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FILED
Superior Court of California
County of Los Angeles

OCT 30 2014

Sherri R. Carter, Executive Officer/Clerk
By Cristina Grijalva Deputy
Cristina Grijalva

9 Attorneys for Plaintiff

D14 Terry A. Green

SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

13 PAUL BRODEUR,
14
15 Plaintiff,
16 vs.
17 ATLAS ENTERTAINMENT, INC.;
ANNAPURNA PRODUCTIONS LLC d/b/a
18 ANNAPURNA PICTURES; COLUMBIA
PICTURES INDUSTRIES, INC.; and FIRST
DOE THROUGH FIFTIETH DOE,
19 Defendants.

Case No. **BC 562288**
COMPLAINT

DEMAND FOR JURY TRIAL

21 **COMES NOW** Paul Brodeur ("Plaintiff"), as and for his Complaint against Atlas
22 Entertainment, Inc., Annapurna Productions LLC d/b/a Annapurna Pictures, Columbia Pictures
23 Industries, Inc., and First Doe through Fiftieth Doe (collectively, "Defendants"), in and to
24 follows:

GENERAL ALLEGATIONS

26 1. Plaintiff is a resident of Truro, Massachusetts. He is a well-known author in the
27 environmental field, pointing out health dangers of the use of various electrical devices and other

CIT/CASE: BC562288
LFA/DF #:
RECEIVED:
DATE PAID: 10/30/14 01:53 PM
AMOUNT: \$435.00
CHECK: \$435.00
CASH: \$0.00
CHANGE: \$0.00
CARD: \$0.00

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10/30/2014

1 household items.

2 2. Defendant Atlas Entertainment, Inc. (“Atlas”) is a California corporation with its
3 principal place of business at 9200 West Sunset Blvd., Los Angeles, California. It is engaged in
4 the business of producing and distributing motion pictures. It was listed as one of the producers of
5 the film *American Hustle*.

6 3. Defendant Annapurna Productions LLC d/b/a Annapurna Pictures (“Annapurna”) is a California corporation with its principal place of business at 9536 Wilshire Blvd., Beverly
7 Hills, California. It is engaged in the business of producing and distributing motion pictures. It is
8 listed as one of the producers of *American Hustle*.

9 4. Defendant Columbia Pictures Industries, Inc. (“Columbia”) is a California
10 corporation with its principal place of business at 10202 West Washington Blvd., Culver City,
11 California. It is listed as one of the producers and distributors of *American Hustle*.

12 5. Plaintiff does not know the true names and capacities, whether corporate, associate
13 or individual of defendants sued herein as First Doe through Fiftieth Doe, inclusive, and each of
14 them, and for that reason prays leave to insert the true names and capacities of said defendants
15 when the same are ascertained. Plaintiff is informed and believes and therefore alleges that each
16 of the defendants designated herein as a Doe is liable or responsible in some manner for the events
17 and happenings herein referred to, and proximately caused injury and damages to Plaintiff thereby
18 as herein alleged.

19
20 **FACTUAL BACKGROUND**

21 6. Defendants Atlas and Annapurna have produced a film entitled *American Hustle*,
22 which was also produced and distributed by Columbia. It was released in the United States on
23 December 20, 2013. It is the story of various frauds committed by the leading characters Irving
24 Rosenfeld (played by Christian Bale) and Sidney Prosser (played by Amy Adams). In the film,
25 Irving Rosenfeld is married to Roselyn Rosenfeld (played by Jennifer Lawrence) with whom he
26 has a contentious, difficult relationship.

27 7. The film is loosely based on the Abscam scandal in which various members of
28

1 Congress were bribed to advance various fraudulent schemes concocted by the FBI who promptly
2 arrested the offenders. The film has nothing to do with the environmental issues examined by
3 Mr. Brodeur.

4 8. In the course of the film, there is an antagonistic encounter between the Rosenfelds.
5 In a scene in the movie, a microwave oven explodes. The character played by Jennifer Lawrence,
6 Rosalyn Rosenfeld, then has an argument with her husband, the character Irving Rosenfeld, played
7 by Christian Bale, about the microwave oven. She says:

8 ROSALYN: "You know, I read that it [the microwave oven] takes all of the
9 nutrition out of our food. It's empty, just like your deals. Empty, Empty."

10 IRVING: "That's Bullshit."

11 ROSALYN "It's not bullshit. I read it in an article. (She holds up a magazine)
12 Look, by Paul Brodeur."

13 9. The film clearly shows that Rosalyn's husband believes her comment. In this
14 sequence, Rosalyn hands her husband the magazine which allegedly contains an article by
15 Mr. Brodeur, declaring that cooking in a microwave oven allegedly takes all the nutrition out of
16 food. Irving then spends at least ten seconds reading it – a very long time in a film – and even
17 adjusts his eyeglasses to indicate that he is reading it. During his time and afterward, he remains
18 silent. It is obvious that he accepts that the article contains Brodeur's statement, as she has
19 claimed, that food cooked in the microwave oven "takes all of the nutrition out of our food."

20 10. Paul Brodeur has never written an article or ever declared in any way that a
21 microwave oven "takes all of the nutrition out of food." Indeed, he has publicly stated the
22 opposite. In an interview in People Magazine in 1978, Mr. Brodeur was asked by Jim Jerome: "Is
23 there any danger in eating food cooked by microwaves?" BRODEUR: "None that is known."
24 *People Magazine*, Vol. 9, No. 4, January 30, 1978.

25 11. The Food and Drug Administration has declared in a publication dated April 26,
26 2011, called "Microwave Oven Radiation," that "Microwave cooking does not reduce the
27 nutritional value of foods any more than conventional cooking. In fact, foods cooked in a
28 microwave oven may keep more of their vitamins and minerals, because microwave ovens can

1 cook more quickly and without adding water.” [http://www.fda.gov/radiation-emittingproducts/
2 resourcesforyourradiationemittingproducts/ucm252762.htm](http://www.fda.gov/radiation-emittingproducts/resourcesforyourradiationemittingproducts/ucm252762.htm).

3 12. The World Health Organization has declared, as virtually every other expert has
4 noted, that there is no adverse effect on food cooked in a microwave. “Food cooked in a
5 microwave oven is as safe, and has the same nutrient value, as food cooked in a conventional
6 oven.” [http://www.who.int/peh-emf/publications/ facts/info microwaves/en/](http://www.who.int/peh-emf/publications/facts/info_microwaves/en/).

7 13. By misquoting Mr. Brodeur in this manner, the Defendants have suggested to the
8 movie audience that Mr. Brodeur made a scientifically unsupportable statement. By attributing
9 that untenable statement to Mr. Brodeur, Defendants have damaged his reputation. The United
10 States Supreme Court has held:

11 Under California law, “[l]ibel is a false and unprivileged publication by writing ...
12 which exposes any person to hatred, contempt, ridicule, or obloquy, or which
13 causes him to be shunned or avoided, or which has a tendency to injure him in his
14 occupation.” Cal.Civ.Code Ann. § 45 (West 1982). *False attribution of statements
15 to a person may constitute libel, if the falsity exposes that person to an injury
16 comprehended by the statute. See Selleck v. Globe International, Inc., 166
17 Cal.App.3d 1123, 1132, 212 Cal.Rptr. 838, 844 (1985); Cameron v. Wernick, 251
18 Cal.App.2d 890, 60 Cal.Rptr. 102 (1967); Kerby v. Hal Roach Studios, Inc., 53
19 Cal.App.2d 207, 213, 127 P.2d 577, 581 (1942); cf. Baker v. Los Angeles Herald
20 Examiner, 42 Cal.3d 254, 260–261, 228 Cal.Rptr. 206, 208–210, 721 P.2d 87, 90–
21 91 (1986). It matters not under California law that petitioner alleges only part of the
22 work at issue to be false. “[T]he test of libel is not quantitative; a single sentence
23 may be the basis for an action in libel even though buried in a much longer text, . . .*

24 *Masson v. New Yorker Magazine* (1991) 501 U.S. 496, 509-10 (emphasis added).

25 14. There is no doubt that the dialogue quoted above and the misattribution of the
26 statement about microwave ovens to Mr. Brodeur “exposes [Mr. Brodeur] to an injury” that the
27 libel laws are designed to remedy.

28 **First Claim for Relief**

(Libel – Against All Defendants)

15. Plaintiff realleges and reincorporates by reference each and every allegation
contained above.

16. On or about December 20, 2013, Defendants published in a written format
numerous false statements of fact giving rise to liability for defamation under Civil Code section

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45.

17. The statements are unprivileged.

18. The statements published by Defendants do not pertain to a matter of public interest, but attack Plaintiff's personal reputation.

19. The false publications occurred in the form of writing, printing or other fixed representation disseminated over the media to millions of persons who are not the subject of the defamatory publication.

20. The offending and false publications were spoken of and concerning the Plaintiff both by name and by implication through the use of pronouns, context and otherwise.

21. As a direct and proximate result of the false and defamatory publications of Defendants, and each of them, Plaintiff has been exposed to hatred, contempt, ridicule or disgrace, and Plaintiff has tended to suffer injury and losses as an author in the environmental field.

22. These false publications of Defendants, and each of them, were made with actual malice because they knew the statements to be untrue and/or with a reckless disregard whether or not the statements were true, and were made with the express intent to harm Plaintiff.

Second Claim of Relief

(Defamation – Against All Defendants)

23. Plaintiff realleges and reincorporates by reference each and every allegation contained above.

Third Claim of Relief

(Slander – Against All Defendants)

24. Plaintiff realleges and reincorporates by reference each and every allegation contained above.

25. On or about December 20, 2013, and at all times thereafter, in the presence of millions of people who watched *American Hustle*, Defendants said to, and of Plaintiff, the defamatory statement set forth in Paragraphs 8 through 14 herein giving rise to slander under Civil Code section 46.

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26. The statement was false.

27. The persons who watched *American Hustle* heard the statement by Defendants knew Plaintiff and understood from the statement that Mr. Brodeur made a scientifically unsupportable statement about the safety of microwave ovens.

28. As a proximate result of the slanderous statement by Defendants, and each of them, Plaintiff sustained actual damages in that the statement tended directly to injure Plaintiff's reputation in respect to his profession as a skilled writer on scientific subjects, all to Plaintiff's general damage.

29. As a proximate result of the slanderous statement by Defendants, and each of them, Plaintiff suffered special damages in that statements tended directly to injure Plaintiff's reputation in respect to his profession as a skilled writer on scientific subjects.

Fourth Claim for Relief

(False Light – Against All Defendants)

30. Plaintiff realleges and reincorporates by reference each and every allegation contained above.

31. By releasing *American Hustle* that falsely represents that Plaintiff made a scientifically unsupportable statement about the safety of microwave ovens, Defendants placed Plaintiff before the public in a false light.

32. The scene from the movie *American Hustle* where the defamatory statement was made is highly offensive to a reasonable person.

33. In so doing, Defendants acted with actual malice, gross negligence, and reckless disregard as to the falsity of the publicized matter and the false light in which it portrayed Plaintiff.

34. As a direct and proximate result of Defendants' actions, Plaintiff has suffered actual and special damages in the amount of \$1 million and irreparable harm.

PRAYER FOR RELIEF

By reason of the acts and circumstances alleged above, Plaintiff seeks relief from this Court as follows:

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A Professional Law Corporation

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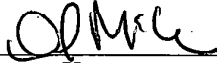
10/27/2014

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1. Compensatory damages in the amount of \$1 million;
2. The costs and expense of this suit, including attorney fees;
3. An injunction removing Mr. Brodeur's name from any copies of the film distributed to the public; and
4. Such other and further relief as this court deems just and proper.

DATED: October 27, 2014

KAZAN, McCLAIN, SATTERLEY & GREENWOOD
A Professional Law Corporation

By: 
Steven Kazan
David McClain

Attorneys for Plaintiff

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):
David McClain, Esq. (C.S.B. #54085)
KAZAN, McCLAIN, STATTERLEY & GREENWOOD
Jack London Marketplace
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TELEPHONE NO.: FAX NO.: 510-835-4913
ATTORNEY FOR (Name): Plaintiff

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FILED
Superior Court of California
County of Los Angeles
OCT 30 2014
Sherri R. Carter, Executive Officer/Clerk
By Cristina Grijalva Deputy
Cristina Grijalva

SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles
STREET ADDRESS: 111 North Hill Street
MAILING ADDRESS:
CITY AND ZIP CODE: Los Angeles, CA 90012
BRANCH NAME: Stanley Mosk Courthouse

CASE NAME: Paul Brodeur v. Atlas Entertainment, Inc., 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)

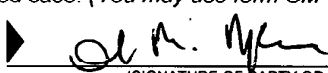
CASE NUMBER: **BC 562288**
JUDGE:
DEPT:

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 checked="" 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 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. Large number of separately represented parties d. Large number of witnesses
b. Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve e. Coordination with related actions pending in one or more courts in other counties, states, or countries; or in a federal court
c. Substantial amount of documentary evidence f. Substantial postjudgment judicial supervision
3. Remedies sought (check all that apply): a. monetary b. nonmonetary; declaratory or injunctive relief c. punitive

4. Number of causes of action (specify): Four - Libel, Defamation, Slander and False Light
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: October 27, 2014
David McClain, Esq. (C.S.B. #54085) 
(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

SHORT TITLE:

Paul Brodeur v. Atlas Entertainment, Inc., et al.

CASE NUMBER

BC 562288

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 2.0 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? [X] YES CLASS ACTION? [] YES LIMITED CASE? [] YES TIME ESTIMATED FOR TRIAL 10 [] HOURS/ [X] 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 2.0.

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

- 1. Class actions must be filed in the Stanley Mosk Courthouse, central district.
2. May be filed in central (other county, or no bodily injury/property damage).
3. Location where cause of action arose.
4. Location where bodily injury, death or damage occurred.
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

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

Table with 3 columns: A (Civil Case Cover Sheet Category No.), B (Type of Action), and C (Applicable Reasons). Rows include Auto Tort, Uninsured Motorist, Asbestos, Product Liability, Medical Malpractice, and Other Personal Injury/Property Damage/Wrongful Death.

10/30/2014

SHORT TITLE: Paul Brodeur v. Atlas Entertainment, Inc., et al.	CASE NUMBER
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Non-Personal Injury/Property Damage/Wrongful Death Tort

Employment

Contract

Real Property

Unlawful Detainer

A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Business Tort (07)	<input type="checkbox"/> A6029 Other Commercial/Business Tort (not fraud/breach of contract)	1., 3.
Civil Rights (08)	<input type="checkbox"/> A6005 Civil Rights/Discrimination	1., 2., 3.
Defamation (13)	<input checked="" type="checkbox"/> A6010 Defamation (slander/libel)	1., 2., 3.
Fraud (16)	<input type="checkbox"/> A6013 Fraud (no contract)	1., 2., 3.
Professional Negligence (25)	<input type="checkbox"/> A6017 Legal Malpractice	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	2,3.
Wrongful Termination (36)	<input type="checkbox"/> A6037 Wrongful Termination	1., 2., 3.
Other Employment (15)	<input type="checkbox"/> A6024 Other Employment Complaint Case	1., 2., 3.
	<input type="checkbox"/> A6109 Labor Commissioner Appeals	10.
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	2., 5., 6.
	<input type="checkbox"/> A6012 Other Promissory Note/Collections Case	2., 5.
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.
Eminent Domain/Inverse Condemnation (14)	<input type="checkbox"/> A7300 Eminent Domain/Condemnation Number of parcels_____	2.
Wrongful Eviction (33)	<input type="checkbox"/> A6023 Wrongful Eviction Case	2., 6.
Other Real Property (26)	<input type="checkbox"/> A6018 Mortgage Foreclosure	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-Commercial (31)	<input type="checkbox"/> A6021 Unlawful Detainer-Commercial (not drugs or wrongful eviction)	2., 6.
Unlawful Detainer-Residential (32)	<input type="checkbox"/> A6020 Unlawful Detainer-Residential (not drugs or wrongful eviction)	2., 6.
Unlawful Detainer-Post-Foreclosure (34)	<input type="checkbox"/> A6020F Unlawful Detainer-Post-Foreclosure	2., 6.
Unlawful Detainer-Drugs (38)	<input type="checkbox"/> A6022 Unlawful Detainer-Drugs	2., 6.

10/30/2014

SHORT TITLE: Paul Brodeur v. Atlas Entertainment, Inc., 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
Judicial Review	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.
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., 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.
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	2., 7.
		<input type="checkbox"/> A6170 Petition for Relief from Late Claim Law	2., 3., 4., 8.
<input type="checkbox"/> A6100 Other Civil Petition	2., 9.		

10/20/2014

SHORT TITLE: Paul Brodeur v. Atlas Entertainment, Inc., 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.

REASON: Check the appropriate boxes for the numbers shown under Column C for the type of action that you have selected for this case. <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.		ADDRESS: 111 North Hill Street
CITY: Los Angeles	STATE: CA	ZIP CODE: 90012

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 2.0, subds. (b), (c) and (d)].

Dated: 10/27/14



 (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. 03/11).
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.

10/30/2014