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Lisa Bloom (158458)  
A. Douglas Mastroianni (150438)  
Alan Goldstein (296430)  
Vanessa Hooker (315270)  
**THE BLOOM FIRM**  
20700 Ventura Blvd., Suite 301  
Woodland Hills, CA 91364  
Telephone: (818) 914-7319  
Facsimile: (866) 852-5666  
Email: Lisa@TheBloomFirm.com  
Doug@TheBloomFirm.com  
Avi@TheBloomFirm.com  
Vanessa@TheBloomFirm.com

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**FILED**  
Superior Court of California  
County of Los Angeles

**AUG 07 2017**

Sherril B. Carter, Executive Officer/Clerk  
By Marlon Gomez Deputy

Attorneys for Plaintiffs Quantasia Sharpton, John Doe and Jane Doe

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF LOS ANGELES

**BY FAX**

**BC671246**

QUANTASIA SHARPTON; JOHN DOE; and  
JANE DOE

Case No:

Plaintiff,

**CIVIL COMPLAINT FOR:**

vs.

1. SEXUAL BATTERY;
2. FRAUD (CONCEALMENT);
3. NEGLIGENCE AND NEGLIGENCE PER SE
4. INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS;
5. NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS.

USHER RAYMOND IV; DOES 1-25,

Defendant.

**DEMAND FOR JURY TRIAL**

Plaintiffs QUANTASIA SHARPTON, JOHN DOE, and JANE DOE, by and through undersigned counsel The Bloom Firm, bring this complaint against Defendant USHER RAYMOND IV and allege as follows:

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///  
///

RECEIPT #: CCH621759018  
DATE PAID: 08/07/17 09:09 AM  
PAYMENT: \$435.00  
RECEIVED:  
CHECK: \$435.00  
CASH: \$0.00  
CHANGE: \$0.00  
CARD: \$0.00

CIT/CASE #: BC671246  
LEA/DEF#:

FSC: 01 / 22 / 2019 TRIAL: 02 / 07 / 2019 OSC: 08 / 07 / 2020

08/07/2017  
THE BLOOM FIRM

1 **PARTIES**

2 1. Plaintiffs QUANTASIA SHARPTON, JOHN DOE, and JANE DOE are individuals,  
3 who had unprotected sex with Usher.

4 2. Defendant USHER RAYMOND IV ("Raymond") is an internationally famous R&B  
5 singer, actor, choreographer, and businessman. He is best known for singing top charting hit singles  
6 such as "Burn," "U Got It Bad," and "Yeah!" He is one of the best-selling musicians of all time.

7 3. The true names and capacities of DOES 1-25, inclusive, whether individual, corporate,  
8 or otherwise are presently unknown to Plaintiffs, who therefore sue said defendants by such fictitious  
9 names and will amend this complaint to alleged their true names and capacities when the same have  
10 been ascertained. Plaintiffs are informed, and believe, and thereon allege that each of the fictitiously  
11 named defendants is responsible in some manner for the occurrences herein alleged.

12 4. Plaintiffs are informed and believe and thereby allege, that each of the DOE  
13 defendants were the agents and employees of Defendant, and in doing the things alleged herein, were  
14 acting pursuant to such relationship or are otherwise responsible to Plaintiffs.

15 **JURISDICTION AND VENUE**

16 5. The court has specific personal jurisdiction over Raymond because he committed torts  
17 in Los Angeles as set forth in the instant complaint. The court has general personal jurisdiction over  
18 Raymond because Raymond does business in California, has generated millions or tens of millions of  
19 dollars of revenue in California, owns businesses in California, has managers and other agents in  
20 California, and made personal appearances, promoted goods, and performed concerts, and other  
21 business in California.

22 **GENERAL ALLEGATIONS**

23 6. Many news organizations have recently reported that Raymond was diagnosed with  
24 Herpes Simplex II<sup>1</sup> in or around 2009 and that in 2012 he settled a case with a woman, who claimed  
25 he had transmitted the disease to her. Usher has not publicly denied these claims. There has long been

26 <sup>1</sup> Herpes simplex type 2 (HSV-2) is a sexually transmitted infection that causes genital Herpes.  
27 According to the World Health Organization, Herpes infections are lifelong. Herpes symptoms  
28 include painful lesions, blisters, and ulcers at the site of the infection, in this case the genitals. While  
the Herpes Virus is most contagious when symptoms are present, it can still be transmitted to others  
when symptoms are absent.

1 a legal presumption that a party who refuses to deny an accusation that a reasonable person would  
2 deny if untrue, adopts the accusation as his admission. Raymond has adopted as an admission the  
3 numerous accusations that he has tested positive for the Herpes virus. Raymond's failure to rebut the  
4 numerous reports that he has Herpes has reasonably induced the Plaintiffs to believe that Raymond  
5 has the virus and that he exposed them to it.

6 7. On information and belief, Raymond was informed of that diagnosis and knew that he  
7 could infect others through sexual conduct -- whether or not he was suffering a Herpes outbreak.

8 8. Each of the Plaintiffs had oral or vaginal sex (or both) with Raymond. Each plaintiff  
9 did so because Raymond was a revered celebrity in their eyes who they believed could be loved and  
10 trusted. Raymond failed to disclose to any of the Plaintiffs that he was a carrier of the Herpes  
11 Simplex II Virus (hereinafter "Herpes" and "Herpes Virus"). Plaintiffs allege on information and  
12 belief that Raymond has the Herpes virus and that he knew or should have known that he could  
13 transmit the virus to them, that they then could suffer the effects of the virus, and subsequently pass it  
14 on to their future sexual partners -- and even their newborn children during vaginal childbirth.

15 9. As a result of being diagnosed with Herpes and/or being exposed to the Herpes Virus,  
16 Plaintiffs have suffered severe emotional distress, birthing complications, stress, depression, anxiety  
17 about having contracted the disease or being exposed to Herpes. As a direct result of learning only  
18 recently, in 2017, that Raymond was diagnosed with Herpes and had sexual contact with each of  
19 them without disclosing it, each Plaintiff realizes that his or her consent was obtained under false  
20 pretenses and/or by Raymond's lie by omission, causing them severe emotional distress.

21 10. Plaintiffs have further experienced embarrassment, shame, anxiety, and revulsion at  
22 contracting Herpes or from being exposed to Herpes by Raymond. Alternatively, Plaintiffs have  
23 suffered embarrassment, shame, anxiety, and revulsion at Raymond's failure and refusal to deny that  
24 he has Herpes and offer medical evidence that his diagnosis is negative and that he could not have and  
25 did not expose the Plaintiffs to Herpes.

26 11. In the event Plaintiffs have contracted the Herpes virus, their health may be  
27 compromised in the future as a result of the increased risk of cancer (especially cervical cancer),  
28 shingles, high-risk pregnancies, higher risk of contracting HIV, and other medical conditions that

1 stem from Herpes. Each of these conditions may require that Plaintiffs undergo costly medical  
2 monitoring.

3 12. Moreover, the health of Plaintiffs' newborn children may have been compromised as a  
4 result of contracting Herpes from Raymond.

5 13. At all times during Plaintiffs and Raymond's intimate relationships, Plaintiffs were  
6 unaware that Raymond was infected with Herpes. Plaintiff alleges on information and belief that  
7 Raymond has Herpes and purposefully concealed his diagnosis specifically to engage in sexual  
8 intercourse or other sexual activity with Plaintiffs. Further, Plaintiffs would not have engaged in  
9 sexual activity with Raymond had he disclosed his Herpes diagnosis and properly warned them of the  
10 risks associated with having sex with him.

11 14. Raymond has not contacted any of the Plaintiffs to advise them that the news reports  
12 are false and he does not have Herpes. Plaintiffs cannot contact Raymond because he called them  
13 from blocked numbers or "burner phones" and failed to leave contact information with them after  
14 they had sex. In the event that Raymond does not have Herpes, his conduct has nevertheless caused  
15 severe emotional distress since he has allowed Plaintiffs, and other men and woman, to worry that he  
16 has exposed them to the virus and that they have, in turn, exposed their own partners and perhaps  
17 newborn children to the disease.

18 **FIRST CAUSE OF ACTION**

19 **(SEXUAL BATTERY)**

20 **(All Plaintiffs Against Defendant Raymond)**

21 15. Plaintiffs restate and incorporate by reference, as though fully set forth herein, the  
22 allegations contained in each of the paragraphs above.

23 16. Plaintiffs had unprotected oral or vaginal sex with Raymond (or both).

24 17. At the time Plaintiffs had sex with Raymond, they allege on information and belief  
25 that he had the infectious and incurable venereal disease, Herpes.

26 18. Plaintiffs allege on information and believe that Raymond knew that he had Herpes at  
27 the time he engaged in sex with the Plaintiffs.

28 19. Raymond failed to disclose to Plaintiffs that he was infected with Herpes.

1           20.    Plaintiffs would not have engaged in sexual intercourse and/or other sexual activity  
2 with Raymond if they had known he was infected with Herpes.

3           21.    Raymond's failure to disclose his Herpes infection vitiated any consent Plaintiffs may  
4 have given to Raymond before engaging in sexual intercourse and/or other sexual activities with him.

5           22.    Plaintiffs allege on information and belief that Raymond transmitted Herpes to  
6 Plaintiffs and/or exposed Plaintiffs to Herpes during sexual intercourse and/or other sexual activity.

7           23.    By acting in this manner, Raymond intended to and did cause harmful and offensive  
8 contact to an intimate part of Plaintiffs' bodies and/or sexually offensive contact with Plaintiffs  
9 directly occurred.

10          24.    By completing the acts set forth above, Raymond intended to and did cause harmful  
11 and offensive contact to Plaintiff using an intimate part of his body.

12          25.    As a direct and proximate result of Raymond's actions set forth herein, Plaintiffs have  
13 suffered physical and/or emotional damages, including permanent physical injury, emotional distress  
14 as a result of now having an increased risk of various other diseases such as mental anguish, shame,  
15 offense to his/her senses of personal dignity, embarrassment, humiliation, pain, irritation, personal  
16 invasions, and inconvenience and financial expense associated with medical examinations, screening,  
17 testing, and monitoring, in a sum according to proof at trial.

18          26.    Pursuant to California Civil Code § 1708.5 "[any] person who commits a sexual  
19 battery upon another is liable to that person for damages, including, but not limited to, general  
20 damages, special damages, and punitive damages."

21          27.    Raymond acted with malice, fraud, oppression in intentionally and purposefully  
22 concealing his Herpes diagnosis from Plaintiffs in a deliberate effort to have sexual relations with  
23 Plaintiffs. By willfully concealing his Herpes infection from Plaintiffs, Raymond dangerously  
24 exposed Plaintiffs to the Herpes Virus without their knowledge or consent. Accordingly, an award of  
25 punitive damages in an amount according to proof at trial is warranted.

26          28.    As a direct and proximate result of Raymond's conduct, as alleged herein, Plaintiffs  
27 suffered, and will continue to suffer the damages herein mentioned, in an amount according to proof  
28 at trial.

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**SECOND CAUSE OF ACTION**

**(FRAUD/CONCEALMENT)**

**(All Plaintiffs Against Defendant Raymond)**

29. Plaintiffs restate and incorporate by reference, as though fully set forth herein, the allegations contained in each of the paragraphs above.

30. Plaintiffs are informed and believe that when they engaged in sexual intercourse and/or other sexual activities with Raymond had actual knowledge that he was infected with Herpes. Raymond knew or should have known that he had a duty to inform Plaintiffs that he was infected with Herpes, prior to engaging in sexual intercourse.

31. At all times relevant, Raymond owed a duty to Plaintiffs, as a sexual partner, to advise and warn Plaintiffs of his Herpes infection before engaging in sexual intercourse and/or other sexual activities that he was, in fact, infected with Herpes.

32. Raymond owed a duty to warn Plaintiffs that he was infected with Herpes. Rather than being forthright with his Herpes diagnosis, Raymond concealed his Herpes diagnosis from Plaintiffs and engaged in sexual intercourse and/or other sexual activities with Plaintiffs without informing them that he was infected with Herpes.

33. As a result of Raymond's concealment of his Herpes infection, Plaintiffs engaged in sexual intercourse and other sexual activities with Raymond, without having knowledge of his Herpes diagnosis.

34. By engaging in sexual relations with Plaintiffs without advising them of his Herpes infection, Raymond breached his duty to disclose his Herpes diagnosis to Plaintiffs.

35. Raymond breached this duty with the intent of misleading Plaintiffs so that they would engage in sexual intercourse and/or other sexual activities with him.

36. Plaintiffs relied on Raymond being direct and honest with them, and relied on his concealment to their detriment.

37. Plaintiffs engaged in sexual relations with Raymond because they detrimentally relied on Raymond's purposeful concealment of his Herpes infection.

38. Raymond acted with malice, fraud, oppression in intentionally and purposefully concealing his Herpes diagnosis from Plaintiffs in a deliberate effort to have sexual relations with

1 Plaintiffs. By willfully concealing his Herpes infection from Plaintiffs, Raymond dangerously  
2 exposed Plaintiffs to the Herpes Virus without their knowledge or consent. Accordingly, an award of  
3 punitive damages in an amount according to proof at trial is warranted.

4           39. As a direct and proximate result of Raymond's conduct, as alleged herein, Plaintiffs  
5 suffered, and will continue to suffer the damages herein mentioned, in an amount according to proof  
6 at trial.

7 **THIRD CAUSE OF ACTION**

8 **(NEGLIGENCE AND NEGLIGENCE PER SE: CAL. HEALTH & SAFETY CODE § 120290)**

9 **(All Plaintiffs Against Defendant Raymond)**

10           40. Plaintiffs restate and incorporate by reference, as though fully set forth herein, the  
11 allegations contained in each of the paragraphs above.

12           41. Raymond owed Plaintiffs a duty to act with reasonable care so as to not cause  
13 Plaintiffs bodily injury or harm.

14           42. Plaintiffs allege on information and belief that Raymond knew or should have known,  
15 that he was infected with Herpes that could have been transmitted by sexual contact at the time he  
16 had sex with the Plaintiffs.

17           43. Raymond had a duty to either avoid sexual contact with Plaintiffs or at least warn  
18 Plaintiffs that he had Herpes that could be transmitted through sexual activity.

19           44. Raymond breached the legal duty of care he owed Plaintiffs.

20           45. Further, Raymond owed Plaintiffs a legal duty of care pursuant to California Health  
21 and Safety Code § 120290 which provides that it is a crime for any person afflicted with any  
22 contagious, infectious, or communicable disease to willfully expose himself to another person.

23           46. Section 120290 is designed to protect public health and is intended to protect against  
24 the precise harm suffered by Plaintiffs.

25           47. Section 120290 is intended to protect all members of the public regardless of the  
26 nature of the relationship between the infected person and the person exposed to such infectious or  
27 communicable diseases.

28           48. Raymond knew, or should have known, that such breaches of the legal duty of care he  
owed Plaintiffs would cause them to suffer physical or emotional harm.

1 49. As a direct and proximate result of Raymond's conduct, as alleged herein, Plaintiffs  
2 suffered, and will continue to suffer the damages herein mentioned, in an amount according to proof  
3 at trial.

4 **FOURTH CAUSE OF ACTION**  
5 **(INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS)**

6 **(All Plaintiffs Against Defendant Raymond)**

7 50. Plaintiffs restate and incorporate by reference, as though fully set forth herein, the  
8 allegations contained in each of the paragraphs above.

9 51. As their sexual partner, Raymond owed Plaintiffs a legal duty to use ordinary care to  
10 prevent injury to them.

11 52. Raymond breached this duty intentionally and with reckless disregard for the  
12 probability that Plaintiffs would suffer severe injury as a result of him engaging in unprotected sexual  
13 intercourse and/or other sexual activities with Plaintiffs and from Raymond failure to advise Plaintiffs  
14 that he was infected with Herpes. Alternatively, Raymond breached his duty to prevent injury to  
15 Plaintiffs by failing and refusing to demonstrate that the widely-cited reports of his Herpes diagnosis  
16 were false.

17 53. Raymond's conduct, as set forth herein, was outrageous and beyond the bounds of  
18 decency that a reasonable person should be expected to endure.

19 54. As a result of being exposed to and/or contracting Herpes from Raymond, or  
20 Raymond's refusal to rebut the reports of his purported Herpes diagnosis, Plaintiffs were forced to  
21 endure emotional distress, physical pain, mental anguish, shock, humiliation, feelings of helplessness  
22 and desperation.

23 55. Raymond knew he was infected with Herpes and knew or should have known that he  
24 could infect Plaintiffs with Herpes regardless of whether Raymond was having an active outbreak of  
25 Herpes at the time he was having sex with Plaintiffs. Alternatively, Raymond knew that the reports  
26 were false and allowed a large number of men and women to believe that he had exposed them to  
27 Herpes.

28 56. Raymond acted intentionally and with conscious failure to avoid injury to Plaintiffs by  
engaging in sexual relations with Plaintiffs knowing he was infected with Herpes and by failing to



1 warn Plaintiffs of the potential risks to Plaintiffs' health, or by refusing to inform them that he had  
2 not, in fact, exposed them to Herpes.

3 57. As a result of Raymond's conduct, Plaintiffs either contracted or were dangerously  
4 exposed to Herpes, or were allowed to believe that had been with all of the attendant severe emotional  
5 distress and worry.

6 58. Raymond acted with malice, fraud, oppression in intentionally and purposefully  
7 concealing his Herpes diagnosis from Plaintiffs in a deliberate effort to have sexual relations with  
8 Plaintiffs. By willfully concealing his Herpes infection from Plaintiffs, Raymond dangerously  
9 exposed Plaintiffs to the Herpes Virus without their knowledge or consent. Accordingly, an award of  
10 punitive damages in an amount according to proof at trial is warranted.

11 59. Alternatively, Raymond's failure to inform the Plaintiffs that he did not, in fact, have  
12 Herpes and allow the Plaintiffs to believe they had been exposed to the virus was an act of malice,  
13 fraud, oppression warranting the imposition of punitive damages.

14 60. As a direct and proximate result of Raymond's conduct, as alleged herein, Plaintiffs  
15 suffered, and will continue to suffer the damages herein mentioned, in an amount according to proof  
16 at trial.

17 **FIFTH CAUSE OF ACTION**  
18 **(NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS)**  
19 **(All Plaintiffs Against Defendant Raymond)**

20 61. Plaintiffs restate and incorporate by reference, as though fully set forth herein, the  
21 allegations contained in each of the paragraphs above.

22 62. Raymond owed Plaintiffs a duty to use ordinary care to prevent injury to them.

23 63. Raymond breached his duty of care when he had sex with Plaintiffs without telling  
24 them he had Herpes. Raymond breached his duty of care by failing to inform Plaintiffs of his infected  
25 status and the likelihood of contracting the disease through engaging in sexual relations with him.  
26 Alternatively, Raymond breached his duty to prevent injury to Plaintiffs by failing and refusing to  
27 demonstrate that the widely-cited reports of his Herpes diagnosis were false.

28 64. Upon information and belief, Raymond knew or should have known that said conduct  
would cause serious emotional distress to Plaintiffs.

1           65.     Raymond's breach proximately caused significant injury to Plaintiffs, as they have  
2 either been exposed to and/or incurably infected with Herpes as a result of engaging in sexual  
3 relations with him or have been injured by the reasonable belief, unrebutted by Raymond, that they,  
4 their sexual partners and their newborn children were.

5           66.     Raymond's breach proximately caused significant injury and as a direct and proximate  
6 result of Raymond's conduct, as alleged herein, Plaintiffs suffered, and will continue to suffer the  
7 damages herein mentioned, in an amount according to proof at trial.

8  
9                                   **PRAYER FOR RELIEF**

- 10          A.     For special and general damages according to proof;
- 11          B.     For interest according to law;
- 12          C.     For costs of suit and attorneys' fees to the fullest extent permitted by law;
- 13          D.     For punitive and exemplary damages;
- 14          E.     That the Court issue an injunction requiring that Raymond fully disclose his Herpes  
15                diagnosis before engaging in sexual activity with any man or woman in the future;
- 16          F.     For such other and further relief as the Court may deem proper.

17                                   **DEMAND FOR JURY TRIAL**

18     Plaintiffs hereby demand a trial by jury.

19  
20     DATED: August 7, 2017

Respectfully submitted,  
THE BLOOM FIRM

By: Lisa Bloom  
Lisa Bloom  
A. Douglas Mastroanni  
Alan (Avi) Goldstein  
Vanessa Hooker  
Attorneys for Plaintiffs Quantasia Sharpton, John  
Doe, and Jane Doe

08/07/2017

THE  
BLOOM FIRM

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

Lisa Bloom, Esq. (SBN 158458)  
THE BLOOM FIRM  
20700 Ventura Boulevard, Suite 301  
Woodland Hills, California 91364

TELEPHONE NO.: (818) 914-7319

FAX NO.: (866) 852-5666

ATTORNEY FOR (Name): Plaintiffs, Quantasia Sharpton, Jane Doe and John Doe

FOR COURT USE ONLY

**FILED**  
Superior Court of California  
County of Los Angeles

**AUG 07 2017**

Sherril B. Carter, Executive Officer/Clerk  
By Marlon Gomez Deputy

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

STREET ADDRESS: 111 North Hill Street

MAILING ADDRESS: Same

CITY AND ZIP CODE: Los Angeles, California 90012

BRANCH NAME: Central District-Stanley Mosk Courthouse

CASE NAME:

QUANTASIA SHARPTON v. USHER RAYMOND, IV, et al.

**DC671246 BY FAX**

**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

JUDGE:

DEPT:

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

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

**Auto Tort**

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)  
 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  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
- b.  Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve
- c.  Substantial amount of documentary evidence
- d.  Large number of witnesses
- e.  Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court
- f.  Substantial postjudgment judicial supervision

3. Remedies sought (check all that apply): a.  monetary b.  nonmonetary; declaratory or injunctive relief c.  punitive

4. Number of causes of action (specify): 5: Sexual Battery; Fraud; Negligence/Negligence Per Se; Intentional

5. This case  is  is not a class action suit. Infliction Emot. Distress; and Negligent Infliction Emot. Distress

6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)

Date: August 4, 2017

LISA BLOOM

(TYPE OR PRINT NAME)

Lisa Bloom

(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.

Page 1 of 2

**INSTRUCTIONS ON HOW TO COMPLETE THE COVER SHEET**

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

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

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

**CASE TYPES AND EXAMPLES**

**Auto Tort**

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

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

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

**Non-PI/PD/WD (Other) Tort**

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

**Employment**

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

**Contract**

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

**Real Property**

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

**Unlawful Detainer**

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

**Judicial Review**

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

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

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

**Enforcement of Judgment**

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

**Miscellaneous Civil Complaint**

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

**Miscellaneous Civil Petition**

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

BY FAX

SHORT TITLE: SHARPTON v. RAYMOND

CASE NUMBER BG671246

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 2.3 in all new civil case filings in the Los Angeles Superior Court.

Step 1: After completing the Civil Case Cover Sheet (Judicial Council form CM-010), find the exact case type in Column A that corresponds to the case type indicated in the Civil Case Cover Sheet.

Step 2: In Column B, check the box for the type of action that best describes the nature of the case.

Step 3: In Column C, circle the number which explains the reason for the court filing location you have chosen.

Applicable Reasons for Choosing Court Filing Location (Column C)

- 1. Class actions must be filed in the Stanley Mosk Courthouse, Central District.
2. Permissive filing in central district.
3. Location where cause of action arose.
4. Mandatory personal injury filing in North District.
5. Location where performance required or defendant resides.
6. Location of property or permanently garaged vehicle.
7. Location where petitioner resides.
8. Location wherein defendant/respondent functions wholly.
9. Location where one or more of the parties reside.
10. Location of Labor Commissioner Office.
11. Mandatory filing location (Hub Cases - unlawful detainer, limited non-collection, limited collection, or personal injury).

Auto Tort
Other Personal Injury/Property Damage/Wrongful Death Tort

Table with 3 columns: A (Civil Case Cover Sheet Category/No.), B (Type of Action (Check only one)), and C (Applicable Reasons - See Step 3 Above). Rows include Auto (22), Uninsured Motorist (46), Asbestos (04), Product Liability (24), Medical Malpractice (45), and Other Personal Injury Property Damage Wrongful Death (23).

SHORT TITLE: SHARPTON v. RAYMOND CASE NUMBER

Non-Personal Injury/Property Damage/Wrongful Death Tort

Employment

Contract

Real Property

Unlawful Detainer

A Civil Case Cover Sheet Category No	B Type of Action (Check only one)	C: Applicable Reasons - See Step 3) Above
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
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	1, 2, 3
Wrongful Termination (36)	<input type="checkbox"/> A6037 Wrongful Termination	1, 2, 3
Other Employment (15)	<input type="checkbox"/> A6024 Other Employment Complaint Case	1, 2, 3
	<input type="checkbox"/> A6109 Labor Commissioner Appeals	10
Breach of Contract/ Warranty (06) (not insurance)	<input type="checkbox"/> A6004 Breach of Rental/Lease Contract (not unlawful detainer or wrongful eviction)	2, 5
	<input type="checkbox"/> A6008 Contract/Warranty Breach -Seller Plaintiff (no fraud/negligence)	2, 5
	<input type="checkbox"/> A6019 Negligent Breach of Contract/Warranty (no fraud)	1, 2, 5
	<input type="checkbox"/> A6028 Other Breach of Contract/Warranty (not fraud or negligence)	1, 2, 5
Collections (09)	<input type="checkbox"/> A6002 Collections Case-Seller Plaintiff	5, 6, 11
	<input type="checkbox"/> A6012 Other Promissory Note/Collections Case	5, 11
	<input type="checkbox"/> A6034 Collections Case-Purchased Debt (Charged Off Consumer Debt Purchased on or after January 1, 2014)	5, 6, 11
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, 9
Eminent Domain/Inverse Condemnation (14)	<input type="checkbox"/> A7300 Eminent Domain/Condemnation Number of parcels_____	2, 6
Wrongful Eviction (33)	<input type="checkbox"/> A6023 Wrongful Eviction Case	2, 6
Other Real Property (26)	<input type="checkbox"/> A6018 Mortgage Foreclosure	2, 6
	<input type="checkbox"/> A6032 Quiet Title	2, 6
	<input type="checkbox"/> A6060 Other Real Property (not eminent domain, landlord/tenant, foreclosure)	2, 6
Unlawful Detainer-Commercial (31)	<input type="checkbox"/> A6021 Unlawful Detainer-Commercial (not drugs or wrongful eviction)	6, 11
Unlawful Detainer-Residential (32)	<input type="checkbox"/> A6020 Unlawful Detainer-Residential (not drugs or wrongful eviction)	6, 11
Unlawful Detainer-Post-Foreclosure (34)	<input type="checkbox"/> A6020F Unlawful Detainer-Post-Foreclosure	2, 6, 11
Unlawful Detainer-Drugs (38)	<input type="checkbox"/> A6022 Unlawful Detainer-Drugs	2, 6, 11

SHORT TITLE:

SHARPTON v. RAYMOND

CASE NUMBER

	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Judicial Review	Asset Forfeiture (05)	<input type="checkbox"/> A6108 Asset Forfeiture Case	2, 3, 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	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	2, 5, 11
		<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
Miscellaneous Civil Complaints	RICO (27)	<input type="checkbox"/> A6033 Racketeering (RICO) Case	1, 2, 8
	Other Complaints (Not Specified Above) (42)	<input type="checkbox"/> A6030 Declaratory Relief Only	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/Change of Gender	2, 7
		<input type="checkbox"/> A6170 Petition for Relief from Late Claim Law	2, 3, 8
<input type="checkbox"/> A6100 Other Civil Petition	2, 9		

SHORT TITLE: SHARPTON v. RAYMOND	CASE NUMBER
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**Step 4: Statement of Reason and Address:** Check the appropriate boxes for the numbers shown under Column C for the type of action that you have selected. Enter the address which is the basis for the filing location, including zip code. (No address required for class action cases).

<b>REASON:</b> <input type="checkbox"/> 1. <input type="checkbox"/> 2. <input type="checkbox"/> 3. <input type="checkbox"/> 4. <input type="checkbox"/> 5. <input type="checkbox"/> 6. <input type="checkbox"/> 7. <input type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10. <input checked="" type="checkbox"/> 11.		<b>ADDRESS:</b> 2700 Wilshire Boulevard Los Angeles, California 90057	
<b>CITY:</b> Los Angeles	<b>STATE:</b> CA	<b>ZIP CODE:</b> 90057	

**Step 5: Certification of Assignment:** I certify that this case is properly filed in the Central District of the Superior Court of California, County of Los Angeles [Code Civ. Proc., §392 et seq., and Local Rule 2.3(a)(1)(E)].

Dated: August 4, 2017

*Lisa Bloom*

(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. 02/16).
5. Payment in full of the filing fee, unless there is court order for waiver, partial or scheduled payments.
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.

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