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CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

BY _____

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8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE CENTRAL DISTRICT OF CALIFORNIA

10
11 STATE OF CALIFORNIA DEPARTMENT OF
12 TOXIC SUBSTANCES CONTROL,

13 Plaintiff,

14 v.

15 STANDARD NICKEL-CHROMIUM
16 PLATING COMPANY, a California
17 corporation; GEORGE DULGARIAN,
18 individually; DOUGLAS DULGARIAN,
19 individually; DEAN DULGARIAN,
20 individually; DOUGLAS DULGARIAN as
EXECUTOR for the ESTATE of HAIG
21 DULGARIAN, deceased; the ESTATE of
22 HAIG DULGARIAN, deceased; DUKE
23 DULGARIAN, individually and doing business
24 as DDD & Associates, LLC; DICKIE VAN
25 BREENE (formerly known as DICKIE
26 DULGARIAN), individually and doing business
as DDD & Associates, LLC; DUKE
27 DULGARIAN, as EXECUTOR for the
ESTATE of DICK DULGARIAN, deceased;
28 the ESTATE of DICK DULGARIAN, deceased,

Defendants.

CV 13-03600-26K
(AJW)

COMPLAINT FOR
RECOVERY OF
RESPONSE COSTS AND
DECLARATORY RELIEF
UNDER CERCLA

1 The State of California Department of Toxic Substances Control (“Plaintiff”
2 or the “Department”) alleges as follows:

3 1. This is a civil action by the Department for recovery of unreimbursed
4 response costs and for declaratory and injunctive relief pursuant to sections 107 and
5 113 of the Comprehensive Environmental Response, Compensation, and Liability
6 Act (“CERCLA”), 42 U.S.C. §§ 9607 and 9613, as amended by the Superfund
7 Amendments and Reauthorization Act of 1986, I-99-499.

8 2. The Department has incurred response costs and expects to continue to
9 incur response costs in connection with actions taken pursuant CERCLA and
10 related state laws in response to releases and/or threatened releases of hazardous
11 substances that have resulted or may result in soil and groundwater contamination
12 at, beneath and/or in the vicinity of properties located at 811, 817, 819, 825, and
13 826 East 62nd Street, Los Angeles, CA 90001, referred to herein as “the Site.” For
14 the purposes of this Complaint, the Site also includes the areal extent of the
15 hazardous substance contamination that is or has been present at, or has extended
16 from the Site. The Site is a “facility” within the meaning of CERCLA § 101(9), 42
17 U.S.C. § 9601(9).

18 JURISDICTION AND VENUE

19 3. This Court has jurisdiction over the claims by the Department under
20 federal law pursuant to 28 U.S.C. § 1331 and CERCLA § 113(b), 42 U.S.C. §
21 9613(b). Venue is proper in this district pursuant to CERCLA § 113(b), 42 U.S.C.
22 § 9613(b) and 28 U.S.C. § 1391(b) because the claims asserted herein arose and the
23 releases and/or threatened releases of hazardous substances occurred in this judicial
24 district.

25 STATEMENT OF THE CASE

26 4. The Department brings claims for cost recovery and declaratory relief
27 under sections CERCLA §§ 107(a) and 113(g), 42 U.S.C. §§ 9607(a) and 9613(g),
28 for response, removal and remediation costs incurred by the Department resulting

1 from a release and/or threatened release of hazardous substances at or from the Site.
2 The Department also seeks a declaratory judgment pursuant to 28 U.S.C. § 2201
3 and CERCLA §§107 and 113, 42 U.S.C. §§ 9607 and 9613, that Defendants are
4 liable, jointly and severally, for all future response costs incurred by the
5 Department in responding to releases and/or threatened releases of hazardous
6 substances from or at the Site.

7 **PLAINTIFF**

8 5. The Department is a public agency of the State of California organized
9 and existing under and pursuant to California Health and Safety Code § 58000 et
10 seq. Under California law, the Department is the state agency responsible for
11 determining whether there has been a release and/or threatened release of hazardous
12 substances into the environment, and for determining the actions to be taken in
13 response thereto.

14 **DEFENDANTS**

15 6. Defendant Standard Nickel-Chromium Plating Company is a
16 California corporation and an “owner and/or operator” of a facility, as those terms
17 are described in CERCLA § 107(a), 42 U.S.C. § 9607(a). Defendant Standard
18 Nickel-Chromium Plating Company also was an “owner and/or operator” of a
19 facility at the time of the disposal of hazardous substances at the facility, as those
20 terms are described in CERCLA § 107(a), 42 U.S.C. § 9607(a).

21 7. Defendant George Dulgarian is an individual and an “owner and/or
22 operator” of a facility, as those terms are described in CERCLA § 107(a), 42 U.S.C.
23 § 9607(a). Defendant George Dulgarian also was an “owner and/or operator” of a
24 facility at the time of the disposal of hazardous substances at the facility, as those
25 terms are described in CERCLA § 107(a), 42 U.S.C. § 9607(a).

26 8. Defendant Douglas Dulgarian is an individual and an “owner and/or
27 operator” of a facility, as those terms are described in CERCLA § 107(a), 42 U.S.C.
28 § 9607(a). Defendant Douglas Dulgarian also was an “owner and/or operator” of a

1 facility at the time of the disposal of hazardous substances at the facility, as those
2 terms are described in CERCLA § 107(a), 42 U.S.C. § 9607(a).

3 9. Defendant Dean Dulgarian is an individual and was an “owner and/or
4 operator” of a facility at the time of the disposal of hazardous substances at the
5 facility, as those terms are described in CERCLA § 107(a), 42 U.S.C. § 9607(a).

6 10. Defendant Haig Dulgarian is an individual and was an “owner and/or
7 operator” of a facility at the time of the disposal of hazardous substances at the
8 facility, as those terms are described in CERCLA § 107(a), 42 U.S.C. § 9607(a).

9 Upon information and believe, DTSC alleges that Haig Dulgarian died on
10 November 6, 2010. Defendant Douglas Dulgarian is the Executor of the Estate of
11 Haig Dulgarian. Defendant Douglas Dulgarian is an individual residing in the State
12 of California.

13 11. Defendant Duke Dulgarian is an individual who has done, and who
14 continues to do business under the name DDD & Associates, LLC. Duke
15 Dulgarian was an “owner and/or operator” of a facility at the time of the disposal of
16 hazardous substances at the facility, as those terms are described in CERCLA §
17 107(a), 42 U.S.C. § 9607(a).

18 12. Defendant Dickie Van Breene (formerly known as Dickie Dulgarian)
19 is an individual who has done and continues to do business under the name DDD &
20 Associates, LLC. Dickie Van Breene (formerly known as Dickie Dulgarian) was
21 an “owner and/or operator” of a facility at the time of the disposal of hazardous
22 substances at the facility, as those terms are described in CERCLA § 107(a), 42
23 U.S.C. § 9607(a).

24 13. Defendant Dick Dulgarian was an “owner and/or operator” of a facility
25 at the time of the disposal of hazardous substances at the facility, as those terms are
26 described in CERCLA § 107(a), 42 U.S.C. § 9607(a). Dick Dulgarian did business
27 under the name DDD & Associates, LLC. Upon information and belief, DTSC
28 alleges that Dick Dulgarian died on January 4, 2010. Defendant Duke Dulgarian is

1 the Executor of the Estate of Dick Dulgarian. Defendant Duke Dulgarian is an
2 individual residing in the State of California.

3 **BACKGROUND**

4 14. In approximately 1927, a plating operation, called “Dulgarian & Sons
5 Standard Plating Company” or “Dulgarian Sons Standard Plating Company” was
6 established by certain members of the Dulgarian family on property at the Site. The
7 on-Site operations included plating operations, including the chromium plating of
8 pipes for the oil industry. The business was later incorporated in 1946 under the
9 name Standard Nickel Chromium Plating Company or Standard Nickel Chromium
10 Company, Inc., a named Defendant in this action.

11 15. Defendant Standard Nickel-Chromium Plating operated a plating
12 company on portions of the Site and is a current owner of a portion of the Site.
13 Defendants George Dulgarian and Douglas Dulgarian are also current owners of a
14 portion of the Site. Defendant Dean Dulgarian, individually, Defendant Haig
15 Dulgarian, individually, Defendant Duke Dulgarian, individually and doing
16 business as DDD & Associates, LLC, Defendant Dickie Van Breene (formerly
17 known as Dickie Dulgarian), individually, and doing business as DDD &
18 Associates, LLC, and Defendant Dick Dulgarian, individually and doing business
19 as DDD & Associates, LLC, were all at one time owners and/or operators of a
20 portion of the Site.

21 16. As a result of the acts of each of the Defendants, hazardous substances
22 have been, and continue to be, released and/or threatened to be released, into the
23 soil and groundwater at, around, and beneath the Site.

24 17. The Department has conducted response actions to address the release
25 and/or threatened release of hazardous substances at the Site. In June of 1997, the
26 Department conducted a Site Screening for the United States Environmental
27 Protection Agency (“US EPA”) as part of an investigation of the release and/or
28 threatened release of hazardous substances at or from the Site. In 2008, the

1 Department took the lead to further investigate the release and/or threatened release
2 of hazardous substances at or from the Site.

3 18. As part of its investigation, the Department collected samples of soil at
4 the Site. These samples revealed the presence of hazardous substances in the soil at
5 the Site, including, but not limited to, hexavalent chromium, total chromium, and
6 volatile organic compounds (VOCs), principally the industrial solvents
7 trichloroethylene ("TCE") and perchloroethylene ("PCE"). The levels of
8 chromium, chromium-6, PCE, and TCE in soil exceed the California Human Health
9 Screening Levels and Preliminary Remediation Goals of the US EPA.

10 19. Groundwater samples have been collected at the Site. These samples
11 revealed the presence of hazardous substances in the groundwater beneath the Site,
12 including, but not limited to, hexavalent chromium, total chromium and VOCs,
13 principally the industrial solvents TCE and PCE. The levels of chromium,
14 chromium-6, PCE, and TCE in the groundwater beneath the Site exceed the
15 California Human Health Screening Levels and Preliminary Remediation Goals of
16 the US EPA.

17 20. On or about June 9, 2009, the Department issued an Imminent and
18 Substantial Endangerment Determination and Remedial Action Order ("ISE
19 Order") ordering Defendants to investigate and remediate the release and/or
20 threatened release of hazardous substances at or from the Site. On or about
21 December 29, 2010, the Department issued an Amendment to Imminent and
22 Substantial Endangerment Determination and Remedial Action Order
23 ("Amendment") amending the parties and certain properties identified in the ISE
24 Order.

25 21. Defendants failed to complete the investigation and remediation of
26 releases and/or threatened releases of hazardous substances at or from the Site as
27 required by the ISE Order and Amendment.

28 ///

1 22. Response actions were and are necessary to remove and remedy the
2 hazardous substances released and/or threatened to be released at and from the Site.

3 23. The Department incurred costs of “response” as that term is defined in
4 CERCLA § 101(25), 42 U.S.C. § 9601(25), in taking actions related to the release
5 and/or threatened release of hazardous substances at the Site. The response actions
6 include, but are not limited to, the following activities:

- 7 a) Issuing orders to Defendants requiring response actions at and around
8 the Site;
- 9 b) Reviewing sampling and analysis;
- 10 c) Performing inspections and preparing reports;
- 11 d) Reviewing work plans for investigation and remediation;
- 12 e) Conducting Site visits and overseeing field work;
- 13 f) Holding public meetings;
- 14 g) Meeting with potentially responsible parties; and
- 15 h) Complying with the California Environmental Quality Act.

16 24. Extensive work remains to be done to respond to the release and/or
17 threatened release of hazardous substances at and from the Site. The soil at the Site
18 remains contaminated with significant amounts of hazardous substances. The
19 groundwater at the Site also remains contaminated with significant amounts of
20 hazardous substances.

21 25. The Department will continue to incur response costs conducting
22 and/or overseeing response actions related to the release and/or threatened release
23 of hazardous substances at or from the Site in the future.

24 **FIRST CLAIM FOR RELIEF**

25 (Cost Recovery under CERCLA § 107(a) against each of the Defendants
26 (42 U.S.C. § 9607(a))

27 26. The allegations in Paragraphs 1 through 25 are hereby incorporated as
28 fully alleged herein.

1 27. The Site is a “facility” within the meaning of CERCLA § 101(9), 42
2 U.S.C. § 9601(9).

3 28. Each of the Defendants is or has been an “owner and/or operator” of a
4 portion of the Site at the time of disposal of hazardous substances at the Site, within
5 the meaning of CERCLA §§ 101(9) and 107(a)(1), (2), 42 U.S.C. §§ 9601(9) and
6 9607(a)(1), (2).

7 29. Chromium, hexavalent chromium, TCE and PCE are “hazardous
8 substances” as defined in CERCLA § 101(14), 42 U.S.C. § 9601(4).

9 30. There have been releases and/or threatened releases of hazardous
10 substances at and from the Site into the environment, within the meaning of
11 CERCLA §§ 101(8) and 101(22), 42 U.S.C. §§ 9601(8) and 9601(22).

12 31. As a result of the release and/or threatened release of hazardous
13 substances at or from the Site, the Department has incurred costs for response
14 within the meaning of CERCLA § 101(25), 42 U.S.C. § 9601(25).

15 32. The Department is a “State” for the purposes of cost recovery under
16 CERCLA § 107(a), 42 U.S.C. § 9607(a). All response costs have been incurred by
17 the Department in a manner which satisfies the requirements of CERCLA §
18 107(a)(4), 42 U.S.C. § 9607(a)(4), in that the underlying activities are not
19 inconsistent with the applicable requirements of the National Contingency Plan, 40
20 C.F.R. Part 300.

21 33. Each of the Defendants is jointly and severally liable to the
22 Department without regard to fault or negligence under CERCLA § 107(a), 42
23 U.S.C. § 9607(a), for all costs of response incurred or to be incurred by the
24 Department caused by or resulting from the release and/or threatened release of
25 hazardous substances at or from the Site.

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SECOND CLAIM FOR RELIEF

(Declaratory Relief under CERCLA § 113(g)(2) against each of the Defendants
(42 USC § 9613(g)(2))

34. The allegations in Paragraphs 1 through 33 are incorporated by reference as if fully alleged herein.

35. Pursuant to CERCLA § 113(g)(2), 42 U.S.C. § 9613(g)(2), the Department is entitled to a declaratory judgment that each of the Defendants is jointly and severally liable in any subsequent action or actions by the Department for any further costs incurred in response to the release and/or threatened release of hazardous substances at or from the Site.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff requests that the Court enter a judgment against Defendants as follows:

1. For a judgment that each Defendant is jointly and severally liable to the Department without regard to fault under CERCLA § 107(a), 42 U.S.C. § 9607(a), for all unreimbursed costs of response incurred by the Department as a result of the release and/or threatened release of hazardous substances at or from the Site, in an amount to be proven at trial;

2. For interest on the above sums as provided by CERCLA § 107(a), 42 U.S.C. § 9607(a);

3. For a declaration, pursuant to CERCLA § 113(g)(2), 42 U.S.C. § 9613(g)(2), that each Defendant is jointly and severally liable to the Department without regard to fault for all future costs incurred in response to the release and/or threatened release of hazardous substances at or from the Site.

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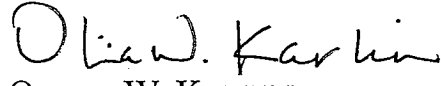
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- 4. For attorneys' fees, all enforcement costs, and the costs of this suit;
- 5. For such other relief as the Court deems just and proper.

Dated: May 17, 2013

Respectfully submitted,
KAMALA D. HARRIS
Attorney General of California


OLIVIA W. KARLIN
Deputy Attorney General
Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

NOTICE OF ASSIGNMENT TO UNITED STATES MAGISTRATE JUDGE FOR DISCOVERY

This case has been assigned to District Judge R. Gary Klausner and the assigned discovery Magistrate Judge is Andrew J. Wistrich.

The case number on all documents filed with the Court should read as follows:

CV13- 3600 RGK (AJWx)

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

All discovery related motions should be noticed on the calendar of the Magistrate Judge

NOTICE TO COUNSEL

A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).

Subsequent documents must be filed at the following location:

Western Division
312 N. Spring St., Rm. G-8
Los Angeles, CA 90012

Southern Division
411 West Fourth St., Rm. 1-053
Santa Ana, CA 92701-4516

Eastern Division
3470 Twelfth St., Rm. 134
Riverside, CA 92501

Failure to file at the proper location will result in your documents being returned to you.

ORIGINAL

OLIVIA W. KARLIN
Deputy Attorneys General
State Bar No. 150432
300 South Spring Street, Suite 1702
Los Angeles, CA 90013
Telephone: (213) 897-0473

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

STATE OF CALIFORNIA DEPARTMENT OF
TOXIC SUBSTANCES CONTROL,

PLAINTIFF(S)

v.

STANDARD NICKEL-CHROMIUM PLATING
COMPANY, a California corporation,
(SEE ADDITIONAL SUMMONS PAGE)

DEFENDANT(S).

CASE NUMBER

CV 13-03600-RGK (ASW)

SUMMONS

TO: DEFENDANT(S):

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached complaint _____ amended complaint counterclaim cross-claim or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, Olivia W. Karlin, whose address is Office of the Attorney General, 300 South Spring Street, # 1702, Los Angeles, CA 90013. If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Clerk, U.S. District Court

Dated: MAY 20 2013

By: *Manlye Beer*
Deputy Clerk

(Seal of the Court)

[Use 60 days if the defendant is the United States or a United States agency, or is an officer or employee of the United States. Allowed 60 days by Rule 12(a)(3)].

SUM-200(A)

SHORT TITLE: STATE OF CALIFORNIA VS. STANDARD NICKE-CHROMIUM	CASE NUMBER:
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INSTRUCTIONS FOR USE

- This form may be used as an attachment to any summons if space does not permit the listing of all parties on the summons.
- If this attachment is used, insert the following statement in the plaintiff or defendant box on the summons: "Additional Parties Attachment form is attached."

List additional parties (Check only one box. Use a separate page for each type of party.):

Plaintiff
 Defendant
 Cross-Complainant
 Cross-Defendant

GEORGE DULGARIAN,
 individually; DOUGLAS DULGARIAN,
 individually; DEAN DULGARIAN,
 individually; DOUGLAS DULGARIAN as
 EXECUTOR for the ESTATE of HAIG
 DULGARIAN, deceased; the ESTATE of
 HAIG DULGARIAN, deceased; DUKE
 DULGARIAN, individually and doing business
 as DDD & Associates, LLC; DICKIE VAN
 BREENE (formerly known as DICKIE
 DULGARIAN), individually and doing business
 as DDD & Associates, LLC; DUKE
 DULGARIAN, as EXECUTOR for the
 ESTATE of DICK DULGARIAN, deceased;
 the ESTATE of DICK DULGARIAN, deceased,

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

I (a) PLAINTIFFS (Check box if you are representing yourself <input type="checkbox"/>) STATE OF CALIFORNIA DEPARTMENT OF TOXIC SUBSTANCES CONTROL	DEFENDANTS STANDARD NICKEL-CHROMIUM PLATING COMPANY, a California corporation, et al.
(b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.) OLIVIA W. KARLIN, Department of Justice 300 South Spring Street, Suite 1702, Los Angeles, CA 90013 Telephone: (213) 897-0473	Attorneys (If Known) Summer Nastich, Esq. Sean M. Sherlock, Esq. Mark Yocca, Esq.

II. BASIS OF JURISDICTION (Place an X in one box only.) <input type="checkbox"/> 1 U.S. Government Plaintiff <input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party) <input type="checkbox"/> 2 U.S. Government Defendant <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)	III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only (Place an X in one box for plaintiff and one for defendant.) <table style="width:100%; border-collapse: collapse;"> <tr> <td style="width:30%;">Citizen of This State</td> <td style="width:10%;"><input type="checkbox"/> 1</td> <td style="width:10%;"><input type="checkbox"/> 1</td> <td style="width:40%;">Incorporated or Principal Place of Business in this State</td> <td style="width:10%;"><input type="checkbox"/> 4</td> <td style="width:10%;"><input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td><input type="checkbox"/> 2</td> <td><input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business in Another State</td> <td><input type="checkbox"/> 5</td> <td><input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td><input type="checkbox"/> 3</td> <td><input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td><input type="checkbox"/> 6</td> <td><input type="checkbox"/> 6</td> </tr> </table>	Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	<input type="checkbox"/> 4	<input type="checkbox"/> 4	Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	<input type="checkbox"/> 4	<input type="checkbox"/> 4														
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5														
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6														

IV. ORIGIN (Place an X in one box only.)

1 Original Proceeding
 2 Removed from State Court
 3 Remanded from Appellate Court
 4 Reinstated or Reopened
 5 Transferred from another district (specify):
 6 Multi-District Litigation
 7 Appeal to District Judge from Magistrate Judge

V. REQUESTED IN COMPLAINT: JURY DEMAND: Yes No (Check 'Yes' only if demanded in complaint.)

CLASS ACTION under F.R.C.P. 23: Yes No
 MONEY DEMANDED IN COMPLAINT: \$ all cleanup costs

VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)

42 U.S.C. § 9607 for recovery of costs and declaratory relief

VII. NATURE OF SUIT (Place an X in one box only.)

OTHER STATUTES <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Act <input type="checkbox"/> 892 Economic Stabilization Act <input checked="" type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Info. Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes	CONTRACT <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	TORTS PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus-Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	TORTS PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability BANKRUPTCY <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 American with Disabilities - Employment <input type="checkbox"/> 446 American with Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 Habeas Corpus General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus/Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition FORFEITURE/PENALTY <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609
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FOR OFFICE USE ONLY: Case Number: **CV13-03600**

AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

VIII(a). IDENTICAL CASES: Has this action been previously filed in this court and dismissed, remanded or closed? No Yes
If yes, list case number(s): _____

VIII(b). RELATED CASES: Have any cases been previously filed in this court that are related to the present case? No Yes
If yes, list case number(s): _____

Civil cases are deemed related if a previously filed case and the present case:

- (Check all boxes that apply) A. Arise from the same or closely related transactions, happenings, or events; or
 B. Call for determination of the same or substantially related or similar questions of law and fact; or
 C. For other reasons would entail substantial duplication of labor if heard by different judges; or
 D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

IX. VENUE: (When completing the following information, use an additional sheet if necessary.)

(a) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH named plaintiff resides.
 Check here if the government, its agencies or employees is a named plaintiff. If this box is checked, go to item (b).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles, CA	

(b) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH named defendant resides.
 Check here if the government, its agencies or employees is a named defendant. If this box is checked, go to item (c).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles, CA	

(c) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH claim arose.
Note: In land condemnation cases, use the location of the tract of land involved.

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles, CA	

* Los Angeles, Orange, San Bernardino, Riverside, Ventura, Santa Barbara, or San Luis Obispo Counties
Note: In land condemnation cases, use the location of the tract of land involved

X. SIGNATURE OF ATTORNEY (OR PRO PER): Ola W. Karl Date May 17, 2013

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405(g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))