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OF ORIGINAL FILED
Los Angeles Superior Court

MAY 15 2008

John A. Clark, Executive Director/Clerk

By J. Doohan, Deputy

Attorneys for Plaintiff

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

JON CARPENTER,

Plaintiff,

v.

**2370 WESTWOOD LLC; PICWOOD
CORPORATION; And DOES 1
THROUGH 10, Inclusive**

Defendants.

Case No. **SC098233**

CIVIL COMPLAINT:
DISCRIMINATORY PRACTICES IN
PUBLIC ACCOMMODATIONS
[42 U.S.C. 12182(a) ET. SEQ; CIVIL
CODE 51, 52, 54, 54.1, 54.3]

**UNLIMITED CIVIL CASE -
PERMANENT INJUNCTIVE RELIEF**

INITIAL CASE MANAGEMENT REVIEW
AND CONFERENCE SEP 02 2008

NAMED DEFENDANTS AND NAMED PLAINTIFF

830 am
Dept tt

1. Plaintiff is informed, believes and thereon alleges that Defendants are, and, at all times mentioned herein, were, a business or corporation or franchise organized and existing and/or doing business under the laws of the State of California. Plaintiff is informed and believes and thereon alleges that Defendants 2370 WESTWOOD LLC; PICWOOD CORPORATION are the owner, operator, and/or lessor/lessee of the real property and the public accommodation located thereon at the Property Address: 2370 WESTWOOD BLVD, LOS ANGELES, CA 90064; Assessor's Parcel Number: 4320-002-034. Defendant 2370 WESTWOOD LLC c/o Registered Agent: ENAYAT ZAKHOR, located at 10750 WILSHIRE BLVD #1502, LOS ANGELES, CA 90024. Defendant PICWOOD CORPORATION c/o Registered Agent: SIAMAC ZAKHOR, located at 2370 WESTWOOD BLVD, LOS ANGELES, CA 90064.

1 2. The words Plaintiff and Plaintiffs as used herein specifically include JON CARPENTER.

2 3. Defendants Does 1 through 10, were at all times relevant herein subsidiaries, employers,
3 employees, agents, of Defendants 2370 WESTWOOD LLC; PICWOOD CORPORATION.

4 Plaintiff is ignorant of the true names and capacities of Defendants sued herein as Does 1 through
5 10, inclusive, and therefore sues these Defendants by such fictitious names. Plaintiff will pray
6 leave of the court to amend this complaint to allege the true names and capacities of the Does
7 when ascertained.

8 4. Plaintiff is informed and believes, and thereon alleges, that Defendants and each of them
9 herein were, at all times relevant to the action, the owner, lessor, lessee, franchiser, franchisee,
10 general partner, limited partner, agent, employee, representing partner, or joint venturer of the
11 remaining Defendants and were acting within the course and scope of that relationship. Plaintiff
12 is further informed and believe, and thereon allege, that each of the Defendants herein gave
13 consent to, ratified, and/or authorized the acts alleged herein to each of the remaining Defendants.

14 CONCISE SET OF FACTS

15 5. Plaintiff JON CARPENTER (hereinafter "Plaintiff") has physical impairments and due to
16 these impairments he has learned to successfully operate a wheelchair for mobility. Plaintiff said
17 physical impairments substantially limit one or more of the following major life activities
18 including but not limited to: walking.

19 6. Plaintiff has physical impairments because their conditions affect one or more of the
20 following body systems: neurological, musculoskeletal, special sense organs, and/or
21 cardiovascular. Further, Plaintiff said physical impairments substantially limits one or more of
22 the following major life activities. In addition, Plaintiff cannot perform one or more of the said
23 major life activities in the manner, speed, and duration when compared to the average person.
24 Moreover, Plaintiff has a history of or has been classified as having a physical impairment as
25 required by 42 U.S.C. § 12102(2)(A).

26 7. On January 16, 2008, Plaintiff JON CARPENTER wanted to visite Defendants' public
27 accommodation facilities located at Property Address: 2370 WESTWOOD BLVD. LOS
28 ANGELES, CA 90064; Assessor's Parcel Number: 4320-002-034 to utilize their goods and/or
services. When Plaintiff JON CARPENTER patronized Defendants' public accommodation

