e.g., money owed, open book accounts) (09) <ul style="list-style-type: none"> Collection Case—Seller Plaintiff Other Promissory Note/Collections Case Insurance Coverage <i>(not provisionally complex)</i> (18) <ul style="list-style-type: none"> Auto Subrogation Other Coverage Other Contract (37) <ul style="list-style-type: none"> Contractual Fraud Other Contract Dispute <p>Real Property</p> <ul style="list-style-type: none"> Eminent Domain/Inverse Condemnation (14) Wrongful Eviction (33) Other Real Property (e.g., quiet title) (26) <ul style="list-style-type: none"> Writ of Possession of Real Property Mortgage Foreclosure Quiet Title Other Real Property <i>(not eminent domain, landlord/tenant, or foreclosure)</i> <p>Unlawful Detainer</p> <ul style="list-style-type: none"> Commercial (31) Residential (32) Drugs (38) <i>(if the case involves illegal drugs, check this item; otherwise, report as Commercial or Residential)</i> <p>Judicial Review</p> <ul style="list-style-type: none"> Asset Forfeiture (05) Petition Re: Arbitration Award (11) Writ of Mandate (02) <ul style="list-style-type: none"> Writ—Administrative Mandamus Writ—Mandamus on Limited Court Case Matter Writ—Other Limited Court Case Review Other Judicial Review (39) <ul style="list-style-type: none"> Review of Health Officer Order Notice of Appeal—Labor Commissioner Appeals 	<p>Provisionally Complex Civil Litigation (Cal. Rules of Court Rules 3.400–3.403)</p> <ul style="list-style-type: none"> Antitrust/Trade Regulation (03) Construction Defect (10) Claims Involving Mass Tort (40) Securities Litigation (28) Environmental/Toxic Tort (30) Insurance Coverage Claims <i>(arising from provisionally complex case type listed above)</i> (41) <p>Enforcement of Judgment</p> <ul style="list-style-type: none"> Enforcement of Judgment (20) <ul style="list-style-type: none"> Abstract of Judgment (Out of County) Confession of Judgment <i>(non-domestic relations)</i> Sister State Judgment Administrative Agency Award <i>(not unpaid taxes)</i> Petition/Certification of Entry of Judgment on Unpaid Taxes Other Enforcement of Judgment Case <p>Miscellaneous Civil Complaint</p> <ul style="list-style-type: none"> RICO (27) Other Complaint <i>(not specified above)</i> (42) <ul style="list-style-type: none"> Declaratory Relief Only Injunctive Relief Only <i>(non-harassment)</i> Mechanics Lien Other Commercial Complaint Case <i>(non-tort/non-complex)</i> Other Civil Complaint <i>(non-tort/non-complex)</i> <p>Miscellaneous Civil Petition</p> <ul style="list-style-type: none"> Partnership and Corporate Governance (21) Other Petition <i>(not specified above)</i> (43) <ul style="list-style-type: none"> 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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**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)

- | | |
|--|---|
| <ul style="list-style-type: none"> 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. | <ul style="list-style-type: none"> 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). |
|--|---|

	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Auto Tort	Auto (22)	<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
Other Personal Injury/ Property Damage/ Wrongful Death Tort	Asbestos (04)	<input type="checkbox"/> A6070 Asbestos Property Damage <input type="checkbox"/> A7221 Asbestos - Personal Injury/Wrongful Death	1, 11 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 <input type="checkbox"/> A7240 Other Professional Health Care Malpractice	1, 4, 11 1, 4, 11
	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	1, 4, 11 1, 4, 11 1, 4, 11
		<input checked="" type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death	1, 4, 11

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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
Non-Personal Injury/ Property Damage/ Wrongful Death Tort	Business Tort (07)	<input type="checkbox"/> A6029 Other Commercial/Business Tort (not fraud/breach of contract)	1, 2, 3
	Civil Rights (08)	<input checked="" 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	1, 2, 3
		<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	
Employment	Wrongful Termination (36)	<input type="checkbox"/> A6037 Wrongful Termination	1, 2, 3
	Other Employment (15)	<input type="checkbox"/> A6024 Other Employment Complaint Case	1, 2, 3
		<input type="checkbox"/> A6109 Labor Commissioner Appeals	10
Contract	Breach of Contract/ Warranty (06) (not insurance)	<input type="checkbox"/> A6004 Breach of Rental/Lease Contract (not unlawful detainer or wrongful eviction)	2, 5
		<input type="checkbox"/> A6008 Contract/Warranty Breach -Seller Plaintiff (no fraud/negligence)	2, 5
		<input type="checkbox"/> A6019 Negligent Breach of Contract/Warranty (no fraud)	1, 2, 5
		<input type="checkbox"/> A6028 Other Breach of Contract/Warranty (not fraud or negligence)	1, 2, 5
	Collections (09)	<input type="checkbox"/> A6002 Collections Case-Seller Plaintiff	5, 6, 11
<input type="checkbox"/> A6012 Other Promissory Note/Collections Case		5, 11	
<input type="checkbox"/> A6034 Collections Case-Purchased Debt (Charged Off Consumer Debt Purchased on or after January 1, 2014)		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	1, 2, 3, 5	
	<input type="checkbox"/> A6031 Tortious Interference	1, 2, 3, 5	
	<input type="checkbox"/> A6027 Other Contract Dispute(not breach/insurance/fraud/negligence)	1, 2, 3, 8, 9	
Real Property	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
	Other Real Property (26)	<input type="checkbox"/> A6018 Mortgage Foreclosure	2, 6
<input type="checkbox"/> A6032 Quiet Title		2, 6	
<input type="checkbox"/> A6060 Other Real Property (not eminent domain, landlord/tenant, foreclosure)		2, 6	
Unlawful Detainer	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
	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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	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Judicial Review	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 <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
Provisionally Complex Litigation	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
Enforcement of Judgment	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
Miscellaneous Civil Complaints	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	
Miscellaneous Civil Petitions	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 With Damages	2, 3, 9
		<input type="checkbox"/> A6123 Workplace Harassment With Damages	2, 3, 9
		<input type="checkbox"/> A6124 Elder/Dependent Adult Abuse Case With Damages	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	

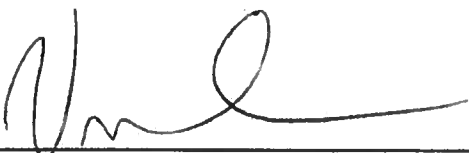
SHORT TITLE: Jafari v. County of Los Angeles, et al.	CASE NUMBER
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Step 4: Statement of Reason and Address: Check the appropriate boxes for the numbers shown under Column C for the type of action that you have selected. Enter the address which is the basis for the filing location, including zip code. (No address required for class action cases).

REASON: <input checked="" 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 checked="" type="checkbox"/> 11.	ADDRESS: 500 W. Temple Avenue Los Angeles, CA 90012			
<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:33%; padding: 2px;">CITY: Los Angeles</td> <td style="width:17%; padding: 2px;">STATE: CA</td> <td style="width:50%; padding: 2px;">ZIP CODE: 90012</td> </tr> </table>	CITY: Los Angeles	STATE: CA	ZIP CODE: 90012	
CITY: Los Angeles	STATE: CA	ZIP CODE: 90012		

Step 5: Certification of Assignment: I certify that this case is properly filed in the Stanley Mosk Courthouse 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: 12/14/2021



 (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.

INSTRUCTIONS FOR HANDLING UNLIMITED CIVIL CASES

The following critical provisions of the California Rules of Court, Title 3, Division 7, as applicable in the Superior Court, are summarized for your assistance.

APPLICATION

The Division 7 Rules were effective January 1, 2007. They apply to all general civil cases.

PRIORITY OVER OTHER RULES

The Division 7 Rules shall have priority over all other Local Rules to the extent the others are inconsistent.

CHALLENGE TO ASSIGNED JUDGE

A challenge under Code of Civil Procedure Section 170.6 must be made within 15 days after notice of assignment for all purposes to a judge, or if a party has not yet appeared, within 15 days of the first appearance.

TIME STANDARDS

Cases assigned to the Independent Calendaring Courts will be subject to processing under the following time standards:

COMPLAINTS

All complaints shall be served within 60 days of filing and proof of service shall be filed within 90 days.

CROSS-COMPLAINTS

Without leave of court first being obtained, no cross-complaint may be filed by any party after their answer is filed. Cross-complaints shall be served within 30 days of the filing date and a proof of service filed within 60 days of the filing date.

STATUS CONFERENCE

A status conference will be scheduled by the assigned Independent Calendar Judge no later than 270 days after the filing of the complaint. Counsel must be fully prepared to discuss the following issues: alternative dispute resolution, bifurcation, settlement, trial date, and expert witnesses.

FINAL STATUS CONFERENCE

The Court will require the parties to attend a final status conference not more than 10 days before the scheduled trial date. All parties shall have motions in limine, bifurcation motions, statements of major evidentiary issues, dispositive motions, requested form jury instructions, special jury instructions, and special jury verdicts timely filed and served prior to the conference. These matters may be heard and resolved at this conference. At least five days before this conference, counsel must also have exchanged lists of exhibits and witnesses, and have submitted to the court a brief statement of the case to be read to the jury panel as required by Chapter Three of the Los Angeles Superior Court Rules.

SANCTIONS

The court will impose appropriate sanctions for the failure or refusal to comply with Chapter Three Rules, orders made by the Court, and time standards or deadlines established by the Court or by the Chapter Three Rules. Such sanctions may be on a party, or if appropriate, on counsel for a party.

This is not a complete delineation of the Division 7 or Chapter Three Rules, and adherence only to the above provisions is therefore not a guarantee against the imposition of sanctions under Trial Court Delay Reduction. Careful reading and compliance with the actual Chapter Rules is imperative.

Class Actions

Pursuant to Local Rule 2.3, all class actions shall be filed at the Stanley Mosk Courthouse and are randomly assigned to a complex judge at the designated complex courthouse. If the case is found not to be a class action it will be returned to an Independent Calendar Courtroom for all purposes.

***Provisionally Complex Cases**

Cases filed as provisionally complex are initially assigned to the Supervising Judge of complex litigation for determination of complex status. If the case is deemed to be complex within the meaning of California Rules of Court 3.400 et seq., it will be randomly assigned to a complex judge at the designated complex courthouse. If the case is found not to be complex, it will be returned to an Independent Calendar Courtroom for all purposes.