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Los Angeles Superior Court

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

**JON CARPENTER,**  
  
**Plaintiff,**

v.

**IMEDRA #3919 FAMILY LIMITED  
PARTNERSHIP; ZENITH  
PRESCRIPTION PHARMACY; And  
DOES 1 THROUGH 10, Inclusive**  
  
**Defendants.**

Case No. **BC390905**

**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**

**NAMED DEFENDANTS AND NAMED PLAINTIFF**

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 IMEDRA #3919 FAMILY LIMITED PARTNERSHIP; ZENITH PRESCRIPTION PHARMACY are the owner, operator, and/or lessor/lessee of the real property and the public accommodation located thereon at the Property Address: 3919 BEVERLY BLVD, LOS ANGELES, CA 90004; Assessor's Parcel Number: 5520-020-008. Defendant IMEDRA #3919 FAMILY LIMITED PARTNERSHIP c/o Registered Agent: S. YOUNG LIM, located at 3919 BEVERLY BLVD., STE. 104, LOS ANGELES, CA 90004. Defendant ZENITH

1 PRESCRIPTION PHARMACY is located at 3919 BEVERLY BLVD, LOS ANGELES, CA  
2 90004.

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

4 3. Defendants Does 1 through 10, were at all times relevant herein subsidiaries, employers,  
5 employees, agents, of Defendants IMEDRA #3919 FAMILY LIMITED PARTNERSHIP;

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

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

#### 16 CONCISE SET OF FACTS

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

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

28 7. On December 3, 2007, Plaintiff JON CARPENTER wanted to visit Defendants' public  
accommodation facilities located at Property Address: 3919 BEVERLY BLVD, LOS ANGELES,

