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LOS ANGELES
SUPERIOR COURT

6 Attorneys for Plaintiff -

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

10 **JIM COHAN;**

11 **Plaintiff,**

12 **v.**

13
14 **RILEY'S PRESCRIPTION**
15 **PHARMACY; CAUSEY**
16 **INVESTMENTS, A CALIFORNIA**
17 **LIMITED PARTNERSHIP; And DOES**
18 **1 THROUGH 10, Inclusive**

19 **Defendants.**

Case No.

EC 045614

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

20 **NAMED DEFENDANTS AND NAMED PLAINTIFF**

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

24 2. Plaintiffs are further informed and believe and thereon allege that Defendants
25 **RILEY'S PRESCRIPTION PHARMACY;** and **CAUSEY INVESTMENTS, A**
26 **CALIFORNIA LIMITED PARTNERSHIP** are the owners, operators, and/or lessors of
27
28

1 the real property, as well as the business operated thereon. RILEY'S PRESCRIPTION
2 PHARMACY

3 633 N CENTRAL AVE
4 GLENDALE, CA 91203
5 (818) 244-2522

6 PROPERTY OWNER: CAUSEY INVESTMENTS (COMPANY/CORPORATION)
7 MAILING ADDRESS: 1401 AVOCADO AVE #901, NEWPORT BEACH, CA 92660
8 PROPERTY ADDRESS: 633 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 3. The words "Plaintiffs" and "Plaintiff's Member" as used herein specifically
16 include the organization and TRIPPLE AAA ASSOCIATION FOR CHILDREN AND
17 ADULTS WITH DEVELOPMENTAL DISABILITIES, SUING ON BEHALF OF ITS
18 MEMBERS, JIM COHAN; and persons associated with its Members who accompanied
19 Members to Defendants' facilities.

20 4. Defendants Does 1 through 10, were at all times relevant herein subsidiaries,
21 employers, employees, agents, of Defendants RILEY'S PRESCRIPTION PHARMACY;
22 and CAUSEY INVESTMENTS, A CALIFORNIA LIMITED PARTNERSHIP.

23 Plaintiffs are ignorant of the true names and capacities of Defendants sued herein as Does
24 1 through 10, inclusive, and therefore sues these Defendants by such fictitious names.
25 Plaintiffs will pray leave of the court to amend this complaint to allege the true names
26 and capacities of the Does when ascertained.
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