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Only
Hague*

*Al0013
90012*

FILED
LOS ANGELES SUPERIOR COURT

MAY 16 2011

John A. Clarke, Executive Officer/Clerk
By *[Signature]* Deputy
ROBINA LOPEZ

In Propria Persona

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES, CENTRAL DISTRICT

BC 461550

GEORGE SHARP,

Case No.

Plaintiff,

COMPLAINT FOR:

v.

- 1) Fraud; and,
- 2) Negligent Misrepresentation; and,
- 3) Violation of California Corporations Code Section 25400 et seq; and,
- 4) Violation of California Unfair Business Practices Act – Business & Professions Code Section 17200; and,
- 5) Violation of California Unfair Business Practices Act – Business & Professions Code Section 17500

Writers' Group Film Corp., Front Row Networks, Inc., Tal Kapelner, Ariella Kapelner, John Diaz, and DOES 1 through 50, inclusive,

Defendants.

CIT/CASE: BC461550 LEA/DEF#:
 RECEIPT #: CCH477728014
 DATE PAID: 05/16/11 08:34:35 AM
 PAYMENT: \$395.00
 RECEIVED:
 0310

CHECK: 395.00
 CASH:
 CHANGE:
 CARD:

85-16711

COMES NOW PLAINTIFF AND ALLEGES AS FOLLOWS:

1
2 1. At all times mentioned herein, Defendant Writers' Group Film Corp.
3 ("WRITERS GROUP"), a developer of entertainment projects, had a listed place
4 of business at 1752 East Avenue J, #266, Lancaster, California. The company's
5 common stock is traded on the over-counter-market, commonly known as the Pink
6 Sheets, under the symbol "WRIT".

7 2. At all times mentioned herein, Defendant Front Row Networks, Inc.
8 ("FRONT ROW"), a Los Angeles-based concert production and distribution
9 company, had a listed place of business of 8200 Wilshire Blvd. Suite 200, Beverly
10 Hills, California. Since March 7, 2011, FRONT ROW has been a wholly owned
11 subsidiary of WRITERS GROUP.

12 3. At all times mentioned herein, Defendant Tal Kapelner ("TAL")
13 acted as either President and/or Chairman of Defendant WRITERS GROUP.

14 4. At all times mentioned herein, Defendant Ariella Kapelner
15 ("ARIELLA") acted as Principal Financial Officer and a Director of Defendant
16 WRITERS GROUP.

17 5. Since March 7, 2011, Defendant John Diaz ("DIAZ") has acted as
18 President and a Director of Defendant WRITERS GROUP and subsidiary FRONT
19 ROW.

20 6. Stocks Gone Wild ("SGW") is a subscription based service which
21 promotes public companies for the express purpose of encouraging the public to
22 purchase the stock of its subject.

23 7. Epic Stock Picks ("EPIC") is a subscription based service which
24 promotes public companies for the express purpose of encouraging the public to
25 purchase the stock of its subject.

26 8. Penny Stocks Expert ("EXPERT") is a subscription based service
27 which promotes public companies for the express purpose of encouraging the
28 public to purchase the stock of its subject.

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1 9. Best Top Penny Stocks (“BEST”) is a subscription based service
2 which promotes public companies for the express purpose of encouraging the
3 public to purchase the stock of its subject.

4 10. HotOTC.com (“HOTOTC”) is a subscription based service which
5 promotes public companies for the express purpose of encouraging the public to
6 purchase the stock of its subject.

7 11. Awesome Penny Stocks (“AWESOME”) is a subscription based
8 service which promotes public companies for the express purpose of encouraging
9 the public to purchase the stock of its subject.

10 12. HotPennyStocksOnline.com (“HOTPENNY”) is a subscription based
11 service which promotes public companies for the express purpose of encouraging
12 the public to purchase the stock of its subject.

13 13. Plaintiff is ignorant of the true names of defendants sued herein as
14 DOES 1 through 50, inclusive, and therefore sues these defendants by such
15 fictitious names. Plaintiff will amend this Complaint to allege their true names and
16 capacities when ascertained. Any allegation against any defendant shall apply to
17 each DOE defendant

18 14. Plaintiff is informed and believes, and on such information and belief
19 alleges, that at all times herein mentioned, each defendant was the agent of each
20 and every other defendant, and in doing the things alleged herein, was acting in the
21 course and scope of its/his agency and/or employment and was acting with the
22 consent, permission and/or authorization of each and every remaining defendant.
23 The acts and conduct of each defendant herein was ratified and approved by every
24 remaining defendant.

25 15. Plaintiff is informed and believes that the Defendants conspired to
26 deceive the Plaintiff and other members of the general investing public and
27 engaged in a course of conduct designed to artificially inflate the share price and
28 trading volume of WRITERS GROUP common stock in order to enable certain

1 insiders to divest themselves of their WRITERS GROUP stock holdings.
2 Defendants achieved this through a campaign of disseminating false and misleading
3 information and concealment of material facts, including, but not limited to the
4 issuance of press releases and propaganda distribution. Furthermore, the acts set
5 forth in paragraphs 16 through 38 below were each false and/or misleading
6 statements made in furtherance of this conspiracy by the defendants.

8 **CHRONOLOGICAL FACTUAL HISTORY OF CLAIMS**

9 16. On July 27, 2010, Defendant FRONT ROW was incorporated in the
10 State of Nevada.

11 17. During December 2010, Writer's Group borrowed \$14,000 and issued
12 two convertible notes to then President and Chairman, TAL, with a face value of
13 \$11,000 and \$3,000 with maturity dates of December 1, 2011 and December 22,
14 2011, respectively. The notes carry an 8% annual interest rate, and have a
15 conversion feature which allows TAL to convert all or any portion of the note into
16 common shares at \$0.00001 per share.

17 18. As of December 31, 2010, WRITERS GROUP had issued additional
18 convertible notes (additional to those issued to TAL) in the amount of \$41,640
19 which are convertible at the discretion of the noteholder, into 2,976,000,000 shares
20 of WRITERS GROUP common stock.

21 19. In January 25, 2011, WRITERS GROUP executed a reverse split of
22 its common stock on a one for one thousand basis, effectively eliminating all of the
23 existing shareholders of the company.

24 20. During February 2011, "certain" convertible noteholders converted a
25 total of \$1,400 into 140,000,000 common shares at \$0.00001 and another \$12,960
26 into 12,960,000 common shares at \$0.001 per share, bringing the total "float" of
27 the stock to approximately 153 million shares, held virtually entirely by these
28 converted noteholders.

1 21. On February 25, 2011, WRITERS GROUP disseminated a press
2 release which, amongst other things, announced the acquisition of FRONT ROW.

3 22. On March 7, 2011, WRITERS GROUP disseminated a press release
4 which, amongst other things, announced that Defendant DIAZ had been appointed
5 President and Director of WRITERS and subsidiary FRONT ROW.

6 23. On March 7, 2011, SGW disseminated an email to its subscribers in
7 order to promote the common stock of WRITERS GROUP.

8 24. On March 8, 2011, SGW disseminated an email to its subscribers
9 touting WRITERS GROUP's 157% increase in share price since it's initial email

10 25. On March 10, 2011, WRITERS GROUP disseminated a press release
11 which, amongst other things, projected \$35 Million in revenue for its subsidiary
12 FRONT ROW.

13 26. On March 22, 2011, WRITERS GROUP disseminated a press release
14 which, amongst other things, announced FRONT ROW's acquisition of several
15 hours of Metallica 3D & 2D concert video footage for distribution.

16 27. On March 23, 2011, WRITERS GROUP disseminated a press release
17 which, amongst other things, announced that Eric Mitchell has partnered and
18 joined the company as head of finance and distribution.

19 28. On March 24, 2011, WRITERS GROUP disseminated a press release
20 which, amongst other things, announced that FRONT ROW had Metallica footage
21 in its possession.

22 29. On April 6, 2011, WRITERS GROUP disseminated a press release
23 which, amongst other things, announced that FRONT ROW had begun the process
24 of converting 2D concert footage into 3D.

25 30. On May 11, 2011, EXPERT disseminated at least three separate
26 emails to its subscribers in order to promote the common stock of WRITERS
27 GROUP.
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1 31. On May 11, 2011, BEST disseminated an email to its subscribers in
2 order to promote the common stock of WRITERS GROUP.

3 32. On May 11, 2011, HOTOTC disseminated at least two separate emails
4 to its subscribers in order to promote the common stock of WRITERS GROUP.

5 33. On May 11, 2011, AWESOME disseminated an email to its
6 subscribers in order to promote the common stock of WRITERS GROUP.

7 34. On May 11, 2011, HOTPENNY disseminated an email to its
8 subscribers in order to promote the common stock of WRITERS GROUP.

9 35. On May 12, 2011, AWESOME disseminated an email to its
10 subscribers in order to promote the common stock of WRITERS GROUP.

11 36. On May 12, 2011, EXPERT disseminated an email to its subscribers
12 in order to promote the common stock of WRITERS GROUP.

13 37. On May 11, 2011, WRITERS GROUP disseminated a press release
14 which, amongst other things, announced FRONT ROW's partnership with "The
15 Fyzz" to develop 3D music programming.

16 38. On May 11, 2011, WRITERS GROUP disseminated a press release
17 which, amongst other things, announced that Bob Johnston had joined FRONT
18 ROW's executive team as Executive Vice President of Business Development and
19 3D Producer.

20
21 **FIRST CAUSE OF ACTION**

22 **Fraud**

23 39. Plaintiff hereby re-alleges and incorporates by reference the facts and
24 allegations contained in Paragraphs 1 through 38 as though fully set forth herein.

25
26 **Count 1 – Intentional Misrepresentation**

27 40. In order to induce the Plaintiff as well as other members of the public
28 to purchase its common stock, the Defendants made express representations,

1 through the issuances of press releases and other public statements. These
2 representations included, but are not limited to, identifying their Global
3 Headquarters as an auto body shop; and, their relationship with the USDA.

4 41. At the time these representations were made they were false and
5 misleading, and the Defendants knew such representations were false and
6 misleading.

7 42. The representations were made to induce the Plaintiff and other
8 members of the public to purchase and retain the common stock of the Defendants
9 and in order to manipulate and increase the trading volume and share price of
10 WRITERS GROUP common stock.

11 43. The representations were made with the intent to induce the Plaintiff
12 and other members of the public to rely on these representations and to become a
13 shareholder of the Defendant WRITERS GROUP.

14 44. This scheme by the Defendants was unknown to Plaintiff at the time it
15 was concocted, and he had no basis to know that these representations were false.
16 Hence, the Plaintiff reasonably and justifiably relied upon the Defendants'
17 representations and purchased the common of Defendant WRITERS GROUP.

18 45. As a result of this fraud by the Defendants, Plaintiff has suffered
19 damages including the loss of money, the loss of the opportunity to invest in other
20 investments, loss of the benefits from increases in the stock price that could have
21 been achieved had the Defendants' intentions been forthright, as well as other
22 damages in an amount to be proven at the time of trial.

23 46. At the time these representations were made, the Defendants knew
24 them to be false and misleading and made the representations for the purpose of
25 inducing the Plaintiff to rely on them.

26 47. At the time these representations were made, the Plaintiff was
27 unaware that they were false and reasonably and justifiably relied upon them.
28

1 48. These representations caused damages including but not limited to the
2 loss to the Plaintiff of almost his entire investment, in an amount to be proven at
3 the time of trial.

4 49. As these misrepresentations constituted fraud and were made with a
5 conscious disregard for the rights and privileges of the Plaintiff, the Plaintiff is
6 entitled to an award of punitive and exemplary damages in an amount to be proven
7 at the time of trial.

8 **Count 2 – Concealment**

9 50. In order to induce the Plaintiff and other members of the public to
10 purchase its common stock, the Defendants knowingly omitted material facts
11 within its many representations, including but not limited to the fact that the
12 singular purpose of recent promotions and publicity was to enrich the Defendants
13 through the sale of their stock to the victimized public.

14 51. The Defendants made these omissions as they knew that the
15 dissemination of these material facts would likely depress the price of the
16 Defendant WRITERS GROUP's common stock.

17 52. The material facts were omitted in order to induce the Plaintiff and
18 other members of the public to purchase and retain the common stock of the
19 Defendants and in order to prevent the degradation of the stock's price per share.

20 53. Through this omission, the Defendants misrepresented the viability of
21 WRITERS GROUP common stock.

22 54. The Defendants' omissions were deliberate with the intent to conceal
23 the material facts from the Plaintiff and other members of the public in order to
24 induce them to become shareholders of the Defendant WRITERS GROUP.

25 55. This scheme by the Defendants was unknown to Plaintiff at the time it
26 was concocted and he had no reason to believe that material facts were omitted.
27 Hence, the Plaintiff reasonably and justifiably relied upon the Defendants'
28

1 representation and purchased the common of the Defendant WRITERS GROUP at
2 artificially high prices.

3 56. As a result of this fraud by the Defendants, Plaintiff has suffered
4 damages including the loss of money, the loss of the opportunity to participate in
5 other investments, loss of the benefits from increases in the stock price that could
6 have been achieved had the Defendants' intentions been forthright, as well as other
7 damages in an amount to be proven at the time of trial.

8
9 **SECOND CAUSE OF ACTION**

10 **For Negligent Misrepresentation**

11 57. Plaintiff hereby re-alleges and incorporates by reference the facts and
12 allegations contained in Paragraphs 1 through 38 as though fully set forth herein.

13 58. In order to induce the Plaintiff and other members of the public to
14 purchase the Defendant WRITERS GROUP's common stock, the Defendants
15 expressed representations to the Plaintiff through press releases and other public
16 statements.

17 59. In order to induce the Plaintiff and other members of the public to
18 purchase its common stock, the Defendants negligently omitted material facts
19 within its as the Defendants knew that the dissemination of these material facts
20 would depress the price of the Defendant's common stock. These facts included
21 but are not limited to the fact that the singular purpose of recent promotions and
22 publicity was to enrich the Defendants through the sale of their stock to the
23 victimized public.

24 60. At the time these representations were made, they were false and
25 misleading, and the Defendants made the representations with the negligent
26 disregard as to whether such representations were true or false.

27 61. The representations were made to induce the Plaintiff and other
28 members of the public to purchase the common stock of the Defendant WRITERS

1 GROUP and in order to manipulate and increase the trading volume and price per
2 share of the stock.

3 62. This scheme by the Defendants was unknown to Plaintiff and he had
4 no basis to know that these representations were false. Hence, the Plaintiff
5 reasonably and justifiably relied upon the Defendants' representations and
6 purchased the common of the Defendant WRITERS GROUP at artificially high
7 prices.

8 63. As a result of this negligent misrepresentation by the Defendants,
9 Plaintiff has suffered damages including the loss of the opportunity to participate
10 in other investments, loss of the benefits from increases in the stock price that
11 could have been achieved had the Defendants' intentions been forthright, as well as
12 other damages in an amount to be proven at the time of trial.

13 64. At the time each of these representations were made, the Defendants
14 made them with a negligent disregard for whether the representations were true or
15 false and made them for the purpose of inducing the Plaintiff to rely on them.

16 65. At the time each of the aforementioned representations was made, the
17 Plaintiff was unaware that they were false and reasonably and justifiably relied
18 upon them.

19
20 **THIRD CAUSE OF ACTION**

21 **Violation of California Corporations Code 25400 et seq.**

22 66. Plaintiff hereby re-alleges and incorporates by reference the facts and
23 allegations contained in Paragraphs 1 through 56 as though fully set forth herein.

24 67. By virtue of the allegations set forth above, the Defendants were in
25 violation of California Corporations Code 25400 et seq. Defendants' violations
26 were committed directly in the state of California.

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1 **FIFTH CAUSE OF ACTION**

2 **False Advertising**

3 **– California Business and Professions Code Section 17500**

4 74. Plaintiff hereby re-alleges and incorporates by reference the facts and
5 allegations contained in Paragraphs 1 through 56 and 66 through 69 as though fully
6 set forth herein.

7 75. The aforementioned conduct, including the issuances of press releases
8 and other statements for the purpose of misrepresentation, each constitute false
9 advertising in violation of California Business and Professions Code section
10 17500, et seq.

11 76. At the time of the representations, the Defendants knew that these
12 representations were false and misleading, and were effectively using false
13 advertising in order to promote WRITERS GROUP common stock.

14 77. The Plaintiff has suffered actual injury and loss of money in that the
15 value of his investment was affected by the predictable devaluation of his
16 investment as a direct result of the misrepresentations of the Defendants.

17 78. As the misrepresentations constituted false advertising and were made
18 with a conscious disregard for the rights and privileges of the Plaintiff, the Plaintiff
19 is entitled to an award of punitive and exemplary damages in an amount to be
20 proven at the time of trial.

21
22 **WHEREFORE**, Plaintiff prays judgment against the Defendants as follows:

23 1. On Plaintiff's First Cause of Action herein:

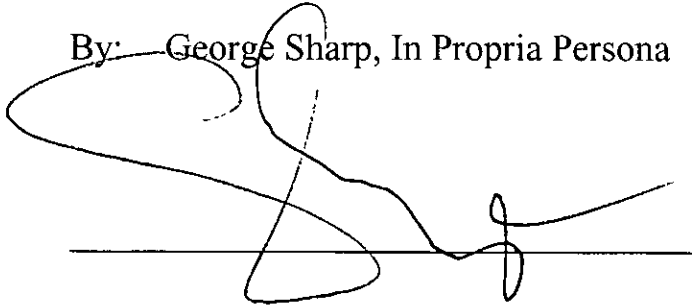
- 24 (a) for a preliminary and permanent injunction;
25 (b) for damages;
26 (c) for restitution;
27 (d) for cost of suit herein incurred;
28 (e) for punitive and exemplary damages; and,

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- (f) for such other and further relief as the court may deem proper.
- 2. On Plaintiff's Second Cause of Action herein:
 - (a) for damages;
 - (b) for cost of suit herein incurred; and
 - (c) for such other and further relief as the court may deem proper.
- 3. On Plaintiff's Third Cause of Action herein:
 - (a) for damages pursuant to California Corporations Code 25500;
 - (b) for cost of suit herein incurred; and,
 - (c) for such other and further relief as the court may deem proper.
- 4. On Plaintiff's Fourth Cause of Action herein:
 - (a) for a preliminary and permanent injunction;
 - (b) for restitution;
 - (c) for cost of suit herein incurred; and
 - (d) for such other and further relief as the court may deem proper.
- 5. On Plaintiff's Fifth Cause of Action herein:
 - (a) for a preliminary and permanent injunction;
 - (b) for damages;
 - (c) for restitution;
 - (d) for cost of suit herein incurred; and
 - (e) for such other and further relief as the court may deem proper.

Dated: May 16, 2011

By: George Sharp, In Propria Persona



FOR COURT USE ONLY

FILED
LOS ANGELES SUPERIOR COURT

MAY 16 2011

John A. Clarke, Executive Officer/Clerk

By [Signature] Deputy
ROBINA LOPRZ

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

George Sharp
In Propria Persona
7600 Fay Avenue, Suite H122

La Jolla, CA 92037

TELEPHONE NO.: (310) 498-4455 FAX NO.: (619) 446-6717

ATTORNEY FOR (Name):

SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles
STREET ADDRESS: 111 North Hill Street, Room 102
MAILING ADDRESS: P.O. Box 958
CITY AND ZIP CODE: Los Angeles, CA 90012

BRANCH NAME:

CASE NAME: Sharp v. Writers' Group Film Corp.

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:

JUDGE: **BC461550**

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): Five (5)

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: May 16, 2011

George Sharp

(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.

To Plaintiffs and Others Filing First Papers. If you are filing a first paper (for example, a complaint) in a civil case, you must complete and file, along with your first paper, the *Civil Case Cover Sheet* contained on page 1. This information will be used to compile statistics about the types and numbers of cases filed. You must complete items 1 through 6 on the sheet. In item 1, you must check one box for the case type that best describes the case. If the case fits both a general and a more specific type of case listed in item 1, check the more specific one. If the case has multiple causes of action, check the box that best indicates the primary cause of action. To assist you in completing the sheet, examples of the cases that belong under each case type in item 1 are provided below. A cover sheet must be filed only with your initial paper. Failure to file a cover sheet with the first paper filed in a civil case may subject a party, its counsel, or both to sanctions under rules 2.30 and 3.220 of the California Rules of Court.

To Parties in Rule 3.740 Collections Cases. A "collections case" under rule 3.740 is defined as an action for recovery of money owed in a sum stated to be certain that is not more than \$25,000, exclusive of interest and attorney's fees, arising from a transaction in which property, services, or money was acquired on credit. A collections case does not include an action seeking the following: (1) tort damages, (2) punitive damages, (3) recovery of real property, (4) recovery of personal property, or (5) a prejudgment writ of attachment. The identification of a case as a rule 3.740 collections case on this form means that it will be exempt from the general time-for-service requirements and case management rules, unless a defendant files a responsive pleading. A rule 3.740 collections case will be subject to the requirements for service and obtaining a judgment in rule 3.740.

To Parties in Complex Cases. In complex cases only, parties must also use the *Civil Case Cover Sheet* to designate whether the case is complex. If a plaintiff believes the case is complex under rule 3.400 of the California Rules of Court, this must be indicated by completing the appropriate boxes in items 1 and 2. If a plaintiff designates a case as complex, the cover sheet must be served with the complaint on all parties to the action. A defendant may file and serve no later than the time of its first appearance a joinder in the plaintiff's designation, a counter-designation that the case is not complex, or, if the plaintiff has made no designation, a designation that the case is complex.

CASE TYPES AND EXAMPLES

Auto Tort

- Auto (22)—Personal Injury/Property Damage/Wrongful Death
- Uninsured Motorist (46) (*if the case involves an uninsured motorist claim subject to arbitration, check this item instead of Auto*)

Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort

- Asbestos (04)
 - Asbestos Property Damage
 - Asbestos Personal Injury/Wrongful Death
- Product Liability (*not asbestos or toxic/environmental*) (24)
- Medical Malpractice (45)
 - Medical Malpractice—Physicians & Surgeons
 - Other Professional Health Care Malpractice
- Other PI/PD/WD (23)
 - Premises Liability (e.g., slip and fall)
 - Intentional Bodily Injury/PD/WD (e.g., assault, vandalism)
 - Intentional Infliction of Emotional Distress
 - Negligent Infliction of Emotional Distress
 - Other PI/PD/WD

Non-PI/PD/WD (Other) Tort

- Business Tort/Unfair Business Practice (07)
- Civil Rights (e.g., discrimination, false arrest) (*not civil harassment*) (08)
- Defamation (e.g., slander, libel) (13)
- Fraud (16)
- Intellectual Property (19)
- Professional Negligence (25)
 - Legal Malpractice
 - Other Professional Malpractice (*not medical or legal*)
- Other Non-PI/PD/WD Tort (35)

Employment

- Wrongful Termination (36)
- Other Employment (15)

Contract

- Breach of Contract/Warranty (06)
 - Breach of Rental/Lease Contract (*not unlawful detainer or wrongful eviction*)
- Contract/Warranty Breach—Seller Plaintiff (*not fraud or negligence*)
- Negligent Breach of Contract/Warranty
- Other Breach of Contract/Warranty
- Collections (e.g., money owed, open book accounts) (09)
 - Collection Case—Seller Plaintiff
 - Other Promissory Note/Collections Case
- Insurance Coverage (*not provisionally complex*) (18)
 - Auto Subrogation
 - Other Coverage
- Other Contract (37)
 - Contractual Fraud
 - Other Contract Dispute

Real Property

- Eminent Domain/Inverse Condemnation (14)
- Wrongful Eviction (33)
- Other Real Property (e.g., quiet title) (26)
 - Writ of Possession of Real Property
 - Mortgage Foreclosure
 - Quiet Title
 - Other Real Property (*not eminent domain, landlord/tenant, or foreclosure*)

Unlawful Detainer

- Commercial (31)
- Residential (32)
- Drugs (38) (*if the case involves illegal drugs, check this item; otherwise, report as Commercial or Residential*)

Judicial Review

- Asset Forfeiture (05)
- Petition Re: Arbitration Award (11)
- Writ of Mandate (02)
 - Writ—Administrative Mandamus
 - Writ—Mandamus on Limited Court Case Matter
 - Writ—Other Limited Court Case Review
- Other Judicial Review (39)
 - Review of Health Officer Order
 - Notice of Appeal—Labor Commissioner Appeals

Provisionally Complex Civil Litigation (Cal. Rules of Court Rules 3.400–3.403)

- Antitrust/Trade Regulation (03)
- Construction Defect (10)
- Claims Involving Mass Tort (40)
- Securities Litigation (28)
- Environmental/Toxic Tort (30)
- Insurance Coverage Claims (*arising from provisionally complex case type listed above*) (41)

Enforcement of Judgment

- Enforcement of Judgment (20)
 - Abstract of Judgment (Out of County)
 - Confession of Judgment (*non-domestic relations*)
 - Sister State Judgment
 - Administrative Agency Award (*not unpaid taxes*)
 - Petition/Certification of Entry of Judgment on Unpaid Taxes
 - Other Enforcement of Judgment Case

Miscellaneous Civil Complaint

- RICO (27)
- Other Complaint (*not specified above*) (42)
- Declaratory Relief Only
- Injunctive Relief Only (*non-harassment*)
- Mechanics Lien
- Other Commercial Complaint Case (*non-tort/non-complex*)
- Other Civil Complaint (*non-tort/non-complex*)

Miscellaneous Civil Petition

- Partnership and Corporate Governance (21)
- Other Petition (*not specified above*) (43)
 - Civil Harassment
 - Workplace Violence
 - Elder/Dependent Adult Abuse
 - Election Contest
 - Petition for Name Change
 - Petition for Relief from Late Claim
 - Other Civil Petition

SHORT TITLE: Sharp v. Writers' Group Film Corp.

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	2.
		<input type="checkbox"/> A7221 Asbestos - Personal Injury/Wrongful Death	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	1., 2., 4.
		<input type="checkbox"/> A7240 Other Professional Health Care Malpractice	1., 2., 4.
Other Personal Injury Property Damage Wrongful Death (23)	<input type="checkbox"/> A7250 Premises Liability (e.g., slip and fall)	1., 2., 4.	
	<input type="checkbox"/> A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.)	1., 2., 4.	
	<input type="checkbox"/> A7270 Intentional Infliction of Emotional Distress	1., 2., 3.	
	<input type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death	1., 2., 4.	
Business Tort (07)	<input type="checkbox"/> A6029 Other Commercial/Business Tort (not fraud/breach of contract)	1., 2., 3.	
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.	
Non-Personal Injury/Property Damage/Wrongful Death Tort	Fraud (16)	<input checked="" type="checkbox"/> A6013 Fraud (no contract)	1. (2), 3.

SHORT TITLE: Sharp v. Writers' Group Film Corp.	CASE NUMBER
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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	1., 2., 3.
	<input type="checkbox"/> A6050 Other Professional Malpractice (not medical or legal)	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.
	<input type="checkbox"/> A6024 Other Employment Complaint Case	1., 2., 3.
Other Employment (15)	<input type="checkbox"/> A6109 Labor Commissioner Appeals	10.

Breach of Contract/ Warranty (06) (not insurance)	<input type="checkbox"/> A6004 Breach of Rental/Lease Contract (not Unlawful Detainer or wrongful eviction)	2., 5.
	<input type="checkbox"/> A6008 Contract/Warranty Breach -Seller Plaintiff (no fraud/negligence)	2., 5.
	<input type="checkbox"/> A6019 Negligent Breach of Contract/Warranty (no fraud)	1., 2., 5.
	<input type="checkbox"/> A6028 Other Breach of Contract/Warranty (not fraud or negligence)	1., 2., 5.
Collections (09)	<input type="checkbox"/> A6002 Collections Case-Seller Plaintiff	2., 5., 6.
	<input type="checkbox"/> A6012 Other Promissory Note/Collections Case	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	1., 2., 3., 5.
	<input type="checkbox"/> A6031 Tortious Interference	1., 2., 3., 5.
	<input type="checkbox"/> A6027 Other Contract Dispute(not breach/insurance/fraud/negligence)	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	2., 6.
	<input type="checkbox"/> A6032 Quiet Title	2., 6.
	<input type="checkbox"/> A6060 Other Real Property (not eminent domain, landlord/tenant, foreclosure)	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.

SHORT TITLE: Sharp v. Writers' Group Film Corp.	CASE NUMBER
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	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Judicial Review (Cont'd.)	Writ of Mandate (02)	<input type="checkbox"/> A6151 Writ - Administrative Mandamus	2., 8.
		<input type="checkbox"/> A6152 Writ - Mandamus on Limited Court Case Matter	2.
		<input type="checkbox"/> A6153 Writ - Other Limited Court Case Review	2.
	Other Judicial Review (39)	<input type="checkbox"/> A6150 Other Writ / Judicial Review	2., 8.
Provisionally Complex Litigation	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	Enforcement of Judgment (20)	<input type="checkbox"/> A6141 Sister State Judgment	2., 9.
		<input type="checkbox"/> A6160 Abstract of Judgment	2., 6.
		<input type="checkbox"/> A6107 Confession of Judgment (non-domestic relations)	2., 9.
		<input type="checkbox"/> A6140 Administrative Agency Award (not unpaid taxes)	2., 8.
		<input type="checkbox"/> A6114 Petition/Certificate for Entry of Judgment on Unpaid Tax	2., 8.
		<input type="checkbox"/> A6112 Other Enforcement of Judgment Case	2., 8., 9.
Miscellaneous Civil Complaints	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	1., 2., 8.
		<input type="checkbox"/> A6040 Injunctive Relief Only (not domestic/harassment)	2., 8.
		<input type="checkbox"/> A6011 Other Commercial Complaint Case (non-tort/non-complex)	1., 2., 8.
<input type="checkbox"/> A6000 Other Civil Complaint (non-tort/non-complex)		1., 2., 8.	
Miscellaneous Civil Petitions	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	2., 3., 9.
		<input type="checkbox"/> A6123 Workplace Harassment	2., 3., 9.
		<input type="checkbox"/> A6124 Elder/Dependent Adult Abuse Case	2., 3., 9.
		<input type="checkbox"/> A6190 Election Contest	2.
		<input type="checkbox"/> A6110 Petition for Change of Name	2., 7.
		<input type="checkbox"/> A6170 Petition for Relief from Late Claim Law	2., 3., 4., 8.
<input type="checkbox"/> A6100 Other Civil Petition	2., 9.		

SHORT TITLE: Sharp v. Writers' Group Film Corp.

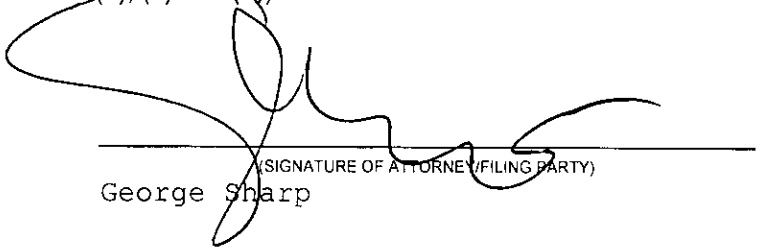
CASE NUMBER

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 type="checkbox"/> 6. <input type="checkbox"/> 7. <input type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10.			ADDRESS: 111 N. Hill Street
CITY: Los Angeles	STATE: CA	ZIP CODE: 90012	- Permissive filing in Central Under Category 2

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: May 16, 2011



(SIGNATURE OF ATTORNEY (FILING PARTY))
George Sharp

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.

TT/9T/5B