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LOS ANGELES
SUPERIOR COURT

7 Attorneys for Plaintiff

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

10 **JIM COHAN;**

Case No.

11 **Plaintiff,**

EC 045613

12 v.

CIVIL COMPLAINT:
DISCRIMINATORY PRACTICES IN
PUBLIC ACCOMMODATIONS

13
14 **GLENDALE HAN KUK PHARMACY;**
15 **PACIFIC ENTERPRISES LLC; And**
16 **DOES 1 THROUGH 10, Inclusive**

[42 U.S.C. 12182(a) ET. SEQ; CIVIL
CODE 51, 52, 54, 54.1]

17 **Defendants.**

18
19 **NAMED DEFENDANTS AND NAMED PLAINTIFF**

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

23 2. Plaintiffs are further informed and believe and thereon allege that Defendants
24 **GLENDALE HAN KUK PHARMACY;** and **PACIFIC ENTERPRISES LLC** are the
25 owners, operators, and/or lessors of the real property, as well as the business operated
26 thereon. **GLENDALE HAN KUK PHARMACY, INC.**

27 **MAILING ADDRESS:**

28

1 831 NORTH PACIFIC AVENUE #G

2 GLENDALE, CA 91203

3 TYPE: ARTICLES OF INCORPORATION (DOMESTIC)

4 REGISTERED AGENT: SOON H CHOI

5 REGISTERED OFFICE:

6 831 NORTH PACIFIC AVENUE #G

7 GLENDALE, CA 91203

8 PROPERTY OWNER: PACIFIC ENTERPRISES LLC (COMPANY/CORPORATION)

9 PROPERTY ADDRESS: 831 N PACIFIC AVE, GLENDALE, CA 91203

10 COMPANY NAME: PACIFIC ENTERPRISES, LLC

11 REGISTERED AGENT: SOSIK M. KHATCHATURIAN

12 REGISTERED OFFICE:

13 1007 SOUTH CENTRAL AVENUE #100

14 GLENDALE, CA 91204

15
16 3. The words "Plaintiffs" and "Plaintiff's Member" as used herein specifically
17 include the organization and TRIPPLE AAA ASSOCIATION FOR CHILDREN AND
18 ADULTS WITH DEVELOPMENTAL DISABILITIES, SUING ON BEHALF OF ITS
19 MEMBERS, JIM COHAN; and persons associated with its Members who accompanied
20 Members to Defendants' facilities.

21 4. Defendants Does 1 through 10, were at all times relevant herein subsidiaries,
22 employers, employees, agents, of Defendants GLENDALE HAN KUK PHARMACY;
23 and PACIFIC ENTERPRISES LLC. Plaintiffs are ignorant of the true names and
24 capacities of Defendants sued herein as Does 1 through 10, inclusive, and therefore sues
25 these Defendants by such fictitious names. Plaintiffs will pray leave of the court to
26 amend this complaint to allege the true names and capacities of the Does when
27 ascertained.

28

1 5. Plaintiffs are informed and believe, and thereon allege, that Defendants and each
2 of them herein were, at all times relevant to the action, the owner, lessor, lessee,
3 franchiser, franchisee, general partner, limited partner, agent, employee, representing
4 partner, or joint venturer of the remaining Defendants and were acting within the course
5 and scope of that relationship. Plaintiffs are further informed and believe, and thereon
6 allege, that each of the Defendants herein gave consent to, ratified, and/or authorized the
7 acts alleged herein to each of the remaining Defendants.
8

9 **CONCISE SET OF FACTS**

10 6. Plaintiff's Members JIM COHAN visited the Defendants' facility. Plaintiff has an
11 impairment.

12 7. Defendants failed to provide auxiliary aids and services that are necessary to
13 ensure equal access to the goods, services, privileges, or accommodations that it offers.

14 Title 28, part 36.303 of Code of Federal Regulations states:

15 (a) General. A public accommodation shall take those steps that may be
16 necessary to ensure that no individual with a disability is excluded, denied
17 services, segregated or otherwise treated differently than other individuals
18 because of the absence of auxiliary aids and services, unless the public
19 accommodation can demonstrate that taking those steps would
20 fundamentally alter the nature of the goods, services, facilities, privileges,
21 advantages, or accommodations being offered or would result in an undue
22 burden, i.e., significant difficulty or expense.

23 (b) Examples. The term "auxiliary aids and services" includes:

24 (1) Qualified interpreters, notetakers, computer-aided transcription
25 services, written materials, telephone handset amplifiers, assistive
26 listening devices, assistive listening systems, telephones compatible with
27

