

FILED
Los Angeles Superior Court

SEP 19 2013

John A. Clarke, Executive Officer/Clerk
By SHAUNYA WESLEY, Deputy

Wesley 9/19/13

GAIMS WEIL WEST LLP
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1875 Century Park East, Suite 1200
Los Angeles, California 90067
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Facsimile: (310) 277-2133

Attorneys for Plaintiff Alima Beg

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

BC521715

ALIMA BEG, an individual,

Plaintiff,

v.

JOHN BABIKIAN, an individual,
MIDDLEBAY TRADE LTD., A Republic
of Seychelles entity, ORIWA VILLAS
LTD., a Guatemala entity and Does 1-100,
inclusive,

Defendants.

Case No.

**COMPLAINT FOR RESCISSION AND
DAMAGES BASED ON FRAUD,
DETERMINATION OF ALTER EGO AND
DECLARATORY RELIEF**

CIT/CASE: BCE21715
LEA/DEF#: _____
RECEIPT #: CCH465980012
DATE PAID: 09/19/13 08:52 AM
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RECEIVED: 310
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CASH: \$0.00
CHANGE: \$0.00
CARD: \$0.00

COMPLAINT

ORIGINAL

38 Maureen Leun

GAIMS WEIL WEST LLP
ATTORNEYS AT LAW
1875 CENTURY PARK EAST, 12TH FLOOR, LOS ANGELES, CALIFORNIA 90067-2513
TELEPHONE (310) 407-4500

09/19/2013

Los Angeles Superior Court
1-11-2011

SEP 14 2011

Shirley West
Clerk of Court
Los Angeles Superior Court

ORIGINAL

8102016160

1 Plaintiff Alima Beg ("Beg") for her complaint against defendants alleges:

2 **THE PARTIES AND THE FACTS**

3 1. On July 31, 2010, Beg and defendant John Babikian ("Babikian") were
4 married in Quebec, Canada where they then resided.

5 2. In September 2013, Beg filed a proceeding in Quebec, Canada to dissolve
6 the Beg/Babikian marriage.

7 **SUMMARY OF CLAIM**

8 3. As described in detail below, Babikian has engaged in actual fraud in the
9 County of Los Angeles in a scheme to deprive Beg of her ownership interests in the
10 properties located at 642 North Laurel Avenue, Los Angeles, California ("North
11 Laurel") and 1401 Londonderry Place, Los Angeles, California ("Londonderry Place").

12 4. Babikian made the material misrepresentations and engaged in the
13 misconduct described below in an effort to deprive Beg of her interests in North Laurel
14 and Londonderry Place. As part of that scheme Babikian has transferred title to the
15 properties to the other defendants, offshore entities which he owns and/or controls,
16 with the intention of depriving Beg of her ownership rights and selling or otherwise
17 transferring or encumbering the properties and secreting the proceeds from Beg.

18 **NORTH LAUREL**

19 5. In December 2010, Beg and Babikian purchased North Laurel to use as
20 their home while visiting California.

21 6. Beginning in December 2010, Beg and Babikian resided in North Laurel
22 approximately three months each year.

23 7. At the time of the purchase of North Laurel, Babikian represented to Beg
24 that Babikian and Beg were purchasing North Laurel together as husband and wife, but
25 that to protect Beg from potential problems arising from the nature of Babikian's
26 business activities, title to North Laurel should be taken in Babikian's name alone.

27 8. Babikian's representations regarding North Laurel were false and known
28 by Babikian to be false at the time he made them. Beg is informed and believes and on

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1 that basis alleges that Babikian made the false representations to Beg with the intention
2 of depriving Beg of her ownership interest in North Laurel.

3 9. Babikian then presented Beg with a Quitclaim Deed, a true and correct
4 copy of which is attached as Exhibit A.

5 10. Beg was unaware Babikian's representations were false and Beg relied to
6 her detriment on Babikian's false representations.

7 11. Beg had no experience with real estate transactions or with Quitclaim
8 Deeds. In reasonable reliance on Babikian's representation to Beg that North Laurel was
9 being purchased for both of them, but that to protect Beg it was in Beg's best interest for
10 title to be taken in Babikian's name alone, Beg executed the Quitclaim Deed.

11 12. Thereafter, without Beg's knowledge or consent, Babikian secretly
12 transferred title to North Laurel into the name of defendant Middlebay Trade Ltd., a
13 Republic of Seychelles entity ("Middlebay"), which Beg is informed and believes and on
14 that basis alleges that Babikian owns and/or controls.

15 13. Beg is informed and believes and on that basis alleges that Babikian
16 through Middlebay, is attempting to sell North Laurel for approximately three million
17 dollars (\$3,000,000) without the consent of Beg and with the intention of keeping the
18 proceeds from that sale and secreting them from Beg.

19 LONDONDERRY PLACE

20 14. In or about March 2012, Beg and Babikian purchased 1401 Londonderry
21 Place.

22 15. Beg and Babikian purchased Londonderry Place with the intention of
23 building a new home where they would reside during their visits to California.

24 16. At the time of the acquisition of Londonderry Place and throughout the
25 construction project Babikian repeatedly represented to Beg that Londonderry Place
26 was being and had been purchased in the names of and was to be constructed as the
27 joint California home of Beg and Babikian.
28

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17. Beg reasonably believed Babikian, reasonably relied on his promise that Londonderry Place belonged to the two of them and reasonably believed that title to Londonderry Place had been taken in their joint names.

18. Beg was actively involved in all aspects of the planning for, design and selection of materials for Londonderry Place. Construction on Londonderry Place began in the spring of 2012 and Beg is informed and believes and on that basis alleges is still underway.

19. Babikian's representations regarding Londonderry Place were false and known by Babikian to be false. In mid-2013, Beg discovered that Babikian had taken title to Londonderry in the name of Oriwa Villas Ltd. ("Oriwa"). Beg learned in September 2013 that Oriwa is an entity organized under the laws of Guatemala. Beg is informed and believes and on that basis alleges that Oriwa is owned and/or controlled by Babikian.

20. Beg is informed and believes, and thereupon alleges, that at all times herein mentioned, defendants were agents of each other, and in doing the things hereinafter mentioned, each was acting within the scope of his/its authority as an agent, with permission and consent of some or all of the other defendants.

21. Beg is presently unaware of the true names and capacities of defendants sued as Does 1-100, inclusive, and therefore sues those defendants by such fictitious names and capacities. Beg will amend this complaint upon determining the true names and capacities of those defendants.

FIRST CAUSE OF ACTION
(Rescission Based on Fraud - North Laurel)

22. Beg repeats and realleges each and every allegation in paragraphs 1 through 21.

23. As a result of defendants' fraud alleged above, Beg is entitled to judgment rescinding the Quitclaim Deed, rescinding the transfer of North Laurel to Middlebay,

09/19/2013

1 enjoining defendants from transferring or encumbering North Laurel and for
2 compensatory damages according to proof.

3 24. Beg is informed and believes and thereupon alleges, that in doing the
4 things herein alleged, defendants acted intentionally, maliciously and fraudulently so
5 that Beg is entitled to an award of punitive damages.

6 **SECOND CAUSE OF ACTION**
7 **(Rescission Based on Fraud - Londonderry)**

8 25. Beg repeats and realleges each and every allegation in paragraphs 1
9 through 24.

10 26. As a result of defendants' fraud alleged above, Beg is entitled to judgment
11 rescinding the transfer of Londonderry Place to Oriwa, enjoining defendants from
12 transferring or encumbering Londonderry Place and for compensatory damages
13 according to proof.

14 27. Beg is informed and believes and thereupon alleges, that in doing the
15 things herein alleged, defendants acted intentionally, maliciously and fraudulently so
16 that Beg is entitled to an award of punitive damages.

17 **THIRD CAUSE OF ACTION**
18 **(Declaratory Relief)**

19 28. Beg repeats and realleges each and every allegation in paragraphs 1
20 through 27.

21 29. An actual controversy has arisen and exists relating to the rights and
22 duties of the parties in that Beg alleges she owns an undivided interest in North Laurel
23 and Londonderry Place while defendants presumably deny that Beg owns an
24 undivided interest in each.

25 30. A judicial declaration is necessary and appropriate at this time so that
26 plaintiff may ascertain her rights and duties.
27
28

FOURTH CAUSE OF ACTION
(Alter Ego)

31. Beg repeats and realleges each and every allegation in paragraphs 1 through 30.

32. Beg is informed and believes, and on that basis alleges, that Babikian controlled, dominated and influenced Middlebay and Oriwa through which Babikian sought to promote, enhance and further his personal interests rather than (and to the exclusion of) the interests of Beg.

33. Beg is informed and believes, and on that basis alleges, that Babikian is the controlling owner and officer of Middlebay and Oriwa.

34. Beg is informed and believes, and on that basis alleges, that with respect to the preceding allegations, Babikian has completely dominated and controlled Middlebay and Oriwa and ignored their separate identities, to the extent that Middlebay and Oriwa were mere devices to further Babikian's personal and business interests.

35. Beg is informed and believes, and on that basis alleges, that Middlebay and Oriwa failed to maintain their separate existence and corporate or company form, and failed to honor legal formalities.

36. Beg is informed and believes, and on that basis alleges, that Babikian is the alter ego of Middlebay and Oriwa and their corporate or company forms should be disregarded to achieve an equitable result.

37. Beg is informed and believes, and on that basis alleges, that Babikian's domination of Middlebay and Oriwa was used to commit the frauds and wrongs against Beg alleged above, which caused wrongful and inequitable consequences and injury to Beg.

38. This Court should intervene and disregard the corporate or company forms of Middlebay and Oriwa to prevent a wrong or injustice against Beg.

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1 39. Accordingly, Beg is entitled to an order declaring that Babikian,
2 Middlebay and Oriwa should be held jointly and severally liable to Beg for the claims
3 set forth in this complaint.

4 WHEREFORE plaintiff requests judgment against defendants as follows:

5 1. Rescinding the Quitclaim deed from Beg to Babikian with respect to
6 642 North Laurel Avenue, Los Angeles, California.

7 2. Rescinding any transfer by Babikian or any of his entities of title to
8 642 North Laurel Avenue, Los Angeles, California.

9 3. Rescinding any transfer by Babikian or any of his entities of title to 1401
10 Londonderry Place, Los Angeles, California.

11 4. Determining that Beg is an owner of an undivided interest in 642 North
12 Laurel Avenue, Los Angeles, California.

13 5. Determining that Beg is an owner of an undivided interest in
14 1401 Londonderry Place, Los Angeles, California.

15 6. Enjoining defendants from selling, transferring or encumbering 642 North
16 Laurel Avenue, Los Angeles, California or 1401 Londonderry Place, Los Angeles,
17 California without the prior express written approval of Beg.

18 7. For compensatory damages according to proof at trial.

19 8. For punitive damages in an amount to be determined at trial.

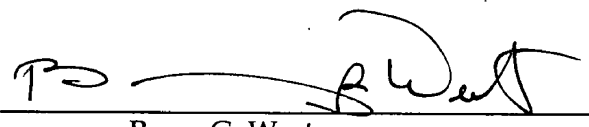
20 9. For a judicial determination that defendants are each the alter ego of the
21 other.

22 10. For interest, costs and attorneys fees as permitted by law.
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11. For such other and further relief as the Court deems appropriate.

Dated: September 19, 2013 GAIMS WEIL WEST LLP
BARRY G. WEST

By: 
Barry G. West
Attorneys for Plaintiff Alima Beg

GAIMS WEIL WEST LLP
ATTORNEYS AT LAW
1875 CENTURY PARK EAST, 12th FLOOR, LOS ANGELES, CALIFORNIA 90067-2513
TELEPHONE (310) 407-4500

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ORTC
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JOHN BABIKIAN
642 N. LAUREL AVENUE
LOS ANGELES, CA 90048
MAIL TAX STATEMENTS TO:



SAME AS ABOVE

2476013786

SPACE ABOVE FOR RECORDER'S USE

QUITCLAIM DEED

THE UNDERSIGNED GRANTOR(S) DECLARE(S) THIS CONVEYANCE ESTABLISHES SOLE AND SEPARATE
DOCUMENTARY TRANSFER TAX IS \$ -0- PROPERTY OF A SPOUSE, R & T 11911.

() COMPUTED ON FULL VALUE OF PROPERTY CONVEYED, OR

() COMPUTED ON FULL VALUE, LESS VALUE OF LIENS AND

ENCUMBRANCES REMAINING AT TIME OF SALE.

() UNINCORPORATED AREA: (X) CITY OF LOS ANGELES AND, FOR A VALUABLE CONSIDERATION, RECEIPT
OF WHICH IS HEREBY ACKNOWLEDGED,

ALIMA BEG, A MARRIED WOMAN AND SPOUSE OF THE GRANTEE HEREIN

HEREBY REMISES, RELEASES AND QUITCLAIMS TO:

JOHN BABIKIAN, A MARRIED MAN AS HIS SOLE AND SEPARATE PROPERTY

THE FOLLOWING DESCRIBED REAL PROPERTY IN THE CITY OF LOS ANGELES, COUNTY
OF LOS ANGELES, STATE OF CALIFORNIA:

LOT 140 OF TRACT NO. 5244, IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF
CALIFORNIA, AS PER MAP RECORDED IN BOOK 54, PAGE 42 OF MAPS, IN THE OFFICE OF THE COUNTY
RECORDER OF SAID COUNTY.

APN: 5527-015-023

***THIS CONVEYANCE ESTABLISHES THE SOLE AND SEPARATE PROPERTY OF A SPOUSE, R & T 11911. THIS
DEED IS GIVEN TO CARRY OUT THE MUTUAL DESIRE AND AGREEMENT OF THE PARTIES HERETO, THAT SAID
PROPERTY SHALL BECOME VESTED IN THE GRANTEE HEREIN AS (HIS/HER) SOLE AND SEPARATE
PROPERTY.**

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QUITCLAIM DEED (CONTINUED)

IN WITNESS WHEREOF, THE GRANTOR HAS CAUSED THIS GRANT DEED TO BE EXECUTED AS OF THE
6th DAY OF Dec, 2010.

SIGNATURE OF GRANTOR

ALIMA BEG

NOTARY ACKNOWLEDGMENT:

STATE OF CALIFORNIA }

COUNTY OF LOS ANGELES }

ON 12-6-10 BEFORE ME, IRIS Y. CHAE, A NOTARY PUBLIC
PERSONALLY APPEARED ALIMA BEG, WHO PROVED TO ME ON THE BASIS OF SATISFACTORY EVIDENCE TO
BE THE PERSON (S) WHOSE NAME(S) IS/ARE SUBSCRIBED TO THE WITHIN INSTRUMENT AND
ACKNOWLEDGED TO ME THAT HE/SHE/THEY EXECUTED THE SAME IN
HIS/HER/THEIR AUTHORIZED CAPACITY(IES) AND THAT BY HIS/HER/THEIR SIGNATURE(S) ON THE
INSTRUMENT THE PERSON(S), OR THE ENTITY UPON BEHALF OF WHICH THE PERSON(S) ACTED, EXECUTED
THE WITHIN INSTRUMENT.

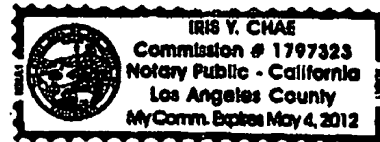
I CERTIFY UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF CALIFORNIA THAT THE
FOREGOING PARAGRAPH IS TRUE AND CORRECT.

WITNESS MY HAND AND OFFICIAL SEAL.

SIGNATURE: [Signature]

NOTARY PUBLIC

(SEAL)



09/19/2013

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09/19/2013

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ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):

GAIMS WEST & EPSTEIN LLP

Barry G. West (SBN 55365)

1875 Century Park East, #1200

Los Angeles, California 90067

TELEPHONE NO.: (310) 407-4528

FAX NO.: (310) 277-2133

ATTORNEY FOR (Name): Plaintiff Alima Beg

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

STREET ADDRESS: 111 North Hill Street

MAILING ADDRESS: 111 North Hill Street

CITY AND ZIP CODE: Los Angeles, California 90012

BRANCH NAME: Central

FOR COURT USE ONLY

FILED
Los Angeles Superior Court

SEP 19 2013

John A. Clarke, Executive Officer/Clerk
By SHAUNYA WESLEY, Deputy

CASE NAME:

ALIMA BEG V. JOHN BABIKIAN, an individual, MIDDLEBAY TRADE LTD., A Republic of Seychelles entity; ORIWA VILLAS LTD., Guatemala entity, and Does 1-100

CIVIL CASE COVER SHEET
☒ **Unlimited**
(Amount
demanded
exceeds \$25,000)
 ☐ **Limited**
(Amount
demanded is
\$25,000 or less)
Complex Case Designation
☐ **Counter**
☐ **Joinder**

 Filed with first appearance by defendant
(Cal. Rules of Court, rule 3.402)
CASE NUMBER: **PC 521715**

JUDGE:

DEPT:

Items 1-6 below must be completed (see instructions on page 2).

1. Check one box below for the case type that best describes this case:

Auto Tort
☐ Auto (22)
☐ Uninsured motorist (46)
Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort
☐ Asbestos (04)
☐ Product liability (24)
☐ Medical malpractice (45)
☐ Other PI/PD/WD (23)
Non-PI/PD/WD (Other) Tort
☐ Business tort/unfair business practice (07)
☐ Civil rights (08)
☐ Defamation (13)
☐ Fraud (16)
☐ Intellectual property (19)
☐ Professional negligence (25)
☐ Other non-PI/PD/WD tort (35)
Employment
☐ Wrongful termination (36)
☐ Other employment (15)
Contract
☐ Breach of contract/warranty (06)
☐ Rule 3.740 collections (09)
☐ Other collections (09)
☐ Insurance coverage (18)
☐ Other contract (37)
Real Property
☐ Eminent domain/Inverse condemnation (14)
☐ Wrongful eviction (33)
☒ Other real property (26)
Unlawful Detainer
☐ Commercial (31)
☐ Residential (32)
☐ Drugs (38)
Judicial Review
☐ Asset forfeiture (05)
☐ Petition re: arbitration award (11)
☐ Writ of mandate (02)
☐ Other judicial review (39)
Provisionally Complex Civil Litigation
(Cal. Rules of Court, rules 3.400-3.403)
☐ Antitrust/Trade regulation (03)
☐ Construction defect (10)
☐ Mass tort (40)
☐ Securities litigation (28)
☐ Environmental/Toxic tort (30)
☐ Insurance coverage claims arising from the above listed provisionally complex case types (41)
Enforcement of Judgment
☐ Enforcement of judgment (20)
Miscellaneous Civil Complaint
☐ RICO (27)
☐ Other complaint (not specified above) (42)
Miscellaneous Civil Petition
☐ Partnership and corporate governance (21)
☐ Other petition (not specified above) (43)
2. This case ☐ is ☒ is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:

- a. ☐ Large number of separately represented parties
 b. ☐ Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve
 c. ☐ Substantial amount of documentary evidence
 d. ☐ Large number of witnesses
 e. ☐ Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court
 f. ☐ Substantial postjudgment judicial supervision

3. Remedies sought (check all that apply): a. ☒ monetary b. ☒ nonmonetary; declaratory or injunctive relief c. ☒ punitive

4. Number of causes of action (specify): Four (4)

5. This case ☐ is ☒ is not a class action suit.

6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)

Date: September 19, 2013

Barry G. West

(TYPE OR PRINT NAME)

(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

NOTICE

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
- Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

Page 1 of 2

ORIGINAL

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):

GAIMS WEST & EPSTEIN LLP

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Barry G. West

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SHORT TITLE:

ALIMA BEG V. JOHN BABIKIAN, ET AL.

CASE NUMBER

**CIVIL CASE COVER SHEET ADDENDUM AND STATEMENT OF LOCATION
(CERTIFICATE OF GROUNDS FOR ASSIGNMENT TO COURTHOUSE LOCATION)**

This form is required pursuant to LASC Local Rule 2.0 in all new civil case filings in the Los Angeles Superior Court.

Item I. Check the types of hearing and fill in the estimated length of hearing expected for this case:

JURY TRIAL? ☒ YES CLASS ACTION? ☐ YES LIMITED CASE? ☐ YES TIME ESTIMATED FOR TRIAL 5 ☐ HOURS/ ☒ DAYS

Item II. Select the correct district and courthouse location (4 steps – If you checked "Limited Case", skip to Item III, Pg. 4):

Step 1: After first completing the Civil Case Cover Sheet Form, find the main civil case cover sheet heading for your case in the left margin below, and, to the right in Column **A**, the Civil Case Cover Sheet case type you selected.

Step 2: Check one Superior Court type of action in Column **B** below which best describes the nature of this case.

Step 3: In Column **C**, circle the reason for the court location choice that applies to the type of action you have checked. For any exception to the court location, see Los Angeles Superior Court Local Rule 2.0.

Applicable Reasons for Choosing Courthouse Location (see Column C below)

- | | |
|---|--|
| 1. Class Actions must be filed in the County Courthouse, Central District. | 6. Location of property or permanently garaged vehicle. |
| 2. May be filed in Central (Other county, or no Bodily Injury/Property Damage). | 7. Location where petitioner resides. |
| 3. Location where cause of action arose. | 8. Location wherein defendant/respondent functions wholly. |
| 4. Location where bodily injury, death or damage occurred. | 9. Location where one or more of the parties reside. |
| 5. Location where performance required or defendant resides. | 10. Location of Labor Commissioner Office. |

Step 4: Fill in the information requested on page 4 in Item III; complete Item IV. Sign the declaration.

	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Auto Tort	Auto (22)	<input type="checkbox"/> A7100 Motor Vehicle - Personal Injury/Property Damage/Wrongful Death	1., 2., 4.
	Uninsured Motorist (46)	<input type="checkbox"/> A7110 Personal Injury/Property Damage/Wrongful Death – Uninsured Motorist	1., 2., 4.
Other Personal Injury/Property Damage/Wrongful Death Tort	Asbestos (04)	<input type="checkbox"/> A6070 Asbestos Property Damage <input type="checkbox"/> A7221 Asbestos - Personal Injury/Wrongful Death	2. 2.
	Product Liability (24)	<input type="checkbox"/> A7260 Product Liability (not asbestos or toxic/environmental)	1., 2., 3., 4., 8.
	Medical Malpractice (45)	<input type="checkbox"/> A7210 Medical Malpractice - Physicians & Surgeons <input type="checkbox"/> A7240 Other Professional Health Care Malpractice	1., 2., 4. 1., 2., 4.
	Other Personal Injury Property Damage Wrongful Death (23)	<input type="checkbox"/> A7250 Premises Liability (e.g., slip and fall) <input type="checkbox"/> A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.) <input type="checkbox"/> A7270 Intentional Infliction of Emotional Distress <input type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death	1., 2., 4. 1., 2., 4. 1., 2., 3. 1., 2., 4.
	Business Tort (07)	<input type="checkbox"/> A6029 Other Commercial/Business Tort (not fraud/breach of contract)	1., 2., 3.
Non-Personal Injury/Property Damage/Wrongful Death Tort	Civil Rights (08)	<input type="checkbox"/> A6005 Civil Rights/Discrimination	1., 2., 3.
	Defamation (13)	<input type="checkbox"/> A6010 Defamation (slander/libel)	1., 2., 3.
	Fraud (16)	<input type="checkbox"/> A6013 Fraud (no contract)	1., 2., 3.

ORIGINAL

Non-Personal Injury/Property Damage/
Wrongful Death Tort (Cont'd.)

SHORT TITLE: ALIMA BEG V. JOHN BABIKIAN, ET AL.	CASE NUMBER
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Employment

Contract

Real Property

Judicial Review Unlawful Detainer

A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons -See Step 3 Above
Professional Negligence (25)	<input type="checkbox"/> A6017 Legal Malpractice <input type="checkbox"/> A6050 Other Professional Malpractice (not medical or legal)	1., 2., 3. 1., 2., 3.
Other (35)	<input type="checkbox"/> A6025 Other Non-Personal Injury/Property Damage tort	2., 3.
Wrongful Termination (36)	<input type="checkbox"/> A6037 Wrongful Termination	1., 2., 3.
Other Employment (15)	<input type="checkbox"/> A6024 Other Employment Complaint Case <input type="checkbox"/> A6109 Labor Commissioner Appeals	1., 2., 3. 10.
Breach of Contract/ Warranty (06) (not insurance)	<input type="checkbox"/> A6004 Breach of Rental/Lease Contract (not Unlawful Detainer or wrongful eviction) <input type="checkbox"/> A6008 Contract/Warranty Breach -Seller Plaintiff (no fraud/negligence) <input type="checkbox"/> A6019 Negligent Breach of Contract/Warranty (no fraud) <input type="checkbox"/> A6028 Other Breach of Contract/Warranty (not fraud or negligence)	2., 5. 2., 5. 1., 2., 5. 1., 2., 5.
Collections (09)	<input type="checkbox"/> A6002 Collections Case-Seller Plaintiff <input type="checkbox"/> A6012 Other Promissory Note/Collections Case	2., 5., 6. 2., 5.
Insurance Coverage (18)	<input type="checkbox"/> A6015 Insurance Coverage (not complex)	1., 2., 5., 8.
Other Contract (37)	<input type="checkbox"/> A6009 Contractual Fraud <input type="checkbox"/> A6031 Tortious Interference <input type="checkbox"/> A6027 Other Contract Dispute(not breach/insurance/fraud/negligence)	1., 2., 3., 5. 1., 2., 3., 5. 1., 2., 3., 8.
Eminent Domain/Inverse Condemnation (14)	<input type="checkbox"/> A7300 Eminent Domain/Condemnation Number of parcels _____	2.
Wrongful Eviction (33)	<input type="checkbox"/> A6023 Wrongful Eviction Case	2., 6.
Other Real Property (26)	<input type="checkbox"/> A6018 Mortgage Foreclosure <input type="checkbox"/> A6032 Quiet Title <input checked="" type="checkbox"/> A6060 Other Real Property (not eminent domain, landlord/tenant, foreclosure)	2., 6. 2., 6. 2., 6.
Unlawful Detainer- Commercial (31)	<input type="checkbox"/> A6021 Unlawful Detainer-Commercial (not drugs or wrongful eviction)	2., 6.
Unlawful Detainer- Residential (32)	<input type="checkbox"/> A6020 Unlawful Detainer-Residential (not drugs or wrongful eviction)	2., 6.
Unlawful Detainer- Drugs (38)	<input type="checkbox"/> A6022 Unlawful Detainer-Drugs	2., 6.
Asset Forfeiture (05)	<input type="checkbox"/> A6108 Asset Forfeiture Case	2., 6.
Petition re Arbitration (11)	<input type="checkbox"/> A6115 Petition to Compel/Confirm/Vacate Arbitration	2., 5.

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Judicial Review (Cont'd.)

Provisionally Complex Litigation

Enforcement of Judgment

Miscellaneous Civil Complaints

Miscellaneous Civil Petitions

A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Writ of Mandate (02)	<input type="checkbox"/> A6151 Writ - Administrative Mandamus <input type="checkbox"/> A6152 Writ - Mandamus on Limited Court Case Matter <input type="checkbox"/> A6153 Writ - Other Limited Court Case Review	2., 8. 2. 2.
Other Judicial Review (39)	<input type="checkbox"/> A6150 Other Writ /Judicial Review	2., 8.
Antitrust/Trade Regulation (03)	<input type="checkbox"/> A6003 Antitrust/Trade Regulation	1., 2., 8.
Construction Defect (10)	<input type="checkbox"/> A6007 Construction defect	1., 2., 3.
Claims Involving Mass Tort (40)	<input type="checkbox"/> A6006 Claims Involving Mass Tort	1., 2., 8.
Securities Litigation (28)	<input type="checkbox"/> A6035 Securities Litigation Case	1., 2., 8.
Toxic Tort Environmental (30)	<input type="checkbox"/> A6036 Toxic Tort/Environmental	1., 2., 3., 8.
Insurance Coverage Claims from Complex Case (41)	<input type="checkbox"/> A6014 Insurance Coverage/Subrogation (complex case only)	1., 2., 5., 8.
Enforcement of Judgment (20)	<input type="checkbox"/> A6141 Sister State Judgment <input type="checkbox"/> A6160 Abstract of Judgment <input type="checkbox"/> A6107 Confession of Judgment (non-domestic relations) <input type="checkbox"/> A6140 Administrative Agency Award (not unpaid taxes) <input type="checkbox"/> A6114 Petition/Certificate for Entry of Judgment on Unpaid Tax <input type="checkbox"/> A6112 Other Enforcement of Judgment Case	2., 9. 2., 6. 2., 9. 2., 8. 2., 8. 2., 8., 9.
RICO (27)	<input type="checkbox"/> A6033 Racketeering (RICO) Case	1., 2., 8.
Other Complaints (Not Specified Above) (42)	<input type="checkbox"/> A6030 Declaratory Relief Only <input type="checkbox"/> A6040 Injunctive Relief Only (not domestic/harassment) <input type="checkbox"/> A6011 Other Commercial Complaint Case (non-tort/non-complex) <input type="checkbox"/> A6000 Other Civil Complaint (non-tort/non-complex)	1., 2., 8. 2., 8. 1., 2., 8. 1., 2., 8.
Partnership Corporation Governance(21)	<input type="checkbox"/> A6113 Partnership and Corporate Governance Case	2., 8.
Other Petitions (Not Specified Above) (43)	<input type="checkbox"/> A6121 Civil Harassment <input type="checkbox"/> A6123 Workplace Harassment <input type="checkbox"/> A6124 Elder/Dependent Adult Abuse Case <input type="checkbox"/> A6190 Election Contest <input type="checkbox"/> A6110 Petition for Change of Name <input type="checkbox"/> A6170 Petition for Relief from Late Claim Law <input type="checkbox"/> A6100 Other Civil Petition	2., 3., 9. 2., 3., 9. 2., 3., 9. 2. 2., 7. 2., 3., 4., 8. 2., 9.

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SHORT TITLE: ALIMA BEG V. JOHN BABIKIAN, ET AL.	CASE NUMBER
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Item III. Statement of Location: Enter the address of the accident, party's residence or place of business, performance, or other circumstance indicated in Item II., Step 3 on Page 1, as the proper reason for filing in the court location you selected.

REASON: CHECK THE NUMBER UNDER COLUMN C WHICH APPLIES IN THIS CASE <input type="checkbox"/> 1. <input checked="" type="checkbox"/> 2. <input type="checkbox"/> 3. <input type="checkbox"/> 4. <input type="checkbox"/> 5. <input checked="" type="checkbox"/> 6. <input type="checkbox"/> 7. <input type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10.		ADDRESS: 642 North Laurel Avenue 1401 Londonderry Place	
CITY: Los Angeles; Los Angeles	STATE: CA; CA	ZIP CODE: 90048; 90069	

Item IV. Declaration of Assignment: I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that the above-entitled matter is properly filed for assignment to the Stanley Mosk courthouse in the Central District of the Los Angeles Superior Court (Code Civ. Proc., § 392 et seq., and LASC Local Rule 2.0, subds. (b), (c) and (d)).

Dated: September 19, 2013


(SIGNATURE OF ATTORNEY/FILING PARTY)

PLEASE HAVE THE FOLLOWING ITEMS COMPLETED AND READY TO BE FILED IN ORDER TO PROPERLY COMMENCE YOUR NEW COURT CASE:

1. Original Complaint or Petition.
2. If filing a Complaint, a completed Summons form for issuance by the Clerk.
3. Civil Case Cover Sheet form CM-010.
4. Complete Addendum to Civil Case Cover Sheet form LACIV 109 (Rev. 01/07), LASC Approved 03-04.
5. Payment in full of the filing fee, unless fees have been waived.
6. Signed order appointing the Guardian ad Litem, JC form FL-935, if the plaintiff or petitioner is a minor under 18 years of age, or if required by Court.
7. Additional copies of documents to be conformed by the Clerk. Copies of the cover sheet and this addendum must be served along with the summons and complaint, or other initiating pleading in the case.

09/19/2013