



# EXHIBIT 1





CORPORATION SERVICE COMPANY®

SKD / ALL  
Transmittal Number: 15785030  
Date Processed: 10/25/2016

## Notice of Service of Process

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**Primary Contact:** Walgreens Distribution  
Corporation Service Company- Wilmington, DELAWARE  
2711 Centerville Road  
Wilmington, DE 19808

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**Entity:** Walgreen Co.  
Entity ID Number 0501431

**Entity Served:** Walgreen Co

**Title of Action:** Golnaz Kamali vs. Walgreen Co.

**Document(s) Type:** Summons/Complaint

**Nature of Action:** Wrongful Termination

**Court/Agency:** Los Angeles County Superior Court, California

**Case/Reference No:** BC633041

**Jurisdiction Served:** California

**Date Served on CSC:** 10/24/2016

**Answer or Appearance Due:** 30 Days

**Originally Served On:** CSC

**How Served:** Personal Service

**Sender Information:** Tyler F. Clark  
818-741-2101

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Information contained on this transmittal form is for record keeping, notification and forwarding the attached document(s). It does not constitute a legal opinion. The recipient is responsible for interpreting the documents and taking appropriate action.

**To avoid potential delay, please do not send your response to CSC**  
2711 Centerville Road Wilmington, DE 19808 (888) 690-2882 | [sop@cscglobal.com](mailto:sop@cscglobal.com)

SUM-100

**SUMMONS  
(CITACION JUDICIAL)**

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

**WALGREEN CO., a Corporation; and DOES 1-10, inclusive,**

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

**GOLNAZ KAMALI**

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

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

SEP 08 2016

Sherri R. Carter, Executive Officer/Clerk  
By Ricardo Perez Deputy  
Ricardo Perez

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](http://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](http://www.lawhelpcalifornia.org)), the California Courts Online Self-Help Center ([www.courtinfo.ca.gov/selfhelp](http://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](http://www.sucorte.ca.gov)), en la biblioteca de leyes de su condado o en la corte que le queda 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](http://www.lawhelpcalifornia.org)), en el Centro de Ayuda de las Cortes de California, ([www.sucorte.ca.gov](http://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 o 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): Los Angeles County Superior Court  
Stanley Mosk Courthouse  
111 North Hill Street, Los Angeles, California 90012

CASE NUMBER:  
(Número del Caso):

BC633041

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):  
Tyler Clark, Clark Employment Law, APC, 16000 Ventura Blvd., #850, Encino, CA 91436 (818) 741-2101

DATE: **SEP 08 2016** **SHERRI R. CARTER** Clerk, by Ricardo Perez Deputy  
(Fecha) (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

- 1.  as an individual defendant.
- 2.  as the person sued under the fictitious name of (specify):
- 3.  on behalf of (specify): Walgreen Co., a Corporation
  - 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):
- 4.  by personal delivery on (date):

To: 18185613701

From: (4422473714)

09/08/16 08:27 AM

Page 3 of 5

11:45:09 a.m. 09-07-2016 3 NextivaFax

09/07/2016 11:47 PDT TO:12136253244 FROM:8185613701

Page: 3

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

SEP 07 2016

Sherri R. Carter, Executive Officer/Clerk  
By Ricardo Perez Deputy  
Ricardo Perez

Dept. 61  
Hon. Gregory Keosian

1 Tyler F. Clark (SBN 258309)  
2 Yi-Hsuan Rachel Lin (SBN 283632)  
3 **CLARK EMPLOYMENT LAW, APC**  
4 16000 Ventura Boulevard, Suite 850  
5 Encino, California 91436  
6 Telephone: (818) 741-2101  
7 Facsimile: (818) 561-3701  
8 Email: tyler@clarkemploymentlaw.com  
9 Email: rachel@clarkemploymentlaw.com

10 Attorneys for Plaintiff  
11 Golnaz Kamali

12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
13 **COUNTY OF LOS ANGELES**

14 **GOLNAZ KAMALI,**  
15 **Plaintiff,**

16 v.

17 **WALGREEN CO., a Corporation; and DOES**  
18 **1-10, inclusive,**  
19 **Defendants.**

CASE NO.: **BC 693 041**

[Unlimited Jurisdiction]

**COMPLAINT FOR DAMAGES**

- 1. Retaliation in Violation of Labor Code Sections 1102.5(b) & (c);
- 2. Wrongful Discharge in Violation of Public Policy; and
- 3. Civil Penalties Pursuant to Labor Code Private Attorneys General Act

**[JURY TRIAL DEMANDED]**

CIT/CORSE: BC633041  
LEA/DEF#:   
RECEIPT #: CCH521665040  
DATE PAID: 09/07/16 03:07 PM  
PAYMENT: \$435.00 310  
RECEIVED:   
CHECK: \$0.00  
CASH: \$0.00  
CHANGE: \$0.00  
CARD: \$435.00

COMPLAINT  
Opt-Out: Not Defined

1 Plaintiff Golnaz Kamali, demanding a jury trial, brings this action against Defendants  
2 Walgreen Co., a Corporation, and DOES 1-10 for: general, compensatory, punitive and statutory  
3 damages, penalties, costs and attorneys' fees, resulting from defendants' unlawful conduct, and as  
4 grounds therefore alleges as follows:

5 **PARTIES**

6 1. Plaintiff Golnaz Kamali ("Ms. Kamali" or "Plaintiff"), is, and at all relevant times  
7 was, an adult female residing in Los Angeles County, California.

8 2. At all times material to this complaint, Defendant Walgreen Co. ("Defendant"), was  
9 and is an Illinois corporation doing business in the State of California and within the county of Los  
10 Angeles. Further, Plaintiff was hired to perform work and did perform work for Defendant in the  
11 County of Los Angeles, wherein she alleges the unlawful employment practices that are the subject  
12 of this Complaint took place.

13 3. Plaintiff is further informed and believes that Defendant maintains records relevant to  
14 her employment at 20901 Devonshire Street, Chatsworth, California 91311.

15 4. The true names and capacities of those individuals, corporations, associations, or  
16 other entities sued as DOES 1-10 are unknown to Plaintiff, who therefore sues these defendants by  
17 such fictitious names. Plaintiff will seek leave of court to amend this complaint to show their true  
18 names and capacities when ascertained.

19 5. Plaintiff is informed, believes, and on that basis alleges, that each defendant sued  
20 under such fictitious names (DOES 1-10) is in some manner responsible for the occurrences herein  
21 alleged, and that Plaintiff's injuries as herein alleged were proximately caused by the conduct of  
22 such defendants.

23 6. Plaintiff is informed and believes and thereupon alleges that, at all times material  
24 herein, each defendant was functioning as the agent, servant, partner, employee and/or working in  
25 concert with his, her or its co-defendant and was acting within the course and scope of such agency,  
26 partnership, employment and/or concerted activity. To the extent that certain acts and omissions  
27 were perpetrated by certain defendants, the remaining defendants confirmed and ratified said acts  
28 and omissions of the co-defendants, and in doing the actions mentioned below were acting within the

1 course and scope of his, her or its authority as such agent, servant, partner, and employee with the  
2 permission, consent and ratification of the co-defendants.

3 7. Whenever and wherever reference is made in this complaint to any act or failure to  
4 act by a defendant or defendants, such allegations and reference shall also be deemed to mean the  
5 acts and failures to act of each defendant acting individually, jointly, and severally. Whenever and  
6 wherever reference is made to individuals who are not named as plaintiff or defendants in this  
7 complaint but who were employees/agents of defendants, such individuals at all relevant times acted  
8 on behalf of Defendant within the course and scope of their employment.

9 8. Plaintiff is informed and believes and thereupon alleges that, at all times material  
10 herein, defendants and each of them, and/or their agents/employees or supervisors, authorized,  
11 condoned and ratified the unlawful conduct of each other.

12 9. Plaintiff is informed and believes and thereupon alleges that, at all times material  
13 herein, defendants, and/or their agents/employees knew or reasonably should have known that unless  
14 they intervened to protect Plaintiff, and to adequately supervise, prohibit, control, regulate,  
15 discipline, and/or otherwise penalize the conduct of the employees of Defendant set forth above, the  
16 remaining defendants and employees perceived the conduct and omissions as being ratified and  
17 condoned.

18 **FACTUAL ALLEGATIONS RELEVANT TO ALL CAUSES OF ACTION**

19 10. Plaintiff incorporates each allegation set forth in paragraphs 1 through 9.

20 11. On or around May 4, 2011, Ms. Kamali was hired by Defendant as a Pharmacist. Ms.  
21 Kamali was a "floating" Pharmacist in that she was assigned to multiple locations in Southern  
22 California, as needed. As a Pharmacist, Ms. Kamali's job responsibilities included, but were not  
23 limited to, counseling patients, preparing medications by reviewing and interpreting physician  
24 orders, dispensing medications, controlling medications by monitoring drug therapies, maintaining  
25 pharmacy records. At all relevant times during her employment, Ms. Kamali was performing her job  
26 satisfactorily.

27 12. During her employment, Ms. Kamali learned that some of Defendant's pharmacies  
28 were dispensing certain controlled substances in a manner that was inconsistent with its obligation

1 under various federal and state regulations in that the controlled substances were dispensed to  
2 customers even though the prescriptions failed to meet Defendant's own Controlled Substance  
3 Prescriptions and Good Faith Dispensing Policy and Procedures. Ms. Kamali complained to various  
4 pharmacists-in-charge, pharmacy managers, and district managers about Defendant's failure to  
5 adhere to its legal obligations for dispensing controlled substances. However, Ms. Kamali's  
6 complaints were largely ignored. Ms. Kamali continued to complain/oppose what she reasonably  
7 believed to be a violation of state or federal statute, or a violation of or non-compliance with a local,  
8 state, or federal rule or regulation, including but not limited to, California Business and Professions  
9 Code sections 4052.01, 4301, 4306, 4306.5; California Health and Safety Code sections 11152-  
10 11154, 11156, 11158; California Code of Regulations, title 16, sections 1746.3, 1761; 21 U.S.C. §  
11 842; 21 C.F.R. §§ 1301.74, 1306.04; California Business and Professions Code § 17200, among  
12 others.

13 13. In or about July 2015, Ms. Kamali was written up for refusing to fill prescriptions that  
14 Ms. Kamali, in her professional judgment, reasonably believed should not be filled for a legitimate  
15 medical purpose. Mr. Kamali challenged this write-up and informed her superiors of the reason why  
16 she did not fill the prescriptions.

17 14. In or about August, 2015, Ms. Kamali was again written up for refusing to fill  
18 prescriptions under the guise of poor "customer service." Ms. Kamali complained to District  
19 Manager Cori Evans ("Manager Evans") concerning the write-ups because she reasonably believed  
20 that it was unlawful for Defendant to discipline or otherwise retaliate against the pharmacist for  
21 refusing to dispense controlled substances that the pharmacist believed were not for a legitimate  
22 medical purpose. Ms. Kamali also informed Manager Evans that she did not want to dispense any  
23 controlled substances that, in her professional opinion, were not for a legitimate medical purpose.

24 15. On or about September 3, 2015, Ms. Kamali declined to fill a prescription that in her  
25 professional judgment should not have been refilled. After the customer left, Ms. Kamali re-checked  
26 the customer's record on the Controlled Substance Utilization Review and Evaluation System  
27 ("CURES"), a database of Schedule II, III and IV controlled substance prescriptions dispensed in  
28 California, and realized that she had reviewed the wrong patient's record on CURES. Realizing her

1 error, Ms. Kamali called the customer and informed the customer that his prescription would be  
2 filled the next day. The customer came in the next day and his prescription was filled. On  
3 information and belief, the customer never complained to Defendant.

4 16. On or around September 24, 2015, Defendant terminated Ms. Kamali's employment  
5 under the pretext of "customer service" issues. In reality, a contributing factor in Defendant's  
6 decision to terminate Ms. Kamali was due to her complaining/opposing what she reasonably  
7 believed was an unlawful business practice (i.e. refusing to fill prescriptions for customers that she,  
8 in her professional judgment, did not believe were for a legitimate medical purpose).

9 17. On August 18, 2016, Plaintiff provided written notice to the California Labor and  
10 Workforce Development Agency ("LWDA") by e-mail at [PAGAfilings@dir.ca.gov](mailto:PAGAfilings@dir.ca.gov) and to  
11 Defendant via certified mail specifying the Labor Code provisions violated and describing the facts  
12 and theories to support the particular violations. Plaintiff also paid a filing fee to the LWDA for the  
13 filing of her PAGA claim notice.

14 18. Plaintiff has yet to receive a response from the LWDA, however, Plaintiff anticipates  
15 that the LWDA will decline to investigate her claims. Plaintiff will amend this Complaint to  
16 conform to proof once a response is received from the LWDA or 60 days has passed from the date of  
17 notice provided to the LWDA.

18 **FIRST CAUSE OF ACTION**

19 (RETALIATION IN VIOLATION OF LABOR CODE SECTIONS 1102.5(b) & (c) –  
20 AGAINST ALL DEFENDANTS)

21 19. Plaintiff incorporates each allegation set forth in paragraphs 1 through 18.

22 20. At all times relevant to this Complaint, Plaintiff was employed by Defendants.

23 21. At all times relevant to this Complaint, California Labor Code section 1102.5 was in  
24 effect and applied to Defendants. Labor Code section 1102.5, subdivision (b) provides in part that  
25 an employer may not retaliate against an employee for disclosing information, or because the  
26 employer believes that the employee disclosed or may disclose information, to a government or law  
27 enforcement agency, to a person with authority over the employee or another employee who has the  
28 authority to investigate, discover, or correct the violation or noncompliance, if the employee has



1 reasonable cause to believe that the information discloses a violation of state or federal statute, or a  
2 violation of or noncompliance with a local, state, or federal rule or regulation. Further, Labor Code  
3 section 1102.5, subdivision (c) provides in part that an employer may not retaliate against any  
4 employee for refusing to participate in an activity that would result in a violation of state or federal  
5 statute, or a violation of or noncompliance with a state or federal rule or regulation.

6 22. Plaintiff engaged in legally protected activity covered by section 1102.5, subdivision  
7 (b) by reporting what she reasonably believed to be unlawful conduct to Defendants' agents,  
8 officers, or directors who had authority over Plaintiff and/or over Defendants' other employees with  
9 authority to investigate, discover, or correct the violations/noncompliance, and/or Defendants' belief  
10 that she would report or have reported what she reasonably believed to be unlawful conduct to a  
11 government or law enforcement agency. Further, Plaintiff engaged in legally protected activity  
12 covered by section 1102.5, subdivision (c) by refusing to participate in what she reasonably believed  
13 to be unlawful conduct.

14 23. Defendants discharged Plaintiff.

15 24. Plaintiff's report to Defendant or Defendant's belief that Plaintiff would report or  
16 have reported to a government or law enforcement agency about what she reasonably believed was  
17 unlawful conduct and/or her refusal to participate in unlawful conduct resulted in retaliation against  
18 her and the termination of her employment.

19 25. As a direct and foreseeable result of the aforesaid acts of Defendants, Plaintiff has  
20 lost and will continue to lose income and benefits in an amount to be proven at the time of trial.  
21 Plaintiff claims such amount as damages together with pre-judgment interest pursuant to Civil Code  
22 section 3287 and/or any other provision of law providing for pre-judgment interest.

23 26. As a result of the aforesaid acts of Defendants, Plaintiff claims general damages for  
24 mental and emotional distress and aggravation in an amount to be proven at the time of trial.

25 27. The above described acts of Defendants, by and through their managing agents,  
26 officers, or directors, were engaged in with a deliberate, cold, callous, fraudulent and intentional  
27 manner to injure and damage Plaintiff and/or with a conscious disregard for Plaintiff's rights. Such  
28 acts were despicable, and constitute malice, fraud and/or oppression within the meaning of Civil

1 Code section 3294. Plaintiff requests an assessment of punitive damages against Defendants, in an  
2 amount to be proven at the time of trial.

3 28. As a proximate result of the foregoing conduct, which violated the provisions of  
4 Labor Code section 1102.5, subdivisions (b) and (c), Plaintiff has been forced to and will incur  
5 attorney's fees and costs in the prosecution of this claim, in an amount to be proven at trial.

6 29. Pursuant to Labor Code section 1102.5, subdivision (f), an employer that is a  
7 corporation or limited liability company is liable for a civil penalty not exceeding ten thousand  
8 dollars (\$10,000) for each violation of section 1102.5.

9 **SECOND CAUSE OF ACTION**

10 (WRONGFUL DISCHARGE IN VIOLATION OF PUBLIC POLICY –  
11 AGAINST ALL DEFENDANTS)

12 30. Plaintiff incorporates each allegation s set forth in paragraphs 1 through 29.

13 31. Plaintiff complained about what she reasonably believed was unlawful conduct and/or  
14 refused to participate in said conduct. Following Plaintiff's complaint concerning what she  
15 reasonably believed was unlawful conduct and/or her refusal to participate in said conduct, Plaintiff  
16 was terminated.

17 32. Plaintiff's refusal to participate and/or her complaints of what she reasonably and in  
18 good faith believed to be Defendants' violation of a state or federal statute or a violation  
19 of/noncompliance with a state or federal rule or regulation, along with her engaging in other  
20 statutorily and constitutionally protected activities, were substantial motivating reasons for  
21 Defendants' decision to terminate Plaintiff's employment.

22 33. Defendants' conduct is in violation of, among other things, the public policies  
23 embodied in California Labor Code § 1102.5; California Business and Professions Code sections  
24 4052.01, 4301, 4306, 4306.5; California Health and Safety Code sections 11152–11154, 11156,  
25 11158; California Code of Regulations, title 16 , sections 1746.3, 1761; 21 U.S.C. § 842; 21 C.F.R.  
26 §§ 1301.74, 1306.04; California Business and Professions Code § 17200; and such conduct has  
27 resulted in damage and injury to Plaintiff as alleged herein.  
28



1           41. Plaintiff is also entitled to, and seeks, all reasonable attorney’s fees and costs of suit  
2 pursuant to Labor Code section 2699(g).

3

4

**PRAYER FOR RELIEF**

5

**WHEREFORE**, Plaintiff Golnaz Kamali prays for judgment against Defendants, jointly and  
6 severally, as follows:

7

**ON THE FIRST CAUSE OF ACTION**

8

1. For past and present compensatory damages according to proof and prejudgment  
9 interest thereon to the extent allowable by law;

10

2. For exemplary and punitive damages according to proof;

11

3. For civil penalties under California Labor Code sections 1102.5 subdivision (f);

12

4. For injunctive and equitable relief;

13

5. For attorneys’ fees and costs of suit; and

14

6. For such other and further relief as the Court deems proper.

15

**ON THE SECOND CAUSE OF ACTION**

16

1. For past and present compensatory damages according to proof and prejudgment  
17 interest thereon to the extent allowable by law;

18

2. For exemplary and punitive damages according to proof;

19

3. For injunctive and equitable relief; and

20

4. For such other and further relief as the Court deems proper.

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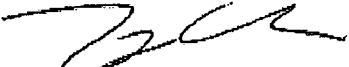
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**ON THE THIRD CAUSE OF ACTION**

- 1. For a civil penalty as stated in California Labor Code section 2699 subdivision (f);
- 2. For attorneys' fees and costs; and
- 3. For such other and further relief as the Court deems proper.

Dated: September 7, 2016

CLARK EMPLOYMENT LAW, APC

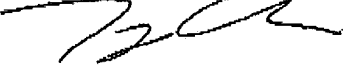
By:   
 Tyler F. Clark, Esq.  
 Yi-Hsuan Rachel Lin, Esq.  
 Attorneys for Plaintiff Golnaz Kamali

**DEMAND FOR JURY TRIAL**

Plaintiff hereby demands a trial by jury.

Dated: September 7, 2016

CLARK EMPLOYMENT LAW, APC

By:   
 Tyler F. Clark, Esq.  
 Yi-Hsuan Rachel Lin, Esq.  
 Attorneys for Plaintiff Golnaz Kamali

11:45:09 a.m. 09-07-2016 13 NextivaFax

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CM-010

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Tyler F. Clark (SBN 258309) Yi-Hsuan Rachel Lin (SBN 283632) CLARK EMPLOYMENT LAW, APC 16000 Ventura Boulevard, Suite 850, Encino, California 91436 TELEPHONE NO.: (818) 741-2101 FAX NO.: (818) 561-3701 ATTORNEY FOR (Name): Plaintiff Golnaz Kamali		FOR COURT USE ONLY  <b>FILED</b> Superior Court of California County of Los Angeles  <b>SEP 07 2016</b>  Sherri B. Carter, Executive Officer/Clerk By <u>Ricardo Perez</u> Deputy
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES STREET ADDRESS: 111 North Hill Street MAILING ADDRESS: 111 North Hill Street CITY AND ZIP CODE: Los Angeles, California 90012 BRANCH NAME: Stanley Mosk Courthouse		
CASE NAME: Kamali v. Walgreen Co., et al.		CASE NUMBER: <b>BC 633 041</b>  JUDGE:  DEPT:
<b>CIVIL CASE COVER SHEET</b> <input checked="" type="checkbox"/> <b>Unlimited</b> (Amount demanded exceeds \$25,000)	<input type="checkbox"/> <b>Limited</b> (Amount demanded is \$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:

<b>Auto Tort</b> <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46)	<b>Contract</b> <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)	<b>Provisionally Complex Civil Litigation</b> (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)
<b>Other P/IPD/W/D (Personal Injury/Property Damage/Wrongful Death) Tort</b> <input type="checkbox"/> Asbestos (04) <input type="checkbox"/> Product liability (24) <input type="checkbox"/> Medical malpractice (45) <input type="checkbox"/> Other P/IPD/W/D (23)	<b>Real Property</b> <input type="checkbox"/> Eminent domain/Inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (26)	<b>Enforcement of Judgment</b> <input type="checkbox"/> Enforcement of judgment (20)
<b>Non-P/IPD/W/D (Other) Tort</b> <input type="checkbox"/> Business tort/unfair business practice (07) <input type="checkbox"/> Civil rights (08) <input type="checkbox"/> Defamation (13) <input type="checkbox"/> Fraud (16) <input type="checkbox"/> Intellectual property (19) <input type="checkbox"/> Professional negligence (25) <input type="checkbox"/> Other non-P/IPD/W/D tort (35)	<b>Unlawful Detainer</b> <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38)	<b>Miscellaneous Civil Complaint</b> <input type="checkbox"/> RICO (27) <input type="checkbox"/> Other complaint (not specified above) (42)
<b>Employment</b> <input checked="" type="checkbox"/> Wrongful termination (36) <input type="checkbox"/> Other employment (15)	<b>Judicial Review</b> <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)	<b>Miscellaneous Civil Petition</b> <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> Other petition (not specified above) (43)

2. This case  is  is not complex under rule 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): Three (3)
5. This case  is  is not a class action suit.
6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)

Date: September 7, 2016.  
Tyler F. Clark, Esq.

(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.

Page 1 of 2

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 Judicial Administration, std. 3.10  
www.courtinfo.ca.gov

Opt-Out: Not Defined

CM-010

**INSTRUCTIONS ON HOW TO COMPLETE THE COVER SHEET**

**To Plaintiffs and Others Filing First Papers.** If you are filing a first paper (for example, a complaint) in a civil case, you **must** complete and file, along with your first paper, the *Civil Case Cover Sheet* contained on page 1. This information will be used to compile statistics about the types and numbers of cases filed. You must complete items 1 through 6 on the sheet. In item 1, you must check **one** box for the case type that best describes the case. If the case fits both a general and a more specific type of case listed in item 1, check the more specific one. If the case has multiple causes of action, check the box that best indicates the **primary** cause of action. To assist you in completing the sheet, examples of the cases that belong under each case type in item 1 are provided below. A cover sheet must be filed only with your initial paper. Failure to file a cover sheet with the first paper filed in a civil case may subject a party, its counsel, or both to sanctions under rules 2.30 and 3.220 of the California Rules of Court.

**To Parties in Rule 3.740 Collections Cases.** A "collections case" under rule 3.740 is defined as an action for recovery of money owed in a sum stated to be certain that is not more than \$25,000, exclusive of interest and attorney's fees, arising from a transaction in which property, services, or money was acquired on credit. A collections case does not include an action seeking the following: (1) tort damages, (2) punitive damages, (3) recovery of real property, (4) recovery of personal property, or (5) a prejudgment writ of attachment. The identification of a case as a rule 3.740 collections case on this form means that it will be exempt from the general time-for-service requirements and case management rules, unless a defendant files a responsive pleading. A rule 3.740 collections case will be subject to the requirements for service and obtaining a judgment in rule 3.740.

**To Parties in Complex Cases.** In complex cases only, parties must also use the *Civil Case Cover Sheet* to designate whether the case is complex. If a plaintiff believes the case is complex under rule 3.400 of the California Rules of Court, this must be indicated by completing the appropriate boxes in items 1 and 2. If a plaintiff designates a case as complex, the cover sheet must be served with the complaint on all parties to the action. A defendant may file and serve no later than the time of its first appearance a joinder in the plaintiff's designation, a counter-designation that the case is not complex, or, if the plaintiff has made no designation, a designation that the case is complex.

**CASE TYPES AND EXAMPLES****Auto Tort**

Auto (22)—Personal Injury/Property Damage/Wrongful Death  
Uninsured Motorist (46) (*if the case involves an uninsured motorist claim subject to arbitration, check this item instead of Auto*)

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

Asbestos (04)  
Asbestos Property Damage  
Asbestos Personal Injury/Wrongful Death  
Product Liability (*not asbestos or toxic/environmental*) (24)  
Medical Malpractice (45)  
Medical Malpractice—  
Physicians & Surgeons  
Other Professional Health Care Malpractice  
Other PI/PD/WD (23)  
Premises Liability (e.g., slip and fall)  
Intentional Bodily Injury/PD/WD (e.g., assault, vandalism)  
Intentional Infliction of Emotional Distress  
Negligent Infliction of Emotional Distress  
Other PI/PD/WD

**Non-PI/PD/WD (Other) Tort**

Business Tort/Unfair Business Practice (07)  
Civil Rights (e.g., discrimination, false arrest) (*not civil harassment*) (08)  
Defamation (e.g., slander, libel) (13)  
Fraud (16)  
Intellectual Property (19)  
Professional Negligence (25)  
Legal Malpractice  
Other Professional Malpractice (*not medical or legal*)  
Other Non-PI/PD/WD Tort (35)

**Employment**

Wrongful Termination (36)  
Other Employment (15)

**Contract**

Breach of Contract/Warranty (06)  
Breach of Rental/Lease  
Contract (*not unlawful detainer or wrongful eviction*)  
Contract/Warranty Breach—Seller Plaintiff (*not fraud or negligence*)  
Negligent Breach of Contract/Warranty  
Other Breach of Contract/Warranty  
Collections (e.g., money owed, open book accounts) (09)  
Collection Case—Seller Plaintiff  
Other Promissory Note/Collections Case  
Insurance Coverage (*not provisionally complex*) (18)  
Auto Subrogation  
Other Coverage  
Other Contract (37)  
Contractual Fraud  
Other Contract Dispute

**Real Property**

Eminent Domain/Inverse Condemnation (14)  
Wrongful Eviction (33)  
Other Real Property (e.g., quiet title) (26)  
Writ of Possession of Real Property  
Mortgage Foreclosure  
Quiet Title  
Other Real Property (*not eminent domain, landlord/tenant, or foreclosure*)

**Unlawful Detainer**

Commercial (31)  
Residential (32)  
Drugs (38) (*if the case involves illegal drugs, check this item; otherwise, report as Commercial or Residential*)

**Judicial Review**

Asset Forfeiture (05)  
Petition Re: Arbitration Award (11)  
Writ of Mandate (02)  
Writ—Administrative Mandamus  
Writ—Mandamus on Limited Court Case Matter  
Writ—Other Limited Court Case Review  
Other Judicial Review (39)  
Review of Health Officer Order  
Notice of Appeal—Labor Commissioner Appeals

**Provisionally Complex Civil Litigation (Cal. Rules of Court Rules 3.400–3.403)**

Antitrust/Trade Regulation (03)  
Construction Defect (10)  
Claims Involving Mass Tort (40)  
Securities Litigation (28)  
Environmental/Toxic Tort (30)  
Insurance Coverage Claims (*arising from provisionally complex case type listed above*) (41)

**Enforcement of Judgment**

Enforcement of Judgment (20)  
Abstract of Judgment (Out of County)  
Confession of Judgment (*non-domestic relations*)  
Sister State Judgment  
Administrative Agency Award (*not unpaid taxes*)  
Petition/Certification of Entry of Judgment on Unpaid Taxes  
Other Enforcement of Judgment Case

**Miscellaneous Civil Complaint**

RICO (27)  
Other Complaint (*not specified above*) (42)  
Declaratory Relief Only  
Injunctive Relief Only (*non-harassment*)  
Mechanics Lien  
Other Commercial Complaint Case (*non-tort/non-complex*)  
Other Civil Complaint (*non-tort/non-complex*)

**Miscellaneous Civil Petition**

Partnership and Corporate Governance (21)  
Other Petition (*not specified above*) (43)  
Civil Harassment  
Workplace Violence  
Elder/Dependent Adult Abuse  
Election Contest  
Petition for Name Change  
Petition for Relief From Late Claim  
Other Civil Petition

SHORT TITLE: Kamali v. Walgreen Co., et al.	CASE NUMBER <b>BC 633 041</b>
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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.

Item I. Check the types of hearing and fill in the estimated length of hearing expected for this case:

JURY TRIAL?  YES CLASS ACTION? YES LIMITED CASE? YES TIME ESTIMATED FOR TRIAL 10 HOURS/DAYS

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

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

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

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

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

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

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

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



SHORT TITLE: Kamali v. Walgreen Co., et al.	CASE NUMBER
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	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
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., 3.
	Civil Rights (08)	<input type="checkbox"/> A6005 Civil Rights/Discrimination	1., 2., 3.
	Defamation (13)	<input type="checkbox"/> A6010 Defamation (slander/libel)	1., 2., 3.
	Fraud (16)	<input type="checkbox"/> A6013 Fraud (no contract)	1., 2., 3.
	Professional Negligence (25)	<input type="checkbox"/> A6017 Legal Malpractice <input type="checkbox"/> A6050 Other Professional Malpractice (not medical or legal)	1., 2., 3. 1., 2., 3.
	Other (35)	<input type="checkbox"/> A6025 Other Non-Personal Injury/Property Damage tort	2.,3.
Employment	Wrongful Termination (36)	<input checked="" type="checkbox"/> A6037 Wrongful Termination	1., 2., 3.
	Other Employment (15)	<input type="checkbox"/> A6024 Other Employment Complaint Case <input type="checkbox"/> A6109 Labor Commissioner Appeals	1., 2., 3. 10.
Contract	Breach of Contract/ Warranty (06) (not insurance)	<input type="checkbox"/> A6004 Breach of Rental/Lease Contract (not unlawful detainer or wrongful eviction) <input type="checkbox"/> A6008 Contract/Warranty Breach -Seller Plaintiff (no fraud/negligence) <input type="checkbox"/> A6019 Negligent Breach of Contract/Warranty (no fraud) <input type="checkbox"/> A6028 Other Breach of Contract/Warranty (not fraud or negligence)	2., 5. 2., 5. 1., 2., 5. 1., 2., 5.
	Collections (09)	<input type="checkbox"/> A6002 Collections Case-Seller Plaintiff <input type="checkbox"/> A6012 Other Promissory Note/Collections Case <input type="checkbox"/> A6034 Collections Case-Purchased Debt (Charged Off Consumer Debt Purchased on or after January 1, 2014)	2., 5., 6, 11 2., 5, 11 5, 6, 11
	Insurance Coverage (18)	<input type="checkbox"/> A6015 Insurance Coverage (not complex)	1., 2., 5., 8.
	Other Contract (37)	<input type="checkbox"/> A6009 Contractual Fraud <input type="checkbox"/> A6031 Tortious Interference <input type="checkbox"/> A6027 Other Contract Dispute(not breach/insurance/fraud/negligence)	1., 2., 3., 5. 1., 2., 3., 5. 1., 2., 3., 8.
	Eminent Domain/Inverse Condemnation (14)	<input type="checkbox"/> A7300 Eminent Domain/Condemnation      Number of parcels_____	2.
	Wrongful Eviction (33)	<input type="checkbox"/> A6023 Wrongful Eviction Case	2., 6.
Real Property	Other Real Property (26)	<input type="checkbox"/> A6018 Mortgage Foreclosure <input type="checkbox"/> A6032 Quiet Title <input type="checkbox"/> A6060 Other Real Property (not eminent domain, landlord/tenant, foreclosure)	2., 6. 2., 6. 2., 6.
	Unlawful Detainer-Commercial (31)	<input type="checkbox"/> A6021 Unlawful Detainer-Commercial (not drugs or wrongful eviction)	2., 6.
	Unlawful Detainer-Residential (32)	<input type="checkbox"/> A6020 Unlawful Detainer-Residential (not drugs or wrongful eviction)	2., 6.
Unlawful Detainer	Unlawful Detainer- Post-Foreclosure (34)	<input type="checkbox"/> A6020F Unlawful Detainer-Post-Foreclosure	2., 6.
	Unlawful Detainer-Drugs (38)	<input type="checkbox"/> A6022 Unlawful Detainer-Drugs	2., 6.

SHORT TITLE: Kamali v. Walgreen Co., et al.	CASE NUMBER
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	<b>A</b> Civil Case Cover Sheet Category No.	<b>B</b> Type of Action (Check only one)	<b>C</b> Applicable Reasons - See Step 3 Above
<b>Judicial Review</b>	Asset Forfeiture (05)	<input type="checkbox"/> A6108 Asset Forfeiture Case	2., 6.
	Petition re Arbitration (11)	<input type="checkbox"/> A6115 Petition to Compel/Confirm/Vacate Arbitration	2., 5.
	Writ of Mandate (02)	<input type="checkbox"/> A6151 Writ - Administrative Mandamus <input type="checkbox"/> A6152 Writ - Mandamus on Limited Court Case Matter <input type="checkbox"/> A6153 Writ - Other Limited Court Case Review	2., 8. 2. 2.
	Other Judicial Review (39)	<input type="checkbox"/> A6150 Other Writ /Judicial Review	2., 8.
<b>Provisionally Complex Litigation</b>	Antitrust/Trade Regulation (03)	<input type="checkbox"/> A6003 Antitrust/Trade Regulation	1., 2., 8.
	Construction Defect (10)	<input type="checkbox"/> A6007 Construction Defect	1., 2., 3.
	Claims Involving Mass Tort (40)	<input type="checkbox"/> A6006 Claims Involving Mass Tort	1., 2., 8.
	Securities Litigation (28)	<input type="checkbox"/> A6035 Securities Litigation Case	1., 2., 8.
	Toxic Tort Environmental (30)	<input type="checkbox"/> A6036 Toxic Tort/Environmental	1., 2., 3., 8.
	Insurance Coverage Claims from Complex Case (41)	<input type="checkbox"/> A6014 Insurance Coverage/Subrogation (complex case only)	1., 2., 5., 8.
<b>Enforcement of Judgment</b>	Enforcement of Judgment (20)	<input type="checkbox"/> A6141 Sister State Judgment	2., 9.
		<input type="checkbox"/> A6160 Abstract of Judgment	2., 6.
		<input type="checkbox"/> A6107 Confession of Judgment (non-domestic relations)	2., 9.
		<input type="checkbox"/> A6140 Administrative Agency Award (not unpaid taxes)	2., 8.
		<input type="checkbox"/> A6114 Petition/Certificate for Entry of Judgment on Unpaid Tax	2., 8.
		<input type="checkbox"/> A6112 Other Enforcement of Judgment Case	2., 8., 9.
<b>Miscellaneous Civil Complaints</b>	RICO (27)	<input type="checkbox"/> A6033 Racketeering (RICO) Case	1., 2., 8.
	Other Complaints (Not Specified Above) (42)	<input type="checkbox"/> A6030 Declaratory Relief Only	1., 2., 8.
		<input type="checkbox"/> A6040 Injunctive Relief Only (not domestic/harassment)	2., 8.
		<input type="checkbox"/> A6011 Other Commercial Complaint Case (non-tort/non-complex) <input type="checkbox"/> A6000 Other Civil Complaint (non-tort/non-complex)	1., 2., 8. 1., 2., 8.
<b>Miscellaneous Civil Petitions</b>	Partnership Corporation Governance (21)	<input type="checkbox"/> A6113 Partnership and Corporate Governance Case	2., 8.
	Other Petitions (Not Specified Above) (43)	<input type="checkbox"/> A6121 Civil Harassment	2., 3., 9.
		<input type="checkbox"/> A6123 Workplace Harassment	2., 3., 9.
		<input type="checkbox"/> A6124 Elder/Dependent Adult Abuse Case	2., 3., 9.
		<input type="checkbox"/> A6190 Election Contest	2.
		<input type="checkbox"/> A6110 Petition for Change of Name	2., 7.
<input type="checkbox"/> A6170 Petition for Relief from Late Claim Law <input type="checkbox"/> A6100 Other Civil Petition		2., 3., 4., 8. 2., 9.	

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

<p><b>REASON:</b> Check the appropriate boxes for the numbers shown under Column C for the type of action that you have selected for this case.</p> <p><input type="checkbox"/> 1. <input checked="" type="checkbox"/> 2. <input type="checkbox"/> 3. <input type="checkbox"/> 4. <input type="checkbox"/> 5. <input type="checkbox"/> 6. <input type="checkbox"/> 7. <input type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10. <input type="checkbox"/> 11.</p>	<p>ADDRESS: 5000 Van Nuys Boulevard</p>			
<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:33%; padding: 2px;">CITY: Sherman Oaks</td> <td style="width:17%; padding: 2px;">STATE: CA</td> <td style="width:50%; padding: 2px;">ZIP CODE: 91403</td> </tr> </table>	CITY: Sherman Oaks	STATE: CA	ZIP CODE: 91403	
CITY: Sherman Oaks	STATE: CA	ZIP CODE: 91403		

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

Dated: September 7, 2016

  
 \_\_\_\_\_  
 (SIGNATURE OF ATTORNEY FILING PARTY)

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

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

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES  
 NOTICE OF CASE ASSIGNMENT - UNLIMITED CIVIL CASE (NON-CLASS ACTION)

Case Number \_\_\_\_\_

**BC 899041**

**THIS FORM IS TO BE SERVED WITH THE SUMMONS AND COMPLAINT**

Your case is assigned for all purposes to the judge indicated below. There is more information on the reverse side of this form.

ASSIGNED JUDGE	DEPT	ROOM	ASSIGNED JUDGE	DEPT	ROOM
Hon. Kevin C. Brazile	1	534	Hon. Elizabeth Allen White	48	506
Hon. Barbara A. Meiers	12	636	Hon. Deirdre Hill	49	509
Hon. Terry A. Green	14	300	Hon. Teresa A. Beaudet	50	508
Hon. Richard Fruin	15	307	Hon. Michael J. Raphael	51	511
Hon. Rita Miller	16	306	Hon. Susan Bryant-Deason	52	510
Hon. Richard E. Rico	17	309	Hon. Howard L. Halm	53	513
Hon. Stephanie Bowick	19	311	Hon. Ernest M. Hiroshige	54	512
Hon. Dalila Corral Lyons	20	310	Hon. Malcolm H. Mackey	55	515
Hon. Robert L. Hess	24	314	Hon. Michael Johnson	56	514
Hon. Yvette M. Palazuelos	28	318	Hon. John P. Doyle	58	516
Hon. Barbara Scheper	30	400	Hon. Gregory Keosian	61	732
Hon. Samantha Jessner	31	407	Hon. Michael L. Stern	62	600
Hon. Daniel S. Murphy	32	406	Hon. Mark Mooney	68	617
Hon. Michael P. Linfield	34	408	Hon. William F. Fahey	69	621
Hon. Gregory Alarcon	36	410	Hon. Suzanne G. Bruguera	71	729
Hon. Marc Marmaro	37	413	Hon. Ruth Ann Kwan	72	731
Hon. Maureen Duffy-Lewis	38	412	Hon. Rafael Ongkeko	73	733
Hon. Elizabeth Feffer	39	415	Hon. Teresa Sanchez-Gordon	74	735
Hon. David Sotelo	40	414	Hon. Gail Ruderman Feuer	78	730
Hon. Holly E. Kendig	42	416			
Hon. Mel Red Recana	45	529	Hon. Steven J. Kleifield	324	CCW
Hon. Frederick C. Shaller	46	500	*Provisionally Complex Non-class Action Cases Assignment is Pending Complex Determination	324	CCW
Hon. Debre K. Weintraub	47	507			

**\*Complex**

All non-class action cases designated as provisionally complex are forwarded to the Supervising Judge of the Complex Litigation Program located in the Central Civil West Courthouse (600 S. Commonwealth Ave., Los Angeles 90005), for complex/non-complex determination pursuant to Local Rule 3.3(k). This procedure is for the purpose of assessing whether or not the case is complex within the meaning of California Rules of Court, rule 3.400. Depending on the outcome of that assessment, the case may be reassigned to one of the judges of the Complex Litigation Program or reassigned randomly to a court in the Central District.

Given to the Plaintiff/Cross-Complainant/Attorney of Record on \_\_\_\_\_ **SHERRI R. CARTER**, Executive Officer/Clerk  
 By **RICARDO PEREZ**, Deputy Clerk

## INSTRUCTIONS FOR HANDLING UNLIMITED CIVIL CASES

The following critical provisions of the Chapter Three Rules, as applicable in the Central District, are summarized for your assistance.

### APPLICATION

The Chapter Three Rules were effective January 1, 1994. They apply to all general civil cases.

### PRIORITY OVER OTHER RULES

The Chapter Three 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 Individual Calendaring Court 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 of filing.

**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.

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 at a status conference not more than 10 days before the trial to have timely filed and served all motions in limine, bifurcation motions, statements of major evidentiary issues, dispositive motions, requested jury instructions, and special jury instructions and special jury verdicts. These matters may be heard and resolved at this conference. At least 5 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 Eight 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 the party.

**This is not a complete delineation of the 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 absolutely imperative.**

### VOLUNTARY EFFICIENT LITIGATION STIPULATIONS

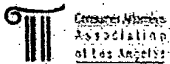


Superior Court of California  
County of Los Angeles

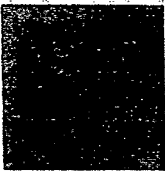


Los Angeles County  
Bar Association  
Litigation Section

Los Angeles County  
Bar Association Labor and  
Employment Law Section



Consumer Attorneys  
Association of Los Angeles



Southern California  
Defense Counsel



Association of  
Business Trial Lawyers



California Employment  
Lawyers Association

The Early Organizational Meeting Stipulation, Discovery Resolution Stipulation, and Motions in Limine Stipulation are voluntary stipulations entered into by the parties. The parties may enter into one, two, or all three of the stipulations; however, they may not alter the stipulations as written, because the Court wants to ensure uniformity of application. These stipulations are meant to encourage cooperation between the parties and to assist in resolving issues in a manner that promotes economic case resolution and judicial efficiency.

*The following organizations endorse the goal of promoting efficiency in litigation and ask that counsel consider using these stipulations as a voluntary way to promote communications and procedures among counsel and with the court to fairly resolve issues in their cases.*

◆ Los Angeles County Bar Association Litigation Section ◆

◆ Los Angeles County Bar Association  
Labor and Employment Law Section ◆

◆ Consumer Attorneys Association of Los Angeles ◆

◆ Southern California Defense Counsel ◆

◆ Association of Business Trial Lawyers ◆

◆ California Employment Lawyers Association ◆

LACIV 230 (NEW)  
LASC Approved 4-11  
For Optional Use

NAME AND ADDRESS OF ATTORNEY OR PARTY WITHOUT ATTORNEY:		STATE BAR NUMBER	Reserved for Clerk's File Stamp
TELEPHONE NO.: E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name):		FAX NO. (Optional):	
<b>SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES</b>			
COURTHOUSE ADDRESS:			
PLAINTIFF:			
DEFENDANT:			
<b>STIPULATION – DISCOVERY RESOLUTION</b>			
			CASE NUMBER:

**This stipulation is intended to provide a fast and informal resolution of discovery issues through limited paperwork and an informal conference with the Court to aid in the resolution of the issues.**

**The parties agree that:**

1. Prior to the discovery cut-off in this action, no discovery motion shall be filed or heard unless the moving party first makes a written request for an Informal Discovery Conference pursuant to the terms of this stipulation.
2. At the Informal Discovery Conference the Court will consider the dispute presented by parties and determine whether it can be resolved informally. Nothing set forth herein will preclude a party from making a record at the conclusion of an Informal Discovery Conference, either orally or in writing.
3. Following a reasonable and good faith attempt at an informal resolution of each issue to be presented, a party may request an Informal Discovery Conference pursuant to the following procedures:
  - a. The party requesting the Informal Discovery Conference will:
    - i. File a Request for Informal Discovery Conference with the clerk's office on the approved form (copy attached) and deliver a courtesy, conformed copy to the assigned department;
    - ii. Include a brief summary of the dispute and specify the relief requested; and
    - iii. Serve the opposing party pursuant to any authorized or agreed method of service that ensures that the opposing party receives the Request for Informal Discovery Conference no later than the next court day following the filing.
  - b. Any Answer to a Request for Informal Discovery Conference must:
    - i. Also be filed on the approved form (copy attached);
    - ii. Include a brief summary of why the requested relief should be denied;

SHORT TITLE:	CASE NUMBER:
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- iii. Be filed within two (2) court days of receipt of the Request; and
  - iv. Be served on the opposing party pursuant to any authorized or agreed upon method of service that ensures that the opposing party receives the Answer no later than the next court day following the filing.
- c. No other pleadings, including but not limited to exhibits, declarations, or attachments, will be accepted.
- d. If the Court has not granted or denied the Request for Informal Discovery Conference within ten (10) days following the filing of the Request, then it shall be deemed to have been denied. If the Court acts on the Request, the parties will be notified whether the Request for Informal Discovery Conference has been granted or denied and, if granted, the date and time of the Informal Discovery Conference, which must be within twenty (20) days of the filing of the Request for Informal Discovery Conference.
- e. If the conference is not held within twenty (20) days of the filing of the Request for Informal Discovery Conference, unless extended by agreement of the parties and the Court, then the Request for the Informal Discovery Conference shall be deemed to have been denied at that time.
4. If (a) the Court has denied a conference or (b) one of the time deadlines above has expired without the Court having acted or (c) the Informal Discovery Conference is concluded without resolving the dispute, then a party may file a discovery motion to address unresolved issues.
5. The parties hereby further agree that the time for making a motion to compel or other discovery motion is tolled from the date of filing of the Request for Informal Discovery Conference until (a) the request is denied or deemed denied or (b) twenty (20) days after the filing of the Request for Informal Discovery Conference, whichever is earlier, unless extended by Order of the Court.
- It is the understanding and intent of the parties that this stipulation shall, for each discovery dispute to which it applies, constitute a writing memorializing a "specific later date to which the propounding [or demanding or requesting] party and the responding party have agreed in writing," within the meaning of Code Civil Procedure sections 2030.300(c), 2031.320(c), and 2033.290(c).
6. Nothing herein will preclude any party from applying *ex parte* for appropriate relief, including an order shortening time for a motion to be heard concerning discovery.
7. Any party may terminate this stipulation by giving twenty-one (21) days notice of intent to terminate the stipulation.
8. References to "days" mean calendar days, unless otherwise noted. If the date for performing any act pursuant to this stipulation falls on a Saturday, Sunday or Court holiday, then the time for performing that act shall be extended to the next Court day.



SHORT TITLE:	CASE NUMBER:
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**The following parties stipulate:**

Date:

\_\_\_\_\_  
(TYPE OR PRINT NAME)



\_\_\_\_\_  
(ATTORNEY FOR PLAINTIFF)

Date:

\_\_\_\_\_  
(TYPE OR PRINT NAME)



\_\_\_\_\_  
(ATTORNEY FOR DEFENDANT)

Date:

\_\_\_\_\_  
(TYPE OR PRINT NAME)



\_\_\_\_\_  
(ATTORNEY FOR DEFENDANT)

Date:

\_\_\_\_\_  
(TYPE OR PRINT NAME)



\_\_\_\_\_  
(ATTORNEY FOR DEFENDANT)

Date:

\_\_\_\_\_  
(TYPE OR PRINT NAME)



\_\_\_\_\_  
(ATTORNEY FOR \_\_\_\_\_)

Date:

\_\_\_\_\_  
(TYPE OR PRINT NAME)



\_\_\_\_\_  
(ATTORNEY FOR \_\_\_\_\_)

Date:

\_\_\_\_\_  
(TYPE OR PRINT NAME)



\_\_\_\_\_  
(ATTORNEY FOR \_\_\_\_\_)

NAME AND ADDRESS OF ATTORNEY OR PARTY WITHOUT ATTORNEY:		STATE BAR NUMBER	Reserved for Clerk's File Stamp
TELEPHONE NO.:		FAX NO. (Optional):	
E-MAIL ADDRESS (Optional):			
ATTORNEY FOR (Name):			
<b>SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES</b>			
COURTHOUSE ADDRESS:			
PLAINTIFF:			
DEFENDANT:			
<b>STIPULATION – EARLY ORGANIZATIONAL MEETING</b>			CASE NUMBER:

**This stipulation is intended to encourage cooperation among the parties at an early stage in the litigation and to assist the parties in efficient case resolution.**

**The parties agree that:**

1. The parties commit to conduct an initial conference (in-person or via teleconference or via videoconference) within 15 days from the date this stipulation is signed, *to discuss and consider whether there can be agreement on the following:*
  - a. Are motions to challenge the pleadings necessary? If the issue can be resolved by amendment as of right, or if the Court would allow leave to amend, could an amended complaint resolve most or all of the issues a demurrer might otherwise raise? If so, the parties agree to work through pleading issues so that a demurrer need only raise issues they cannot resolve. Is the issue that the defendant seeks to raise amenable to resolution on demurrer, or would some other type of motion be preferable? Could a voluntary targeted exchange of documents or information by any party cure an uncertainty in the pleadings?
  - b. Initial mutual exchanges of documents at the "core" of the litigation. (For example, in an employment case, the employment records, personnel file and documents relating to the conduct in question could be considered "core." In a personal injury case, an incident or police report, medical records, and repair or maintenance records could be considered "core.");
  - c. Exchange of names and contact information of witnesses;
  - d. Any insurance agreement that may be available to satisfy part or all of a judgment, or to indemnify or reimburse for payments made to satisfy a judgment;
  - e. Exchange of any other information that might be helpful to facilitate understanding, handling, or resolution of the case in a manner that preserves objections or privileges by agreement;
  - f. Controlling issues of law that, if resolved early, will promote efficiency and economy in other phases of the case. Also, when and how such issues can be presented to the Court;
  - g. Whether or when the case should be scheduled with a settlement officer, what discovery or court ruling on legal issues is reasonably required to make settlement discussions meaningful, and whether the parties wish to use a sitting judge or a private mediator or other options as

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discussed in the "Alternative Dispute Resolution (ADR) Information Package" served with the complaint;

- h. Computation of damages, including documents, not privileged or protected from disclosure, on which such computation is based;
  - i. Whether the case is suitable for the Expedited Jury Trial procedures (see information at [www.lacourt.org](http://www.lacourt.org) under "Civil" and then under "General Information").
2. The time for a defending party to respond to a complaint or cross-complaint will be extended to \_\_\_\_\_ for the complaint, and \_\_\_\_\_ for the cross-complaint, which is comprised of the 30 days to respond under Government Code § 68616(b), and the 30 days permitted by Code of Civil Procedure section 1054(a), good cause having been found by the Civil Supervising Judge due to the case management benefits provided by this Stipulation. A copy of the General Order can be found at [www.lacourt.org](http://www.lacourt.org) under "Civil", click on "General Information", then click on "Voluntary Efficient Litigation Stipulations".  
(INSERT DATE) (INSERT DATE)
  3. The parties will prepare a joint report titled "Joint Status Report Pursuant to Initial Conference and Early Organizational Meeting Stipulation, and if desired, a proposed order summarizing results of their meet and confer and advising the Court of any way it may assist the parties' efficient conduct or resolution of the case. The parties shall attach the Joint Status Report to the Case Management Conference statement, and file the documents when the CMC statement is due.
  4. References to "days" mean calendar days, unless otherwise noted. If the date for performing any act pursuant to this stipulation falls on a Saturday, Sunday or Court holiday, then the time for performing that act shall be extended to the next Court day

The following parties stipulate:

Date: _____ (TYPE OR PRINT NAME)	>	_____
Date: _____ (TYPE OR PRINT NAME)	>	_____
Date: _____ (TYPE OR PRINT NAME)	>	_____
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Date: _____ (TYPE OR PRINT NAME)	>	_____
Date: _____ (TYPE OR PRINT NAME)	>	_____
Date: _____ (TYPE OR PRINT NAME)	>	_____

NAME AND ADDRESS OF ATTORNEY OR PARTY WITHOUT ATTORNEY:    TELEPHONE NO.: _____ FAX NO. (Optional): _____ E-MAIL ADDRESS (Optional): _____ ATTORNEY FOR (Name): _____	STATE BAR NUMBER: _____	Reserved for Clerk's File Stamp
<b>SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES</b>		
COURTHOUSE ADDRESS: _____		
PLAINTIFF: _____		
DEFENDANT: _____		
<b>INFORMAL DISCOVERY CONFERENCE</b> (pursuant to the Discovery Resolution Stipulation of the parties)		CASE NUMBER: _____

1. This document relates to:
  - Request for Informal Discovery Conference
  - Answer to Request for Informal Discovery Conference
2. Deadline for Court to decide on Request: \_\_\_\_\_ (insert date 10 calendar days following filing of the Request).
3. Deadline for Court to hold Informal Discovery Conference: \_\_\_\_\_ (insert date 20 calendar days following filing of the Request).
4. For a Request for Informal Discovery Conference, **briefly** describe the nature of the discovery dispute, including the facts and legal arguments at issue. For an Answer to Request for Informal Discovery Conference, **briefly** describe why the Court should deny the requested discovery, including the facts and legal arguments at issue.

LACIV 094 (new)  
 LASC Approved 04/11  
 For Optional Use

**INFORMAL DISCOVERY CONFERENCE**  
 (pursuant to the Discovery Resolution Stipulation of the parties)

NAME AND ADDRESS OF ATTORNEY OR PARTY WITHOUT ATTORNEY:		STATE BAR NUMBER	Reserved for Clerk's File Stamp
TELEPHONE NO.:		FAX NO. (Optional):	
E-MAIL ADDRESS (Optional):			
ATTORNEY FOR (Name):			
<b>SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES</b>			
COURTHOUSE ADDRESS:			
PLAINTIFF:			
DEFENDANT:			
<b>STIPULATION AND ORDER – MOTIONS IN LIMINE</b>			CASE NUMBER:

**This stipulation is intended to provide fast and informal resolution of evidentiary issues through diligent efforts to define and discuss such issues and limit paperwork.**

**The parties agree that:**

1. At least \_\_\_ days before the final status conference, each party will provide all other parties with a list containing a one paragraph explanation of each proposed motion in limine. Each one paragraph explanation must identify the substance of a single proposed motion in limine and the grounds for the proposed motion.
2. The parties thereafter will meet and confer, either in person or via teleconference or videoconference, concerning all proposed motions in limine. In that meet and confer, the parties will determine:
  - a. Whether the parties can stipulate to any of the proposed motions. If the parties so stipulate, they may file a stipulation and proposed order with the Court.
  - b. Whether any of the proposed motions can be briefed and submitted by means of a short joint statement of issues. For each motion which can be addressed by a short joint statement of issues, a short joint statement of issues must be filed with the Court 10 days prior to the final status conference. Each side's portion of the short joint statement of issues may not exceed three pages. The parties will meet and confer to agree on a date and manner for exchanging the parties' respective portions of the short joint statement of issues and the process for filing the short joint statement of issues.
3. All proposed motions in limine that are not either the subject of a stipulation or briefed via a short joint statement of issues will be briefed and filed in accordance with the California Rules of Court and the Los Angeles Superior Court Rules.

SHORT TITLE:	CASE NUMBER:
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**The following parties stipulate:**

Date:

\_\_\_\_\_  
(TYPE OR PRINT NAME)

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\_\_\_\_\_  
(ATTORNEY FOR PLAINTIFF)

Date:

\_\_\_\_\_  
(TYPE OR PRINT NAME)

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\_\_\_\_\_  
(ATTORNEY FOR DEFENDANT)

Date:

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(TYPE OR PRINT NAME)

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(ATTORNEY FOR DEFENDANT)

Date:

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(ATTORNEY FOR DEFENDANT)

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(ATTORNEY FOR \_\_\_\_\_)

Date:

\_\_\_\_\_  
(TYPE OR PRINT NAME)

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\_\_\_\_\_  
(ATTORNEY FOR \_\_\_\_\_)

**THE COURT SO ORDERS.**

Date: \_\_\_\_\_

\_\_\_\_\_  
JUDICIAL OFFICER

1 Tyler F. Clark (SBN 258309)  
 2 Yi-Hsuan Rachel Lin (SBN 283632)  
 3 **CLARK EMPLOYMENT LAW, APC**  
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 8 Email: tyler@clarkemploymentlaw.com  
 9 Email: rachel@clarkemploymentlaw.com

7 Attorneys for Plaintiff  
 8 Golnaz Kamali

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
 10 **COUNTY OF LOS ANGELES**

11 GOLNAZ KAMALI,

12 Plaintiff,

13 v.

14 WALGREEN CO., a Corporation; and DOES  
 15 1-10, inclusive,

16 Defendants.  
 17

CASE NO.: BC633041

[Unlimited Jurisdiction]

**FIRST AMENDED COMPLAINT FOR DAMAGES**

1. Retaliation in Violation of Labor Code Sections 1102.5(b) & (c);
2. Wrongful Discharge in Violation of Public Policy; and
3. Civil Penalties Pursuant to Labor Code Private Attorneys General Act

Assigned to: Hon. Gregory Keosian  
 Department: 61

Complaint filed: September 7, 2016  
 Trial date: None set

**[JURY TRIAL DEMANDED]**

1 Plaintiff Golnaz Kamali, demanding a jury trial, brings this action against Defendants  
2 Walgreen Co., a Corporation, and DOES 1-10 for: general, compensatory, punitive and statutory  
3 damages, penalties, costs and attorneys' fees, resulting from defendants' unlawful conduct, and as  
4 grounds therefore alleges as follows:

5 **PARTIES**

6 1. Plaintiff Golnaz Kamali ("Ms. Kamali" or "Plaintiff"), is, and at all relevant times  
7 was, an adult female residing in Los Angeles County, California.

8 2. At all times material to this complaint, Defendant Walgreen Co. ("Defendant"), was  
9 and is an Illinois corporation doing business in the State of California and within the county of Los  
10 Angeles. Further, Plaintiff was hired to perform work and did perform work for Defendant in the  
11 County of Los Angeles, wherein she alleges the unlawful employment practices that are the subject  
12 of this Complaint took place.

13 3. Plaintiff is further informed and believes that Defendant maintains records relevant to  
14 her employment at 20901 Devonshire Street, Chatsworth, California 91311.

15 4. The true names and capacities of those individuals, corporations, associations, or  
16 other entities sued as DOES 1-10 are unknown to Plaintiff, who therefore sues these defendants by  
17 such fictitious names. Plaintiff will seek leave of court to amend this complaint to show their true  
18 names and capacities when ascertained.

19 5. Plaintiff is informed, believes, and on that basis alleges, that each defendant sued  
20 under such fictitious names (DOES 1-10) is in some manner responsible for the occurrences herein  
21 alleged, and that Plaintiff's injuries as herein alleged were proximately caused by the conduct of  
22 such defendants.

23 6. Plaintiff is informed and believes and thereupon alleges that, at all times material  
24 herein, each defendant was functioning as the agent, servant, partner, employee and/or working in  
25 concert with his, her or its co-defendant and was acting within the course and scope of such agency,  
26 partnership, employment and/or concerted activity. To the extent that certain acts and omissions  
27 were perpetrated by certain defendants, the remaining defendants confirmed and ratified said acts  
28 and omissions of the co-defendants, and in doing the actions mentioned below were acting within the



1 course and scope of his, her or its authority as such agent, servant, partner, and employee with the  
2 permission, consent and ratification of the co-defendants.

3 7. Whenever and wherever reference is made in this complaint to any act or failure to  
4 act by a defendant or defendants, such allegations and reference shall also be deemed to mean the  
5 acts and failures to act of each defendant acting individually, jointly, and severally. Whenever and  
6 wherever reference is made to individuals who are not named as plaintiff or defendants in this  
7 complaint but who were employees/agents of defendants, such individuals at all relevant times acted  
8 on behalf of Defendant within the course and scope of their employment.

9 8. Plaintiff is informed and believes and thereupon alleges that, at all times material  
10 herein, defendants and each of them, and/or their agents/employees or supervisors, authorized,  
11 condoned and ratified the unlawful conduct of each other.

12 9. Plaintiff is informed and believes and thereupon alleges that, at all times material  
13 herein, defendants, and/or their agents/employees knew or reasonably should have known that unless  
14 they intervened to protect Plaintiff, and to adequately supervise, prohibit, control, regulate,  
15 discipline, and/or otherwise penalize the conduct of the employees of Defendant set forth above, the  
16 remaining defendants and employees perceived the conduct and omissions as being ratified and  
17 condoned.

18 **FACTUAL ALLEGATIONS RELEVANT TO ALL CAUSES OF ACTION**

19 10. Plaintiff incorporates each allegation set forth in paragraphs 1 through 9.

20 11. On or around May 4, 2011, Ms. Kamali was hired by Defendant as a Pharmacist. Ms.  
21 Kamali was a "floating" Pharmacist in that she was assigned to multiple locations in Southern  
22 California, as needed. As a Pharmacist, Ms. Kamali's job responsibilities included, but were not  
23 limited to, counseling patients, preparing medications by reviewing and interpreting physician  
24 orders, dispensing medications, controlling medications by monitoring drug therapies, maintaining  
25 pharmacy records. At all relevant times during her employment, Ms. Kamali was performing her job  
26 satisfactorily.

27 12. During her employment, Ms. Kamali learned that some of Defendant's pharmacies  
28 were dispensing certain controlled substances in a manner that was inconsistent with its obligation

1 under various federal and state regulations in that the controlled substances were dispensed to  
2 customers even though the prescriptions failed to meet Defendant's own Controlled Substance  
3 Prescriptions and Good Faith Dispensing Policy and Procedures. Ms. Kamali complained to various  
4 pharmacists-in-charge, pharmacy managers, and district managers about Defendant's failure to  
5 adhere to its legal obligations for dispensing controlled substances. However, Ms. Kamali's  
6 complaints were largely ignored. Ms. Kamali continued to complain/oppose what she reasonably  
7 believed to be a violation of state or federal statute, or a violation of or non-compliance with a local,  
8 state, or federal rule or regulation, including but not limited to, California Business and Professions  
9 Code sections 4052.01, 4301, 4306, 4306.5; California Health and Safety Code sections 11152-  
10 11154, 11156, 11158; California Code of Regulations, title 16 , sections 1746.3, 1761; 21 U.S.C. §  
11 842; 21 C.F.R. §§ 1301.74, 1306.04; California Business and Professions Code § 17200, among  
12 others.

13 13. In or about July 2015, Ms. Kamali was written up for refusing to fill prescriptions that  
14 Ms. Kamali, in her professional judgment, reasonably believed should not be filled for a legitimate  
15 medical purpose. Ms. Kamali challenged this write-up and informed her superiors of the reason why  
16 she did not fill the prescriptions.

17 14. In or about August, 2015, Ms. Kamali was again written up for refusing to fill  
18 prescriptions under the guise of poor "customer service." Ms. Kamali complained to District  
19 Manager Cori Evans ("Manager Evans") concerning the write-ups because she reasonably believed  
20 that it was unlawful for Defendant to discipline or otherwise retaliate against the pharmacist for  
21 refusing to dispense controlled substances that the pharmacist believed were not for a legitimate  
22 medical purpose. Ms. Kamali also informed Manager Evans that she did not want to dispense any  
23 controlled substances that, in her professional opinion, were not for a legitimate medical purpose.

24 15. On or about September 3, 2015, Ms. Kamali declined to fill a prescription that in her  
25 professional judgment should not have been refilled. After the customer left, Ms. Kamali re-checked  
26 the customer's record on the Controlled Substance Utilization Review and Evaluation System  
27 ("CURES"), a database of Schedule II, III and IV controlled substance prescriptions dispensed in  
28 California, and realized that she had reviewed the wrong patient's record on CURES. Realizing her

1 error, Ms. Kamali called the customer and informed the customer that his prescription would be  
2 filled the next day. The customer came in the next day and his prescription was filled. On  
3 information and belief, the customer never complained to Defendant.

4 16. On or around September 24, 2015, Defendant terminated Ms. Kamali's employment  
5 under the pretext of "customer service" issues. In reality, a contributing factor in Defendant's  
6 decision to terminate Ms. Kamali was due to her complaining/opposing what she reasonably  
7 believed was an unlawful business practice (i.e. refusing to fill prescriptions for customers that she,  
8 in her professional judgment, did not believe were for a legitimate medical purpose).

9 **FACUAL ALLEGATIONS RELEVANT TO THE THIRD CAUSE OF ACTION**

10 17. On August 18, 2016, Plaintiff provided written notice to the California Labor and  
11 Workforce Development Agency ("LWDA") by e-mail at [PAGAFilings@dir.ca.gov](mailto:PAGAFilings@dir.ca.gov) and to  
12 Defendant via certified mail specifying the Labor Code provisions violated and describing the facts  
13 and theories to support the particular violations. Plaintiff also paid a filing fee to the LWDA for the  
14 filing of her PAGA claim notice.

15 18. At least sixty-seven (67) days have passed since said notice was provided, and the  
16 LWDA has not notified the aggrieved employee of any intent to investigate the claims as to all  
17 named Defendant in the original Complaint. Therefore, Plaintiff has complied with all preconditions  
18 to alleging remedies under California Labor Code sections 2698, et seq. as to the named Defendant.

19 **FIRST CAUSE OF ACTION**

20 (RETALIATION IN VIOLATION OF LABOR CODE SECTIONS 1102.5(b) & (c) --  
21 AGAINST ALL DEFENDANTS)

22 19. Plaintiff incorporates each allegation set forth in paragraphs 1 through 18.

23 20. At all times relevant to this Complaint, Plaintiff was employed by Defendants.

24 21. At all times relevant to this Complaint, California Labor Code section 1102.5 was in  
25 effect and applied to Defendants. Labor Code section 1102.5, subdivision (b) provides in part that  
26 an employer may not retaliate against an employee for disclosing information, or because the  
27 employer believes that the employee disclosed or may disclose information, to a government or law  
28 enforcement agency, to a person with authority over the employee or another employee who has the

1 authority to investigate, discover, or correct the violation or noncompliance, if the employee has  
2 reasonable cause to believe that the information discloses a violation of state or federal statute, or a  
3 violation of or noncompliance with a local, state, or federal rule or regulation. Further, Labor Code  
4 section 1102.5, subdivision (c) provides in part that an employer may not retaliate against any  
5 employee for refusing to participate in an activity that would result in a violation of state or federal  
6 statute, or a violation of or noncompliance with a state or federal rule or regulation.

7 22. Plaintiff engaged in legally protected activity covered by section 1102.5, subdivision  
8 (b) by reporting what she reasonably believed to be unlawful conduct to Defendants' agents,  
9 officers, or directors who had authority over Plaintiff and/or over Defendants' other employees with  
10 authority to investigate, discover, or correct the violations/noncompliance, and/or Defendants' belief  
11 that she would report or have reported what she reasonably believed to be unlawful conduct to a  
12 government or law enforcement agency. Further, Plaintiff engaged in legally protected activity  
13 covered by section 1102.5, subdivision (c) by refusing to participate in what she reasonably believed  
14 to be unlawful conduct.

15 23. Defendants discharged Plaintiff.

16 24. Plaintiff's report to Defendant or Defendant's belief that Plaintiff would report or  
17 have reported to a government or law enforcement agency about what she reasonably believed was  
18 unlawful conduct and/or her refusal to participate in unlawful conduct resulted in retaliation against  
19 her and the termination of her employment.

20 25. As a direct and foreseeable result of the aforesaid acts of Defendants, Plaintiff has  
21 lost and will continue to lose income and benefits in an amount to be proven at the time of trial.  
22 Plaintiff claims such amount as damages together with pre-judgment interest pursuant to Civil Code  
23 section 3287 and/or any other provision of law providing for pre-judgment interest.

24 26. As a result of the aforesaid acts of Defendants, Plaintiff claims general damages for  
25 mental and emotional distress and aggravation in an amount to be proven at the time of trial.

26 27. The above described acts of Defendants, by and through their managing agents,  
27 officers, or directors, were engaged in with a deliberate, cold, callous, fraudulent and intentional  
28 manner to injure and damage Plaintiff and/or with a conscious disregard for Plaintiff's rights. Such

1 acts were despicable, and constitute malice, fraud and/or oppression within the meaning of Civil  
2 Code section 3294. Plaintiff requests an assessment of punitive damages against Defendants, in an  
3 amount to be proven at the time of trial.

4 28. As a proximate result of the foregoing conduct, which violated the provisions of  
5 Labor Code section 1102.5, subdivisions (b) and (c), Plaintiff has been forced to and will incur  
6 attorney’s fees and costs in the prosecution of this claim, in an amount to be proven at trial.

7 29. Pursuant to Labor Code section 1102.5, subdivision (f), an employer that is a  
8 corporation or limited liability company is liable for a civil penalty not exceeding ten thousand  
9 dollars (\$10,000) for each violation of section 1102.5.

10 **SECOND CAUSE OF ACTION**

11 (WRONGFUL DISCHARGE IN VIOLATION OF PUBLIC POLICY –  
12 AGAINST ALL DEFENDANTS)

13 30. Plaintiff incorporates each allegation s set forth in paragraphs 1 through 29.

14 31. Plaintiff complained about what she reasonably believed was unlawful conduct and/or  
15 refused to participate in said conduct. Following Plaintiff’s complaint concerning what she  
16 reasonably believed was unlawful conduct and/or her refusal to participate in said conduct, Plaintiff  
17 was terminated.

18 32. Plaintiff’s refusal to participate and/or her complaints of what she reasonably and in  
19 good faith believed to be Defendants’ violation of a state or federal statute or a violation  
20 of/noncompliance with a state or federal rule or regulation, along with her engaging in other  
21 statutorily and constitutionally protected activities, were substantial motivating reasons for  
22 Defendants’ decision to terminate Plaintiff’s employment.

23 33. Defendants’ conduct is in violation of, among other things, the public policies  
24 embodied in California Labor Code § 1102.5; California Business and Professions Code sections  
25 4052.01, 4301, 4306, 4306.5; California Health and Safety Code sections 11152–11154, 11156,  
26 11158; California Code of Regulations, title 16 , sections 1746.3, 1761; 21 U.S.C. § 842; 21 C.F.R.  
27 §§ 1301.74, 1306.04; California Business and Professions Code § 17200; and such conduct has  
28 resulted in damage and injury to Plaintiff as alleged herein.

1 34. As a direct and foreseeable result of the aforesaid acts of Defendants, Plaintiff has  
2 lost and will continue to lose income and benefits in an amount to be proven at the time of trial.  
3 Plaintiff claims such amount as damages together with pre-judgment interest pursuant to Civil Code  
4 section 3287 and/or any other provision of law providing for pre-judgment interest.

5 35. As a result of the aforesaid acts of Defendants, Plaintiff claims general damages for  
6 mental and emotional distress and aggravation in an amount to be proven at the time of trial.

7 36. The above described acts of Defendants, by and through their managing agents,  
8 officers, or directors, were engaged in with a deliberate, cold, callous, fraudulent and intentional  
9 matter in order to injure and damage Plaintiff and/or with a conscious disregard for Plaintiff's rights.  
10 Such acts were despicable, and constitute malice, fraud and/or oppression within the meaning of  
11 Civil Code section 3294. Plaintiff requests an assessment of punitive damages against Defendants,  
12 in an amount to be proven at the time of trial.

13 **THIRD CAUSE OF ACTION**

14 (CIVIL PENALTIES PURSUANT TO LABOR CODE PRIVATE ATTORNEYS GENERAL  
15 ACT [CALIFORNIA LABOR CODE §§ 2698 ET SEQ.] – AGAINST ALL DEFENDANTS)

16 37. Plaintiff incorporates each allegation as set forth in paragraphs 1 through 36.

17 38. Defendants' conduct as set forth herein has caused injury to Plaintiff and has violated  
18 provisions of the California Labor Code.

19 39. Under California Labor Code section 2699(f), "[f]or all provisions of this code except  
20 those for which a civil penalty is specifically provided, there is established a civil penalty for a  
21 violation of these provisions, as follows: . . . (2) If, at the time of the alleged violation, the person  
22 employs one or more employees, the civil penalty is one hundred dollars (\$100) for each aggrieved  
23 employee per pay period for the initial violation and two hundred dollars (\$200) for each aggrieved  
24 employee per pay period for each subsequent violation."

25 40. Based on the conduct alleged herein, Plaintiff seeks and Defendants are liable for  
26 penalties for the whistleblower and retaliation violations as alleged in the first cause of action,  
27 penalties under California Labor Code section 2699(f) and California Labor Code section 1102.5.  
28

1           41. Plaintiff is also entitled to, and seeks, all reasonable attorney’s fees and costs of suit  
2 pursuant to Labor Code section 2699(g).

3  
4

**PRAYER FOR RELIEF**

5 **WHEREFORE**, Plaintiff Golnaz Kamali prays for judgment against Defendants, jointly and  
6 severally, as follows:

7 **ON THE FIRST CAUSE OF ACTION**

- 8           1. For past and present compensatory damages according to proof and prejudgment
- 9                     interest thereon to the extent allowable by law;
- 10           2. For exemplary and punitive damages according to proof;
- 11           3. For civil penalties under California Labor Code sections 1102.5 subdivision (f);
- 12           4. For injunctive and equitable relief;
- 13           5. For attorneys’ fees and costs of suit; and
- 14           6. For such other and further relief as the Court deems proper.

15 **ON THE SECOND CAUSE OF ACTION**

- 16           1. For past and present compensatory damages according to proof and prejudgment
- 17                     interest thereon to the extent allowable by law;
- 18           2. For exemplary and punitive damages according to proof;
- 19           3. For injunctive and equitable relief; and
- 20           4. For such other and further relief as the Court deems proper.

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**ON THE THIRD CAUSE OF ACTION**

1. For a civil penalty as stated in California Labor Code section 2699 subdivision (f);
2. For attorneys' fees and costs; and
3. For such other and further relief as the Court deems proper.

Dated: October 24, 2016

CLARK EMPLOYMENT LAW, APC


By:   
 Tyler F. Clark, Esq.  
 Yi-Hsuan Rachel Lin, Esq.  
 Attorneys for Plaintiff Golnaz Kamali

**DEMAND FOR JURY TRIAL**

Plaintiff hereby demands a trial by jury.

Dated: October 24, 2016

CLARK EMPLOYMENT LAW, APC

By:   
 Tyler F. Clark, Esq.  
 Yi-Hsuan Rachel Lin, Esq.  
 Attorneys for Plaintiff Golnaz Kamali



NOTICE SENT TO:

Clark Employment Law, APC  
16000 Ventura Boulevard, Suite 850  
Encino CA 91436

CONFORMED COPY  
ORIGINAL FILED  
FILE STAMP Court of California  
County of Los Angeles

SEP 20 2016

Sherri R. Carter, Executive Officer/Clerk  
By Norma Alvarado, Deputy

**SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES**

GLONAZ KAMALI

Plaintiff(s),

CASE NUMBER

BC633041

VS.

WALGREEN CO

Defendant(s).

**NOTICE OF CASE  
MANAGEMENT CONFERENCE**

TO THE PLAINTIFF(S)/ATTORNEY(S) FOR PLAINTIFF(S) OF RECORD:

You are ordered to serve this notice of hearing on all parties/attorneys of record forthwith, and meet and confer with all parties/attorneys of record about the matters to be discussed no later than 30 days before the Case Management Conference.

Your Case Management Conference has been scheduled for November 28, 2016 at 9:00 am in Dept. 61 at 111 North Hill Street, Los Angeles, California 90012.

**NOTICE TO DEFENDANT: THE SETTING OF THE CASE MANAGEMENT CONFERENCE DOES NOT EXEMPT THE DEFENDANT FROM FILING A RESPONSIVE PLEADING AS REQUIRED BY LAW.**

Pursuant to California Rules of Court, rules 3.720-3.730, a completed Case Management Statement (Judicial Council form # CM-110) must be filed at least **15 calendar days** prior to the Case Management Conference. The Case Management Statement may be filed jointly by all parties/attorneys of record or individually by each party/attorney of record. You must be familiar with the case and be fully prepared to participate effectively in the Case Management Conference.

At the Case Management Conference, the Court may make pretrial orders including the following, but not limited to, an order establishing a discovery schedule; an order referring the case to Alternative Dispute Resolution (ADR); an order reclassifying the case; an order setting subsequent conference and the trial date; or other orders to achieve the goals of the Trial Court Delay Reduction Act (Gov. Code, section 68600 et seq.)

Notice is hereby given that if you do not file the Case Management Statement or appear and effectively participate at the Case Management Conference, the Court may impose sanctions pursuant to LASC Local Rule 3.37, Code of Civil Procedure sections 177.5, 575.2, 583.150, 583.360 and 583.410, Government Code Section 68608 (b), and California Rules of Court 2.2 et seq.

Date: September 20, 2016

**GREGORY KEOSIAN**

Judicial Officer

**CERTIFICATE OF SERVICE**

I, the below named Executive Officer/Clerk of the above-entitled court, do hereby certify that I am not a party to the cause herein, and that on this date I served the Notice of Case Management Conference upon each party or counsel named above:

by depositing in the United States mail at the courthouse in Los Angeles, California, one copy of the original filed herein in a separate sealed envelope to each address as shown above with postage thereon fully prepaid.

by personally giving the party notice upon filing the complaint.

Date: September 20, 2016

Sherri R. Carter, Executive Officer/Clerk

by N. Alvarado, Deputy Clerk

LACIV 132 (Rev. 07/13)  
LASC Approved 10-03

Cal. Rules of Court, rule 3.720-3.730  
LASC Local Rules, Chapter Three

NOTICE SENT TO:

Clark Employment Law, APC  
 16000 Ventura Boulevard, Suite 850  
 Encino CA 91436

FILE STAMP

CONFORMED COPY  
 ORIGINAL FILED  
 Superior Court of California  
 County of Los Angeles

SEP 20 2016

Sherri R. Carter, Executive Officer/Clerk  
 By Norma Alvarado, Deputy

**SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES**

GLONAZ KAMALI

Plaintiff(s),

VS.

WALGREEN CO

Defendant(s).

CASE NUMBER

BC633041

**ORDER TO SHOW CAUSE HEARING**

To the party/attorney of record:

You are ordered to appear for an Order to Show Cause Hearing on October 28, 2016 at 9:00 am in Dept. 61 of this court, Central District, 111 North Hill Street, Los Angeles, California 90012, and show cause why sanctions should not be imposed for:

Failure to file Proof of Service of  Petition  Summons and  Complaint  Cross-Complaint pursuant to California Rules of Court, rule 3.110(b) and (c) as to: -

Failure to comply or appear may result in sanctions, pursuant to one or more of the following: California Rules of Court, rule 2.30, and rule 3.1340; Code of Civil Procedure sections 177.5, 575.2, 583.150, 583.310, 583.360, 583.410, 583.420, 583.430; and Government Code section 68608.

To avoid a mandatory appearance all required documents must be filed in  this Department Clerk's Office, Room 102 at least 5 court days prior to the date of the hearing.

The Court may infer from your failure to appear that possession of the premises is no longer at issue, and that your case is not entitled to preference in setting pursuant to Code of Civil Procedure section 1179a.

You are ordered to give notice of said hearing forthwith to any party served with summons and complaint prior to OSC Hearing and file a Proof of Service in this department or Clerk's Office at least 5 court days prior to the date of the hearing.

Dated: September 20, 2016

**GREGORY KEOSIAN**

Judicial Officer

**CERTIFICATE OF MAILING**

I, the below named Executive Officer/Clerk of the above-entitled court, do hereby certify that I am not a party to the cause herein, and that on this date I served the Order to Show Cause Hearing upon each party or counsel named above by depositing in the United States mail at the courthouse in Los Angeles, California, one copy of the original filed/entered herein in a separate sealed envelope to each address as shown above with the postage thereon fully prepaid.

Date: September 20, 2016

Sherri R. Carter, EXECUTIVE OFFICER/CLERK

By N. Alvarado, Deputy Clerk

**ORDER TO SHOW CAUSE HEARING**

LACIV 166-1 (Rev. 09/08)  
 LASC Approved 06-04

LASC Local Rules, Chapter 7  
 Cal. Rules of Court, rule 2.30