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OF ORIGINAL FILED  
Los Angeles County Superior Court

MAY 15 2008

John A. Clarke, Executive Officer/Clerk  
By \_\_\_\_\_, Deputy

Attorneys for Plaintiff

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

11 **JON CARPENTER,**

Case No. PC042845

12 **Plaintiff,**

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

13 v.

14 **LAUREL REAL INVESTMENTS;**  
15 **LAUREL PHARMACY; And DOES 1**  
16 **THROUGH 10, Inclusive**

**UNLIMITED CIVIL CASE -**  
**PERMANENT INJUNCTIVE RELIEF**

17 **Defendants.**

18 **NAMED DEFENDANTS AND NAMED PLAINTIFF**

19 1. Plaintiff is informed, believes and thereon alleges that Defendants are, and, at all times  
20 mentioned herein, were, a business or corporation or franchise organized and existing and/or  
21 doing business under the laws of the State of California. Plaintiff is informed and believes and  
22 thereon alleges that Defendants LAUREL REAL INVESTMENTS; LAUREL PHARMACY are  
23 the owner, operator, and/or lessor/lessee of the real property and the public accommodation  
24 located thereon at the Property Address: 13686 VAN NUYS BLVD, PACOIMA, CA 91331;  
25 Assessor's Parcel Number: 2646-005-006. Defendant LAUREL REAL INVESTMENTS is  
26 located at 13686 VAN NUYS BLVD, PACOIMA, CA 91331-3616. Defendant LAUREL  
27 PHARMACY is located at 13686 VAN NUYS BLVD, PACOIMA, CA 91331-3616.

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

1 3. Defendants Does 1 through 10, were at all times relevant herein subsidiaries, employers,  
2 employees, agents, of Defendants LAUREL REAL INVESTMENTS; LAUREL PHARMACY.  
3 Plaintiff is ignorant of the true names and capacities of Defendants sued herein as Does 1 through  
4 10, inclusive, and therefore sues these Defendants by such fictitious names. Plaintiff will pray  
5 leave of the court to amend this complaint to allege the true names and capacities of the Does  
6 when ascertained.

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

#### 13 CONCISE SET OF FACTS

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

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

25 7. On February 26, 2008, Plaintiff JON CARPENTER wanted to visit Defendants' public  
26 accommodation facilities located at Property Address: 13686 VAN NUYS BLVD, PACOIMA,  
27 CA 91331; Assessor's Parcel Number: 2646-005-006 to utilize their goods and/or services. When  
28 Plaintiff JON CARPENTER patronized Defendants' public accommodation facilities, he was  
unable to use and/or had difficulty using the public accommodations' facilities including but not

