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A7230

1 MICHAEL R. SHAPIRO, ESQ. (CSBN 37011)
2 LAW OFFICE OF MICHAEL R. SHAPIRO, APC
3 612 North Sepulveda Blvd., Suite 11
4 Los Angeles, CA 90049
5 Tel.: (310) 472-8900
6 Fax: (310) 472-4600
7 Email: mickeyimc@aol.com

8 MARCUS JACKSON, ESQ. (CSBN 205792)
9 ATTORNEY AT LAW
10 705 Center Dr., Suite 108-456
11 San Marcos, California 92069
12 Tel.: (760) 798-0308
13 Fax: (760) 798-0408
14 Email: marcus@jacksonlitigation.com

15 Attorneys for Plaintiff PAIGE HYLAND

FILED
Superior Court of California
County of Los Angeles

OCT 09 2014

Sherri R. Carter, Executive Officer/Clerk
By Amber Hayes Deputy

D92 Eila Wambach

FSC: 03 / 24 / 2016 TRIAL: 04 / 11 / 2016 OSC: 10 / 10 / 2017

SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES
CENTRAL DIVISION

BC560406

16 PAIGE HYLAND,

17 Plaintiff,

18 v.

19 ABIGAIL LEE MILLER, an Individual; and
20 DOES 1 through 20, Inclusive,

21 Defendants.

CASE NO.

**COMPLAINT FOR DAMAGES AND
INJUNCTIVE RELIEF BASED ON:**

1.) ASSAULT.

DEMAND FOR JURY TRIAL

BY FAX

22 Plaintiff PAIGE HYLAND, upon information and belief, allege the following:

JURISDICTION AND VENUE

23
24 1. This case arises out of the professional, personal and contractual relationship
25 between Plaintiff PAIGE HYLAND on the one hand and Defendant ABIGAIL LEE MILLER
26 ("MILLER") that existed within the jurisdiction of the Superior Court of Los Angeles County.
27 During all times relevant to this Complaint, Plaintiff and Defendant were parties to contracts
28 governed by California law and giving rise to claims within the jurisdiction of the Superior Court.

10/09/2014

COMPLAINT

RECEIPT #: CCH503057093
DATE PAID: 10/09/14 03:00 PM
PAYMENT: \$435.00
RECEIVED: 310
FEE: \$435.00
CHARGE: \$0.00
PAR: \$0.00
CIT/CASE: BC560406
LEADER#:

1 for the County of Los Angeles, State of California.

2 2. Venue is proper in this Court under California Code of Civil Procedure Section 395
3 because all of the parties do business in this County of Los Angeles, State of California.

4 **PARTIES**

5 3. Plaintiff PAIGE HYLAND, an individual, is a 13 year-old resident of the State of
6 Pennsylvania.

7 4. Defendant MILLER, an individual, is and was at all relevant times herein an adult
8 resident of the State of Pennsylvania who travels to California for business.

9 5. Plaintiff is not aware of the true names and capacities of the Defendants sued herein
10 as DOES 1 through 20 inclusive, and therefore sues these Defendants by their fictitious names.
11 Plaintiff will seek leave to amend the Complaint to reflect the true names and capacities of the DOE
12 Defendants when these have been ascertained. Plaintiff is informed and believes and based thereon
13 alleges that the fictitiously named Defendants, and each of them, were responsible in some manner
14 for the harm sustained by Plaintiff.

15 6. To the extent the conduct below was perpetrated by certain Defendants, the named
16 Defendant or Defendants confirmed and ratified the same.

17 7. Plaintiff is informed and believes and, on that basis alleges, that at all times herein
18 mentioned, each Defendant was the agent, principal and/or employee of each other Defendant in the
19 acts and conduct alleged herein and therefore incurred liability to Plaintiff for the acts alleged
20 below. Plaintiff is further informed and believes and, on that basis, alleges that at all times herein
21 mentioned, all the Defendants were acting within the course and scope of their employment and/or
22 said agency.

23
24 **BACKGROUND FACTS**

25 8. Plaintiff PAIGE HYLAND along with her mother KELLY HYLAND and her sister
26 BROOKE HYLAND are starring cast members of the popular reality television program "Dance
27 Moms" which is broadcast on the Lifetime Television network. The show is currently in its fourth
28 season and features young girls, members of the Abby Lee Dance Company, who compete in dance

1 competitions around the United States, including in the County of Los Angeles, State of California.
2 The girls and their mothers are featured on the show and all of them are subject to the demands, as
3 well as the notorious temper, of Defendant MILLER who owns the dance company. Indeed the
4 producers of the show, in an effort to attract ratings and viewership, encourage and facilitate
5 conflicts between MILLER on the one hand and the young girl dancers and their mothers on the
6 other. In order to produce each episode of approximately 43 minutes, the cast spends up to 60
7 hours per week shooting footage of dance classes and competitions under the authoritative,
8 domineering and often bullying and insulting leadership style of MILLER.

9 9. KELLY HYLAND had a long history with MILLER dating back many years before
10 the show "Dance Moms" went into production. Back when KELLY HYLAND was a young girl
11 she danced for MILLER'S mother. Around the time KELLY HYLAND was eight years of age
12 MILLER started the Abby Lee Dance Company and KELLY HYLAND danced for MILLER but
13 by the time she was 14 years of age KELLY HYLAND quit due to the oppressive time demands
14 MILLER made of her students. During KELLY HYLAND'S high school years her father and
15 sister opened a dance studio a few minutes away from MILLER'S that actually attracted more
16 students. That competing studio, operated by KELLY HYLAND'S sister, was later sold. After
17 KELLY HYLAND became a mother she decided she wanted her daughter BROOKE HYLAND to
18 dance so she took BROOKE to MILLER'S dance studio. BROOKE has been dancing continuously
19 with MILLER since she was three years of age. Later PAIGE HYLAND started dancing with
20 MILLER as well. During this period of time, before the show "Dance Moms" ever came into
21 existence, MILLER was generally caring and nurturing toward KELLY HYLAND'S daughters.

22 10. When producers started casting for the television show hundreds of mothers and
23 their dancer children auditioned. Originally the show was conceived as a six-part documentary
24 about the lives of child competitive dancers and their mothers, tentatively titled "Just Dance."
25 Ultimately, KELLY HYLAND and her daughters were selected to be part of the show as well as
26 several other girls and their mothers, most of whom were originally members of MILLER'S dance
27 studio.

28 11. As the show went into production it became clear early on that the children on the

1 show were being subjected to abusive and unlawful working conditions. In fact the girls on the
2 show often worked long hours without receiving all required breaks in violation of Pennsylvania
3 Child Labor Laws and other applicable provisions of law. The average week involves rehearsals on
4 Tuesday through Thursdays from 4:00 p.m. to at times past 10:00 p.m. Fridays the girls generally
5 travel many hours, usually by bus, to competitions and they spend 12-hour days on Saturdays
6 competing before returning home on Sundays. KELLY HYLAND often complained, starting in
7 Season Two, about the extreme burden on her daughters and on several occasions talked to
8 producers about her desire to quit the show and her need to remove her daughters from the
9 production. She even had three different attorneys raise the subject with the producers COLLINS
10 AVENUE ENTERTAINMENT, LLC ("COLLINS") numerous times. However, on each occasion
11 that she threatened to quit she was told that she had signed a contract and the production company
12 would enforce it. COLLINS threatened to sue her for everything she owned if she attempted to
13 back out of the contract she signed. KELLY HYLAND and another show mom retained an attorney
14 with extensive child labor experience in 2012 address the mistreatment of the children on the show.

15 12. Most alarming was the emotional impact the show, and MILLER'S abuse, had on
16 the young PAIGE HYLAND. MILLER is paid to be abusive and bullying to her students and
17 provoke arguments with the mothers in front of the children. MILLER screams at the girls in front
18 of the other dancers, moms and production crew, causing them to cry, and then MILLER derides
19 them for being emotionally weak when they do. MILLER insulted and abused PAIGE on an almost
20 daily basis, including cruel name calling, insults about PAIGE'S physical appearance and making
21 offensive false and defamatory accusation about PAIGE'S family. All of this abuse was done for
22 the sake of drama during the show.

23 13. MILLER even tossed a chair during a confrontation with PAIGE, while KELLY
24 HYLAND was not present, causing PAIGE to run from the room terrified as she feared she would
25 be physically injured by MILLER. PAIGE HYLAND reasonably feared she would be physically
26 injured because she had observed MILLER physically batter other people on the show including
27 physically pushing KELLY HYLAND'S face, pinching another student until she bled and violently
28 grabbing another student by the arm. All of this was part of a deliberate scheme by the producers

1 to generate interest in the television show and strong ratings when each episode airs. PAIGE
2 HYLAND began suffering from anxiety and having panic attacks related to her fear of MILLER.
3 Her condition worsened to the point that it affected her performance in school and she was
4 interviewed by school counselors who concluded that PAIGE was being bullied by MILLER. Had
5 KELLY HYLAND known how her daughters would be abused, harassed and overworked she never
6 would have signed a contract with COLLINS in the first place.

7 14. Since being involved on the show, PAIGE HYLAND has suffered from panic
8 attacks caused by MILLER'S abusive, intimidating and aggressive conduct, which she never
9 suffered from previously. She has received professional medical treatment for the anxiety, panic
10 attacks and other emotional distress caused by MILLER'S actions.

11
12 **FIRST CAUSE OF ACTION:**
13 **ASSAULT**
14 **CALIFORNIA PENAL CODE §240 AND COMMON LAW**
15 **[Against MILLER and DOES 1 through 20, Inclusive]**

16 15. Plaintiffs repeat and reallege paragraphs 1 through 14 above and incorporate them
17 herein by reference as though set forth in full.

18 16. Defendant MILLER intentionally engaged in conduct that caused Plaintiff PAIGE
19 HYLAND to reasonably believe that she was about to be touched or harmed in an offensive
20 manner, namely by hit by a chair thrown by MILLER. A reasonable person in PAIGE HYLAND'S
21 position would have been offended by the threatened touching or harm from MILLER.

22 17. PAIGE HYLAND did not consent to the threatened touching or harm and such
23 conduct caused her harm, including but not limited to emotional distress and anxiety.

24 18. As a proximate result of Defendant's wrongful conduct, Plaintiff PAIGE HYLAND
25 has suffered loss of general and specific damages in an amount unknown at this time, but according
26 to proof at trial.

27 19. As a further proximate result of the aforementioned wrongful conduct, Plaintiff
28 PAIGE HYLAND has suffered emotional distress, anxiety, frustration, anger, humiliation, post
traumatic stress and anguish in an amount unknown at this time, but according to proof at trial.

20. Defendant's conduct was willful, wanton, malicious, and with reckless disregard for

1 the rights of Plaintiff so as to justify an award of exemplary and punitive damages.

2
3 **WHEREFORE**, Plaintiffs pray for judgment as follows:

- 4
- 5 1. For general and non-economic damages according to proof at trial;
 - 6 2. For economic and special damages according to proof at trial;
 - 7 3. For punitive damages as allowed by law and according to proof at trial;
 - 8 4. For civil penalties and fees as allowed by law;
 - 9 5. For pre-judgment interest at the prevailing legal rate;
 - 10 6. For injunctive relief to permanently restrain and prohibit Defendant from engaging
11 in the unlawful conduct set forth herein; and
 - 12 7. For such other and further relief as this Court deems just and proper.

13
14 **REQUEST FOR JURY TRIAL**

15 Plaintiff hereby requests a trial by jury for all issues so triable.


16 DATED: October 6, 2014

17 By: 

18 MICHAEL R. SHAPIRO, ESQ.
19 MARCUS JACKSON, ESQ.
20 Attorneys for Plaintiff
21 PAIGE HYLAND

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25
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27
28
10/09/2014

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):
 Michael R. Shapiro, A Professional Corporation SBN: 37011
 612 N. Sepulveda Blvd., Suite 11
 Los Angeles, California 90049
 TELEPHONE NO.: 310-472-8900 FAX NO.: 310-472-4600
 ATTORNEY FOR (Name): Paige Hyland

FOR COURT USE ONLY
FILED
 Superior Court of California
 County of Los Angeles
 OCT 09 2014
 Sherri R. Carter, Executive Officer/Clerk
 By  Deputy

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

CASE NAME:

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

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

CASE NUMBER: **BC560406**
 JUDGE:
 DEPT:

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

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

<p>Auto Tort</p> <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46) <p>Other P/PI/PD/W/D (Personal Injury/Property Damage/Wrongful Death) Tort</p> <input type="checkbox"/> Asbestos (04) <input type="checkbox"/> Product liability (24) <input type="checkbox"/> Medical malpractice (45) <input checked="" type="checkbox"/> Other P/PI/PD/W/D (23) <p>Non-P/PI/PD/W/D (Other) Tort</p> <input type="checkbox"/> Business tort/unfair business practice (07) <input type="checkbox"/> Civil rights (08) <input type="checkbox"/> Defamation (13) <input type="checkbox"/> Fraud (16) <input type="checkbox"/> Intellectual property (19) <input type="checkbox"/> Professional negligence (25) <input type="checkbox"/> Other non-P/PI/PD/W/D tort (35) <p>Employment</p> <input type="checkbox"/> Wrongful termination (36) <input type="checkbox"/> Other employment (15)	<p>Contract</p> <input type="checkbox"/> Breach of contract/warranty (06) <input type="checkbox"/> Rule 3.740 collections (09) <input type="checkbox"/> Other collections (09) <input type="checkbox"/> Insurance coverage (18) <input type="checkbox"/> Other contract (37) <p>Real Property</p> <input type="checkbox"/> Eminent domain/inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (26) <p>Unlawful Detainer</p> <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38) <p>Judicial Review</p> <input type="checkbox"/> Asset forfeiture (05) <input type="checkbox"/> Petition re: arbitration award (11) <input checked="" type="checkbox"/> Writ of mandate (02) <input type="checkbox"/> Other judicial review (39)	<p>Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403)</p> <input type="checkbox"/> Antitrust/Trade regulation (03) <input type="checkbox"/> Construction defect (10) <input type="checkbox"/> Mass tort (40) <input type="checkbox"/> Securities litigation (28) <input type="checkbox"/> Environmental/Toxic tort (30) <input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41) <p>Enforcement of Judgment</p> <input type="checkbox"/> Enforcement of judgment (20) <p>Miscellaneous Civil Complaint</p> <input type="checkbox"/> RICO (27) <input type="checkbox"/> Other complaint (not specified above) (42) <p>Miscellaneous Civil Petition</p> <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> Other petition (not specified above) (43)
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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): 1. Assault
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: 10/9/2014
 Michael R. Shapiro
 (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.

10/09/2014

BY FAX

INSTRUCTIONS ON HOW TO COMPLETE THE COVER SHEET

CM-010

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 P/DPD/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 P/DPD/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

Non-P/DPD/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-P/DPD/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:

PAIGE HYLAND VS. ABIGAIL LEE MILLER

CASE NUMBER

BC560406

**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 4 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)

- Class actions must be filed in the Stanley Mosk Courthouse, central district.
- May be filed in central (other county, or no bodily injury/property damage).
- Location where cause of action arose.
- Location where bodily injury, death or damage occurred.
- Location where performance required or defendant resides.
- Location of property or permanently garaged vehicle.
- Location where petitioner resides.
- Location wherein defendant/respondent functions wholly.
- Location where one or more of the parties reside.
- Location of Labor Commissioner Office.

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

	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons See Step 3 Above
Auto Tort	Auto (22)	<input type="checkbox"/> A7100 Motor Vehicle - Personal Injury/Property Damage/Wrongful Death	1., 2., 4.
	Uninsured Motorist (46)	<input type="checkbox"/> A7110 Personal Injury/Property Damage/Wrongful Death - Uninsured Motorist	1., 2., 4.
Other Personal Injury/ Property Damage/ Wrongful Death Tort	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., 8.
	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 checked="" 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., 4.

BY FAX

10/09/2014

SHORT TITLE:

PAIGE HYLAND VS. ABIGAIL LEE MILLER

CASE NUMBER

	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Non-Personal Injury/ Property Damage/ Wrongful Death Tort	Business Tort (07)	<input type="checkbox"/> A6029 Other Commercial/Business Tort (not fraud/breach of contract)	1., 3.
	Civil Rights (08)	<input type="checkbox"/> A6005 Civil Rights/Discrimination	1., 2., 3.
	Defamation (13)	<input type="checkbox"/> A6010 Defamation (slander/libel)	1., 2., 3.
	Fraud (16)	<input type="checkbox"/> A6013 Fraud (no contract)	1., 2., 3.
	Professional Negligence (25)	<input type="checkbox"/> A6017 Legal Malpractice	1., 2., 3.
		<input type="checkbox"/> A6050 Other Professional Malpractice (not medical or legal)	1., 2., 3.
Other (35)	<input type="checkbox"/> A6025 Other Non-Personal Injury/Property Damage tort	2., 3.	
Employment	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.
Contract	Breach of Contract/ Warranty (06) (not insurance)	<input type="checkbox"/> A6004 Breach of Rental/Lease Contract (not unlawful detainer or wrongful eviction)	2., 5.
		<input type="checkbox"/> A6008 Contract/Warranty Breach -Seller Plaintiff (no fraud/negligence)	2., 5.
		<input type="checkbox"/> A6019 Negligent Breach of Contract/Warranty (no fraud)	1., 2., 5.
		<input type="checkbox"/> A6028 Other Breach of Contract/Warranty (not fraud or negligence)	1., 2., 5.
	Collections (09)	<input type="checkbox"/> A6002 Collections Case-Seller Plaintiff	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.	
Real Property	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	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.

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SHORT TITLE:

PAIGE HYLAND VS. ABIGAIL LEE MILLER

CASE NUMBER

A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons (See Step 3 Above)
Asset Forfeiture (05)	<input type="checkbox"/> A6108 Asset Forfeiture Case	2., 6.
Petition re Arbitration (11)	<input type="checkbox"/> A6115 Petition to Compel/Confirm/Vacate Arbitration	2., 5.
Writ of Mandate (02)	<input type="checkbox"/> A6151 Writ - Administrative Mandamus	2., 8.
	<input type="checkbox"/> A6152 Writ - Mandamus on Limited Court Case Matter	2.
	<input type="checkbox"/> A6153 Writ - Other Limited Court Case Review	2.
Other Judicial Review (39)	<input type="checkbox"/> A6150 Other Writ /Judicial Review	2., 8.
Provisionally Complex Litigation	<input type="checkbox"/> A6003 Antitrust/Trade Regulation	1., 2., 8.
	<input type="checkbox"/> A6007 Construction Defect	1., 2., 3.
	<input type="checkbox"/> A6006 Claims Involving Mass Tort (40)	1., 2., 8.
	<input type="checkbox"/> A6035 Securities Litigation Case	1., 2., 8.
	<input type="checkbox"/> A6036 Toxic Tort/Environmental	1., 2., 3., 8.
	<input type="checkbox"/> A6014 Insurance Coverage/Subrogation (complex case only)	1., 2., 5., 8.
Enforcement of Judgment	<input type="checkbox"/> A6141 Sister State Judgment	2., 9.
	<input type="checkbox"/> A6160 Abstract of Judgment	2., 6.
	<input type="checkbox"/> A6107 Confession of Judgment (non-domestic relations)	2., 9.
	<input type="checkbox"/> A6140 Administrative Agency Award (not unpaid taxes)	2., 6.
	<input type="checkbox"/> A6114 Petition/Certificate for Entry of Judgment on Unpaid Tax	2., 8.
	<input type="checkbox"/> A6112 Other Enforcement of Judgment Case	2., 8., 9.
RICO (27)	<input type="checkbox"/> A6033 Racketeering (RICO) Case	1., 2., 8.
Miscellaneous Civil Complaints	<input type="checkbox"/> A6030 Declaratory Relief Only	1., 2., 8.
	<input type="checkbox"/> A6040 Injunctive Relief Only (not domestic/harassment)	2., 8.
	<input type="checkbox"/> A6011 Other Commercial Complaint Case (non-tort/non-complex)	1., 2., 8.
	<input type="checkbox"/> A6000 Other Civil Complaint (non-tort/non-complex)	1., 2., 8.
Partnership Corporation Governance (21)	<input type="checkbox"/> A6113 Partnership and Corporate Governance Case	2., 8.
Miscellaneous Civil Petitions	<input type="checkbox"/> A6121 Civil Harassment	2., 3., 9.
	<input type="checkbox"/> A6123 Workplace Harassment	2., 3., 9.
	<input type="checkbox"/> A6124 Elder/Dependent Adult Abuse Case	2., 3., 9.
	<input type="checkbox"/> A6190 Election Contest	2.
	<input type="checkbox"/> A6110 Petition for Change of Name	2., 7.
	<input type="checkbox"/> A6170 Petition for Relief from Late Claim Law	2., 3., 4., 8.
	<input type="checkbox"/> A6100 Other Civil Petition	2., 9.

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SHORT TITLE: PAIGE HYLAND VS. ABIGAIL LEE MILLER	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 type="checkbox"/> 2. <input type="checkbox"/> 3. <input type="checkbox"/> 4. <input type="checkbox"/> 5. <input type="checkbox"/> 6. <input type="checkbox"/> 7. <input checked="" type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10.		ADDRESS: 5410 Wilshire Blvd., Suite 800
CITY: Los Angeles	STATE: CA	ZIP CODE: 90036

Item IV. Declaration of Assignment: I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that the above-entitled matter is properly filed for assignment to the Stanley Mosk courthouse in the Central District of the Superior Court of California, County of Los Angeles [Code Civ. Proc., § 392 et seq., and Local Rule 2.0, subds. (b), (c) and (d)].

Dated: 10/9/2014


 (SIGNATURE OF ATTORNEY/FILING PARTY)

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

1. Original Complaint or Petition.
2. If filing a Complaint, a completed Summons form for issuance by the Clerk.
3. Civil Case Cover Sheet, Judicial Council form CM-010.
4. Civil Case Cover Sheet Addendum and Statement of Location form, LACIV 109, LASC Approved 03-04 (Rev. 03/11).
5. Payment in full of the filing fee, unless fees have been waived.
6. A signed order appointing the Guardian ad Litem, Judicial Council form CIV-010, if the plaintiff or petitioner is a minor under 18 years of age will be required by Court in order to issue a summons.
7. Additional copies of documents to be conformed by the Clerk. Copies of the cover sheet and this addendum must be served along with the summons and complaint, or other initiating pleading in the case.

10/09/2014