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CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

BY:

1 Kevin M. McGuire
2 California Bar No. 164895
3 themcguirelawfirm@yahoo.com
4 43460 Ridge Park Drive, Suite 200
5 Temecula, California 92590

6 Fax: 949-258-5807

7 Arick W. Fudali, Esq.
8 California Bar No. 296364
9 afudali@hermanlaw.com

10 Jeffrey M. Herman
11 (*pending pro hac vice admission*)
12 Florida Bar No. 521647

13 jherman@hermanlaw.com
14 Herman Law

15 3351 NW Boca Raton Boulevard
16 Boca Raton FL, 33431
17 Tel: 305-931-2200
18 Fax: 305-931-0877
19 www.hermanlaw.com

20 UNITED STATES DISTRICT COURT
21 CENTRAL DISTRICT OF CALIFORNIA

22 **CASE NO. 14-04403-RSWL(JEM)**

23 MICHAEL F. EGAN, III

24 Plaintiff,

25 v.

26 JOHN DOE,

27 Defendant.

28) COMPLAINT ALLEGING DAMAGES FOR:

1. Childhood Sexual Abuse (Oral Copulation)

2. Childhood Sexual Abuse (Sodomy)

3. Sexual Battery

DEMAND FOR JURY TRIAL

BY FAX

29 Plaintiff MICHAEL F. EGAN, III, hereby sues Defendant JOHN DOE, and states the
30 following:

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INTRODUCTION

This is an action for damages arising from the childhood sexual abuse of MICHAEL F. EGAN, III by Defendant, JOHN DOE. JOHN DOE manipulated his power, wealth, and position in the entertainment industry to sexually abuse and exploit the underage Plaintiff through the use of drugs, alcohol, threats, and inducements which resulted in Plaintiff suffering catastrophic psychological and emotional injuries. Defendant DOE did so as part of a group of adult males similarly positioned in the entertainment industry that maintained and exploited boys in a sordid sex ring. A Hollywood mogul must not use his position to sexually exploit underage actors.

JURISDICTION, VENUE, AND PARTIES

1. Plaintiff, MICHAEL F. EGAN, III ("Plaintiff"), is a citizen and resident of Clark County, Nevada, and is *sui juris*.

2. Defendant, JOHN DOE ("DOE"), is a citizen and resident of the State of California and is *sui juris*.

3. This Court has diversity jurisdiction over this action pursuant to 28 U.S.C. §1332(a)(1) because the amount in controversy exceeds \$75,000.00 and the action is between citizens of different states.

4. A substantial part of the acts, events, or omissions giving rise to Plaintiff's claims arose in and around Los Angeles, California. Therefore, pursuant to 28 U.S.C. §1391(b)(2), venue is proper in the Central District of California.

FACTUAL ALLEGATIONS

5. When Plaintiff was in elementary school in the Midwest, he began modeling for print advertising. As time passed, he performed in school plays and was ultimately encouraged

1 to pursue acting professionally. For a period of time, he moved with his mother to New York
2 and engaged in modeling for print advertising and in television commercials.

3 6. When Plaintiff was 14 or 15, he moved to the Los Angeles, California, area with
4 his family at the suggestion of his talent manager to further his acting career, and continued to
5 model. He dreamed and aspired to an acting career.

7 7. Plaintiff attended a very small private high school in the San Fernando Valley in
8 the Los Angeles, California, area. Plaintiff was short and of a slight stature.

9 8. There were approximately four children in Plaintiff's grade, one of whom was
10 Scott Shackley ("Scott"), whom Plaintiff considered a close friend. In early or mid-1998, Scott
11 introduced Plaintiff to his older brother Chad Shackley ("Chad") who, upon information and
12 belief, was Scott's caretaker. Chad resided in a mansion in Encino, California, which was
13 commonly referred to as the M & C Estate. Plaintiff would often go to the M & C Estate to visit
14 Scott. Marc Collins-Rector (Collins-Rector) also resided in the M & C Estate as did Chad, Scott,
15 and Brock Pierce ("Pierce").
16

17 9. At the time, upon information and belief, Collins-Rector was the Chairperson of
18 the Board of Directors of an online entertainment business known as Digital Entertainment
19 Network (DEN). Both Chad and Collins-Rector were principals in DEN. Defendant DOE was
20 the president of DEN. Collins-Rector was instrumental in promoting and marketing DEN as a
21 commercial venture that would revolutionize television and online entertainment, and DEN was
22 considered at the time to be in the vanguard of the growing online entertainment industry. DEN
23 was a well-known enterprise which attracted a significant number of prominent investors,
24 including persons and organizations that were renowned in the entertainment industry.
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1 10. Upon information and belief, Collins-Rector, Pierce, and Chad hosted many
2 notorious parties on the grounds of the M & C Estate which were attended by numerous young
3 males who had been lured to the M & C Estate as well as by prominent investors and persons
4 that were renowned in the entertainment industry such as Defendant DOE. The parties were
5 typically sordid and featured sexual contact between adult males and the many teenage boys who
6 were present for the parties. Further, the parties included the distribution of drugs and alcoholic
7 beverages to the teenage boys at the party. Upon information and belief, the nature of the parties
8 was well-known and notorious among many men in the Hollywood entertainment industry.
9

10 11. Soon after Plaintiff was introduced to Collins-Rector, Pierce, and Chad, the three
11 men began systematically and routinely grooming, threatening, drugging, coercing, and
12 brainwashing Plaintiff into a sexual abuse victim.
13

14 12. As residents of the M & C Estate, primary organizers of the alcohol and drug
15 induced sex parties, and the men initially and routinely responsible for threatening, drugging, and
16 coercing Plaintiff into a sexual abuse victim, Plaintiff viewed Collins-Rector, Pierce, and Chad
17 as the “ringleaders” of the culture of sexual abuse and exploitation that took place at the M & C
18 Estate.
19

20 13. Collins-Rector, Pierce, and Chad often told Plaintiff in a bullying manner that
21 they had “gaydar” and knew that Plaintiff was homosexual, a characterization which Plaintiff,
22 who is heterosexual, categorically denied. He was told that he was part of the “group”, referring
23 to the numerous young males who were lured to the M & C Estate for the purpose of sexual
24 contact with the adult males who visited the M & C Estate ostensibly for recreational and
25 business purposes. He was advised that those adult males controlled Hollywood and would
26 destroy his hopes and dreams of an acting career if he was not compliant. They threatened to
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1 “eliminate” him and his family, and told him that they were monitoring not only his phone, but
2 those of his family members, and asserted he would be “destroyed” if he ever disclosed the
3 unconscionable activities that occurred at the Estate.

4 14. The M & C Estate contained a number of bars and was replete with alcohol and
5 drugs. Collins-Rector, Pierce, and Chad strenuously pressured the teenagers who were there,
6 including Plaintiff, to ingest the copiously available drugs and alcohol. Plaintiff was often forced
7 to consume alcoholic beverages and drugs, and was also surreptitiously administered drugs when
8 they were placed in beverages that he consumed. Collins-Rector, Pierce, and Chad would often
9 place illicit drugs such as Xanax, Rohypnol, and Ecstasy in Plaintiff’s drink. Plaintiff would
10 then ingest the drugs unknowingly. On some occasions, Pierce, who often possessed a bag full
11 of a variety of illicit drugs, bragged about drugging Plaintiff, stating “I just gave you something
12 to make you feel a little more relaxed.”
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15 15. Defendant DOE was often present at the M & C Estate when these drug and
16 alcohol-related activities were occurring and knew, or should have known, that such was taking
17 place.
18

19 16. During the infamous and degenerate parties at the M & C Estate, the adult males
20 engaged in sexual contacts with the Plaintiff, as well as the other boys present. Plaintiff, as an
21 underage minor, could not and did not freely, voluntarily, or knowingly consent to these sexual
22 interactions, and often attempted to resist them.
23

24 17. On several occasions, Collins-Rector, Pierce, and Chad engaged in unwanted
25 sexual acts with Plaintiff through physical threats, drugs, or other means of coercion.
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1 18. On several occasions when Plaintiff resisted submitting to sexual contact, Collins-
2 Rector physically and aggressively held Plaintiff down in order to facilitate his sexual
3 victimization.

4 19. On one occasion when Plaintiff was being resistant to sexual contact, Collins-
5 Rector called him into the master bedroom of the M & C Estate. Collins-Rector pointed a
6 firearm at Plaintiff and threatened to pull the trigger if his resistance to submitting to sexual
7 contact continued. Collins-Rector then forcibly locked Plaintiff for a period of time in a gun safe
8 which was located in a master bedroom closet.
9

10 20. As president of DEN and a routine visitor to the M & C Estate, Defendant DOE
11 witnessed the abusive and detrimental influence Collins-Rector, Pierce, and Chad had over
12 Plaintiff. After observing the systematic threats, coercion, drugging, and brainwashing of
13 Plaintiff into a sexual abuse victim by Collins-Rector, Pierce, and Chad, Defendant DOE seized
14 the opportunity to take advantage of Plaintiff to satisfy his depraved sexual desires.
15

16 21. Defendant DOE was present for, and participated in, several threatening
17 communications during which he told Plaintiff how the adults who resided in or frequented the
18 M & C Estate controlled Hollywood and could decide whether Plaintiff's career aspirations and
19 hopes would be realized. Defendant DOE was also present during times when threats were
20 relayed to Plaintiff concerning his and his family's well-being by Collins-Rector, Pierce, and
21 Chad. Defendant DOE often told Plaintiff that he would find a role for him in television shows,
22 and that he would use his connections to further Plaintiff's acting career.
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25 22. Defendant DOE sexually assaulted Plaintiff on more than approximately 30
26 occasions beginning when Plaintiff was approximately 15 years old. Those unwanted sexual acts
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1 included sodomy, oral copulation, and fondling of genitals. These acts of childhood sexual
2 abuse took place at the M & C Estate, a television show set, and Defendant DOE's home.

3 23. In an attempt to manipulate his compliance with the sexual demands of those
4 adults who frequented the M & C Estate, Plaintiff was placed on DEN's payroll as an actor in
5 Royal Standard, an online television show broadcast on DEN's network, and was paid
6 approximately \$1,500.00 per week. Plaintiff additionally was paid approximately \$600.00 per
7 week from different accounts without any designation of job duties, title, or position. Upon
8 information and belief, payments of this nature were made to many of the teenage males lured to
9 the M & C Estate to have sex with the adults who resided there or visited there for recreational
10 and business purposes.
11

12 24. During and after the sexual abuse by Defendant DOE, Defendant DOE, through
13 DEN, made advance or partial payment of damages as an accommodation to Plaintiff because of
14 the childhood sexual abuse he committed on Plaintiff. Defendant DOE made advance and partial
15 payments to Plaintiff with the intent of lulling Plaintiff into a false sense of complacency about
16 the need to sue Defendant DOE for childhood sexual abuse. At no time did Defendant DOE
17 notify Plaintiff in writing or otherwise of the statute of limitations applicable to Plaintiff's
18 childhood sexual abuse claim against Defendant DOE, as required by California Insurance Code
19 §11583. Plaintiff was not represented by counsel in relation to the childhood sexual abuse
20 committed by Defendant DOE at the time he was receiving those payments. To the date of filing
21 this Complaint, Defendant DOE has failed to provide Plaintiff with written notice of the
22 applicable statute of limitations. Defendant DOE's failure to do so, therefore, has continuously
23 tolled the statute of limitations for when Plaintiff may bring this childhood sexual abuse lawsuit
24 against Defendant DOE.
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1 25. In approximately 2003, Plaintiff began receiving phone calls from Pierce,
2 threatening Plaintiff to release Pierce and exculpate Defendant DOE. The threats by Pierce
3 included "destroying" Plaintiff legally, exposing Plaintiff's name, and ruining Plaintiff's
4 business. Defendant DOE then contacted Plaintiff and continued to threaten him, stating "this is
5 going to turn very bad as we have all the power to defeat you" and "let me help you before this
6 destroys you and your family." Pierce and Defendant DOE also threatened that "we know
7 where you live, we know where you work, we know the potential business you are working on
8 and you know what we can do to you, right?" Plaintiff was legitimately scared and felt
9 threatened by Pierce and Defendant DOE. At Defendant DOE's request, Plaintiff met Defendant
10 DOE in a public place. Defendant DOE placed a form in front of Plaintiff and said "you are
11 going to sign this now. I will stop all of the bad things that are about to happen to you. You
12 need to sign this now and we will get you a nice studio job and you and your family will be okay
13 as well as your girlfriend, and she will never know a thing." In approximately December, 2003,
14 under fear, threats, and duress, Plaintiff signed the form Defendant DOE placed in front of him, a
15 false declaration denying any childhood sexual abuse by Defendant DOE.
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19 26. Plaintiff moved back to Nebraska in an attempt to leave the sexual abuse behind
20 him. Plaintiff's adjustment became impaired and Plaintiff began abusing alcohol and utilizing the
21 psychological defense mechanisms of repression, denial, minimization, and dissociation to
22 suppress his conscious awareness of the childhood sexual abuse by Defendant DOE and its
23 relationship to his psychological injuries. As a result of the utilization of these defense
24 mechanisms, Plaintiff "blocked out" from his conscious certain aspects of the childhood sexual
25 abuse perpetrated on him during his time in California, including the sexual abuse by Defendant
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1 DOE, and was unable to recognize or connect his severe psychological and emotional injuries to
2 the sexual abuse perpetrated by Defendant DOE.

3 27. Although Plaintiff suppressed his conscious awareness of the childhood sexual
4 abuse by Defendant DOE and its relationship to his psychological damages, Plaintiff was unable
5 to escape the pervasive memories of the threats, coercion, drugging, and constant childhood
6 sexual abuse by Collins-Rector, Chad Shackley, and Brock Pierce, whom he considered the
7 "main members of the wolfpack." As a result, Plaintiff attributed all of his psychological and
8 emotional injuries to those men.
9

10 28. As Plaintiff grew older, his psychological injuries and alcoholism grew more
11 severe and more debilitating to the point in which Plaintiff entered trauma therapy in
12 approximately June, 2013. Through trauma therapy and quitting alcohol abuse, Plaintiff
13 challenged his maladaptive defense mechanisms. This allowed Plaintiff to finally recognize the
14 childhood sexual abuse by Defendant DOE and how it contributed to the severe psychological
15 and emotional injuries for which he was suffering.
16

17 29. As an actual, legal, and proximate result of the childhood sexual abuse of Plaintiff
18 by Defendant DOE, Plaintiff has suffered, is suffering, and will continue to suffer: a) severe
19 psychological, mental, and emotional injuries and trauma; b) expenses for counseling and
20 therapy for the psychological, mental and emotional injuries and trauma; c) loss of enjoyment of
21 life; d) shame, humiliation, and indignity; and e) substantial future expenses for counseling.
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24 **COUNT I**
25 **CHILDHOOD SEXUAL ABUSE**
26 **(Violation of California Penal Code §288a --**
27 **Oral Copulation with person who is under 18 years of age)**

28 30. Plaintiff repeats and realleges paragraphs 1 through 29 above.

1 31. During the time Plaintiff was under the age of eighteen (18) years old and
2 Defendant DOE was and adult male, Defendant DOE performed oral copulation on Plaintiff's
3 genitals in California.

4 32. During the time Plaintiff was under the age of eighteen (18) years old and
5 Defendant DOE was and adult male, Defendant DOE coerced Plaintiff to perform oral
6 copulation on Defendant DOE's genitals.

7 33. These acts of oral copulation occurred on more than one occasion during the time
8 Plaintiff was under the age of eighteen (18), and Defendant DOE was and adult male.

9 34. As an actual, legal, and proximate result of the childhood sexual abuse through
10 oral copulation of Plaintiff by Defendant DOE, Plaintiff has suffered, is suffering, and will
11 continue to suffer: a) severe psychological, mental, and emotional injuries and trauma; b)
12 expenses for counseling and therapy for the psychological, mental and emotional injuries and
13 trauma; c) loss of enjoyment of life; d) shame, humiliation, and indignity; and e) substantial
14 future expenses for counseling.

15 35. Plaintiff did not discover and could not reasonably have discovered the
16 connection between the childhood sexual abuse through oral copulation by Defendant DOE and
17 his psychological injuries before approximately June, 2013.

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21 **COUNT II**
22 **- CHILDHOOD SEXUAL ABUSE**
23 **(Violation of California Penal Code §286 --**
24 **Sodomy with person who is under 18 years of age)**

25 36. Plaintiff repeats and realleges paragraphs 1 through 29 above.

26 37. During the time Plaintiff was under the age of eighteen (18) years old and
27 Defendant DOE was and adult male, Defendant DOE performed sodomy on Plaintiff by sexually
28 penetrating Plaintiff's anus with Defendant DOE's penis.

1 38. Defendant DOE sodomized Plaintiff on more than one occasion during the time
2 Plaintiff was under the age of eighteen (18) and Defendant DOE was an adult male.

3 39. As an actual, legal, and proximate result of the childhood sexual abuse through
4 sodomy of Plaintiff by Defendant DOE, Plaintiff has suffered, is suffering, and will continue to
5 suffer: a) severe psychological, mental, and emotional injuries and trauma; b) expenses for
6 counseling and therapy for the psychological, mental and emotional injuries and trauma; c) loss
7 of enjoyment of life; d) shame, humiliation, and indignity; and e) substantial future expenses for
8 counseling.
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10 40. Plaintiff did not discover and could not reasonably have discovered the
11 connection between the childhood sexual abuse through sodomy by Defendant DOE and his
12 psychological injuries before approximately June, 2013.
13

14 **COUNT III**
15 **COMMON LAW SEXUAL BATTERY**
16 **(Violation of California Civil Code §1708.5)**

17 41. Plaintiff repeats and realleges paragraphs 1 through 29 above.

18 42. Defendant DOE acted with the intent to cause a harmful or offensive contact with
19 an intimate part of Plaintiff and a sexually offensive contact with Plaintiff directly or indirectly
20 resulted by placing his penis, and/or by placing his mouth or tongue in contact with the genitals
21 of Plaintiff.

22 43. As an actual, legal, and proximate result of the childhood sexual abuse through
23 sodomy of Plaintiff by Defendant DOE, Plaintiff has suffered, is suffering, and will continue to
24 suffer: a) severe psychological, mental, and emotional injuries and trauma; b) expenses for
25 counseling and therapy for the psychological, mental and emotional injuries and trauma; c) loss
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1 of enjoyment of life; d) shame, humiliation, and indignity; and e) substantial future expenses for
2 counseling.

3 44. Plaintiff did not discover and could not reasonably have discovered the
4 connection between the childhood sexual abuse through oral copulation by Defendant DOE and
5 his psychological injuries before approximately June, 2013.
6

7 **WHEREFORE, Plaintiff demands against Defendant JOHN DOE:**

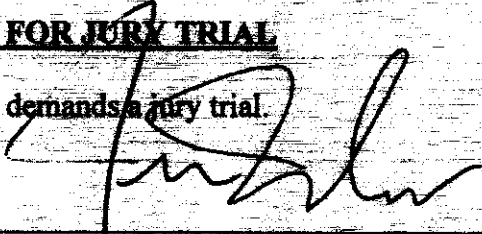
8 1) compensatory damages; 2) special damages; 3) punitive and exemplary damages; 4) costs of
9 suit; 5) reasonable attorney fees; 6) post-judgment interest as permitted by law; and 7) such other
10 relief as the Court may deem proper.
11

12 **DEMAND FOR JURY TRIAL**

13 Plaintiff, MICHAEL F. EGAN; **HEREBY** demands a jury trial.

14 Dated: June 6, 2014.

15 By: _____


Kevin M. McGuire
California Bar No. 164895
themcguirelawfirm@yahoo.com
43460 Ridge Park Drive, Suite 200
Temecula, California 92590
Tel: 951-719-8416
Fax: 949-258-5807

20 Arick W. Fudali, Esq.
21 California Bar No. 296364
afudali@hermanlaw.com
22 Jeffrey M. Herman
(pending application for the approval of pro
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24 Florida Bar No. 521647
jherman@hermanlaw.com
25 Herman Law
26 3351 NW Boca Raton Boulevard
Boca Raton FL, 33431
27 Tel: 305-931-2200
28 Fax: 305-931-0877
www.hermanlaw.com

AO 416 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Central District of California

MICHAEL F. EGAN, III

Plaintiff(s)

v.

JOHN DOE

Defendant(s)

Civil Action No.

14-04403-RSWL(JEMx)

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)*

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Kevin M. McGuire, Esq., THE MCGUIRE LAW FIRM
43460 Ridge Park Drive, #300, Tamasqua, CA 92590
and
Arick W. Fudell, Esq., HERMAN LAW
3351 NW Boca Raton Blvd., Boca Raton, FL 33431

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Date: 6/6/2014

CLERK OF COURT

Clerk
1202

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. _____

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (d))

This summons for *(name of individual and title, if any)* _____
was received by me on *(date)* _____.

I personally served the summons on the individual at *(place)* _____
on *(date)* _____; or

I left the summons at the individual's residence or usual place of abode with *(name)* _____,
a person of suitable age and discretion who resides there,
on *(date)* _____, and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* _____, who is
designated by law to accept service of process on behalf of *(name of organization)* _____
on *(date)* _____; or

I returned the summons unexecuted because _____; or

Other *(specify)*: _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET**

COPY

I. (a) PLAINTIFFS (Check box if you are representing yourself) **DEFENDANTS** (Check box if you are representing yourself)
MICHAEL K. BGAN, II JOHN DOE

(b) County of Residence of First Listed Plaintiff Clark County, NV **County of Residence of First Listed Defendant** _____
(EXCEPT IN U.S. PLAINIFF CASES) (IN U.S. PLAINTIFF CASES ONLY)

(c) Attorneys (Firm Name, Address and Telephone Number) If you are representing yourself, provide the same information.
 Plaintiff: Kevin M. McGuire (CA Bar #154825) 43460 Ridge Park Dr. #200, Temecula, CA 92590; 951-7159114; and Zach W. Pothol (CA Bar # 268864) 3331 NW Boca Raton Blvd, Boca Raton, FL 33431 T: 562-991-2208
 Defendant: _____

III. BASIS OF JURISDICTION (Place an X in one box only.)
 1. U.S. Government Plaintiff 3. Federal Question (U.S. Government Not a Party)
 2. U.S. Government Defendant 4. Diversity (Indicate Citizenship of Parties in Item III)
III. CITIZENSHIP OF PARTIES (Place an X in one box for Plaintiff and one for Defendant)
 Plaintiff: Citizen of This State 1 2 Incorporated or Principal Place of Business in This State 4 5
 Citizen of Another State 2 3 Incorporated and Principal Place of Business in Another State 5 6
 Citizen or Subject of a Foreign Country 3 4 Foreign Nation 6 6

IV. ORIGIN (Place an X in one box only.)
 1. Original Proceeding 2. Removed from State Court 3. Remanded from Appellate Court 4. Reinstated or Resealed 5. Transferred from Another District Court 6. Multi-District Litigation

V. REQUESTED IN COMPLAINT: JURY DEMAND: Yes No (Check Yes only if demanded in complaint)

CLASS ACTION under F.R.Cv.P. 23: Yes No **MONEY DEMANDS IN COMPLAINT: \$** _____

VI. CASE OF ACTION (Cite the U.S. Civil Statute under which you are filing and with a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)
 28 U.S.C. 1332. Cause for removal obtain.

VII. NATURE OF SUIT (Place an X in one box only.)

| | | | | |
|---|--|--|--|--|
| <input type="checkbox"/> 270 Fair Labor Act | <input type="checkbox"/> 110 Insurance | <input type="checkbox"/> 240 Trade or Land | <input type="checkbox"/> 400 Other Personal Injury | <input type="checkbox"/> 600 Copyrights |
| <input type="checkbox"/> 400 State Department | <input type="checkbox"/> 120 Marine | <input type="checkbox"/> 245 Tort Product Liability | <input type="checkbox"/> 405 Other Personal Injury | <input type="checkbox"/> 605 Patent |
| <input type="checkbox"/> 410 Arrest | <input type="checkbox"/> 130 Miller Act | <input type="checkbox"/> 250 All Other Real Property | <input type="checkbox"/> 410 Other Personal Injury | <input type="checkbox"/> 610 Trademark |
| <input type="checkbox"/> 420 Bank and Banking | <input type="checkbox"/> 140 Negotiable Instrument | <input type="checkbox"/> 255 Other Real Property | <input type="checkbox"/> 415 Other Personal Injury | <input type="checkbox"/> 615 Fair Labor |
| <input type="checkbox"/> 430 Commerce/ICC Rates/Etc. | <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment | <input type="checkbox"/> 260 Other Real Property | <input type="checkbox"/> 420 Other Personal Injury | <input type="checkbox"/> 620 Black Lung (33) |
| <input type="checkbox"/> 440 Deportation | <input type="checkbox"/> 151 Medicare Act | <input type="checkbox"/> 265 Other Real Property | <input type="checkbox"/> 425 Other Personal Injury | <input type="checkbox"/> 625 DMV/DMV (405) (g) |
| <input type="checkbox"/> 470 Supplier Influence & Corrupt Org. | <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Educ. Inst.) | <input type="checkbox"/> 270 Other Real Property | <input type="checkbox"/> 430 Other Personal Injury | <input type="checkbox"/> 630 S&P Title XA |
| <input type="checkbox"/> 480 Consumer Credit | <input type="checkbox"/> 153 Recovery of Overpayment of Vet. Benefits | <input type="checkbox"/> 275 Other Real Property | <input type="checkbox"/> 435 Other Personal Injury | <input type="checkbox"/> 635 FDI (405) (g) |
| <input type="checkbox"/> 490 Cable/Sat TV | <input type="checkbox"/> 154 Recovery of Overpayment of Vet. Benefits | <input type="checkbox"/> 280 Other Real Property | <input type="checkbox"/> 440 Other Personal Injury | <input type="checkbox"/> 640 Other U.S. Plaintiff or Defendant |
| <input type="checkbox"/> 500 Securities/Commodities/Exchange | <input type="checkbox"/> 155 Stockholder Suits | <input type="checkbox"/> 285 Other Real Property | <input type="checkbox"/> 445 Other Personal Injury | <input type="checkbox"/> 645 3rd Party 28 USC 7000 |
| <input type="checkbox"/> 510 Other Statutory Actions | <input type="checkbox"/> 156 Other Contract | <input type="checkbox"/> 290 Other Real Property | <input type="checkbox"/> 450 Other Personal Injury | |
| <input type="checkbox"/> 520 Agricultural Acts | <input type="checkbox"/> 157 Contract Product Liability | <input type="checkbox"/> 295 Other Real Property | <input type="checkbox"/> 455 Other Personal Injury | |
| <input type="checkbox"/> 530 Environmental Matters | <input type="checkbox"/> 158 Franchise | <input type="checkbox"/> 300 Other Real Property | <input type="checkbox"/> 460 Other Personal Injury | |
| <input type="checkbox"/> 540 Freedom of Info. Act | <input type="checkbox"/> 159 Land Condemnation | <input type="checkbox"/> 305 Other Real Property | <input type="checkbox"/> 465 Other Personal Injury | |
| <input type="checkbox"/> 550 Arbitration | <input type="checkbox"/> 200 Pensions | <input type="checkbox"/> 310 Other Real Property | <input type="checkbox"/> 470 Other Personal Injury | |
| <input type="checkbox"/> 560 Admin. Procedures/Action/Review of Appeal of Agency Decision | <input type="checkbox"/> 210 Rent Lease & Ejectment | <input type="checkbox"/> 315 Other Real Property | <input type="checkbox"/> 475 Other Personal Injury | |
| <input type="checkbox"/> 570 Constitutionality of State Statute | | <input type="checkbox"/> 320 Other Real Property | <input type="checkbox"/> 480 Other Personal Injury | |

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET**

VIII. VENUE: Your answers to the questions below will determine the division of the Court to which this case will be initially assigned. This initial assignment is subject to change, in accordance with the Court's General Orders, upon review by the Court of your Complaint or Petition of Removal.

| | | |
|--|--|---|
| <p>QUESTION A: Was this case removed from state court?</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If "no," skip to Question B. If "yes," check the box to the right that applies, enter the corresponding number in response to Question E, below, and continue from there.</p> | <p><input type="checkbox"/> Los Angeles, Ventura, Santa Barbara, or San Luis Obispo</p> <p><input type="checkbox"/> Orange</p> <p><input type="checkbox"/> Riverside or San Bernardino</p> | <p>Western</p> <p>Southern</p> <p>Eastern</p> |
| <p>QUESTION B: Is the United States, or one of its agencies or employees, a PLAINTIFF in this action?</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If "no," skip to Question C. If "yes," answer Question B.1, at right.</p> | <p>B.1. Do 50% or more of the defendants who reside in the district reside in Orange Co.?</p> <p>check one of the boxes to the right →</p> <p>B.2. Do 50% or more of the defendants who reside in the district reside in Riverside and/or San Bernardino Counties? (Consider the two counties together.)</p> <p>check one of the boxes to the right →</p> | <p><input type="checkbox"/> YES. Your case will initially be assigned to the Southern Division. Enter "Southern" in response to Question E, below, and continue from here.</p> <p><input type="checkbox"/> NO. Continue to Question B.2.</p> <p><input type="checkbox"/> YES. Your case will initially be assigned to the Eastern Division. Enter "Eastern" in response to Question E, below, and continue from here.</p> <p><input type="checkbox"/> NO. Your case will initially be assigned to the Western Division. Enter "Western" in response to Question E, below, and continue from here.</p> |
| <p>QUESTION C: Is the United States, or one of its agencies or employees, a DEFENDANT in this action?</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If "no," skip to Question D. If "yes," answer Question C.1, at right.</p> | <p>C.1. Do 50% or more of the plaintiffs who reside in the district reside in Orange Co.?</p> <p>check one of the boxes to the right →</p> <p>C.2. Do 50% or more of the plaintiffs who reside in the district reside in Riverside and/or San Bernardino Counties? (Consider the two counties together.)</p> <p>check one of the boxes to the right →</p> | <p><input type="checkbox"/> YES. Your case will initially be assigned to the Southern Division. Enter "Southern" in response to Question E, below, and continue from here.</p> <p><input type="checkbox"/> NO. Continue to Question C.2.</p> <p><input type="checkbox"/> YES. Your case will initially be assigned to the Eastern Division. Enter "Eastern" in response to Question E, below, and continue from here.</p> <p><input type="checkbox"/> NO. Your case will initially be assigned to the Western Division. Enter "Western" in response to Question E, below, and continue from here.</p> |
| <p>QUESTION D: In which 50% or more of plaintiffs who reside in the district reside. (Check up to two boxes, or leave blank if none of these choices apply.)</p> <p><input type="checkbox"/> Los Angeles, Orange, San Diego, or San Bernardino Counties</p> <p><input type="checkbox"/> Riverside, San Bernardino, or San Diego Counties</p> <p><input type="checkbox"/> San Diego, San Bernardino, or San Luis Obispo Counties</p> | | |
| <p>D.1. Is there at least one answer in Category A?</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If "yes," your case will initially be assigned to the SOUTHERN DIVISION.</p> <p>Enter "Southern" in response to Question E, below, and continue from there.</p> <p>If "no," go to question D.2 to the right. →</p> | <p>D.2. Is there at least one answer in Category B?</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If "yes," your case will initially be assigned to the EASTERN DIVISION.</p> <p>Enter "Eastern" in response to Question E, below.</p> <p>If "no," your case will be assigned to the WESTERN DIVISION.</p> <p>Enter "Western" in response to Question E, below. ↓</p> | |
| <p>Enter the initial division determined by Question A, B, C, or D above: → <input type="checkbox"/> Western <input type="checkbox"/> Southern <input checked="" type="checkbox"/> Eastern</p> | | |
| <p>Do 50% or more of plaintiffs or defendants in this district reside in Ventura, Santa Barbara, or San Luis Obispo Counties? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> | | |

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET**

IX(a). IDENTICAL CASES: Has this action been previously filed in this court? NO YES

If yes, list case number(s): _____

IX(b). RELATED CASES: Is this case related (as defined below) to any cases previously filed in this court? NO YES

If yes, list case number(s): _____

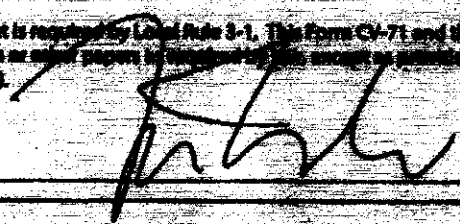
Civil cases are related when they: (1) arise from the same or a closely related transaction, happening, or event; (2) call for determination of the same or substantially related or similar questions of law and fact; or (3) for other reasons would entail substantial duplication of labor if heard by different judges. That cases may involve the same patent, trademark, or copyright claim, in itself, is not sufficient to deem cases related.

X. SIGNATURE OF ATTORNEY

(OR SELF-REPRESENTED LITIGANT): /s/ Kevin M. McGuire

DATE: 6/5/2014

Notice to Counsel/Petitioner: The submission of this Civil Cover Sheet is required by Local Rule 3-1. This Form CV-71 and the information contained herein neither replaces nor supplements the filing and service of pleadings or other papers in accordance with the amount as prescribed by local rules of court. For more detailed instructions, see separate instruction sheet (CV-071A).



Key to Statistical codes relating to Social Security Cases:

| Statistical Code | Abbreviation | Substantive Statement of Cause of Action |
|------------------|--------------|---|
| 001 | HA | All claims for health insurance benefits provided under Title 16, Part A, of the Social Security Act, as amended. Also, include claims for hospital, skilled nursing, home care, for care services or payments of services under the program. (42 U.S.C. 1395ff-1395gg) |
| 002 | IL | All claims for "Black Lung" benefits under Title 4, Part 9, of the Federal Coal Mine Health and Safety Act of 1968. (30 U.S.C. 923) |
| 003 | DWIC | All claims filed by injured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended, plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405 (a)) |
| 004 | DWW | All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405 (a)) |
| 004 | SSD | All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended. |
| 005 | RSI | All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405 (a)) |