

Case assigned to North Central Glendale,
600 E. Broadway, Glendale, CA., for all further
proceedings.

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SUPERIOR COURT OF CALIFORNIA

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

JON CARPENTER,

Plaintiff,

v.

**HEE DUK KANG; INJA KANG;
VERDUGO, INC.
DBA TOLUCA PHARMACY; And
DOES 1 THROUGH 10, Inclusive**

Defendants.

Case No. **EC 047312**

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 HEE DUK KANG; INJA KANG; VERDUGO, INC. DBA TOLUCA PHARMACY are the owner, operator, and/or lessor/lessee of the real property and the public accommodation located thereon at the Property Address: 10646-10674 RIVERSIDE DR, LOS ANGELES, CA 91602; Assessor's Parcel Number: 2423-004-067. Defendants HEE DUK KANG; and INJA KANG are located at 2734 DRESSER CT, CAMPBELL, CA 95008. Defendant VERDUGO, INC. DBA TOLUCA PHARMACY is located

1 at 10670 RIVERSIDE DR, NORTH HOLLYWOOD, CA 91602-2319 or c/o Registered Agent:
2 ADRINE MARTIROSYAN, located at 925 SHERLOCK DR, BURBANK, CA 91501.

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 employeess, agents, of Defendants HEE DUK KANG; INJA KANG; VERDUGO, INC. DBA
6 TOLUCA PHARMACY. Plaintiff is ignorant of the true names and capacities of Defendants
7 sued herein as Does 1 through 10, inclusive, and therefore sues these Defendants by such
8 fictitious names. Plaintiff will pray leave of the court to amend this complaint to allege the true
9 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 March 13, 2008, Plaintiff JON CARPENTER wanted to visite Defendants' public
accommodation facilities located at Property Address: 10646-10674 RIVERSIDE DR, LOS

