

ORIGINAL

LAW OFFICES OF CARLIN & BUCHSBAUM, LLP

GARY R. CARLIN, CSBN: 44945
BRENT S. BUCHSBAUM, CSBN: 194816
LAUREL N. HAAG, CSBN: 211279
ANA L. DE LA TORRE, CSBN: 236705
ana@carlinbuchbaum.com

555 East Ocean Blvd., Suite 818
Long Beach, California 90802
Telephone: (562)432-8933; Facsimile: (562)435-1656

Attorneys for Plaintiff, LISA EDWARDS

*46024
9030,
51
Daphnael*

FILED
Superior Court Of California
County Of Los Angeles

SEP 06 2017

Herri R. Gutter Executive Officer
By: *[Signature]* Deputy
Giortella Robles

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

BC 674794

LISA EDWARDS,

Plaintiff;

vs.

INGLEWOOD UNIFIED SCHOOL
DISTRICT, a government entity; KYLE
DOUGLAS, an individual; and DOES 1
through 250, inclusive,

Defendants

CASE NO.

COMPLAINT FOR DAMAGES

(1) RETALIATION IN VIOLATION OF
LABOR CODE SECTION 1102.5 AND
(2) INTENTIONAL INFLICTION OF
EMOTIONAL DISTRESS

[DEMAND FOR JURY TRIAL]

COMES NOW the Plaintiff, LISA EDWARDS, (who hereinafter shall be referred to as
"Plaintiff" or as "EDWARDS"), who hereby respectfully alleges, avers, and complains
follows:

//
//

RECEIPT #: CHE05336079
CITY/CASE #: BC674794
LEA/DEF#:
DATE PAID: 09/06/17 02:46 PM
PAYMENT: \$435.00 310
RECEIVED:
CHECK: \$435.00
CASH: \$0.00
CHANGE: \$0.00
CARD: \$0.00

COMPLAINT

1 **INTRODUCTION**

2
3 1. This is an action brought by the Plaintiff, LISA EDWARDS, pursuant to California statutory,
4 decisional, and regulatory laws. Plaintiff was an employee of Defendant INGLEWOOD
5 UNIFIED SCHOOL DISRICT (hereinafter collectively referred to as "Defendant" or
6 "INGLEWOOD UNIFIED"), a government entity, at all times herein mentioned.

7
8 2. Plaintiff alleges that California statutory, decisional, and regulatory laws prohibit the
9 conduct by Defendants herein alleged, and therefore Plaintiff has an entitlement to monetary
10 relief on the basis that Defendants violated such statutes, decisional law, and regulations.
11

12
13 **JURISDICTION AND VENUE**

14
15 3. Jurisdiction is proper in this court by virtue of the California statutes, decisional law, and
16 regulations, and the local rules under the Los Angeles County Superior Court Rules.
17

18 4. Venue in this Court is proper in that Defendant operates schools throughout the City of
19 Inglewood, County of Los Angeles, State of California.
20

21 **PARTIES**

22
23 5. At all times herein mentioned, Plaintiff EDWARDS is and has been a resident of Los
24 Angeles County, State of California.
25

26 6. Defendant INGLEWOOD UNIFIED SCHOOL DISTRICT is and at all times herein
27 mentioned has been a government capacity with the capacity to sue and to be sued, and
28 doing business, with a principal place of business located at 401 S. Inglewood Ave.,
29

09/05/2017

1 Inglewood, CA 90301.

2
3 7. Defendant KYLE DOUGLAS, (hereinafter referred to as "DOUGLAS"), was at all times
4 herein mentioned a Principal at Inglewood High School, and at all times herein mentioned
5 was and, upon information and belief, still is a resident of the County of Los Angeles, State
6 of California.

7
8 8. Plaintiff is informed and believes and thereon alleges that each of the Defendants herein
9 were at all times the agent, employee, or representative of each remaining Defendant and
10 were at all times herein acting within and outside the scope and purpose of said agency and
11 employment. Plaintiff further alleges that as to each Defendant, whether named, or referred
12 to as a fictitious name, said Defendants supervised, ratified, controlled, acquiesced in,
13 adopted, directed, substantially participated in, and/or approved the acts, errors, or omissions,
14 of each remaining Defendant.

15
16 9. The true names and capacities of the Defendants named herein as DOES 1 through 250,
17 inclusive, whether individual, corporate, partnership, association, or otherwise, are unknown
18 to Plaintiff who therefore sues these Defendants by such fictitious names. Plaintiff will
19 request leave of court to amend this Complaint to allege their true names and capacities at
20 such time as they are ascertained.

21
22 **FACTUAL ALLEGATIONS**

23
24 10. Plaintiff commenced her employment with DEFENDANT on or about January 23, 2013, as
25 a Spanish Teacher. Plaintiff remained in this position for approximately two years and then,
26 was promoted to the position of Assistant Principal. She was constructively terminated from
27 her employment at DEFENDANT on June 23, 2017, after making continuous and repeated
28 complaints about unlawful activities at Inglewood High School.

09/05/2017

1
2 11. In or about August 2015, Plaintiff began working as an Assistant Principal at Inglewood
3 High School. Soon after Plaintiff began working at Inglewood High School, she noticed
4 various improprieties occurring at the school.

5
6 12. In or about October 2015, Plaintiff brought her concerns to the attention of Principal
7 DOUGLAS. Her concerns included, but was not limited to, missing funds, stipends being
8 issued for non-existing positions, the absence of a school site council, the non-existence of
9 minutes and/or agendas for meetings and reports not being submitted.

10
11 13. DOUGLAS told Plaintiff that he would look into it, but nothing changed. In or about
12 January 2016, Plaintiff realized that DOUGLAS had been aware of the issues she had raised
13 with him in October 2015, but had no intentions of changing anything.

14
15 14. In or about March 2016, Plaintiff decided to meet with Reginald Sirls ("Sirls"), Douglas'
16 immediate supervisor, and Kenneth Wheeler ("Wheeler"), Director of Student Support
17 Services. Plaintiff basically raised the same issues she had previously brought to the
18 attention of DOUGLAS back in October of 2015. Plaintiff was told by Sirls and Wheeler
19 that they would look into it. However, there was no follow up with Plaintiff after this
20 meeting.

21
22 15. In or about May 2016, Plaintiff informed Nora Roque ("Roque"), Executive Director of H.R.
23 that there were funds that were missing and that required fund raising forms were not being
24 submitted to Plaintiff. Roque simply told Plaintiff that another employee would handle these
25 issues. During this time frame, Plaintiff also gave Dr. Vincent Matthews, a former
26 Superintendent, a detailed complaint about violations taking place at Inglewood High School.
27 Plaintiff never heard back from Dr. Matthews.

28
09/06/2017

1 16. During the summer of 2016, Plaintiff attempted to transfer out of Inglewood High School
2 due to the continuous unlawful activities. Unfortunately, Plaintiff was unable to transfer to
3 another school.

4
5 17. In or about September 2016, Plaintiff returned to Inglewood High School for the following
6 school year. It was at this time that Plaintiff began to experience retaliation by DOUGLAS.
7 DOUGLAS became critical of Plaintiff's job performance. DOUGLAS did not support
8 Plaintiff in her position as Vice Principal, expressed annoyance over Plaintiff speaking
9 Spanish during school assemblies and began to have a problem with Plaintiff having
10 relationships with the Spanish-speaking parents.

11
12 18. In addition, Plaintiff began to be subjected to sexually offensive comments and/or
13 conversations. First, DOUGLAS insinuated that Plaintiff was having a homosexual
14 relationship with one of her female colleagues. Plaintiff is heterosexual and married.
15 DOUGLAS would make comments such as "you're always together," "people are beginning
16 to talk," and "people saw you like you were doing something." DOUGLAS also subjected
17 Plaintiff to unwelcome sexually obscene conversations and text conversations that related
18 to female teachers sexually propositioning DOUGLAS.

19
20 19. On January 30, 2017, DOUGLAS gave Plaintiff a negative performance evaluation. Plaintiff
21 disputed the evaluation and attempted to contact H.R. that same day, to discuss her negative
22 evaluation, to no avail. Prior to this evaluation, Plaintiff has not received any verbal or
23 written warnings.

24
25 20. In or about March 2017, Roque sent Plaintiff an email informing Plaintiff that she would be
26 receiving a letter of "non re-elect" as Assistant Principal of Inglewood High School. The
27 letter of non re-elect, in essence, ended Plaintiff's career with DEFENDANT. Roque also
28 informed Plaintiff that she could be placed on the agenda to determine if she could be hired

1 as a Teacher.

2
3 21. Due to the retaliation and hostile work environment, Plaintiff chose to resign her
4 employment with DEFENDANT on June 23, 2017.

5
6
7 **FIRST CAUSE OF ACTION**

8 **(Retaliation in Violation of Labor Code Section 1102.5)**

9 **(EDWARDS Against Defendants INGLEWOOD UNIFIED**

10 **and DOES 1 through 250)**

11
12 22. The allegations of paragraphs 1 through 21 are re-alleged and incorporated herein by
13 reference as though fully set forth herein.

14
15 23. At all times herein mentioned in this complaint, California Labor Code Section 1102.5 et
16 seq. was in full force and effect and binding on the Defendants and the Defendants were
17 subject to its terms. Defendants wrongfully retaliated against Plaintiff for reasons and in a
18 manner contrary to public policy, on a pre-textual basis, because of her complaints that
19 Defendants were engaged in unlawful activities, as herein above alleged.

20
21 24. Pursuant to California Labor Code Section 1102.5(b), an employer may not retaliate against
22 an employee for disclosing information to a government or law enforcement agency, to a
23 person with authority over the employee or another employee who has the authority to
24 investigate, discover, or correct the violation or noncompliance, where the employee has
25 reasonable cause to believe that the information discloses a violation of state or federal
26 statute, or a violation or noncompliance with a state or federal rule or regulation.

27
28 25. In or about August 2015, Plaintiff began working as an Assistant Principal at Inglewood

09:00:2017

1 High School. Soon after Plaintiff began working at Inglewood High School, she noticed
2 various improprieties occurring at the school.

3
4 26. In or about October 2015, Plaintiff brought her concerns to the attention of Principal
5 DOUGLAS. Her concerns included, but was not limited to, missing funds, stipends being
6 issued for non-existing positions, the absence of a school site council, the non-existence of
7 minutes and/or agendas for meetings and reports not being submitted.

8
9 27. DOUGLAS told Plaintiff that he would look into it, but nothing changed. In or about
10 January 2016, Plaintiff realized that DOUGLAS had been aware of the issues she had raised
11 with him in October 2015, but had no intentions of changing anything.

12
13 28. In or about March 2016, Plaintiff decided to meet with Reginald Sirls ("Sirls"), Douglas'
14 immediate supervisor, and Kenneth Wheeler ("Wheeler"), Director of Student Support
15 Services. Plaintiff basically raised the same issues she had previously brought to the
16 attention of DOUGLAS back in October of 2015. Plaintiff was told by Sirls and Wheeler
17 that that they would look into it. However, there was no follow up with Plaintiff after this
18 meeting.

19
20 29. In or about May 2016, Plaintiff informed Nora Roque ("Roque"), Executive Director of H.R.
21 that there were funds that were missing and that required fund raising forms were not being
22 submitted to Plaintiff. Roque simply told Plaintiff that another employee would handle these
23 issues. During this time frame, Plaintiff also gave Dr. Vincent Matthews, a former
24 Superintendent, a detailed complaint about violations taking place at Inglewood High School.
25 Plaintiff never heard back from Dr. Matthews.

26
27
28 30. During the summer of 2016, Plaintiff attempted to transfer out of Inglewood High School

1 due to the continuous unlawful activities. Unfortunately, Plaintiff was unable to transfer to
2 another school.

3
4 31. In or about September 2016, Plaintiff returned to Inglewood High School for the following
5 school year. It was at this time that Plaintiff began to experience retaliation by DOUGLAS.
6 DOUGLAS became critical of Plaintiff's job performance. DOUGLAS did not support
7 Plaintiff in her position as Vice Principal, expressed annoyance over Plaintiff speaking
8 Spanish during school assemblies and began to have a problem with Plaintiff having
9 relationships with the Spanish-speaking parents.

10
11 32. In addition, Plaintiff began to be subjected to sexually offensive comments and/or
12 conversations. First, DOUGLAS insinuated that Plaintiff was having a homosexual
13 relationship with one of her female colleagues. Plaintiff is heterosexual and married.
14 DOUGLAS would make comments such as "you're always together," "people are beginning
15 to talk," and "people saw you like you were doing something." DOUGLAS also subjected
16 Plaintiff to unwelcome sexually obscene conversations and text conversations that related
17 to female teachers sexually propositioning DOUGLAS.

18
19 33. On January 30, 2017, DOUGLAS gave Plaintiff a negative performance evaluation. Plaintiff
20 disputed the evaluation and attempted to contact H.R. that same day, to discuss her negative
21 evaluation, to no avail. Prior to this evaluation, Plaintiff has not received any verbal or
22 written warnings.

23
24 34. In or about March 2017, Roque sent Plaintiff an email informing Plaintiff that she would be
25 receiving a letter of "non re-elect" as Assistant Principal Inglewood High School. The letter
26 of non re-elect, in essence, ended Plaintiff's career with DEFENDANT. Roque also
27 informed Plaintiff that she could be placed on the agenda to determine if she could be hired
28 as a Teacher instead.

09/05/2017

1 Plaintiff to sexually obscene conversations and text messages, none of which are a normal
2 part of an employment relationship, constitutes extreme and outrageous conduct, as described
3 in more detail *above*.

4
5 40. As a proximate result of Defendants' conduct, Plaintiff suffered severe emotional distress,
6 anxiety, pain and suffering, *physical injuries, physical sickness*, medical expenses, future
7 medical expenses, attorneys' fees, and other damages to be determined at trial according to
8 proof.

9
10 41. Said conduct was wrongful and justifies the imposition of punitive damages. Defendants
11 committed the acts alleged herein maliciously, fraudulently and oppressively, with the
12 wrongful intentions of injuring Plaintiff, from an improper and evil motive amounting to
13 malice, and in conscious disregard of Plaintiff's rights. Based upon the foregoing, Plaintiff
14 is entitled to recover punitive damages from Defendants, and each of them, in an amount
15 according to proof.

16
17
18 **PRAYER**

- 19
20 1. For damages according to proof, including loss of earnings, deferred compensation, overtime
21 and other employment benefits;
- 22 2. For general damages, according to proof;
- 23 3. For other special damages according to proof, including but not limited to reasonable
24 medical expenses;
- 25 4. For punitive damages according to proof;
- 26 5. For prejudgment interest on lost wages and benefits;
- 27 6. For costs incurred by Plaintiff, including reasonable attorneys' fees and costs of suit, in
28 obtaining the benefits due Plaintiff and for violations of Plaintiff's civil rights;

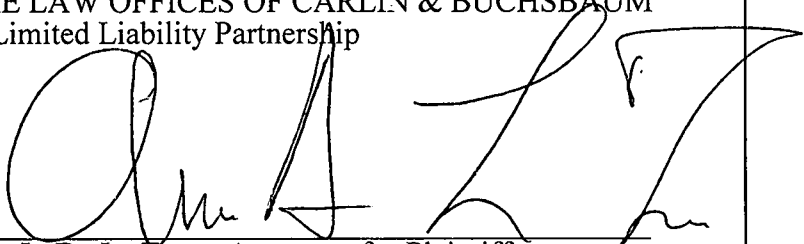
09/05/2017

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

7. For such other and further relief as the court deems just and proper.

Dated: September 1, 2017

THE LAW OFFICES OF CARLIN & BUCHSBAUM
A Limited Liability Partnership

By 
Ana L. De La Torre, Attorneys for Plaintiff,
LISA EDWARDS

DEMAND FOR JURY TRIAL

Plaintiff hereby respectfully demands a jury trial.

Dated: September 1, 2017

THE LAW OFFICES OF CARLIN & BUCHSBAUM
A Limited Liability Partnership

By 
Ana L. De La Torre, Attorneys for Plaintiff,
LISA EDWARDS

09/05/2017

ORIGINAL

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

Ana L. De La Torre, CSBN: 236705
Law Offices of Carlin & Buchsbaum, LLP
555 East Ocean Blvd., Suite 818
Long Beach, California 90802

TELEPHONE NO.: (562)432-8933 FAX NO.: (562)435-1656

ATTORNEY FOR (Name): Lisa Edwards, Plaintiff

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: Central District

CASE NAME: Edwards v. Inglewood Unified School District, et al.

CIVIL CASE COVER SHEET
 Unlimited (Amount demanded exceeds \$25,000)
 Limited (Amount demanded is \$25,000 or less)

Complex Case Designation
 Counter **Joinder**
Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)

FOR COURT USE ONLY
FILED
Superior Court Of California
County Of Los Angeles
SEP 06 2017
K. ... Executive Officer
... Deputy
... Robata

CASE NUMBER: **BC 674794**
JUDGE:
DEPT:

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

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

<p>Auto Tort</p> <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46) <p>Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort</p> <input type="checkbox"/> Asbestos (04) <input type="checkbox"/> Product liability (24) <input type="checkbox"/> Medical malpractice (45) <input type="checkbox"/> Other PI/PD/WD (23) <p>Non-PI/PD/WD (Other) Tort</p> <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-PI/PD/WD tort (35) <p>Employment</p> <input type="checkbox"/> Wrongful termination (36) <input checked="" type="checkbox"/> Other employment (15)	<p>Contract</p> <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) <p>Real Property</p> <input type="checkbox"/> Eminent domain/Inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (26) <p>Unlawful Detainer</p> <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38) <p>Judicial Review</p> <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)	<p>Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403)</p> <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) <p>Enforcement of Judgment</p> <input type="checkbox"/> Enforcement of judgment (20) <p>Miscellaneous Civil Complaint</p> <input type="checkbox"/> RICO (27) <input type="checkbox"/> Other complaint (not specified above) (42) <p>Miscellaneous Civil Petition</p> <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): Two (2)

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 5, 2017

Ana L. De La Torre, CSBN: 236705
(TYPE OR PRINT NAME)

(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

NOTICE

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

ORIGINAL

SHORT TITLE: Edwards v. Inglewood Unified School District, et al.

CASE NUMBER

CIVIL CASE COVER SHEET ADDENDUM AND STATEMENT OF LOCATION (CERTIFICATE OF GROUNDS FOR ASSIGNMENT TO COURTHOUSE LOCATION)

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

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

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

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

Applicable Reasons for Choosing Court Filing Location (Column C)

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

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

SHORT TITLE: Edwards v. Inglewood Unified School District, et al.

CASE NUMBER

	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Non-Personal Injury/ Property Damage/ Wrongful Death Tort	Business Tort (07)	<input type="checkbox"/> A6029 Other Commercial/Business Tort (not fraud/breach of contract)	1, 2, 3
	Civil Rights (08)	<input type="checkbox"/> A6005 Civil Rights/Discrimination	1, 2, 3
	Defamation (13)	<input type="checkbox"/> A6010 Defamation (slander/libel)	1, 2, 3
	Fraud (16)	<input type="checkbox"/> A6013 Fraud (no contract)	1, 2, 3
	Professional Negligence (25)	<input type="checkbox"/> A6017 Legal Malpractice	1, 2, 3
		<input type="checkbox"/> A6050 Other Professional Malpractice (not medical or legal)	1, 2, 3
Other (35)	<input type="checkbox"/> A6025 Other Non-Personal Injury/Property Damage tort	1, 2, 3	
Employment	Wrongful Termination (36)	<input type="checkbox"/> A6037 Wrongful Termination	1, 2, 3
	Other Employment (15)	<input checked="" type="checkbox"/> A6024 Other Employment Complaint Case	1, 2, 3
		<input type="checkbox"/> A6109 Labor Commissioner Appeals	10
Contract	Breach of Contract/ Warranty (06) (not insurance)	<input type="checkbox"/> A6004 Breach of Rental/Lease Contract (not unlawful detainer or wrongful eviction)	2, 5
		<input type="checkbox"/> A6008 Contract/Warranty Breach -Seller Plaintiff (no fraud/negligence)	2, 5
		<input type="checkbox"/> A6019 Negligent Breach of Contract/Warranty (no fraud)	1, 2, 5
		<input type="checkbox"/> A6028 Other Breach of Contract/Warranty (not fraud or negligence)	1, 2, 5
	Collections (09)	<input type="checkbox"/> A6002 Collections Case-Seller Plaintiff	5, 6, 11
		<input type="checkbox"/> A6012 Other Promissory Note/Collections Case	5, 11
	<input type="checkbox"/> A6034 Collections Case-Purchased Debt (Charged Off Consumer Debt Purchased on or after January 1, 2014)	5, 6, 11	
Insurance Coverage (18)	<input type="checkbox"/> A6015 Insurance Coverage (not complex)	1, 2, 5, 8	
Other Contract (37)	<input type="checkbox"/> A6009 Contractual Fraud	1, 2, 3, 5	
	<input type="checkbox"/> A6031 Tortious Interference	1, 2, 3, 5	
	<input type="checkbox"/> A6027 Other Contract Dispute(not breach/insurance/fraud/negligence)	1, 2, 3, 8, 9	
Real Property	Eminent Domain/Inverse Condemnation (14)	<input type="checkbox"/> A7300 Eminent Domain/Condemnation Number of parcels _____	2, 6
	Wrongful Eviction (33)	<input type="checkbox"/> A6023 Wrongful Eviction Case	2, 6
	Other Real Property (26)	<input type="checkbox"/> A6018 Mortgage Foreclosure	2, 6
<input type="checkbox"/> A6032 Quiet Title		2, 6	
	<input type="checkbox"/> A6060 Other Real Property (not eminent domain, landlord/tenant, foreclosure)	2, 6	
Unlawful Detainer	Unlawful Detainer-Commercial (31)	<input type="checkbox"/> A6021 Unlawful Detainer-Commercial (not drugs or wrongful eviction)	6, 11
	Unlawful Detainer-Residential (32)	<input type="checkbox"/> A6020 Unlawful Detainer-Residential (not drugs or wrongful eviction)	6, 11
	Unlawful Detainer- Post-Foreclosure (34)	<input type="checkbox"/> A6020F Unlawful Detainer-Post-Foreclosure	2, 6, 11
	Unlawful Detainer-Drugs (38)	<input type="checkbox"/> A6022 Unlawful Detainer-Drugs	2, 6, 11

SHORT TITLE: Edwards v. Inglewood Unified School District, et al.

CASE NUMBER

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

1037 90760

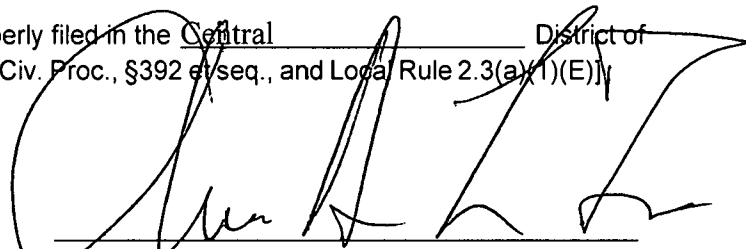
SHORT TITLE: Edwards v. Inglewood Unified School District, et al.	CASE NUMBER
---	-------------

Step 4: Statement of Reason and Address: Check the appropriate boxes for the numbers shown under Column C for the type of action that you have selected. Enter the address which is the basis for the filing location, including zip code. (No address required for class action cases).

REASON: <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.		ADDRESS: 401 S. Inglewood Avenue	
CITY:	STATE:	ZIP CODE:	
Inglewood	CA	90301	

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

Dated: September 5, 2017


 (SIGNATURE OF ATTORNEY/FILING PARTY)
 Ana L. De La Torre, CSBN: 236705

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

1. Original Complaint or Petition.
2. If filing a Complaint, a completed Summons form for issuance by the Clerk.
3. Civil Case Cover Sheet, Judicial Council form CM-010.
4. Civil Case Cover Sheet Addendum and Statement of Location form, LACIV 109, LASC Approved 03-04 (Rev. 02/16).
5. Payment in full of the filing fee, unless there is court order for waiver, partial or scheduled payments.
6. A signed order appointing the Guardian ad Litem, Judicial Council form CIV-010, if the plaintiff or petitioner is a minor under 18 years of age will be required by Court in order to issue a summons.
7. Additional copies of documents to be conformed by the Clerk. Copies of the cover sheet and this addendum must be served along with the summons and complaint, or other initiating pleading in the case.

09/05/2017