

1 GREGORY W. SMITH (SBN 134385)
2 **LAW OFFICES OF GREGORY W. SMITH**
3 9952 Santa Monica Boulevard, 1st Floor
4 Beverly Hills, California 90212
5 Telephone: (310) 282-0507
6 Telecopier: (310) 286-1171

FILED
LOS ANGELES SUPERIOR COURT

SEP 22 2009

JOHN A. CLARKE, CLERK
BY MARY GARCIA, DEPUTY

7 CHRISTOPHER BRIZZOLARA (SBN 130304)
8 1528 16th Street
9 Santa Monica, California 90404
10 Telephone: (310) 394-6447
11 Telecopier: (310) 656-7701

12 Attorneys for Plaintiff
13 WILLIAM TAYLOR

UNLIMITED JURISDICTION

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

BC 422252

13 WILLIAM TAYLOR,

CASE NO.

14 Plaintiff,

COMPLAINT FOR DAMAGES:

15 vs.

1. RETALIATION (LABOR CODE SECTION 1102.5)

16 CITY OF BURBANK and DOES 1 through
17 100, inclusive,

2. RETALIATION IN VIOLATION OF THE CALIFORNIA FAIR EMPLOYMENT

18 Defendants.

19 DEMAND FOR JURY TRIAL

20 GENERAL ALLEGATIONS

21
22 1. At all times relevant hereto, Plaintiff William Taylor ("Plaintiff") was a sworn
23 California peace officer residing in the County of Los Angeles, State of California, and
24 and is a competent adult.

25
26 2. Plaintiff is informed and believes and thereon alleges that, at all times
27 relevant hereto, Defendant City of Burbank ("City"), was an entity committing torts and
28 violating laws in and engaged as a matter of commercial actuality in purposeful economic

D-58
Rolf M. Tew

RECEIPT #:
DATE PAID: 09/22/09 02:07:10 PM
PAYMENT: \$355.00
RECEIVED:
CHECK: \$55.00
CASH:
CHANGE:
CARD:

CIT/CASE: BC422252 LEA/REF#:
CGH#78057036

1 activity within the County of Los Angeles, State of California. At all times pertinent hereto,
2 Defendant City owned, controlled, and operated the law enforcement agency known as
3 the Burbank Police Department.

4 3. Plaintiff is informed and believes and thereupon alleges that defendants
5 DOES 1 through 33, inclusive, and each of them, were, at all times relevant hereto, public,
6 business, and/or other entities whose form is unknown, committing torts in and/or
7 engaged as a matter of commercial actuality, in purposeful economic activity within the
8 County of Los Angeles, State of California.

9 4. Plaintiff is informed and believes and thereupon alleges that defendants
10 DOES 34 through 67, inclusive, and each of them, were, at all times relevant hereto,
11 individuals, residing in and/or committing torts within the County of Los Angeles, State of
12 California.

13 5. Plaintiff is informed and believes and thereupon alleges that DOES 68
14 through 100 inclusive, and each of them, at all times relevant hereto, were residents of the
15 County of Los Angeles, State of California, and were agents, partners, and/or joint
16 venturers of defendants and/or DOES 1 through 33, inclusive, acting as supervisors,
17 managers, administrators, owners, and/or directors or in some other unknown capacity.

18 6. The true names and capacities of defendants DOE 1 through 100, and each
19 of them, whether individual, corporate, associate or otherwise, are unknown to Plaintiff at
20 this time, who therefore sues said defendants by such fictitious names. Plaintiff will file
21 DOE amendments, and/or ask leave of court to amend this complaint to assert the true
22 names and capacities of these defendants when they have been ascertained. Plaintiff is
23 informed and believes, and upon such information and belief alleges, that each defendant
24 herein designated as a DOE was and is in some manner, negligently, wrongfully, or
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1 otherwise, responsible and liable to Plaintiff for the injuries and damages hereinafter
2 alleged, and that Plaintiff's damages as herein alleged were proximately caused by their
3 conduct.

4 7. Plaintiff is informed and believes, and thereon alleges, that at all times
5 material herein the defendants, and each of them, were the agents, servants, and
6 employees, or ostensible agents, servants, or employees of each other defendant, and as
7 such, were acting within the course and scope of said agency and employment or
8 ostensible agency and employment, except on those occasions when defendants were
9 acting as principals, in which case, said defendants, and each of them, were negligent in
10 the selection, hiring, and use of the other defendants.
11

12 8. Each defendant principal and/or employer herein had advance knowledge of
13 the unfitness of each defendant agent and/or employee, and employed each such agent
14 and/or employee with a conscious disregard of the rights or safety of others or otherwise
15 authorized or ratified the wrongful conduct of each such agent and/or employee. As to
16 each such corporate or other entity defendant herein, the advance knowledge and
17 conscious disregard, authorization, ratification, or act of oppression, fraud, or malice was
18 on the part of an officer, director, or managing agent of the corporation or other entity.
19

20 9. Plaintiff is further informed and believes that at all times relevant hereto,
21 defendants, and each of them, acted in concert and in furtherance of the interests of each
22 other defendant.
23

24 10. This court is the proper court because injury or damage to Plaintiff occurred
25 in its jurisdictional area.

26 11. Plaintiff has complied with and/or exhausted any applicable claims statutes
27 and/or administrative and/or internal remedies and/or grievance procedures, or is excused
28

1 from complying therewith. Attached hereto as Exhibit "1" is a true and correct copy of the
2 Government Claim for Damages Pursuant to Government Code Sections 905 and 910,
3 filed on or about August 3, 2009. The City failed to respond to the notice within the 45-
4 day period set forth in the Government Code.

5 12. Plaintiff herein was and is employed by Defendant City and the Burbank
6 Police Department.
7

8
9 **FIRST CAUSE OF ACTION FOR**
10 **RETALIATION (LABOR CODE SECTION 1102.5)**

11 13. Plaintiff repeats and re-alleges each and every allegation set forth above,
12 and incorporates same by reference as though set forth fully herein.
13

14 14. Plaintiff disclosed information to the City of Burbank and the Burbank Police
15 Department, government and law enforcement agencies, which Plaintiff had reasonable
16 cause to believe disclosed violations of state or federal statutes, or violation or
17 noncompliance with state or federal rules or regulations, by other employees of the City of
18 Burbank and the Burbank Police Department, including but not limited to:

- 19 a. During March 2009, a sworn employee of the Burbank Police Department
20 was accused of sexually harassing numerous females at the Burbank
21 Animal Shelter. The employee was accused of inappropriate sexual
22 comments, acts and gestures. When Plaintiff was notified of the allegations
23 of sexual harassment, he recommended to Chief of Police Tim Stehr that the
24 employee be placed on administrative leave pending an investigation. Chief
25 of Police Stehr became angry and demanded that the employee not be
26 placed on administrative leave for a long period of time and ultimately
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28

1 directed Plaintiff to bring the employee back to work prematurely before
2 sufficient investigation had been undertaken. On information and belief,
3 Plaintiff alleges that before Stehr was promoted to the rank of Chief of
4 Police, while on duty as a sworn police officer had sexual intercourse with a
5 female in a Burbank Police vehicle and was subject to discipline. Plaintiff
6 alleges that Chief Stehr's motivation to retaliate against Plaintiff arises from
7 his own personal experiences being subjected to discipline for having sexual
8 intercourse in a police vehicle while on duty. Consequently, Stehr
9 minimized complaints of sexual misconduct and frowned upon Plaintiff for
10 reporting it and taking the issue seriously. This employee was subsequently
11 accused of other acts of sexual harassment. Plaintiff informed the City
12 Manager, Mike Flad, about this incident and that it was handled
13 inappropriately on or about April or May 2009. In fact during the Summer of
14 2009 during a management team meeting for the Department, Flad stated
15 "What difference does it make what Tim [Stehr] did in the back of a police
16 car 20 years ago."

- 17
18
19 b. Plaintiff repeatedly complained from April 2008 through April 2009, to Stehr
20 that minority (African-American and Hispanic) probationary police officers
21 were being singled out by the Patrol Captain, Pat Lynch, at the time, and
22 some of his staff, for termination on account of their race. Plaintiff was able
23 to stop the terminations by refusing to support the record that had been
24 unjustly prepared to support the potential terminations. The discriminatory
25 actions Plaintiff witnessed towards African-American and Hispanic police
26 officers was systemic and rampant and sanctioned by the Chief of Police
27
28

1 Tim Stehr. Plaintiff had a good faith and reasonable belief that the unjust
2 attempts to terminate minority probationary officers was a violation of federal
3 and state statutes and law (specifically Government Code sections 12940 et.
4 seq.). Plaintiff was hesitant to complain to Stehr because in or around the
5 Fall of 2008, Stehr stated very casually during a management team meeting,
6 with approximately 20 plus attendees, none of whom were African-
7 American, I remember a time when it was okay to use the word "nigger"
8 around here, but times have changed. On information and belief, Plaintiff
9 alleges that Stehr was uncomfortable with the fact that more minorities,
10 including African-Americans were seeking employment with the Burbank
11 Police Department. On or about April or May 2009, Plaintiff informed the City
12 Manager that high ranking department personnel were attempting to unfairly
13 terminate probationary minority officers solely because of their race. The
14 City Manager took no action after Plaintiff's Complaint, but was instrumental
15 in demoting Plaintiff from Deputy Chief to the rank of Captain shortly after
16 Plaintiff made his complaint. The demotion was initiated by Chief Stehr in
17 retaliation for Plaintiff's Complaints of racial discrimination.
18
19

- 20 c. In or about January 2007, an IA investigation had been initiated based upon
21 an allegation that a lieutenant, while he held the rank of sergeant, had used
22 excessive force against a suspect. The investigation was conducted,
23 interviews were taken, and evidence was gathered. In or around 2007 all of
24 the documents, flash drive and interview tapes pertaining to the case that
25 were stored in a locked office in the Burbank Police Department were stolen.
26
27 The theft could have only been committed by an employee of the Burbank
28

1 Police Department. In a memo to Stehr dated November 19, 2007, Plaintiff
2 requested that an outside agency be contacted and brought into the
3 Burbank Police Department to investigate what was certainly a burglary
4 within the Department by Department employees. In the memo, Plaintiff
5 specifically requested that the Los Angeles County Sheriff's Department and
6 Burbank City Attorney's office become involved. Plaintiff's request to bring
7 in the Los Angeles County Sheriff's Department was angrily denied. On or
8 about April or May 2009, Plaintiff informed the City Manager about the 2007
9 burglary and the Chief's failure to take appropriate action.
10

11 As a result of the aforementioned complaints, Plaintiff was subjected to retaliatory
12 actions by the Burbank Chief of Police and City Manager.
13

14 15. On or about April 22, 2009, Plaintiff was approached by City Manager Mike
15 Flad when Plaintiff was returning from lunch. Flad requested that Plaintiff tell him
16 everything "that was going on" in the Police Department and that Plaintiff would not be
17 punished for telling the truth. Plaintiff responded by informing Flad that there was
18 discrimination, sexual harassment and corruption going on within the Department.
19 Plaintiff specified that Stehr was trying to cover up sexual harassment, that minority
20 officers were being unfairly targeted for termination during their probationary periods, and
21 that there were multiple burglaries going on in the Department in which officers were likely
22 involved. Plaintiff also told Flad that Stehr was trying to demote him. Plaintiff told Flad
23 that Stehr said to him "I have to save myself, I can't go out this way." Stehr was referring
24 to complaints of sexual harassment, burglaries and discrimination. Flad told Plaintiff, "I
25 know you're the heir apparent (to become chief) and subject to take shots, because I was
26 the heir apparent and it happened to me. Sometimes Bill, you have to take one for the
27
28

1 team. It's almost a leadership development thing for the number one's to throw the
2 number two's under the bus when things go wrong. It happened to me twice by Mary
3 (former City Manager). When she did it to me I almost quit, but I thought about it and just
4 went along. Ultimately I became city manager. Bill, I promise not to hold this against you,
5 and I'll remember it when it comes time to name the next chief." Plaintiff refused.
6

7 16. On or about April 30, 2009, Plaintiff and Flad were at a retirement party for
8 Council woman Marsha Romas. Flad approached Plaintiff and told Plaintiff that he had
9 found out about Lieutenant Rodriguez' lawsuit for discrimination. Flad said "Bill I
10 understand that Omar [Lt. Rodriguez] might use discrimination for the court thing, but
11 does the police department really have a discrimination problem? The question was
12 rhetorical and Flad expected Plaintiff to say no, proving Plaintiff's intent to support the City
13 in Rodriguez' lawsuit. When Plaintiff responded "Yes," Flad became silent and appeared
14 to be angry. Plaintiff urged Flad not to allow Stehr to retaliate against the minority officers
15 who were working in the detective bureau and who had complained about discrimination.
16

17 17. On or about May 4, 2009, Plaintiff was demoted from deputy chief to the
18 rank of captain. Stehr told Plaintiff if he wouldn't fight the demotion he would let Plaintiff
19 keep deputy chief pay for a few more months. Stehr also told Plaintiff that he had not
20 talked to Flad about the demotion, but had demoted Plaintiff on his own authority. Plaintiff
21 then immediately went to Flad's office and informed him of the demotion. Flad said he
22 had talked to Stehr during the weekend and that Flad had agreed to the demotion. Flad
23 told Plaintiff that his career was finished in Burbank, but "why don't you go over to
24 Glendale and become chief."
25

26 18. Defendants, and each of them, made, adopted, and/or enforced rules,
27 regulations, and/or policies designed to prevent employees from disclosing information to
28

1 a government or law enforcement agency, which Plaintiff had reasonable cause to believe
2 disclosed violations of state or federal statutes.

3 19 Defendants, and each of them, retaliated against Plaintiff for disclosing
4 information to the City of Burbank and the Burbank Police Department, government and/or
5 law enforcement agencies, which the Plaintiff had reasonable cause to believe disclosed
6 violations of state or federal statutes, or violations or noncompliance with state or federal
7 rules or regulations, including but not limited to: 1) denying Plaintiff future promotions; 2)
8 demoting Plaintiff; 3) denying Plaintiff transfers to coveted and/or favorable job positions
9 and assignments; subjecting Plaintiff to ostracism from Defendant and co-workers; 3)
10 removing from Plaintiff job responsibilities which would further Plaintiff's career; 5) denying
11 Plaintiff other employment benefits; 6) knowingly making false, misleading or malicious
12 statements regarding Plaintiff which were are reasonably calculated to harm or destroy
13 the reputation, authority or official standing of the Plaintiff; 7) denying Plaintiff a bonus; 8)
14 making false and unfounded complaints regarding Plaintiff's work performance; 9)
15 charging Plaintiff with false allegations of misconduct; 11) wrongfully fabricating
16 misconduct and instituting baseless IA investigations against Plaintiff in an attempt to
17 embarrass and accuse Plaintiff falsely of misconduct; and 10) other actions having a
18 substantial and material adverse effect on Plaintiff's employment.

19 20. A motivating reason for Defendants, and each of them, engaging in the
20 foregoing adverse employment actions against Plaintiff was to retaliate for the Plaintiff
21 engaging in the protected activities of disclosing information to the City of Burbank and
22 the Burbank Police Department, government and/or law enforcement agencies, which the
23 Plaintiff had reasonable cause to believe disclosed violations of state or federal statutes,
24 or violations or noncompliance with state or federal rules or regulations.

1 21. Defendants, and each of them, further retaliated against Plaintiff for refusing
2 to participate in activities that would result in a violation of state or federal statutes, or a
3 violation or noncompliance with a state or federal rules or regulations. Said actions of
4 retaliation were a direct violation of Labor Code Section 1102.5, and said violation shifts
5 the burden of proof onto Defendant to prove beyond clear and convincing evidence that
6 the adverse employment decisions mentioned herein were legitimate.
7

8 22. As a result of the aforesaid unlawful acts of Defendants, and each of them,
9 Plaintiff has lost and may continue to lose income, in an amount to be proven at time of
10 trial. Plaintiff claims such amount as damages together with prejudgment interest
11 pursuant to California Civil Code section 3287 and/or any other provision of law providing
12 for prejudgment interest.
13

14 23. As a further result of the aforesaid unlawful acts of Defendants, and each of
15 them, Plaintiff was personally humiliated and has become mentally upset, distressed and
16 aggravated. Plaintiff claims general damages for such mental distress and aggravation in
17 an amount of be proven at time of trial.
18

19 **SECOND CAUSE OF ACTION**

20 **FOR RETALIATION IN VIOLATION OF THE CALIFORNIA FAIR EMPLOYMENT AND**
21 **HOUSING ACT AGAINST DEFENDANTS, AND EACH OF THEM**
22

23 24. Plaintiff incorporates by reference the allegations of paragraphs 1 through
24 20 as if set forth in full herein.

25 25. The conduct as set forth above, more specifically in paragraph 14b,
26 constituted retaliation thereby creating a continuing violation actionable under, among
27 other things, California Government Code section 12940. et seq.
28

1 26. The aforementioned unlawful employment practices on the part of
2 Defendants, and each of them, were a substantial factor in causing damages and injuries
3 to Plaintiff as set forth below.

4 27. Plaintiff has duly filed administrative complaints with the California
5 Department of Fair Employment and Housing ("DFEH") substantially alleging the acts and
6 conduct of Defendants as herein above described. The Department issued a "right-to-
7 sue" notice on or about June 15, 2009. A true and correct copy of said notice is attached
8 hereto as Exhibit "2".

9
10 28. As a result of the aforesaid unlawful acts of Defendants, and each of them,
11 Plaintiff has lost and may continue to lose income, in an amount to be proven at time of
12 trial. Plaintiff claims such amount as damages together with prejudgment interest
13 pursuant to California Civil Code section 3287 and/or any other provision of law providing
14 for prejudgment interest.

15
16 29. As a further result of the aforesaid unlawful acts of Defendants, and each of
17 them, Plaintiff was personally humiliated and has become mentally upset, distressed and
18 aggravated. Plaintiff claims general damages for such mental distress and aggravation in
19 an amount of be proven at time of trial.

20 **WHEREFORE**, Plaintiff seeks judgment against all Defendants, and each of them,
21 on all Causes of Action for:

22
23 1. Actual, consequential and incidental losses, including but not limited to loss
24 of income, benefits and medical expenses, according to proof, together with prejudgment
25 interest;


26 2. General damages for emotional distress and mental suffering in a sum
27 according to proof;
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- 3. Attorneys fees pursuant California Government Code §12965 (b);
- 4. Costs of suit herein; and
- 5. Such other and further relief as the Court may deem proper.

Dated: September 18, 2009

LAW OFFICES OF GREGORY W. SMITH

By: 

GREGORY W. SMITH
Attorneys for Plaintiff
WILLIAM TAYLOR

1 Hills, California 90212, Tel. (310) 282-0507.

2
3 3. TIMELINESS OF CLAIM

4 Claimant has timely filed a Government Claim within six months of the
5 adverse employment actions taken against Claimant as a result of reporting illegal
6 activities as set forth below.

7
8 4. CIRCUMSTANCES OF THE INCIDENT

9 Claimant, a sworn officer, was employed by the Burbank Police Department
10 and held the rank of Deputy Chief.

11 During March 2009, a sworn employee of the Burbank Police Department
12 was accused of sexually harassing numerous females at the Burbank Animal Shelter.
13 The employee was accused of inappropriate sexual comments and gestures. When
14 Claimant was notified of the allegations of sexual harassment, he recommended to Chief
15 of Police Tim Stehr that the employee be placed on administrative leave pending an
16 investigation. Chief of Police Stehr became agitated and demanded that the employee
17 not be placed on administrative leave for a long period of time and ultimately directed
18 Claimant to bring the employee back to work prematurely before sufficient investigation
19 had been undertaken. Claimant informed the City Manager about this incident and that it
20 was handled inappropriately on or about April or May 2009.

21 Claimant repeatedly complained from April 2008 through April 2009, to Stehr
22 that minority (African-American and Hispanic) probationary police officers were being
23 singled out by the Patrol Captain at the time, and some of his staff, for termination on
24 account of their race. Claimant was able to stop the terminations by refusing to support
25 the record that had been unjustly prepared to support the potential terminations. At the
26 time, Claimant had a good faith and reasonable belief that the unjust attempts to terminate
27 minority probationary officers was a violation of federal and state statutes and law
(specifically Government Code sections 12940 et. seq.).

28 On or about April or May 2009, Claimant informed the City Manager that

1 some department personnel were attempting to unfairly terminate probationary minority
2 officers.

3 In or about January 2007, an IA investigation had been initiated based upon
4 an allegation that a lieutenant, while he held the rank of sergeant, had used excessive
5 force against a suspect. The investigation was conducted, interviews were taken, and
6 evidence was gathered. In or around 2007 all of the documents, flash drive and interview
7 tapes pertaining to the case that were stored in a locked office in the Burbank Police
8 Department were stolen. The theft could have only been committed by an employee of
9 the Burbank Police Department. In a memo to Stehr dated November 19, 2007, Claimant
10 requested that an outside agency be contacted and brought into the Burbank Police
11 Department to investigate what appeared to be a burglary within the Department by
12 Department employees. In the memo, Claimant specifically requested that the Los
13 Angeles County Sheriff's Department and Burbank City Attorney's office become involved.
14 Claimant's request to bring in the Los Angeles County Sheriff's Department was angrily
15 denied. On or about April or May 2009, Claimant informed the City Manager about the
16 2007 burglary and the Chief's failure to take appropriate action.
17
18

19 As a result of the complaints alleged above to the City manager and Chief
20 Stehr, Complainant was demoted from the rank of police Deputy Chief to police Captain.
21

22 5. GENERAL DESCRIPTION OF INJURY

23 Claimant alleges that respondents, and each of them, are agents, servants
24 and/or employees of the remaining respondents, and at all relevant times were acting
25 within the course and scope of said agency, service and/or employment.
26

27 Claimant alleges that the conduct described herein is a violation of
28 numerous state and federal laws and regulations. Further, Claimant alleges that the

1 conduct described herein violates California Labor Code section 1102.5, and California
2 Government Code sections 8547 and 12653, and as an actual and proximate result of
3 said conduct Claimant suffered emotional distress, loss of past and future earnings, loss
4 of bonus, loss of ability to promote to the position of Chief of Police. Claimant also claims
5 attorney's fees under the applicable provisions.

6
7
8 6. AMOUNTS CLAIMED:


9 The amount claimed for the wrongful acts and the causes of action stated
10 herein are presently unascertainable, but will be no less than one thousand dollars
11 (\$1,000), in accordance with Section 54.3 of the California Civil Code, and is in an amount
12 to be assessed in accordance with proof at the time of trial. However, pursuant to
13 amended Government Code §910(f), the amount claimed will necessarily lie within the
14 jurisdiction of the Superior Court and unlimited jurisdiction.

15 Claimant claims attorney's fees and costs as provided by statute.

16
17
18 Dated: July 29, 2009

SMITH & LIPOW

19
20 By:



GREGORY W. SMITH
Attorneys for Claimant
BILL TAYLOR

PROOF OF SERVICE

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STATE OF CALIFORNIA)
)
COUNTY OF LOS ANGELES)

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years of age, and am not a party to the within action; my business address is 9952 Santa Monica Boulevard, 1st Floor, Beverly Hills, California 90212.

On the date hereinbelow specified, I served the foregoing document, described as set forth below on the interested parties in this action by placing the original thereof enclosed in sealed envelopes, at Beverly Hills, addressed as follows:

DATE OF SERVICE : July 30, 2009

DOCUMENT SERVED : **GOVERNMENT CLAIM FOR DAMAGES PURSUANT TO GOVERNMENT CODE SECTIONS 905 and 910, ET SEQ.**

PARTIES SERVED : Office of the City Clerk
City of Burbank
275 East Olive Avenue
P.O. Box 6459
Burbank, California 91510-6459

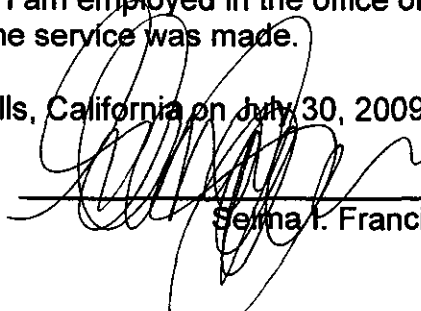
XXX (BY REGULAR MAIL) I caused such envelope(s) with postage thereon fully prepaid to be placed in the United States mail at Beverly Hills, California. I am "readily familiar" with firm's practice of collection and processing correspondence for mailing. It is deposited with U.S. postal service on that same day in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

 (BY PERSONAL SERVICE) I personally delivered by hand to the offices of the addressee(s).

XXX (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

 (FEDERAL) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

EXECUTED at Beverly Hills, California on July 30, 2009.



Selma I. Francia

DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

1055 West 7th Street, Suite 1400
(213) 439-6700
www.dfeh.ca.gov



June 15, 2009

TAYLOR, WILLIAM
9952 SANTA MONICA BOULEVARD, 1ST FLOOR
BEVERLY HILLS, CA 90212

RE: E200809S6087-00
TAYLOR/CITY OF BURBANK (BPD)

Dear TAYLOR, WILLIAM:

NOTICE OF CASE CLOSURE

This letter informs that the above-referenced complaint that was filed with the Department of Fair Employment and Housing (DFEH) has been closed effective June 15, 2009 because an immediate right-to-sue notice was requested. DFEH will take no further action on the complaint.

This letter is also the Right-To-Sue Notice. According to Government Code section 12965, subdivision (b), a civil action may be brought under the provisions of the Fair Employment and Housing Act against the person, employer, labor organization or employment agency named in the above-referenced complaint. The civil action must be filed within one year from the date of this letter.

If a federal notice of Right-To-Sue is wanted, the U.S. Equal Employment Opportunity Commission (EEOC) must be visited to file a complaint within 30 days of receipt of this DFEH *Notice of Case Closure* or within 300 days of the alleged discriminatory act, whichever is earlier.

BA 2

DFEH does not retain case files beyond three years after a complaint is filed, unless the case is still open at the end of the three-year period.

Sincerely,



Lottie Woodruff
District Administrator

cc: Case File

TIMOTHY STEHR
CHIEF OF POLICE
BURBANK POLICE DEPARTMENT
200 NORTH THIRD STREET
BURBANK, CA 91502

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):

GREGORY W. SMITH (SBN 134385)
LAW OFFICES OF GREGORY W. SMITH
9952 SANTA MONICA BOULEVARD, 1ST FLOOR
BURBANK, CALIFORNIA 90212

FOR COURT USE ONLY

FILED
LOS ANGELES SUPERIOR COURT

SEP 22 2009

JOHN A. CLARKE, CLERK

CASE NUMBER BY MARY GARCIA, DEPUTY

JUDGE: BC 422252
DEPT:

ATTORNEY FOR (Name): Plaintiff WILLIAM TAYLOR

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES
STREET ADDRESS: 111 NORTH HILL STREET
MAILING ADDRESS: 111 NORTH HILL STREET
CITY AND ZIP CODE: LOS ANGELES, CALIFORNIA 90012
BRANCH NAME: CENTRAL DISTRICT

CASE NAME: WILLIAM TAYLOR v. CITY OF BURBANK, et al.

CIVIL CASE COVER SHEET

[X] 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)

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

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

Auto Tort

[] Auto (22)
[] Uninsured motorist (46)

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

[] Asbestos (04)
[] Product liability (24)
[] Medical malpractice (45)
[] Other PI/PD/WD (23)

Non-PI/PD/WD (Other) Tort

[] Business tort/unfair business practice (07)
[] Civil rights (08)
[] Defamation (13)
[] Fraud (16)
[] Intellectual property (19)
[] Professional negligence (25)
[] Other non-PI/PD/WD tort (35)

Employment

[] Wrongful termination (36)
[X] Other employment (15)

Contract

[] Breach of contract/warranty (06)
[] Rule 3.740 collections (09)
[] Other collections (09)
[] Insurance coverage (18)
[] Other contract (37)

Real Property

[] Eminent domain/Inverse condemnation (14)
[] Wrongful eviction (33)
[] Other real property (26)

Unlawful Detainer

[] Commercial (31)
[] Residential (32)
[] Drugs (38)

Judicial Review

[] Asset forfeiture (05)
[] Petition re: arbitration award (11)
[] Writ of mandate (02)
[] Other judicial review (39)

Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403)

[] Antitrust/Trade regulation (03)
[] Construction defect (10)
[] Mass tort (40)
[] Securities litigation (28)
[] Environmental/Toxic tort (30)
[] Insurance coverage claims arising from the above listed provisionally complex case types (41)

Enforcement of Judgment

[] Enforcement of judgment (20)

Miscellaneous Civil Complaint

[] RICO (27)
[] Other complaint (not specified above) (42)

Miscellaneous Civil Petition

[] Partnership and corporate governance (21)
[] Other petition (not specified above) (43)

- 2. This case [] is [X] is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:
a. [] Large number of separately represented parties d. [] Large number of witnesses
b. [] Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve e. [] Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court
c. [] Substantial amount of documentary evidence f. [] Substantial postjudgment judicial supervision
3. Remedies sought (check all that apply): a. [X] monetary b. [] nonmonetary; declaratory or injunctive relief c. [] punitive

4. Number of causes of action (specify): TWO (2)

5. This case [] is [X] 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 18, 2009
GREGORY W. SMITH (SBN 134385)
(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.

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

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

Non-PI/PD/WD (Other) Tort

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

Employment

- Wrongful Termination (36)
- Other Employment (15)

Contract

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

Real Property

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

Unlawful Detainer

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

Judicial Review

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

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

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

Enforcement of Judgment

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

Miscellaneous Civil Complaint

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

Miscellaneous Civil Petition

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

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

This form is required pursuant to LASC Local Rule 2.0 in all new civil case filings in the Los Angeles Superior Court.

Item I. Check the types of hearing and fill in the estimated length of hearing expected for this case:

JURY TRIAL? YES CLASS ACTION? YES LIMITED CASE? YES TIME ESTIMATED FOR TRIAL 7-10 HOURS/ DAYS

Item II. Select the correct district and courthouse location (4 steps – If you checked "Limited Case", skip to Item III, Pg. 4):

Step 1: After first completing the Civil Case Cover Sheet Form, find the main civil case cover sheet heading for your case in the left margin below, and, to the right in Column A, the Civil Case Cover Sheet case type you selected.

Step 2: Check one Superior Court type of action in Column B below which best describes the nature of this case.

Step 3: In Column C, circle the reason for the court location choice that applies to the type of action you have checked. For any exception to the court location, see Los Angeles Superior Court Local Rule 2.0.

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

- | | |
|---------------------------------------------------------------------------------|------------------------------------------------------------|
| 1. Class Actions must be filed in the County Courthouse, Central District. | 6. Location of property or permanently garaged vehicle. |
| 2. May be filed in Central (Other county, or no Bodily Injury/Property Damage). | 7. Location where petitioner resides. |
| 3. Location where cause of action arose. | 8. Location wherein defendant/respondent functions wholly. |
| 4. Location where bodily injury, death or damage occurred. | 9. Location where one or more of the parties reside. |
| 5. Location where performance required or defendant resides. | 10. Location of Labor Commissioner Office. |

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

	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	2.
		<input type="checkbox"/> A7221 Asbestos - Personal Injury/Wrongful Death	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	1., 2., 4.
		<input type="checkbox"/> A7240 Other Professional Health Care Malpractice	1., 2., 4.
	Other Personal Injury Property Damage Wrongful Death (23)	<input type="checkbox"/> A7250 Premises Liability (e.g., slip and fall)	1., 2., 4.
		<input type="checkbox"/> A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.)	1., 2., 4.
<input type="checkbox"/> A7270 Intentional Infliction of Emotional Distress		1., 2., 3.	
	<input type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death	1., 2., 4.	
Business Tort (07)	<input type="checkbox"/> A6029 Other Commercial/Business Tort (not fraud/breach of contract)	1., 2., 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.	

SHORT TITLE: WILLIAM TAYLOR V. CITY OF BURBANK, et al.	CASE NUMBER
A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)
Professional Negligence (25)	A6017 Legal Malpractice <input type="checkbox"/> A6050 Other Professional Malpractice (not medical or legal) <input type="checkbox"/>
Other (35)	A6025 Other Non-Personal Injury/Property Damage tort <input type="checkbox"/>
Wrongful Termination (36)	A6037 Wrongful Termination <input type="checkbox"/>
Other Employment (15)	A6024 Other Employment Complaint Case <input checked="" type="checkbox"/> A6109 Labor Commissioner Appeals <input type="checkbox"/>
Breach of Contract Warranty (not insurance) (06)	A6004 Breach of Rental/Lease Contract (not Unlawful Detainer or wrongful eviction) <input type="checkbox"/> A6008 Contract/Warranty Breach - Seller Plaintiff (no fraud/negligence) <input type="checkbox"/> A6019 Negligent Breach of Contract/Warranty (no fraud) <input type="checkbox"/> A6028 Other Breach of Contract/Warranty (not fraud or negligence) <input type="checkbox"/>
Collections (09)	A6002 Collections Case-Seller Plaintiff <input type="checkbox"/> A6012 Other Promissory Note/Collections Case <input type="checkbox"/>
Insurance Coverage (18)	A6015 Insurance Coverage (not complex) <input type="checkbox"/>
Other Contract (37)	A6009 Contractual Fraud <input type="checkbox"/> A6031 Tortious Interference <input type="checkbox"/> A6027 Other Contract Dispute(not breach/insurance/fraud/negligence) <input type="checkbox"/>
Eminent Domain/Inverse Condemnation (14)	A7300 Eminent Domain/Condemnation Number of parcels _____ <input type="checkbox"/>
Wrongful Eviction (33)	A6023 Wrongful Eviction Case <input type="checkbox"/>
Other Real Property (26)	A6018 Mortgage Foreclosure <input type="checkbox"/> A6032 Quiet Title <input type="checkbox"/> A6060 Other Real Property (not eminent domain, landlord/tenant, foreclosure) <input type="checkbox"/>
Unlawful Detainer - Commercial (31)	A6021 Unlawful Detainer-Commercial (not drugs or wrongful eviction) <input type="checkbox"/>
Unlawful Detainer - Residential (32)	A6020 Unlawful Detainer-Residential (not drugs or wrongful eviction) <input type="checkbox"/>
Unlawful Detainer - Drugs (38)	A6022 Unlawful Detainer-Drugs <input type="checkbox"/>
Asset Forfeiture (05)	A6108 Asset Forfeiture Case <input type="checkbox"/>
Petition re Arbitration (11)	A6115 Petition to Compel/Confirm/Vacate Arbitration <input type="checkbox"/>
C Applicable Reasons - See Step 3 Above	2, 5, 6, 8, 10, 11, 12, 13, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50

CIVIL CASE COVER SHEET ADDENDUM AND STATEMENT OF LOCATION

	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Judicial Review (Cont'd.)	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	Antitrust/Trade Regulation (03)	<input type="checkbox"/> A6003 Antitrust/Trade Regulation	1., 2., 8.
	Construction Defect (10)	<input type="checkbox"/> A6007 Construction defect	1., 2., 3.
	Claims Involving Mass Tort (40)	<input type="checkbox"/> A6006 Claims Involving Mass Tort	1., 2., 8.
	Securities Litigation (28)	<input type="checkbox"/> A6035 Securities Litigation Case	1., 2., 8.
	Toxic Tort Environmental (30)	<input type="checkbox"/> A6036 Toxic Tort/Environmental	1., 2., 3., 8.
	Insurance Coverage Claims from Complex Case (41)	<input type="checkbox"/> A6014 Insurance Coverage/Subrogation (complex case only)	1., 2., 5., 8.
	Enforcement of Judgment	Enforcement of Judgment (20)	<input type="checkbox"/> A6141 Sister State Judgment
<input type="checkbox"/> A6160 Abstract of Judgment			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., 8.
<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	Other Complaints (Not Specified Above) (42)	<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	Other Petitions (Not Specified Above) (43)	<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.

**CIVIL CASE COVER SHEET ADDENDUM
AND STATEMENT OF LOCATION**

1. Original Complaint or Petition.
2. If filing a Complaint, a completed Summons form for issuance by the Clerk.
3. Civil Case Cover Sheet form CM-010.
4. Complete Addendum to Civil Case Cover Sheet form LACIV 109 (Rev 01/07), LASC Approved 03-04.
5. Payment in full of the filing fee, unless fees have been waived.
6. Signed order appointing the Guardian ad Litem, JC form FL-935, if the plaintiff or petitioner is a minor under 18 years of age, or if required by Court.
7. Additional copies of documents to be conformed by the Clerk. Copies of the cover sheet and this addendum must be served along with the summons and complaint, or other initiating pleading in the case.

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

Dated: SEPTEMBER 18, 2009



GREGORY W. SMITH
(SIGNATURE OF ATTORNEY/FILING PARTY)

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 SUPERIOR COURT OF THE STATE OF CALIFORNIA courthouse in the CENTRAL District of the Los Angeles Superior Court (Code Civ. Proc., § 392 et seq., and LASC Local Rule 2.0, subs. (b), (c) and (d)).

REASON: CHECK THE NUMBER UNDER COLUMN C WHICH APPLIES IN THIS CASE <input type="checkbox"/> 1. <input checked="" type="checkbox"/> 2. <input type="checkbox"/> 3. <input type="checkbox"/> 4. <input type="checkbox"/> 5. <input type="checkbox"/> 6. <input type="checkbox"/> 7. <input type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10.	ADDRESS: 200 NORTH THIRD STREET CITY: BURBANK STATE: CA ZIP CODE: 91502
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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.

SHORT TITLE: WILLIAM TAYLOR V. CITY OF BURBANK, et al.	CASE NUMBER
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