

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

JAN 24 2011

John A. Clarke, Executive Officer/Clerk
BY Mary Flores, Deputy

A7270
90089

1 Carl E. Douglas, Esq., State Bar No. 097011
2 THE DOUGLAS LAW GROUP
3 8484 Wilshire Boulevard, Suite 548
4 Beverly Hills, California 90211
5 (323) 655-6505 Fax: (323) 651-4990
6 carl@thedouglasfirm.com

7 Drew R. Antablin, Esq., State Bar No. 75710
8 Andrea D. Bruce, Esq., State Bar No. 256561
9 ANTABLIN & BRUCE, a Law Partnership
10 8484 Wilshire Boulevard, Suite 548
11 Beverly Hills, California 90211
12 (323)651-4490 Fax: (323) 651-4990
13 antablin@sbcglobal.net

14 Attorney for Plaintiff STAFON JOHNSON

15 SUPERIOR COURT OF THE STATE OF CALIFORNIA
16 COUNTY OF LOS ANGELES, CENTRAL DISTRICT

17 STAFON JOHNSON,

18 CASE NO.

19 BC 453551

20 *Plaintiff,*

21 **COMPLAINT FOR DAMAGES**
22 **(Negligence: Personal Injury)**

23 v.

24 [Amount Demanded Exceeds \$25,000]

25 UNIVERSITY OF SOUTHERN
26 CALIFORNIA; JAMIE YANCHAR;
27 and DOE 1 through DOE 100, inclusive,

28 *Defendants.*

29 COMES NOW the Plaintiff, STAFON JOHNSON, and for a cause of action against the
30 defendants, and each of them, alleges:

31 **FIRST CAUSE OF ACTION**

32 **(Negligence: Plaintiff against all Defendants)**

33 1. All of the acts complained of in this Complaint took place within the jurisdiction of
34 this court. At all times mentioned here, each of the named Defendants resided and/or maintained
35 its principal place of business within the jurisdiction of this court.

CIT/CASE: BC453551 LK/DEB
RECEIPT #: CCH47801013
DATE PAID: 01/24/11 08:20 AM
PAYMENT: \$395.00
RECEIVED: 0310
CHECK: 395.00
CASH:
CHANGE:
CARD:

D-23
Baven V. Stranstein

L.P.S. 111 N. HILL STREET
SUITE 200
BEVERLY HILLS, CA 90211
TEL: 310.960.1111
FAX: 310.960.1112

1 2. Plaintiff STAFON JOHNSON (hereafter referred to as "Mr. JOHNSON") was,
2 at the time of the events complained of in this action, a resident of the County of Los Angeles, State
3 of California.

4 3. The true names and capacities, whether individual, corporate, associate,
5 governmental, or otherwise of DOE 1 through DOE 100, inclusive, are unknown to Plaintiff at this
6 time, who therefore sues those Defendants using their fictitious names. Plaintiff will amend this
7 Complaint to allege the true names and capacities of the fictitious Defendants when that information
8 becomes known. Plaintiff is informed and believes, and thereon alleges, that each of the Defendants
9 designated here as a DOE was negligent and/or engaged in other wrongful conduct, and is
10 responsible in some manner for the events and other conduct referred to in this Complaint.

11 Plaintiff is also informed and believes that their negligence or other wrongful conduct legally caused
12 the injuries and damages sustained by Plaintiff as alleged here, either through their own negligent
13 or wrongful conduct or through the conduct of their agents, servants, or employees, or in some other
14 manner.

15 4. At all relevant times mentioned here, each Defendant was the agent, servant,
16 employee, joint venturer and/or partner, of each of the remaining Defendants, and was at all times
17 relevant to this matter acting within the course and scope of that agency, employment, servility,
18 and/or partnership.

19 5. Plaintiff is informed and believes, and thereon alleges, that at all times relevant to
20 this action, Defendant UNIVERSITY OF SOUTHERN CALIFORNIA (hereafter, for the sake of
21 convenience, "Defendant U.S.C.") was and is a private educational institution located in the City and
22 County of Los Angeles, and was and is a corporate entity registered under the laws of the State of
23 California; and that Defendants DOE 81 through DOE 100, inclusive, were corporations and/or other
24 business entities of unknown form and structure, organized under the laws of California and doing
25 business in the County of Los Angeles, and were owned, managed and operated by Defendants
26 U.S.C. and/or DOES 61 through 80, inclusive, and each of them.

27 6. At all relevant times mentioned here, Defendant JAMIE YANCHAR (hereafter,
28 referred to as "Defendant YANCHAR") was an agent and employee of Defendant U.S.C., employed

1 as an assistant strength and conditioning coach of Defendant U.S.C.'s men's football team, and all
2 of his acts and/or omissions, as described here, were undertaken within the course and scope of that
3 agency and employment. At all relevant times mentioned here, Defendants U.S.C. and YANCHAR
4 held YANCHAR out to possess that degree of skill, learning, ability, care and competence as is
5 ordinarily possessed by reputable and competent strength and conditioning coaches employed by
6 football programs of major universities across the United States and/or in a same or similar locality
7 and under similar circumstances as are described here.

8 7. At all times material to this action, Mr. JOHNSON was an undergraduate student at
9 Defendant U.S.C. and was a member of the men's football team. At the time of the incident
10 described below, Mr. JOHNSON was a four year member of the football team, in his "senior" year
11 at U.S.C., and was the starting tailback and leading rusher on the football team.

12 8. The incident which is the subject of this action occurred at approximately 11:00 a.m.
13 on the morning of September 28, 2009, in the weight room on Defendant U.S.C.'s campus. The
14 incident occurred while Mr. JOHNSON and other members of the men's football team, were
15 engaged in weight-lifting training, as a part of required football activities and practice. The weight-
16 lifting training session was taking place under the direction and supervision of, among others,
17 Defendant YANCHAR, who was acting in his capacity and within the course and scope of his
18 employment, as the assistant strength and conditioning coach of the football team. As described
19 below, Defendant YANCHAR's, and the remaining Defendants', acts and omissions contributed
20 to Mr. JOHNSON suffering the injuries described here.

21 9. On or about September 28, 2009, as described above, Mr. JOHNSON was engaged
22 in weight-lifting practice, which was being conducted and supervised by Defendants YANCHAR
23 and DOE 1 through DOE 10, inclusive. At that time and place, while Mr. JOHNSON was lifting
24 weights, and specifically performing bench presses, Defendant YANCHAR was supposed to be, and
25 was specifically charged with and undertook the responsibility of, "spotting" Mr. JOHNSON while
26 he was performing those bench presses. In engaging in his weight lifting activities on that date,
27 Mr. JOHNSON was relying on YANCHAR's previously represented abilities and competence as
28 a strength and conditioning coach, and on the fact that YANCHAR had specifically undertaken to

1 “spot” Mr. JOHNSON while he was performing his bench presses. At that time, and known to
2 Defendant YANCHAR, Mr. JOHNSON was lifting up to two hundred and seventy five (275)
3 pounds of weights. While Mr. JOHNSON was just starting to perform his first lift of 275 pounds,
4 the bar was dropped, hit, and/or fell onto his neck, causing him to suffer severe injuries to his neck
5 and person, as described at paragraphs 11 and 12 below. The bar was dropped, hit, and/or fell onto
6 Mr. JOHNSON’s neck by reason of, and as a result of, the negligent, reckless and careless acts and
7 omissions of each of the Defendants including YANCHAR and DOE 1 through DOE 10.

8 10. At all times relevant to this action, and specifically on September 28, 2009, at the
9 time of the above-described weight lifting training practice, all Defendants including but not limited
10 to Defendants YANCHAR and U.S.C., negligently, carelessly and recklessly performed the
11 responsibilities and duties that YANCHAR had agreed to perform for Plaintiff’s benefit in
12 supervising and directing the weight lifting practice and in “spotting” Mr. JOHNSON while he was
13 engaging in his bench press training on that date. The Defendants including Defendants YANCHAR
14 and DOE 1 through DOE 10, failed to use the care, skill and attention ordinarily exercised in like
15 cases by competent, reputable and reasonable members of their profession practicing in the same
16 or a similar locality under similar circumstances, and to use reasonable diligence and care in the
17 exercise of skill, in an effort to supervise the practice and to safely and properly “spot” Mr.
18 JOHNSON while he was participating in his bench pressing activities. In particular, on that date,
19 while Mr. JOHNSON was just starting to make his first lift of 275 pounds, Defendant YANCHAR
20 engaged in the following negligent, careless and reckless acts and omissions, among others:

21 (1) He was distracted and was not paying attention to Mr. JOHNSON at the time that
22 the bar was being lifted from the weight rack, in that his attention was directed away from Mr.
23 JOHNSON and was instead directed towards one or more other members of the football team who
24 were not then engaging in weight lifting activities. At that time, Defendant YANCHAR knew or
25 should have known that he was not paying proper attention to Mr. JOHNSON as the bar was being
26 lifted from the weight rack, and knew or should have known that his failure to pay proper attention
27 was creating a significant and increased risk to Mr. JOHNSON as he was attempting to engage in
28

03/24/11

1 his weight lifting training, in part because Mr. JOHNSON was relying on YANCHAR to properly
2 "spot" this weight lifting activity; and/or,

3 (2) Because Defendant YANCHAR was distracted and was not paying attention to
4 Mr. JOHNSON, he failed to take notice that, as the bar was being lifted from the rack, Mr.
5 JOHNSON was not then ready to take hold of and lift the bar; and/or,

6 (3) As the bar was just being placed into Mr. JOHNSON's hands, and because he
7 was negligently and carelessly inattentive to properly placing the bar into Mr. JOHNSON's hands
8 and making sure that Mr. JOHNSON was ready for the bar to be placed into his hands, Defendant
9 YANCHAR hit the bar with his own body before Mr. JOHNSON had a grip on the bar with both of
10 his hands; and/or,

11 (4) Because YANCHAR struck the bar, while Mr. JOHNSON was attempting to get
12 the bar settled into both hands and thus was not ready to safely grasp the bar on his own, the bar was
13 knocked off balance and slipped from Mr. JOHNSON's hands and fell directly onto Mr.
14 JOHNSON's neck. Defendant YANCHAR's negligent, careless and reckless act and omission, in
15 striking the bar with his body, was something that Mr. JOHNSON was not expecting to occur, and
16 he was therefore unprepared for the bar to be knocked off balance. Defendant YANCHAR's
17 negligent, careless and reckless act and omission, in striking the bar with his body, substantially
18 increased the risk inherent in Mr. JOHNSON's bench pressing on that date, because as a "spotter,"
19 "coach," and "instructor" responsible for supervising the activities of those under his charge,
20 YANCHAR was supposed to act as a safety net for Mr. JOHNSON, rather than acting to actively
21 interfere with his weight lifting and essentially knocking the bar out of Mr. JOHNSON's hands and
22 onto his neck.

23 11. As a legal result of the Defendants' negligent and reckless acts and omissions,
24 Mr. JOHNSON was hurt and injured in his health, strength and activity, sustaining injury to his
25 body, and shock and injury to his nervous system and person. Plaintiff has, as a result, suffered and
26 will continue to suffer great mental, physical and nervous strain, pain and suffering, including but
27 not limited to: a laryngeal fracture and an acute airway obstruction secondary to blunt neck trauma,
28 resulting in his voice box being crushed with the upper portion being separated from the lower

1 portion, and the majority of the lining of the larynx being degloved, all of which required micro-
2 surgical reconstruction and repair. Mr. JOHNSON is informed and believes that those injuries are
3 permanent, all of which have caused in the past and will cause in the future damages in an amount
4 in excess of the minimum jurisdictional limits of this court, but which is to be determined according
5 to proof at trial.

6 12. As a further legal result of the Defendants' negligence and recklessness,
7 Mr. JOHNSON has incurred in the past and will incur in the future expenses for medical care for
8 his injuries, including but not limited to hospitalization immediately after the incident for several
9 weeks and several surgical procedures being performed since the initial surgery, all in an amount
10 to be determined according to proof at trial.

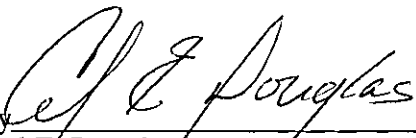
11 13. As a further legal result of Defendants' negligence and recklessness, Mr. JOHNSON
12 has lost earnings from his employment and sustained injury to his future earning capacity and will
13 sustain loss of future earnings, all in an amount to be determined according to proof at trial.

14
15 WHEREFORE, Plaintiff STAFON JOHNSON prays for judgment as follows:

- 16 1. For general damages, including pain and suffering, according to proof at time of trial;
- 17 2. For special damages, including medical-related expenses;
- 18 3. For special damages, including loss of earnings and loss of earning capacity;
- 19 4. For costs of suit;
- 20 5. For interest on damages as allowed by law;
- 21 6. For such other and further relief as the Court may deem just and proper.

22
23 DATED: January 24, 2011

THE DOUGLAS LAW GROUP
ANTABLIN & BRUCE

24
25
26 By 
27 Carl E. Douglas
28 Attorneys for Plaintiff STAFON JOHNSON

01/24/11

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):
Carl E. Douglas, Esq. / Drew R. Antablin, Esq.
(State Bar No. 97011) / (State Bar No. 75710)
THE DOUGLAS LAW GROUP
8484 Wilshire Blvd., Suite 548
Beverly Hills, California 90211
TELEPHONE NO.: (323) 655-6505 FAX NO.: (323) 651-4990

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

JAN 24 2011

John A. Clarke, Executive Officer/Clerk
BY Mary Flores Deputy

ATTORNEY FOR (Name): Plaintiff STAFON JOHNSON
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES
STREET ADDRESS: 111 North Hill Street
MAILING ADDRESS:
CITY AND ZIP CODE: Los Angeles, California 90012
BRANCH NAME: Central District

CASE NAME: JOHNSON v. UNIVERSITY OF SOUTHERN CALIFORNIA, et al.

CASE NUMBER: **BC 458551**

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)

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:

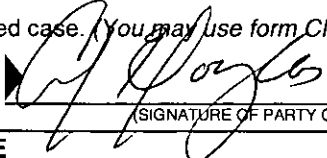
Auto Tort <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46)	Contract <input type="checkbox"/> Breach of contract/warranty (06) <input type="checkbox"/> Rule 3.740 collections (09) <input type="checkbox"/> Other collections (09) <input type="checkbox"/> Insurance coverage (18) <input type="checkbox"/> Other contract (37)	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)
Other PI/PD/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 checked="" type="checkbox"/> Other PI/PD/WD (23)	Real Property <input type="checkbox"/> Eminent domain/Inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (26)	Enforcement of Judgment <input type="checkbox"/> Enforcement of judgment (20)
Non-PI/PD/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/PD/WD tort (35)	Unlawful Detainer <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38)	Miscellaneous Civil Complaint <input type="checkbox"/> RICO (27) <input type="checkbox"/> Other complaint (not specified above) (42)
Employment <input type="checkbox"/> Wrongful termination (36) <input type="checkbox"/> Other employment (15)	Judicial Review <input type="checkbox"/> Asset forfeiture (05) <input type="checkbox"/> Petition re: arbitration award (11) <input type="checkbox"/> Writ of mandate (02) <input type="checkbox"/> Other judicial review (39)	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. 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): TWO

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: January 24, 2011
Carl E. Douglas, Esq. / Drew R. Antablin, Esq. (TYPE OR PRINT NAME)  (SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

NOTICE

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

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

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

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

CASE TYPES AND EXAMPLES

Auto Tort

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

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

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

Non-PI/PD/WD (Other) Tort

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

Employment

Wrongful Termination (36)
Other Employment (15)

Contract

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

Real Property

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

Unlawful Detainer

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

Judicial Review

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

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

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

Enforcement of Judgment

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

Miscellaneous Civil Complaint

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

Miscellaneous Civil Petition

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

SHORT TITLE: JOHNSON v. UNIVERSITY OF SOUTHERN CALIFORNIA, et al.

CASE NUMBER

BC 453551

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

This form is required pursuant to LASC 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 12 [] HOURS/ [X] DAYS

Item II. Select 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 Los Angeles Superior Court Local Rule 2.0.

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

- 1. Class Actions must be filed in the County 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 (Check only one)), and C (Applicable Reasons - See Step 3 Above). Rows include categories like Auto Tort, Other Personal Injury/Property Damage/Wrongful Death Tort, and Non-Personal Injury/Property Damage/Wrongful Death Tort.

Non-Personal Injury/Property Damage/
Wrongful Death Tort (Cont'd.)

Employment

Contract

Real Property

Unlawful Detainer
Judicial Review
11/18/18

SHORT TITLE: JOHNSON v. UNIVERSITY OF SOUTHERN CALIFORNIA, 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
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 - Drugs (38)	<input type="checkbox"/> A6022 Unlawful Detainer-Drugs	2., 6.
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.

SHORT TITLE: JOHNSON v. UNIVERSITY OF SOUTHERN CALIFORNIA, et al.

CASE NUMBER

Judicial Review (Cont'd.)

Provisionally Complex Litigation

Enforcement of Judgment

Miscellaneous Civil Complaints

Miscellaneous Civil Petitions

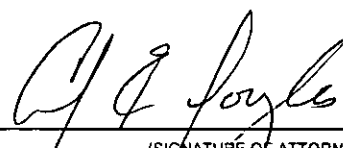
A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Writ of Mandate (02)	<input type="checkbox"/> A6151 Writ - Administrative Mandamus <input type="checkbox"/> A6152 Writ - Mandamus on Limited Court Case Matter <input type="checkbox"/> A6153 Writ - Other Limited Court Case Review	2., 8. 2. 2.
Other Judicial Review (39)	<input type="checkbox"/> A6150 Other Writ / Judicial Review	2., 8.
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 (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.
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.

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 NUMBER UNDER COLUMN C WHICH APPLIES IN THIS CASE <input type="checkbox"/> 1. <input 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: University of Southern California University Park / Weight Room
CITY: Los Angeles	STATE: CA	ZIP CODE: 90089	(213) 740-2311

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 L.A.S.C. STANLEY MOSK courthouse in the CENTRAL District of the Los Angeles Superior Court (Code Civ. Proc., § 392 et seq., and LASC Local Rule 2.0, subds. (b), (c) and (d)).

Dated: January 24, 2011



(SIGNATURE OF ATTORNEY/FILING PARTY)
 Carl E. Douglas, Attorneys for Plaintiff

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 form CM-010.
4. Complete Addendum to Civil Case Cover Sheet form LACIV 109 (Rev 01/07), LASC Approved 03-04.
5. Payment in full of the filing fee, unless fees have been waived.
6. Signed order appointing the Guardian ad Litem, JC form FL-935, if the plaintiff or petitioner is a minor under 18 years of age, or if required by Court.
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.

01/24/11