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**FILED**  
SUPERIOR COURT OF CALIFORNIA  
COUNTY OF RIVERSIDE

SEP 04 2014

*R. Alessandro*  
R. Alessandro

Attorneys for Plaintiffs JOHN AKI and  
RIVERSIDE COUNTY DEPUTY DISTRICT  
ATTORNEYS ASSOCIATION

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF RIVERSIDE

**RIC 1408586**

JOHN AKI and RIVERSIDE COUNTY  
DEPUTY DISTRICT ATTORNEYS  
ASSOCIATION

Plaintiffs,

v.

COUNTY OF RIVERSIDE; RIVERSIDE  
DISTRICT ATTORNEY'S OFFICE; PAUL  
ZELLERBACH, DISTRICT ATTORNEY;  
DOES 1 - 20, inclusive,

Defendants.

CASE NO.:  
**COMPLAINT FOR DAMAGES,  
INJUNCTIVE AND DECLARATORY  
RELIEF**

[Unlimited Civil Action]

**FIRST CAUSE OF ACTION**

1. For a First Cause of Action by Plaintiff John Aki against Defendants County of Riverside, Riverside District Attorney's Office, Paul Zellerbach, District Attorney; Does 1 - 20, for violation of 42 United States Code 1983 allege as follows

2. At all times mentioned herein Plaintiff John Aki was a Deputy District Attorney employed in the Riverside District Attorney's Office for the County of Riverside and was the President and/or member of the Board of Directors of the Plaintiff Riverside County Deputy District Attorneys Association.

3. At all times mentioned herein, Plaintiff Riverside County Deputy District

1 Attorneys Association was a recognized employee organization as defined in California  
2 Government Code Section 3501, formally recognized by the County to represent employees in  
3 the Riverside District Attorney's Office, including Deputy District Attorneys on all matters  
4 relating to employment conditions and employer-employee relations, including but not limited  
5 to wages, hours and other terms and conditions of employment.

6 4. At all times mentioned herein, Defendant County of Riverside (hereinafter  
7 referred to as "County") was, and is, a public agency organized and existing under the laws and  
8 Constitution of the State of California and operated the Riverside District Attorney's Office  
9 with its principal place of business within the venue and jurisdiction in this Court. Defendants  
10 County and Riverside District Attorney's Office were "persons" within the meaning of 42  
11 United States Code Section 1983 charged by its laws and ordinances with the general  
12 supervision of employees in the Riverside District Attorney's Office.

13 5. At all times mentioned herein, Defendant Paul Zellerbach was the District  
14 Attorney for the County of Riverside and charged with the administration and management of  
15 the Office of Riverside District Attorney and, in that capacity, approved and administered the  
16 policies and practices complained herein.

17 6. Plaintiffs are unaware of the true names and capacities, whether corporate,  
18 associate, individual or otherwise, of Defendants named herein as DOES 1 - 20, inclusive.  
19 Plaintiffs will seek leave of court to amend its Complaint to allege said Defendants' true names  
20 and capacities when the same are ascertained. Plaintiffs are informed and believes and thereon  
21 alleges that said fictitiously named Defendants are responsible in some manner for the injury to  
22 the Plaintiff alleged herein.

23 7. Plaintiffs are informed and believes and thereon alleges that Defendants, and  
24 each of them, are, and were at all times mentioned herein, the agents, employees of the  
25 remaining co-Defendants. Further, Plaintiffs alleges that Defendants were acting within the  
26 course and scope of such agency and employment.

27 8. Plaintiff John Aki commenced employment as a Deputy District Attorney with  
28 the Riverside District Attorney's Office in January 1998. During the course of his employment

1 with the District Attorney's Office, Aki performed his prosecutorial duties with professionalism  
2 and skill and had been selected as Prosecutor of the Year on five (5) occasions, as well a  
3 National Capital Litigation trial lawyer of the year.

4 9. During the term of office of Zellerbach as District Attorney, significant labor  
5 relations controversies arose between Zellerbach and Aki as President and/or member of the  
6 Board of Directors of the Plaintiff Riverside County Deputy District Attorneys Association,  
7 including but not limited to litigation concerning Zellerbach's intention to terminate  
8 approximately 10 recently hired Deputy District Attorneys and replace with new employees  
9 selected by Zellerbach, controversy respecting Zellerbach's intended hiring as a Deputy District  
10 Attorney of a political supporter who was alleged involved in prosecutorial/unethical  
11 misconduct during his former employment in another District Attorney's office, and  
12 Association grievances filed against the Riverside District Attorney's Office regarding  
13 computer-camera surveillance capabilities within the workplace and invasion of privacy of  
14 nursing female Deputy District Attorneys.

15 10. In or about March 2013, Mike Hestrin, then Deputy District Attorney for the  
16 County of Riverside announced his candidacy against Zellerbach for the office of District  
17 Attorney for the County of Riverside.

18 11. Commencing on or about September 9, 2013, District Attorney Paul Zellerbach,  
19 County of Riverside, and their agents and employees engaged in a pattern of retaliation,  
20 discrimination, restraint and/or interference with the exercise of Plaintiff John Aki's statutory  
21 and constitutional rights and privilege to engage in free speech, political activity and  
22 participation in activities as President and/or Board Director of the recognized employee  
23 organization, Riverside County Deputy District Attorneys Association, respecting the support  
24 of the candidacy of Mike Hestrin (then Deputy District Attorney for the Riverside District  
25 Attorney's Office) for the upcoming election for the office of District Attorney of the County of  
26 Riverside against the Defendant incumbent Paul Zellerbach, as well as in retaliation for the  
27 exercise of Aki's responsibilities as Association President respecting labor relations matters.

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1           12.     During the course of the political campaign for the election of District Attorney,  
2 Plaintiff Aki endorsed, and actively engaged off-duty in political activity in support of the  
3 candidacy of Mike Hestrin for District Attorney, and participated in the creation and/or issuance  
4 of public statement, press releases and campaign materials in support of the Hestrin campaign  
5 which was critical of the performance of Zellerbach in his duties as District Attorney, as well as  
6 addressed relevant law enforcement issues in the community and presenting Hestrin's vision for  
7 an improved District Attorney's Office under new leadership.

8           13.     Specifically, in or about September 9, 2013, Plaintiff John Aki was involuntarily  
9 transferred from the downtown Riverside office of the District Attorney (Western Division)  
10 where he had been assigned throughout his 17 year career to the Indio office (Eastern Division)  
11 contrary to well-established past practice in the District Attorneys' Office. The involuntary  
12 reassignment was motivated by District Attorney Zellerbach in order to facilitate monitoring of  
13 Plaintiff's off-duty campaign activities in support of Mike Hestrin, interfere with such  
14 campaign activities, and for the purpose of deliberately imposing hardship and burden on  
15 Plaintiff by a commute of approximately 4 hours roundtrip from Plaintiff's then recently  
16 relocated residence in Murrieta.

17           14.     On or about November 13, 2013, Plaintiff Aki discovered that District Attorney  
18 Paul Zellerbach and his agents and employees had secretly conducted an administrative  
19 investigation regarding Plaintiff Aki as to the propriety of his legitimate utilization of a annual  
20 leave day-off to conduct Association/political activity on the scheduling of a criminal trial  
21 assigned to Plaintiff. In addition, Defendants and their agents and employees, without legal  
22 justification, conducted administrative investigations of Aki in an effort to discover misconduct  
23 and impose disciplinary action.

24           15.     On or about January 9, 2014, Plaintiff Aki discovered District Attorney Paul  
25 Zellerbach and his agents and employees caused the removal of Plaintiff from his on-call  
26 responsibilities on Officer Involved Shooting investigations of which he had been assigned for  
27 approximately 10 years and thereby deprived Plaintiff corresponding compensation of which  
28 Plaintiff was otherwise entitled.



1           16.     Commencing in or about July, 2014 and subsequent to Paul Zellerbach re-  
2 election loss to Mike Hestrin for the office of District Attorney, Aki was reassigned to the Gang  
3 Unit of the District Attorney's Office which was a less desirable and prestigious assignment.

4           17.     The Defendants, and each of them, have committed the herein illegal acts and  
5 conduct under color of statute, ordinances, regulations, customs and/or usages of the State of  
6 California, County of Riverside, and have deprived Plaintiff Aki of his rights, privileges and  
7 immunities secured to him as a result of Defendants illegally retaliating against Plaintiff Aki in  
8 the exercise of his First Amendment constitutional right of free speech and political activity and  
9 was denied equal protection in violation of the Fourteenth Amendment of the United States  
10 Constitution.

11           18.     As a direct and proximate result of the aforementioned wrongful conduct of  
12 Defendants, Plaintiff Aki has suffered actual damages, including but not limited to loss of  
13 salary, benefits, diminution of retirement benefits, increased transportation expenses, and  
14 compensatory damages for violation of constitutional and statutory rights including, but not  
15 limited to, humiliation, indignity, loss of professional and personal reputation, physical and  
16 emotional injuries in an amount according to proof and in excess of \$25,000.00.

17           19.     Defendant Zellerbach has willfully, wantonly and intentionally acted to oppress  
18 and injure the Plaintiff Aki as the result of Plaintiff's legitimate exercise of his constitutional  
19 right of free speech, participation in an election campaign, and participation in activities of the  
20 recognized employee organization justifying an award of punitive damages against Defendant  
21 Zellerbach in a sum according to proof.

22           20.     Unless and until equitable relief is issued by this Court, including a mandatory  
23 injunction restoring Plaintiff Aki to his assignment in the downtown Riverside office of the  
24 District Attorney (Western Division), and on-call responsibilities on Officer Involved Shooting  
25 investigations, and enjoining the Defendants from enforcing their unconstitutional policies and  
26 practices against Plaintiff Aki, Plaintiff will continue to suffer irreparable injury and loss as a  
27 result of Defendants violating Plaintiff's constitutional rights under the First and Fourteenth  
28 Amendment of the United States Constitution and Title 42 United States Code Section 1983.



1 First Amendment right to engage in free speech, political activity and participation in activities  
2 of their employee organization, including the endorsement and support of Mike Hestrin for the  
3 District Attorney, Plaintiff Association and its members were subjected to retaliation,  
4 intimidation, coercion, discrimination, including but not limited to punitive transfers, unlawful  
5 public disclosure of confidential personnel information, false and stigmatizing disclosure of  
6 confidential personnel information, for the exercise of their First Amendment constitutional  
7 right of free speech and political activity and denied equal protection in violation of the  
8 Fourteenth Amendment of the United States Constitution.

9         28. In undertaking the aforesaid actions, Defendants sought to chill the  
10 Association's constitutional rights to freedom of association and freedom of speech by  
11 engaging in retaliation, intimidation, coercion, discrimination for the exercise of such rights.

12         29. Plaintiff Association seeks general, special, and punitive damages from  
13 Defendants, and each of them in excess of \$25,000.00 and according to proof, excepting that  
14 punitive damages are sought against Defendant Zellerbach alone.

15         30. Unless and until equitable relief is issued by this Court, including enjoining the  
16 Defendants from enforcing their unconstitutional policies and practices against Plaintiff  
17 Association and its members, Plaintiff will continue to suffer irreparable injury and loss as a  
18 result of Defendants violating Plaintiff's constitutional rights under the First and Fourteenth  
19 Amendment of the United States Constitution and Title 42 United States Code Section 1983.

20         31. On February 20, 2014, Plaintiff Association filed a Claim for Damage with the  
21 County of Riverside which was rejected by the County on March 10, 2014.

22         32. Plaintiff Association is entitled to attorneys fees against Defendants in  
23 accordance with 42 U.S.C. Section 1988.

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**THIRD CAUSE OF ACTION**

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2           33.     For a Third Cause of Action by Plaintiffs John Aki and Riverside County  
3 Deputy District Attorneys Association against Defendants County of Riverside, Riverside  
4 District Attorney's Office, and Does 1-20 for violation of 42 United States Code 1983- Monell  
5 Claim (Free Speech, Freedom of Association, Political Activity, Equal Protection), Plaintiffs  
6 reallege paragraphs 32 and further allege as follows:

7           34.     In perpetrating the above-described acts and omissions, County of Riverside and  
8 the Riverside Sheriff's Department and Does 1-20, inclusive, were, at all relevant times herein  
9 public entities of the State of California. Defendants' above-described acts and omissions  
10 constitute cognizable state action under color of state law.

11           35.     In perpetrating the above-described acts and failures to act, the Defendants, and  
12 each of them, engaged in a pattern, practice, policy, tradition and/or custom of restraining  
13 Plaintiffs' free speech, political activity and freedom of association by harassing, retaliating and  
14 interfering with such rights in violation of the First Amendment and by depriving Plaintiffs  
15 equal protection in violation of the Fourteenth Amendment of the United States Constitution as  
16 well as corresponding California Constitutional protections. Because rights under the federal  
17 and state Constitutions are federally protected, Defendants violated Plaintiffs' rights under 42  
18 U.S.C. Section 1983.

19           36.     At all relevant times herein, there existed within the County of Riverside and/or  
20 the Riverside District Attorney's Office a pattern, policy, practice, tradition, custom, and usage  
21 of harassment and retaliation against employees who engaged in free speech, political activity  
22 of right of association against the interests of Defendant Paul Zellerbach, which resulted in a  
23 deliberate indifference to Plaintiffs' exercise of Constitutional rights.

24           37.     At all relevant times herein, the conduct by Defendant Paul Zellerbach and  
25 agents and employees of the County of Riverside was also pursuant to official policy and/or  
26 practice of the County, and/or policymaking authority by the County, and/or authorized or  
27 ratified by the County and/or committed with deliberate indifference to Plaintiffs' exercise of  
28 Constitutional rights.





1 the exercise of such rights.

2 44. Plaintiffs seeks general, special, and punitive damages from Defendants, and  
3 each of them.

4 45. Unless and until equitable relief is issued by this Court, including enjoining the  
5 Defendants from enforcing their unconstitutional policies and practices against Plaintiffs, they  
6 will continue to suffer irreparable injury and loss.

7 46. On February 20, 2014, Plaintiffs filed Claims for Damage with the County of  
8 Riverside which were rejected by the County on March 10, 2014.

9 47. Plaintiffs are entitled to attorneys fees against Defendants in accordance with  
10 California Code of Civil Procedure 1021.5

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12 **FIFTH CAUSE OF ACTION**

13 48. For a Fifth Cause of Action by Plaintiffs John Aki and the Riverside County  
14 Deputy District Attorneys Association against Defendants County of Riverside, Riverside  
15 District Attorney's Office, Paul Zellerbach, District Attorney and Does 1 - 20, for violation of  
16 California Constitution, Article I, Section 2, Plaintiffs reallege paragraphs 1-16, 21, 25-28, 31  
17 and further allege as follows:

18 49. At all times mentioned herein, California Constitution, Article 1, Section 2(a)  
19 provided in pertinent portion that: "Every person may freely speak, write and publish his or her  
20 sentiments on all subjects, being responsible for the abuse of this right."

21 50. Defendants, and each of them, in violation of Article I, Section 2(a) of the  
22 California Constitution, have engaged in retaliation, intimidation, coercion, discrimination for  
23 the exercise of such rights.

24 51. Plaintiffs seeks general, special, and punitive damages from Defendants, and  
25 each of them.

26 52. Unless and until equitable relief is issued by this Court, including enjoining the  
27 Defendants from enforcing their unconstitutional policies and practices against Plaintiffs, they  
28 will continue to suffer irreparable injury and loss.



SEVENTH CAUSE OF ACTION

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62. For a Seventh Cause of Action by Plaintiffs John Aki and the Riverside County Deputy District Attorneys Association against Defendants County of Riverside, Riverside District Attorney's Office, Paul Zellerbach, District Attorney and Does 1 - 20, for violation of Government Code Section 3502 and 3506, Plaintiffs reallege paragraphs 16, 21, 25-28, 31 and further allege as follows:

63. At all times mentioned herein, Government Code Section 3502 provided in pertinent portion that "public employees shall have the right to form, join, and participate in the activities of employee organizations of their own choosing for the purpose of representation on all matters of employer-employee relations."

64. At all times mentioned herein, Government Code Section 3506 provided that "Public agencies and employee organizations shall not interfere with, intimidate, restrain, coerce or discriminate against public employees because of their exercise of their rights under Section 3502".

65. Defendants, and each of them, in violation of Government Code Sections 3502 and 3506, have engaged in retaliation, intimidation, coercion, discrimination for the exercise of such rights.

66. Plaintiffs seeks general, special, and punitive damages from Defendants, and each of them.

67. Unless and until equitable relief is issued by this Court, including enjoining the Defendants from enforcing their unlawful policies and practices against Plaintiffs, they will continue to suffer irreparable injury and loss.

68. On February 20, 2014, Plaintiffs filed Claims for Damage with the County of Riverside which were rejected by the County on March 10, 2014.

69. Plaintiffs are entitled to attorneys fees against Defendants in accordance with California Code of Civil Procedure 1021.5



1 EIGHTH CAUSE OF ACTION

2 70. For a Eighth Cause of Action by Plaintiffs John Aki and the Riverside County  
3 Deputy District Attorneys Association against Defendants County of Riverside, Riverside  
4 District Attorney's Office, Paul Zellerbach, District Attorney and Does 1 - 20, for violation of  
5 Government Code Section 3506.5, Plaintiffs reallege paragraphs 1-16, 21, 25-28, 31 and  
6 further allege as follows:

7 71. At all times mentioned herein, Government Code Section 3506.5 provided in  
8 pertinent portion:

9 "A public agency shall not do any of the following:

10 (a) Impose or threaten to impose reprisals on employees, to discriminate or threaten to  
11 discriminate against employees, or otherwise to interfere with, restrain, or coerce employees  
12 because of their exercise of rights guaranteed by this chapter."

13 72. Defendants, and each of them, in violation of Government Code Sections  
14 3506.5, have engaged in retaliation, intimidation, coercion, discrimination for the exercise of  
15 such rights.

16 73. Plaintiffs seeks general, special, and punitive damages from Defendants, and  
17 each of them.

18 74. Unless and until equitable relief is issued by this Court, including enjoining the  
19 Defendants from enforcing their unlawful policies and practices against Plaintiffs, they will  
20 continue to suffer irreparable injury and loss.

21 75. On February 20, 2014, Plaintiffs filed Claims for Damage with the County of  
22 Riverside which were rejected by the County on March 10, 2014.

23 76. Plaintiffs are entitled to attorneys fees against Defendants in accordance with  
24 California Code of Civil Procedure 1021.5.

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WHEREFORE, Plaintiffs John Aki and the Riverside County Deputy District Attorneys Association pray for judgment against Defendants, and each of them as follows:

1. For general damages in excess of \$25,000.00 and according to proof, special and punitive damages from Defendants, and each of them, excepting that punitive damages are sought against Defendant Paul Zellerbach only;
2. For equitable relief, including a mandatory injunction restoring Plaintiff Aki to his assignment in the downtown Riverside office of the District Attorney (Western Division) and on-call responsibilities on Officer Involved Shooting investigations, and enjoining the Defendants from enforcing their unconstitutional policies and practices against Plaintiffs.
3. For declaratory adjudication decreeing the legal rights and obligations of the parties hereto;
4. For attorneys fees pursuant to 42 United States Code 1988 and/or Code of Civil Procedure Section 1021.5;
5. For costs of suit herein incurred; and
6. For such other and further relief as this Court may deem necessary and proper.

Dated: 9/4, 2014

SILVER, HADDEN, SILVER, WEXLER  
& LEVINE

By:   
\_\_\_\_\_  
RICHARD A. LEVINE  
Attorneys for Plaintiff

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Richard A. Levine, Esq. (SBN: 91671) Silver, Hadden, Silver, Wexler & Levine P.O. Box 2161 Santa Monica CA 90407-2161 TELEPHONE NO.: (310) 393-1486 FAX NO.: (310) 395-5801 ATTORNEY FOR (Name): John Aki and Riverside County Deputy District Attorneys		FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Riverside STREET ADDRESS: 4050 Main Street MAILING ADDRESS: 4050 Main Street CITY AND ZIP CODE: Riverside CA 92501-3703 BRANCH NAME: Riverside Court		
CASE NAME: John Aki, et al. v. County of Riverside, et al.		
<b>CIVIL CASE COVER SHEET</b> <input checked="" type="checkbox"/> Unlimited (Amount demanded exceeds \$25,000) <input type="checkbox"/> Limited (Amount demanded is \$25,000 or less)	<b>Complex Case Designation</b> <input type="checkbox"/> Counter <input type="checkbox"/> Joinder Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)	CASE NUMBER: <b>RIC 1408586</b> 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:

<b>Auto Tort</b> <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46) <b>Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort</b> <input type="checkbox"/> Asbestos (04) <input type="checkbox"/> Product liability (24) <input type="checkbox"/> Medical malpractice (45) <input checked="" type="checkbox"/> Other PI/PD/WD (23) <b>Non-PI/PD/WD (Other) Tort</b> <input type="checkbox"/> Business tort/unfair business practice (07) <input type="checkbox"/> Civil rights (08) <input type="checkbox"/> Defamation (13) <input type="checkbox"/> Fraud (16) <input type="checkbox"/> Intellectual property (19) <input type="checkbox"/> Professional negligence (25) <input type="checkbox"/> Other non-PI/PD/WD tort (35) <b>Employment</b> <input type="checkbox"/> Wrongful termination (36) <input type="checkbox"/> Other employment (15)	<b>Contract</b> <input type="checkbox"/> Breach of contract/warranty (06) <input type="checkbox"/> Rule 3.740 collections (09) <input type="checkbox"/> Other collections (09) <input type="checkbox"/> Insurance coverage (18) <input type="checkbox"/> Other contract (37) <b>Real Property</b> <input type="checkbox"/> Eminent domain/Inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (26) <b>Unlawful Detainer</b> <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38) <b>Judicial Review</b> <input type="checkbox"/> Asset forfeiture (05) <input type="checkbox"/> Petition re: arbitration award (11) <input type="checkbox"/> Writ of mandate (02) <input type="checkbox"/> Other judicial review (39)	<b>Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403)</b> <input type="checkbox"/> Antitrust/Trade regulation (03) <input type="checkbox"/> Construction defect (10) <input type="checkbox"/> Mass tort (40) <input type="checkbox"/> Securities litigation (28) <input type="checkbox"/> Environmental/Toxic tort (30) <input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41) <b>Enforcement of Judgment</b> <input type="checkbox"/> Enforcement of judgment (20) <b>Miscellaneous Civil Complaint</b> <input type="checkbox"/> RICO (27) <input type="checkbox"/> Other complaint (not specified above) (42) <b>Miscellaneous Civil Petition</b> <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> Other petition (not specified above) (43)
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By Fax

2. This case  is  is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:
- |  |  |
|--|--|
| a. <input type="checkbox"/> Large number of separately represented parties   | d. <input type="checkbox"/> Large number of witnesses  |
| b. <input type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve | e. <input type="checkbox"/> Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court |
| c. <input type="checkbox"/> Substantial amount of documentary evidence   | f. <input type="checkbox"/> Substantial postjudgment judicial supervision  |
3. Remedies sought (check all that apply): a.  monetary    b.  nonmonetary; declaratory or injunctive relief    c.  punitive
4. Number of causes of action (specify): 8
5. This case  is  is not a class action suit.
6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)

Date: September 4, 2014  
 Richard A. Levine, Esq.  
(TYPE OR PRINT NAME)

*[Signature]*  
(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.

SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE  
4050 Main Street - 2nd Floor  
Riverside, CA 92501  
[www.riverside.courts.ca.gov](http://www.riverside.courts.ca.gov)

NOTICE OF DEPARTMENT ASSIGNMENT  
AND CASE MANAGEMENT CONFERENCE (CRC 3.722)

AKI VS COUNTY OF RIVERSIDE

CASE NO. RIC1408586

This case is assigned to the Honorable Judge John D. Molloy in Department 10 for all purposes.

The Case Management Conference is scheduled for 03/03/15 at 8:30 in Department 10.

The plaintiff/cross-complainant shall serve a copy of this notice on all defendants/cross-defendants who are named or added to the complaint and file proof of service.

Any disqualification pursuant to CCP section 170.6 shall be filed in accordance with that section.

Requests for accommodations can be made by submitting Judicial Council form MC-410 no fewer than five court days before the hearing. See California Rules of Court, rule 1.100.

CERTIFICATE OF MAILING

I certify that I am currently employed by the Superior Court of California, County of Riverside, and that I am not a party to this action or proceeding. In my capacity, I am familiar with the practices and procedures used in connection with the mailing of correspondence. Such correspondence is deposited in the outgoing mail of the Superior Court. Outgoing mail is delivered to and mailed by the United States Postal Service, postage prepaid, the same day in the ordinary course of business. I certify that I served a copy of the foregoing NOTICE on this date, by depositing said copy as stated above.

Court Executive Officer/Clerk

Date: 09/04/14

by: \_\_\_\_\_  
RHIANNEN K ALESSANDRO Deputy Clerk