

EXHIBIT A

1 Michael D. McLachlan (State Bar No. 181705)
2 LAW OFFICES OF MICHAEL D. McLACHLAN, APC
3 10490 Santa Monica Boulevard
4 Los Angeles, California 90025
5 Telephone: (310) 954-8270
6 Facsimile: (310) 954-8271
7 mike@mclachlanlaw.com

8 Daniel M. O'Leary (State Bar No. 175128)
9 LAW OFFICE OF DANIEL M. O'LEARY
10 10490 Santa Monica Boulevard
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12 Telephone: (310) 481-2020
13 Facsimile: (310) 481-0049
14 dan@danolearylaw.com

15 Attorneys for Petitioner Richard Wood

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085 James Chalkant

SUPERIOR COURT FOR THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

BS143790

RICHARD A. WOOD,

Petitioner,

v.

COUNTY OF LOS ANGELES,

Respondent.

Case No.:

PETITION FOR WRIT OF
MANDATE TO COMPEL RELEASE
OF PUBLIC RECORDS AND
COMPLIANCE WITH CALIFORNIA
PUBLIC RECORDS ACT
[GOV. CODE § 6250 *et seq.*]

CITY/CASE: BS143790
LEA/DEF#: 310
RECEIPT #: CCH503057150
DATE PAID: 07/02/13 12:27 PM
PAYMENT: \$435.00
RECEIVED:
CHECK: \$435.00
CASH: \$0.00
CHANGE: \$0.00
CARD: \$0.00

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PETITION FOR WRIT OF MANDATE

07/02/2013

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1 receipt, is attached hereto as Exhibit A. Petitioner requested access to 8 categories of
2 documents.

3 7. On June 25, 2013, the County denied the request for access in its entirety,
4 but stated that it did have records responsive to 5 of the 8 categories of records at issue.
5 A true and correct copy of the County's denial letter is attached hereto as Exhibit B.
6

7 **REASONS FOR GRANTING THE PETITION**

8 8. Government Code section 6253, subdivision (b), requires a local agency,
9 such as the County, which receives a request for a copy of public records that reasonably
10 describes an identifiable record or records, to make the records promptly available upon
11 payment of fees covering direct costs of duplication or a statutory fee, if applicable. The
12 only exception is for records that are exempt from disclosure by express provisions of
13 law. Government Code section 6253, subdivision (a), provides in essence that public
14 records are open to inspection at all times during the office hours of a local agency, and
15 every person has the right to inspect any public record, except for records that are exempt
16 from disclosure by express provisions of law. Furthermore under Government Code
17 section 6253, subdivision (a), any reasonably segregable portion of a record shall be
18 available for inspection by any person requesting the record after deletion of the portions
19 that are exempted by law.

20 9. The writings described in paragraph Exhibit A to this petition are public
21 records as defined by the California Public Records Act because they contain information
22 relating to the conduct of the public's business. Petitioner is informed and believes, and
23 on the basis of such information and belief alleges, that none of the requested records is
24 exempt from disclosure. Such records, including attorney fee bills, have been held to be
25 subject to disclosure under the Public Records Act. (*County of Los Angeles v. Superior*
26 *Court* (2012) 211 Cal.App.4th 57, 67.)

27 10. Access to the requested records is in furtherance of the public's interest, in
28 that the public has a right to be informed whether the affairs of the County are being

1 administered fairly and efficiently. There are no administrative exhaustion requirements
2 under the Act.

3 11. Petitioner has no plain, speedy, and adequate remedy at law other than this
4 proceeding. The petition is specifically authorized under Government Code sections
5 6258 and 6259.

6 12. Petitioner contends that the County's refusal to provide the requested
7 records is unjustified and violates the California Public Records Act. Respondent admits
8 to withholding various pertinent records that are responsive to petitioner's request.
9 (Exhibit B, p. 2.) Respondent has not established that any public interest in
10 nondisclosure of any requested record outweighs the public's interest in the writing's
11 disclosure, or that it is impossible to redact information, if any, that respondent is
12 legitimately entitled to withhold, while giving the public access to the remainder of the
13 requested records. The requested records bear upon the County's administration of its
14 Waterworks operations in the Antelope Valley. That is a matter which affects all of the
15 taxpayers of Los Angeles County.

16
17 **PRAYER FOR RELIEF**

18 Petitioner prays for relief as follows:

19 1. That this Court issue a peremptory writ of mandate commanding
20 Respondent to give Petitioner access to all requested records in their possession, custody,
21 or control.

22 2. Alternatively, if the writings are not required to be released immediately,
23 that this Court issue an alternative writ of mandate commanding Respondent to give
24 Petitioner access to all requested records in their possession, custody, or control, or, in the
25 alternative, to show cause before this Court at a time and place then or thereafter
26 specified by Court order, why they have not done so and why a peremptory writ should
27 not issue; and on the return of the alternative writ and hearing on the order to show cause,
28 a peremptory writ of mandate compelling Respondent to perform its public duty as set

1 forth above.

2 3. If the Court issues the alternative writ, that the Court review the requested
3 records in camera, pursuant to Government Code section 6259, subdivision (a), to
4 determine whether any exemption applies.

5 4. That the Court award Petitioner reasonable attorney fees and court costs
6 under Government Code section 6259, subdivision (d).

7 5. That the Court grant Petitioner such other and further relief as the Court
8 deems just.

9
10 DATED: July 1, 2013

LAW OFFICES OF MICHAEL D. McLACHLAN
LAW OFFICE OF DANIEL M. O'LEARY

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13 By: 

14 Michael D. McLachlan
15 Attorneys for Petitioner
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07/02/2013

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VERIFICATION

I am the petitioner. I have read the above Petition for Writ of Mandate and know its contents. The information supplied therein is based on my own personal knowledge and/or has been supplied by my attorneys or other agents and is therefore provided as required by law. The information contained in the foregoing document is true, except as to matters which were provided by my attorneys or other agents, and, as to those matters, I am informed and believe that they are true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Richard A. Wood

Richard A. Wood

PETITION FOR WRIT OF MANDATE

07/02/2013

07/02/2013

LAW OFFICES OF MICHAEL D. McLACHLAN

A PROFESSIONAL CORPORATION
10490 SANTA MONICA BOULEVARD
LOS ANGELES, CA 90025
PHONE 310-954-8270 FAX 310-954-8271
E-MAIL mike@mclachlanlaw.com

April 9, 2013

VIA CERTIFIED MAIL - RETURN RECEIPT

Department of Public Works
County of Los Angeles
900 S. Fremont
Alhambra, CA 91803

Re: California Public Records Act Request

Dear Sir or Madam:

Pursuant to Government Code section 6250 et seq., we hereby request disclosure of the following records within ten days from the date hereof:

1. All contracts for services between the County of Los Angeles, or any political subdivision of the County ("County") and Best, Best & Krieger, LLP ("BBK") including all revisions and amendments thereto since January 1, 2003.
2. All invoices or other requests for payment submitted to the County by or on behalf of BBK for payment since January 1, 2003.
3. All minutes and resolutions of the Board of Supervisors of the County approving payment to BBK since January 1, 2003.
4. Records showing the total amount paid to BBK for its work in connection with the Antelope Valley Groundwater Cases, Judicial Council Coordination Proceeding No. 4408, including all cases consolidated therewith.
5. All contracts for services between the County and Luhdorff & Scalmanini Consulting Engineers ("LSCE") including all revisions and amendments thereto since January 1, 2003.
6. All invoices or other requests for payment submitted to the County by or on behalf of LSCE for payment since January 1, 2003.

BA

07/03/2013

Department of Public Works
County of Los Angeles
April 9, 2013
Page 2

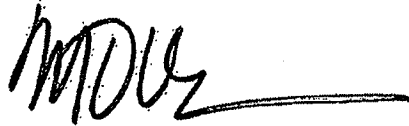
7. All minutes and resolutions of the Board of Supervisors of the County approving payment to LSCE since January 1, 2003,

8. All Statements of Economic Interest (Cal. Form 700) for years 2003 through 2012, inclusive, for BBK attorneys Jeffrey Dunn and Eric Garner.

We agree to pay the direct costs of duplication in an amount not to exceed \$400.00. If the costs of duplication will exceed \$400.00, please contact the undersigned for further authorization.

If any portion of this request is denied, set forth in writing the names and titles or positions of each person responsible for the denial.

Very truly yours,

A handwritten signature in black ink, appearing to read 'MDL', followed by a horizontal line extending to the right.

Michael D. McLachlan

07/02/2013

07/02/2013

EXHIBIT B



COUNTY OF LOS ANGELES
OFFICE OF THE COUNTY COUNSEL

648 KENNETH HAHN HALL OF ADMINISTRATION

500 WEST TEMPLE STREET

LOS ANGELES, CALIFORNIA 90012-2713

JOHN F. KRATTLI
County Counsel

June 25, 2013

TELEPHONE

(213) 974-1828

FACSIMILE

(213) 626-2105

TDD

(213) 633-0901

Michael D. McLachlan, Esq.
Law Offices of Michael D. McLachlan
10490 Santa Monica Blvd.
Los Angeles, California 90025

Re: Public Records Act Request Dated April 9, 2013

Dear Mr. McLachlan:

This letter responds to your April 9, 2013, public records request seeking the following information:

1. All contracts for services between the County of Los Angeles, or any political subdivision of the County ("County") and Best, Best & Krieger, LLP ("BBK") including all revisions and amendments thereto since January 1, 2003.
2. All invoices or other requests for payment submitted to the County by or on behalf of BBK for payment since January 1, 2003.
3. All minutes and resolutions of the Board of Supervisors of the County approving payment to BBK since January 1, 2003.
4. Records showing the total amount paid to BBK for its work in connection with the Antelope Valley Groundwater Cases, Judicial Council Coordination Proceeding No. 4408, including all cases consolidated therewith.
5. All contracts for services between the County and Luhdorff & Scalmanini Consulting Engineers ("LSCE") including all revisions and amendments thereto since January 1, 2003.
6. All invoices or other requests for payment submitted to the County by or on behalf of LSCE for payment since January 1, 2003.

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B B

Michael D. McLachlan, Esq.

June 25, 2013

Page 2

7. All minutes and resolutions of the Board of Supervisors of the County approving payment to LSCE since January 1, 2003.

8. All Statements of Economic Interest (Cal. Form 700) for years 2003 through 2012, inclusive, for BBK attorneys Jeffrey Dunn and Eric Garner.

After reviewing our records, we have determined that there are records that are responsive to the following requests: 1, 2, 4, 5, and 6. We do not possess records responsive the other requests you have made.

Please be advised that the involved responsive documents are exempt from production on the following grounds. The documents and information potentially responsive to your request (in particular, the detailed description, timing, and amount of attorney and consultant work performed, which communicates to the client and discloses attorney strategy, tactics, thought processes and analysis) are exempt from disclosure pursuant to Government Code sections 6254(k) and 6255(a).

The County of Los Angeles and Los Angeles County Waterworks District No. 40 acquired the requested information for purposes including, without limitation, ongoing litigation, pursuant to the contract for legal services with the law firm in question and the contract for consulting services with the consultant in question. The requested information is privileged under the official information privilege pursuant to Evidence Code section 1040, the attorney-client and attorney-work product privileges pursuant to Evidence Code sections 952, 954, and Code of Civil Procedure section 2018, *et. seq.*, and constitutes confidential communications pursuant to Business and Professions Code section 6149.

Additionally, your requests lack foundation and are vague, ambiguous, and unintelligible. Further, your requests appear to be, among other things, an improper attempt to conduct discovery aimed at District 40 in the Antelope Valley Groundwater Cases in circumvention of Judge Komar's discovery and case management orders. To extent that these requests are tantamount to discovery requests in the groundwater adjudication, they improperly seek discovery of information which is irrelevant, protected by the privileges referred to above, and not calculated to lead to the discovery of admissible evidence.

07/02/2013

Michael D. McLachlan, Esq.
June 25, 2013
Page 3

You did not address your request to my attention even though you have long been aware that I represent the County of Los Angeles and Los Angeles County Waterworks District No. 40. As a matter of professional courtesy, I request that you copy me with all communications to my clients that bear any relationship to the Antelope Valley Groundwater Adjudication or any other matters that you believe I am handling.

Very truly yours,

JOHN F. KRATTLI
County Counsel

By



WARREN R. WELLEN
Principal Deputy County Counsel
Public Works Division

WW:gm

07/02/2013

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Michael D. McLachlan SBN 181705 Law Offices of Michael D. McLachlan, APC 10490 Santa Monica Boulevard, Los Angeles, CA 90025 TELEPHONE NO.: 310-954-8270 FAX NO.: 310-954-8271 ATTORNEY FOR (Name): Plaintiff Richard Wood	FOR COURT USE ONLY <div style="font-size: 2em; font-weight: bold; margin: 10px 0;">FILED</div> LOS ANGELES SUPERIOR COURT <div style="font-size: 1.5em; margin: 10px 0;">JUL 02 2013</div> JOHN A. CLARKE, CLERK BY AMANDA L. DEPUTY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles STREET ADDRESS: 111 North Hill Street MAILING ADDRESS: CITY AND ZIP CODE: Los Angeles 90012 BRANCH NAME: Central District	
CASE NAME: Richard Wood v. County of Los Angeles	
CIVIL CASE COVER SHEET <input checked="" type="checkbox"/> Unlimited (Amount demanded exceeds \$25,000) <input type="checkbox"/> Limited (Amount demanded is \$25,000 or less)	Complex Case Designation <input type="checkbox"/> Counter <input type="checkbox"/> Joinder Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)
CASE NUMBER: BS143790 JUDGE: DEPT:	

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

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

Auto Tort <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46) Other PI/PPD/WD (Personal Injury/Property Damage/Wrongful Death) Tort <input type="checkbox"/> Asbestos (04) <input type="checkbox"/> Product liability (24) <input type="checkbox"/> Medical malpractice (45) <input type="checkbox"/> Other PI/PPD/WD (23) Non-PI/PPD/WD (Other) Tort <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/PPD/WD tort (35) Employment <input type="checkbox"/> Wrongful termination (36) <input type="checkbox"/> Other employment (15)	Contract <input type="checkbox"/> Breach of contract/warranty (06) <input type="checkbox"/> Rule 3.740 collections (09) <input type="checkbox"/> Other collections (09) <input type="checkbox"/> Insurance coverage (18) <input type="checkbox"/> Other contract (37) Real Property <input type="checkbox"/> Eminent domain/Inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (26) Unlawful Detainer <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38) Judicial Review <input type="checkbox"/> Asset forfeiture (05) <input type="checkbox"/> Petition re: arbitration award (11) <input checked="" type="checkbox"/> Writ of mandate (02) <input type="checkbox"/> Other judicial review (39)	Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403) <input type="checkbox"/> Antitrust/Trade regulation (03) <input type="checkbox"/> Construction defect (10) <input type="checkbox"/> Mass tort (40) <input type="checkbox"/> Securities litigation (28) <input type="checkbox"/> Environmental/Toxic tort (30) <input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41) Enforcement of Judgment <input type="checkbox"/> Enforcement of judgment (20) Miscellaneous Civil Complaint <input type="checkbox"/> RICO (27) <input type="checkbox"/> Other complaint (not specified above) (42) Miscellaneous Civil Petition <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> Other petition (not specified above) (43)
--	---	--

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
b. <input type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve
c. <input type="checkbox"/> Substantial amount of documentary evidence | d. <input type="checkbox"/> Large number of witnesses
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
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): **4**
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: **July 1, 2013**
Michael D. McLachlan

(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:

Richard Wood v. County of Los Angeles

CASE NUMBER

BS143790

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? ☒ YES CLASS ACTION? ☐ YES LIMITED CASE? ☐ YES TIME ESTIMATED FOR TRIAL 2 ☒ 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 2.0.

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.

Auto
Tort

A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Auto (22)	<input type="checkbox"/> A7100 Motor Vehicle - Personal Injury/Property Damage/Wrongful Death	
Uninsured Motorist (46)	<input type="checkbox"/> A7110 Personal Injury/Property Damage/Wrongful Death – Uninsured Motorist	1., 2., 4.
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.,
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) <input type="checkbox"/> A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.) <input type="checkbox"/> A7270 Intentional Infliction of Emotional Distress <input type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death	1., 4. 1., 4. 1., 3 1.,

Other Personal Injury/Property
Damage/Wrongful Death Tort

SHORT TITLE:

Richard Wood v. County of Los Angeles

CASE NUMBER

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 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.
Wrongful Termination (36)	<input 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.
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	2., 5., 6. 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 <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.
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- 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: Richard Wood v. County of Los Angeles	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 checked="" 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 <input type="checkbox"/> A6160 Abstract of Judgment <input type="checkbox"/> A6107 Confession of Judgment (non-domestic relations) <input type="checkbox"/> A6140 Administrative Agency Award (not unpaid taxes) <input type="checkbox"/> A6114 Petition/Certificate for Entry of Judgment on Unpaid Tax <input type="checkbox"/> A6112 Other Enforcement of Judgment Case	2., 9. 2., 6. 2., 9. 2., 8. 2., 8. 2., 8., 9.	
	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 <input type="checkbox"/> A6040 Injunctive Relief Only (not domestic/harassment) <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. 2., 8. 1., 2., 8. 1., 2., 8.	
	Partnership Corporation Governance (21)	<input type="checkbox"/> A6113 Partnership and Corporate Governance Case	2., 8.	
	Miscellaneous Civil Petitions	Other Petitions (Not Specified Above) (43)	<input type="checkbox"/> A6121 Civil Harassment <input type="checkbox"/> A6123 Workplace Harassment <input type="checkbox"/> A6124 Elder/Dependent Adult Abuse Case <input type="checkbox"/> A6190 Election Contest <input type="checkbox"/> A6110 Petition for Change of Name <input type="checkbox"/> A6170 Petition for Relief from Late Claim Law <input type="checkbox"/> A6100 Other Civil Petition	2., 3., 9. 2., 3., 9. 2., 3., 9. 2. 2., 7. 2., 3., 4., 8. 2., 9.

SHORT TITLE: Richard Wood v. County of Los Angeles	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 checked="" type="checkbox"/> 6. <input type="checkbox"/> 7. <input type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10.		ADDRESS: 900 S. Fremont
CITY: Alhambra	STATE: CA	ZIP CODE: 91803

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: July 1, 2013

(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.

07/01/2013

SUM-100

SUMMONS *on Path*
(CITACION JUDICIAL)

NOTICE TO DEFENDANT:
(AVISO AL DEMANDADO):
COUNTY OF LOS ANGELES

YOU ARE BEING SUED BY PLAINTIFF:
(LO ESTÁ DEMANDANDO EL DEMANDANTE):
RICHARD A. WOOD

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

FILED
LOS ANGELES SUPERIOR COURT

JUL 02 2013

JOHN A. CLARKE, CLERK
[Signature]
BY AMBER HAYES, DEPUTY

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

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

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), or by contacting your local court or county bar association. **NOTE:** The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case.

¡AVISO! Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información a continuación.

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

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

The name and address of the court is:
(El nombre y dirección de la corte es): Los Angeles Superior Court
111 North Hill Street, Los Angeles, CA 90012

CASE NUMBER:
(Número del Caso) **BS148790**

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):
Michael D. McLachlan, 10490 Santa Monica Blvd., Los Angeles, CA, 90025; 310-954-8270

DATE:
(Fecha)

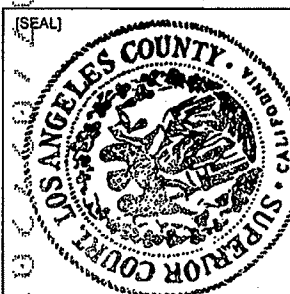
John A. Clarke

Clerk, by
(Secretario)

Amber Hayes

Deputy
(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):

- 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):