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LOS ANGELES  
SUPERIOR COURT

Attorneys for Plaintiff

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
9 **FOR THE COUNTY OF LOS ANGELES**

10 **JIM COHAN;**

11 **Plaintiff,**

12 **v.**

13 **CENTRAL AVE. PHARMACY, INC.;**  
14 **CAUSEY INVESTMENTS; And DOES**  
15 **1 THROUGH 10, Inclusive**

16 **Defendants.**

Case No.

**EC 045610**

**CIVIL COMPLAINT:**  
**DISCRIMINATORY PRACTICES IN**  
**PUBLIC ACCOMMODATIONS**  
**[42 U.S.C. 12182(a) ET. SEQ; CIVIL**  
**CODE 51, 52, 54, 54.1]**

17 **NAMED DEFENDANTS AND NAMED PLAINTIFF**

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19  
20 1. Defendants are, and, at all times mentioned herein, were, a business or  
21 corporation or franchise organized and existing and/or doing business under the laws of  
22 the State of California.

23 2. Plaintiffs are informed and believe and thereon allege that Defendants CENTRAL  
24 AVE. PHARMACY, INC.; and CAUSEY INVESTMENTS are the owners, operators,  
25 and/or lessors of the real property, as well as the business operated thereon.

26 CENTRAL AVE. PHARMACY, INC.

27 MAILING ADDRESS:

1 540 N. CENTRAL AVE.

2 GLENDALE, CA 91203

3 REGISTERED AGENT: HRACH YOUSEFIAN

4 REGISTERED OFFICE:

5 540 N. CENTRAL AVE.

6 GLENDALE, CA 91203

7 PROPERTY OWNER: CAUSEY INVESTMENTS (COMPANY/CORPORATION)

8 PROPERTY ADDRESS: 540 N CENTRAL AVE, GLENDALE, CA 91203

9 COMPANY NAME: CAUSEY INVESTMENTS, A CALIFORNIA LIMITED

10 PARTNERSHIP

11 REGISTERED AGENT: JUNE H. CAUSEY

12 REGISTERED OFFICE:

13 1401 AVOCADO, #901

14 NEWPORT BEACH, CA 92660

15  
16 3. The words "Plaintiffs" and "Plaintiff's Member" as used herein specifically  
17 include the organization and TRIPPLE AAA ASSOCIATION FOR CHILDREN AND  
18 ADULTS WITH DEVELOPMENTAL DISABILITIES, SUING ON BEHALF OF ITS  
19 MEMBERS, JIM COHAN; and persons associated with its Members who accompanied  
20 Members to Defendants' facilities.

21 4. Defendants Does 1 through 10, were at all times relevant herein subsidiaries,  
22 employers, employees, agents, of Defendants CENTRAL AVE. PHARMACY, INC.; and  
23 CAUSEY INVESTMENTS. Plaintiffs are ignorant of the true names and capacities of  
24 Defendants sued herein as Does 1 through 10, inclusive, and therefore sues these  
25 Defendants by such fictitious names. Plaintiffs will pray leave of the court to amend this  
26 complaint to allege the true names and capacities of the Does when ascertained.

27 5. Plaintiffs are informed and believe, and thereon allege, that Defendants and each  
28

1 of them herein were, at all times relevant to the action, the owner, lessor, lessee,  
2 franchiser, franchisee, general partner, limited partner, agent, employee, representing  
3 partner, or joint venturer of the remaining Defendants and were acting within the course  
4 and scope of that relationship. Plaintiffs are further informed and believe, and thereon  
5 allege, that each of the Defendants herein gave consent to, ratified, and/or authorized the  
6 acts alleged herein to each of the remaining Defendants.

### 7 CONCISE SET OF FACTS

8 6. Plaintiff's Members JIM COHAN visited the Defendants' facility. Plaintiff has  
9 an impairment.

10 7. Defendants failed to provide auxiliary aids and services that are necessary to  
11 ensure equal access to the goods, services, privileges, or accommodations that it offers.

12 Title 28, part 36.303 of Code of Federal Regulations states:

13 (a) General. A public accommodation shall take those steps that may be  
14 necessary to ensure that no individual with a disability is excluded, denied  
15 services, segregated or otherwise treated differently than other individuals  
16 because of the absence of auxiliary aids and services, unless the public  
17 accommodation can demonstrate that taking those steps would  
18 fundamentally alter the nature of the goods, services, facilities, privileges,  
19 advantages, or accommodations being offered or would result in an undue  
20 burden, i.e., significant difficulty or expense.

21 (b) Examples. The term "auxiliary aids and services" includes:

22 (1) Qualified interpreters, notetakers, computer-aided transcription  
23 services, written materials, telephone handset amplifiers, assistive  
24 listening devices, assistive listening systems, telephones compatible with  
25 hearing aids, closed caption decoders, open and closed captioning,  
26 telecommunications devices for deaf persons (TDD's), videotext displays,  
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