

1 **PINNOCK & WAKEFIELD**

2 A Professional Corporation

3 Theodore A. Pinnock, Esq.

4 David C. Wakefield, Esq.

5 Michelle L. Wakefield, Esq.

6 3033 Fifth Avenue, Suite 410

7 San Diego, CA 92103

8 Telephone: 619.858.3671

9 Facsimile: 619.858.3646

10 Attorneys for Plaintiff

Bar #: 153434

Bar #: 185736

Bar #: 200424

**ORIGINAL FILED**

SEP 28 2007

LOS ANGELES  
SUPERIOR COURT

11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

12 **FOR THE COUNTY OF LOS ANGELES**

13 **JIM COHAN;**

14 **Plaintiff,**

15 **v.**

16 **ARDEN MEDICAL PHARMACY;**  
17 **SP22, INC.; And DOES 1 THROUGH**  
18 **10, Inclusive**

19 **Defendants.**

Case No.

**EC 045629**

**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 ARDEN MEDICAL PHARMACY; SP22, INC., are the owners, operators, and/or lessors  
26 of the real property, as well as the business operated thereon. COMPANY NAME:  
27 ARDEN MEDICAL PHARMACY; 435 ARDEN AVE STE 110; GLENDALE, CA  
28 91203-4029. OWNERSHIP TYPE: CORPORATION; COUNTY: LOS ANGELES

1 OWNER(S): SP22, INC.; BUSINESS COMMENCEMENT DATE: 5/16/2003

2 BUSINESS DESCRIPTION: DRUG STORES

3 FILING NUMBER: 1002151740000

4 TAX PROGRAM: REGULAR SALES TAX

5 COMPANY NAME: SP22, INC.

6 REGISTERED AGENT: RALPH ZENGER

7 REGISTERED OFFICE:

8 3602 FOOTHILL BLVD

9 LA CRESCENTA, CA 91214

10 PROPERTY OWNER: ARDEN MEDICAL PARTNERSHIP (PARTNERSHIP)

11 MAILING ADDRESS: C/O KEVIN FARHANG, 1645 S LA CIENEGA BLVD, LOS  
12 ANGELES, CA 90064

13 PROPERTY ADDRESS: 435 ARDEN AVE, GLENDALE, CA 91203

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

19 4. Defendants Does 1 through 10, were at all times relevant herein subsidiaries,  
20 employers, employees, agents, of Defendants ARDEN MEDICAL PHARMACY; SP22,  
21 INC. Plaintiffs are ignorant of the true names and capacities of Defendants sued herein  
22 as Does 1 through 10, inclusive, and therefore sues these Defendants by such fictitious  
23 names. Plaintiffs will pray leave of the court to amend this complaint to allege the true  
24 names and capacities of the Does when ascertained.

25 5. Plaintiffs are informed and believe, and thereon allege, that Defendants and each  
26 of them herein were, at all times relevant to the action, the owner, lessor, lessee,



