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**FILED**  
Superior Court of California  
County of Los Angeles

JUN 03 2015

96220  
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DEPT 93  
Sherril R. Carter, Executive Officer/Clerk  
Dawn Alexander Deputy  
Dawn Alexander  
(MON. HOWARD L. HALPERN)

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Attorneys for Plaintiffs

FSC: 11/16/2016 TRIAL: 12/05/2016 OSC: 06/04/2018

13 **LILLIAN CARTER, Individually and as the Personal**  
14 **Representative of the ESTATE OF TERRY CARTER,**  
15 **NEKAYA CARTER, CRYSTAL CARTER**

15 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

16 **FOR THE COUNTY OF LOS ANGELES - CENTRAL DISTRICT**

17 **LILLIAN CARTER, Individually and as )**  
18 **the Personal Representative of the )**  
19 **ESTATE OF TERRY CARTER, )**  
20 **NEKAYA CARTER, CRYSTAL )**  
21 **CARTER )**

*Plaintiffs,*

vs.

22 **UNIVERSAL STUDIOS, INC., )**  
23 **MARION "SUGE" KNIGHT, CLE )**  
24 **"BONE" SLOAN, ANDRE "DR. DRE" )**  
25 **YOUNG, O'SHEA "ICE CUBE" )**  
26 **JACKSON, SR., TOI LIN KELLY, )**  
27 **TAM'S BURGERS, PRETTYBIRD )**  
28 **PICTURES, INC, and DOES 1-100, )**  
**Inclusive, )**

*Defendants.*

Case No.: **BC588946**

**COMPLAINT FOR DAMAGES**  
(Personal Injury)

1. Wrongful Death/Negligence;
2. Negligence;
3. Negligent Entrustment;
4. Assault & Battery;
5. Negligent Hiring, Retention, and Supervision;
6. Premises Liability

**DEMAND FOR JURY TRIAL**

RECEIPT #: CCH481620091  
DATE PAID: 06/03/15 02:32 PM  
PAYMENT: \$435.00  
RECEIVED: 310  
CHECK: \$435.00  
CASH: \$0.00  
CHARGE: \$0.00  
CARD: \$0.00

CIT/CRSE: BC583946  
LEA/DEF#:

06/03/2015

1 COMES NOW the Plaintiff LILLIAN CARTER, Individually, and as the Personal  
2 Representative of the ESTATE OF TERRY CARTER, NEKAYA CARTER. and CRYSTAL  
3 CARTER for causes of action against UNIVERSAL STUDIOS, INC., MARION "SUGE" KNIGHT,  
4 CLE "BONE" SLOAN, ANDRE "DR. DRE" YOUNG, O'SHEA "ICE CUBE" JACKSON, SR.,  
5 TOILIN KELLY, TAM'S BURGERS, PRETTYBIRD PICTURES, INC., and DOES 1 through 100,  
6 inclusive and each of them, and complain and allege as follows:  
7

8 **INTRODUCTORY ALLEGATIONS**

9 1. At all times relevant to the acts and omissions alleged here Plaintiff LILLIAN  
10 CARTER ("Mrs. CARTER") was a resident of Los Angeles County, California and living in Los  
11 Angeles, California. Mrs. CARTER brings this action in both her individual capacity and as the  
12 Personal Representative of the ESTATE OF Terry Carter. Mrs. CARTER is the lawful wife of  
13 decedent Terry Carter, who was born February 18, 1959.

14 2. At all times relevant to the acts and omissions alleged here Plaintiff NEKAYA  
15 CARTER ("NEKAYA") was a resident of the County of Los Angeles County, California and living  
16 in Long Beach, California. NEKAYA is the natural daughter of Terry Carter.

17 3. At all times relevant to the acts and omissions alleged here Plaintiff CRYSTAL  
18 CARTER ("CRYSTAL") was a resident of the County of Los Angeles County, California and living  
19 in Marina Del Rey, California. CRYSTAL is the natural daughter of Terry Carter.

20 4. Plaintiffs are informed and believe, and on that basis allege, that at all relevant  
21 times mentioned here, Defendant UNIVERSAL STUDIOS, INC. ("UNIVERSAL"), was an  
22 individual, corporation, sole proprietorship, business, partnership, or some other business form,  
23 organized and existing under the laws of the State of Delaware, and doing business in Los Angeles  
24 County. UNIVERSAL is an American film studio, owned by Comcast, through its wholly owned  
25 subsidiary, NBCUniversal.

26 5. Plaintiffs are informed and believe, and on that basis allege, that at all relevant  
27 times mentioned here, Defendant MARION "SUGE" KNIGHT ("SUGE") was a resident of Los  
28 Angeles County.

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1           6.       Plaintiffs are informed and believe, and on that basis allege, that at all relevant  
2 times mentioned here, Defendant CLE SLOAN ("BONE") was a resident of Los Angeles County.

3           7.       Plaintiffs are informed and believe, and on that basis allege, that at all relevant  
4 times mentioned here, Defendant ANDRE YOUNG ("DR. DRE") was a resident of Los Angeles  
5 County.

6           8.       Plaintiffs are informed and believe, and on that basis allege, that at all relevant  
7 times mentioned here, Defendant O'SHEA JACKSON, SR., ("ICE CUBE") was a resident of Los  
8 Angeles County.

9           9.       Plaintiffs are informed and believe, and on that basis allege, that at all relevant  
10 times mentioned here, Defendant TOI LIN KELLY ("Ms. KELLY") was a resident of Los Angeles  
11 County. At all relevant times mentioned here, Ms. KELLY was the registered owner of a certain red  
12 Ford F-150 Raptor four-door truck, bearing California license plate number 93622M1 ("Vehicle 1").

13           10.       Plaintiffs are informed and believe, and on that basis allege, that at all relevant  
14 times mentioned here, Defendant TAM'S BURGER'S was a corporation, sole proprietorship,  
15 business, partnership, or some other business form, organized and existing under the laws of the State  
16 of California, and doing business in Los Angeles County, at 1201 East Rosecrans Blvd., Compton, CA.  
17 90220.

18           11.       Plaintiffs are informed and believe, and on that basis allege, that at all relevant  
19 times mentioned here, Defendant PRETTYBIRD PICTURES, INC. was an individual, corporation,  
20 sole proprietorship, business, partnership, or some other business form, organized and existing under  
21 the laws of the State of California, and doing business in Los Angeles County.

22           12.       Plaintiffs are unaware of the true names and capacities of those Defendants sued  
23 here as DOES 1 through 100, and therefore sues these Defendants using their fictitious names.  
24 Plaintiffs will amend this complaint to allege these Defendants' true names and capacities when that  
25 information becomes known. The Plaintiffs are informed and believe that due to the actions and/or  
26 failures to act of each of the Defendants, including DOES 1 through 100, each DOE Defendant is  
27 legally responsible and liable for the injuries, damages, or harms set forth here, and that each  
28 Defendant legally caused the injuries, damages and/or harms by reason of his/her negligent, careless,

1 reckless, intentional, willful and/or wanton misconduct, including creating and otherwise causing the  
2 conditions and circumstances described here, or by reason of direct or imputed negligence or vicarious  
3 fault or breach of duty arising out of the matters alleged.

4 13. The Plaintiffs are informed and believe that at all relevant times mentioned here,  
5 each of the Defendants and DOES 1 through 100 was the agent, servant, employee, joint venturer  
6 and/or co-conspirator of each of their co-Defendants, and each was, as such, acting within the course,  
7 scope and authority of that agency, employment and/or joint venture, and that each and every  
8 Defendant when acting as a principal, was negligent in the selection and hiring of each and every other  
9 Defendant as an agent, employee and/or joint venturer.

10  
11 **FACTS COMMON TO ALL COUNTS**

12 14. This lawsuit concerns the tragic tale of how reckless corporate greed, disguised  
13 as the quest for authenticity, lead to a foreseeable altercation that resulted in the death of a  
14 successful businessman named Terry Carter, and left his wife of 28 years, and his two daughters  
15 asking why his death ever had to occur.

16 15. Sometime before January 29, 2015, Defendants UNIVERSAL, DR. DRE, ICE  
17 CUBE, and DOES 1 - 20 decided to make a biographical drama film, *Straight Outta Compton*. Set  
18 for theatrical release in August 2015, the film revolves around the rise and fall of the seminal  
19 Compton rap group N.W.A., of which Defendants DR. DRE and ICE CUBE were founding  
20 members. Defendants DR. DRE and SUGE were close associates in the early 1990's when they  
21 came together to help form Death Row Records, turning the company into a powerful music record  
22 label in the early days of hip-hop music. Relations between the two men eventually soured, and  
23 DR. DRE eventually left the label years later. Indeed, at some point, DR. DRE went into court  
24 and obtained a Restraining Order against SUGE.

25 15. Plaintiffs are informed and believe, and on that basis allege, that on and before  
26 January 29, 2015, each of the Defendants UNIVERSAL, BONE, DR. DRE, ICE CUBE,  
27 PRETTYBIRD, and DOES 1 through 80 knew, or through the exercise of reasonable diligence  
28 should have known, of the long standing tensions that had existed over the years between DR.

1 DRE and SUGE. Moreover, each of the Defendants UNIVERSAL, BONE, DR. DRE, ICE CUBE,  
2 PRETTYBIRD, and DOES 1 through 80 knew, or through the exercise of reasonable diligence  
3 should have known, that SUGE was a violent individual, who has been arrested several times in  
4 the past and charged with violent crimes, who has many past associations with known gang  
5 members, who has himself been involved in several different shooting incidents where he, and  
6 others in his presence have been shot, and even killed.

7 16. Plaintiffs are informed and believe, and on that basis allege, that on and before  
8 January 29, 2015, each of the Defendants UNIVERSAL, BONE, DR. DRE, ICE CUBE,  
9 PRETTYBIRD, and DOES 1 through 80 knew, or through the exercise of reasonable diligence  
10 should have known, that the filming of *Straight Outta Compton* would take place in and around the  
11 streets of Southern California, and frequently in areas that were considered dangerous due to gang  
12 related criminal activity. Indeed, just seven days after filming began at the Compton Courthouse in  
13 August 2014, a drive-by shooting took place in front of the cast and crew members while they were  
14 on set. Despite that harrowing incident, filming continued in and around Compton.

15 17. Plaintiffs are informed and believe, and on that basis allege, that on and before  
16 January 29, 2015, each of the Defendants UNIVERSAL, BONE, DR. DRE, ICE CUBE,  
17 PRETTYBIRD, and DOES 1 through 80 knew, or through the exercise of reasonable diligence  
18 should have known, that Defendants SUGE and BONE had a more than 10-year history of ill will  
19 and harsh feelings against each other. Their animosity towards each other was discussed among  
20 Defendants UNIVERSAL, BONE, DR. DRE, ICE CUBE, PRETTYBIRD, and DOES 1 through  
21 80 and was a source of concern for the Defendants, given the storyline for *Straight Outta Compton*  
22 included SUGE's depictions and portrayal of his involvement in the creation of Death Row.  
23 Indeed, Plaintiffs are informed and believe, and on that basis allege, that on and before  
24 January 29, 2015, DR. DRE made it known on several occasions to each of the Defendants  
25 UNIVERSAL, BONE, ICE CUBE, PRETTYBIRD, and DOES 1 through 80 that he did not want  
26 SUGE near any movie set connected with the filming.

27 18. Plaintiffs are informed and believe, and on that basis allege, that on and before  
28 January 29, 2015, each of the Defendants UNIVERSAL, PRETTYBIRD, and DOES 1 through 80

1 hired BONE as a Technical Advisor, location assistant, and as part of the film's security team.  
2 BONE had worked for UNIVERSAL and DOES 1 - 40 in the past, including as a Technical  
3 Advisor for the film *Training Day*, which was also filmed in and around Los Angeles. In that  
4 capacity, BONE served as the agent of each of the Defendants UNIVERSAL, DR. DRE, ICE  
5 CUBE, PRETTYBIRD, and DOES 1 through 80. BONE's duties included, among other things,  
6 using funds provided by each of the above-referenced Defendants to recruit known gang members  
7 to serve as cast members and extras for the filming, as well as to provide security for on-location  
8 shooting in gang controlled neighborhoods. Each of the Defendants UNIVERSAL, DR. DRE,  
9 ICE CUBE, PRETTYBIRD, and DOES 1 through 80 knew, or through the exercise of reasonable  
10 diligence should have known that BONE recruited gang members to work as cast members and  
11 provide security to provide "authenticity" to the production.

12 19. Plaintiffs are informed and believe, and on that basis allege, that on and before  
13 January 29, 2015, each of the Defendants UNIVERSAL, BONE, DR. DRE, ICE CUBE,  
14 PRETTYBIRD, and DOES 1 through 80 knew, or through the exercise of reasonable diligence  
15 should have known, that SUGE objected to his violent depiction in the movie. Moreover, each of  
16 the Defendants UNIVERSAL, BONE, DR. DRE, ICE CUBE, PRETTYBIRD, and DOES 1  
17 through 80 knew, or through the exercise of reasonable diligence should have known, that SUGE  
18 was upset about the level of his financial participation in the film's proceeds, and wanted to speak  
19 with DR. DRE and/or ICE CUBE about his financial participation in the film..

20 20. Plaintiffs are informed and believe, and on that basis allege, that on or before  
21 January 29, 2015, the *Straight Outta Compton* cast and crew had set up a base camp at the  
22 Compton City Yard, located at 110 N. Bullis St. in Compton. From that location, the cast and crew  
23 would travel to various locations for filming. During the afternoon of January 29, 2015,  
24 Defendants UNIVERSAL, BONE, DR. DRE, ICE CUBE, PRETTYBIRD, and DOES 1 through  
25 80 traveled to Holiday Styles Barber Shop, located at 317 E. Compton Bl., Compton 90221 to film  
26 a commercial for the project. After the filming, the cast and crew broke for lunch and returned to  
27 the trailers at the base camp.

28 21. Plaintiffs are informed and believe, and on that basis allege, that on and

1 before January 29, 2015, Defendants UNIVERSAL, DR. DRE, ICE CUBE, PRETTYBIRD, and  
2 DOES 1 through 80 made it clear to BONE and other members of the security team that SUGE  
3 was not welcomed on the base camp grounds. Some time after Defendants UNIVERSAL, BONE,  
4 DR. DRE, ICE CUBE, PRETTYBIRD, and DOES 1 through 80 had returned to the base camp,  
5 SUGE pulled up into the camp driving a red Ford F-150 Raptor truck, which was then owned by  
6 Defendants KELLY, and DOES 81 through 100. Plaintiffs are informed and believe that SUGE  
7 was then an unlicensed driver, who had lost the privilege to drive legally on the California streets.  
8 Plaintiffs are informed and believe that SUGE wanted to talk with UNIVERSAL, DR. DRE, ICE  
9 CUBE, and DOES 1 through 70 about his depiction as well as his financial participation in the  
10 film, among other things.

11           22. Plaintiffs are informed and believe, and on that basis allege, that in response to a  
12 specific request from Defendants UNIVERSAL, DR. DRE, ICE CUBE, PRETTYBIRD, and  
13 DOES 1 through 80, BONE confronted SUGE while he was still seated in his truck, directing that  
14 he leave the base camp immediately. After a verbal altercation between the two men, SUGE drove  
15 his truck off the camp property.

16           23. Plaintiffs are informed and believe, and on that basis allege, that after the  
17 January 29, 2015 lunch break at the base camp, the Defendants UNIVERSAL, DR. DRE, ICE  
18 CUBE, PRETTYBIRD, and DOES 1 through 80 next planned to shoot scenes while traveling in a  
19 car along Parmalee Street between 133<sup>rd</sup> and 139<sup>th</sup> Streets.

20           24. Plaintiffs are informed and believe, and on that basis allege, that on and before  
21 January 29, 2015, each of the Defendants TAM'S, and DOES 91 through 100 knew, or through the  
22 exercise of reasonable diligence should have known, that the area surrounding the TAM'S Burgers  
23 restaurant, including the parking lot, was a dangerous area where all types of violent crimes  
24 regularly occurred. These Defendants knew, or through the exercise of reasonable diligence should  
25 have known, that the stationing of security guards at and around the parking lot of Defendant  
26 TAM's restaurant would deter any criminal activity from occurring and create a safe environment  
27 for anyone in and around the parking lot, including Terry Carter.

28           25. On or before January 29, 2015, Terry Carter was known to Defendants BONE,

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1 DR. DRE, ICE CUBE, and SUGE as a successful businessman, and a respected member of the  
2 Compton business community. He had developed a reputation as a unifier, who would often bring  
3 different community interests together for the greater good. Plaintiffs are informed and believe,  
4 and on that basis allege that on or about January 29, 2015, sometime after he was directed to leave  
5 the base camp, SUGE and Terry Carter arranged to meet at the parking lot of TAM's restaurant in  
6 an effort to reduce the tensions between SUGE and Defendants UNIVERSAL, DR. DRE, ICE  
7 CUBE and DOES 1 through 80.

8           26.       On or about January 29, 2015, at about 2:50 p.m. Defendant SUGE drove  
9 Vehicle 1 to an area at or near the TAM's restaurant parking lot, with the permission of Defendant  
10 Kelly and Does 81 - 90. Plaintiffs are informed and believe, and on that basis allege, that on and  
11 before January 29, 2015, each of the Defendants KELLY, and DOES 81 through 90 knew, or  
12 through the exercise of reasonable diligence should have known, that SUGE was a careless,  
13 reckless, violent, and negligent driver, who was prone to drive a vehicle in a careless, reckless,  
14 violent and negligent manner. Moreover, each of these Defendants knew, or through the exercise  
15 of reasonable diligence should have known, that SUGE had a custom, practice, and habit of  
16 breaking the law by driving Vehicle 1 though he did not possess a valid California driver's license.

17           27.       On or about January 29, 2015, at about 2:50 p.m, while SUGE and Terry Carter  
18 were speaking to each other at or near TAM's restaurant, BONE suddenly appeared at the scene  
19 and began continuing the fight with SUGE at the side of Vehicle 1 that had started back at the base  
20 camp. When Terry Carter stepped onto Tam's parking lot in an effort to stop the altercation  
21 between SUGE and BONE, SUGE carelessly, recklessly, violently, and negligently drove Vehicle  
22 1 towards BONE in a reckless and careless manner causing Vehicle 1 to strike Terry Carter and  
23 killing him.

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**FIRST CAUSE OF ACTION**

**- WRONGFUL DEATH / NEGLIGENCE -**

**(LILLIAN CARTER Individually and as the Personal Representative of the ESTATE OF  
TERRY CARTER, NEKAYA CARTER and CRYSTAL CARTER AGAINST  
DEFENDANTS UNIVERSAL, BONE, DR. DRE, ICE CUBE, KELLY, PRETTYBIRD,  
and DOES 1 through 80)**

28. The Plaintiffs incorporates by reference the allegations contained in paragraphs 1 through 27 above as if fully set forth here.

29. On or about January 29, 2015, at the time and place described above, each of the Defendants UNIVERSAL, BONE, DR. DRE, ICE CUBE, KELLY, PRETTYBIRD, and DOES 1 through 80 negligently, carelessly, recklessly and unintentionally committed the acts and failures to act as described above leading to a violent confrontation between SUGE and BONE, when they directed BONE to confront SUGE at the base camp, ordering SUGE to leave the location. The subsequent confrontation between toe two men at TAM's restaurant was a foreseeable result of the initial decision to order SUGE out of the camp.

30. As a legal result of the actions and failures to act by each of the Defendants UNIVERSAL, BONE, DR. DRE, ICE CUBE, KELLY, PRETTYBIRD, and DOES 1 through 80 as described above, Terry Carter was struck by Vehicle 1 and died.

31. As a further legal result of the actions and failures to act by each of the Defendants UNIVERSAL, BONE, DR. DRE, ICE CUBE, KELLY, PRETTYBIRD, and DOES 1 through 80 as described above, Mrs. CARTER, NEKAYA and CRYSTAL have each suffered the loss of the love, comfort, companionship, care, assistance, society, affection, protection, and moral and financial support of Terry Carter, all in an amount to be determined according to proof at trial.

32. As a further legal result of the actions and failures to act as described here, Mrs. CARTER has incurred burial and funeral expenses, all in an amount to be determined according to proof at trial.

33. As a further legal result of the actions and failures to act as described here, as the

1 Personal Representative to the ESTATE OF TERRY CARTER, Mrs. CARTER has suffered a loss  
2 of earnings in the past, as well as the loss of earning capacity in th future, all in an amount to be  
3 determined according to proof at trial.

4  
5 **SECOND CAUSE OF ACTION**

6 **- WRONGFUL DEATH / NEGLIGENCE -**

7 **(LILLIAN CARTER Individually and as the Personal Representative of the ESTATE OF**  
8 **TERRY CARTER, NEKAYA CARTER and CRYSTAL CARTER AGAINST**  
9 **DEFENDANTS SUGE, KELLY, and DOES 81 through 90)**

10 34. The Plaintiffs incorporate by reference the allegations contained in paragraphs 1  
11 through 33 above as if fully set forth here.

12 35. On or about January 29, 2015, at the time and place described above, each of  
13 the Defendants SUGE, KELLY and DOES 81 - 90 negligently, carelessly, recklessly, and  
14 unintentionally drove Vehicle 1 in such a reckless and unsafe manner as to cause Vehicle 1 to run  
15 over Terry Carter, thereby killing him.

16 36. Mr. Carter had done nothing to justify being run over by Vehicle 1. He had  
17 stepped out of his car and was trying to act as a peacemaker stopping the fight which was then  
18 occurring between SUGE and BONE. Plaintiffs are informed and believe, and on that basis allege  
19 that SUGE recklessly slammed down on the gas pedal in Vehicle 1 intending to speed his truck  
20 over BONE, who was then laying on the ground. As Vehicle 1 accelerated, the Plaintiffs are  
21 informed that SUGE lost control of Vehicle 1 causing it to slam into Terry Carter. SUGE's  
22 driving approach in a residential area with pedestrian's present was so reckless and careless that it  
23 justifies the imposition of punitive damages against SUGE and DOES 81 - 90.

24 36. As a further legal result of the actions and failures to act by each of the  
25 Defendants SUGE, KELLY, and DOES 81 through 90 as described above, Mrs. CARTER,  
26 NEKAYA and CRYSTAL have each suffered the loss of the love, comfort, companionship, care,  
27 assistance, society, affection, protection, and moral and financial support of Terry Carter, all in an  
28 amount to be determined according to proof at trial.

1 37. As a further legal result of the actions and failures to act as described here, Mrs.  
2 CARTER has incurred burial and funeral expenses, all in an amount to be determined according to  
3 proof at trial.

4 38. As a further legal result of the actions and failures to act as described here, as the  
5 Personal Representative to the ESTATE OF TERRY CARTER, Mrs. CARTER has suffered a loss  
6 of earnings in the past, as well as the loss of earning capacity in th future, all in an amount to be  
7 determined according to proof at trial.

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**THIRD CAUSE OF ACTION**

**- NEGLIGENT ENTRUSTMENT -**

**(LILLIAN CARTER Individually and as the Personal Representative of the ESTATE OF  
TERRY CARTER, NEKAYA CARTER and CRYSTAL CARTER AGAINST  
DEFENDANTS KELLY, and DOES 81 through 90)**

39. The Plaintiffs incorporate by reference the allegations contained in paragraphs 1 through 38 above as if fully set forth here.

40. On or about January 29, 2015, at the time and place described above, each of the Defendants KELLY and DOES 81 - 90, who owned Vehicle 1, negligently, carelessly, and recklessly entrusted that Ford F-150 truck to SUGE, leading to the actions, and failures to act as described above. On or before Vehicle 1 was entrusted to him, each of these Defendants knew, or through the exercise of reasonable diligence should have known, that SUGE had a custom, practice, and habit of breaking the law by driving Vehicle 1 though he did not possess a valid California driver's license.

41. As a legal result of the actions and failures to act by each of the Defendants KELLY, and DOES 81 through 90 as described above, Terry Carter was struck by Vehicle 1 and died.

42. As a further legal result of the actions and failures to act by each of the Defendants SUGE, KELLY, and DOES 81 through 90 as described above, Mrs. CARTER, NEKAYA and CRYSTAL have each suffered the loss of the love, comfort, companionship, care,

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1 assistance, society, affection, protection, and moral and financial support of Terry Carter, all in an  
2 amount to be determined according to proof at trial.

3 43. As a further legal result of the actions and failures to act as described here, Mrs.  
4 CARTER has incurred burial and funeral expenses, all in an amount to be determined according to  
5 proof at trial.

6 44. As a further legal result of the actions and failures to act as described here, as the  
7 Personal Representative to the ESTATE OF TERRY CARTER, Mrs. CARTER has suffered a loss  
8 of earnings in the past, as well as the loss of earning capacity in th future, all in an amount to be  
9 determined according to proof at trial.

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11 **FOURTH CAUSE OF ACTION**

12 **- ASSAULT & BATTERY -**

13 **(LILLIAN CARTER Individually and as the Personal Representative of the ESTATE OF**  
14 **TERRY CARTER, NEKAYA CARTER and CRYSTAL CARTER AGAINST**  
15 **DEFENDANTS SUGE, and DOES 81 through 90)**

16 45. The Plaintiffs incorporate by reference the allegations contained in paragraphs 1  
17 through 44 above as if fully set forth here.

18 46. As an alternative theory of liability, on or about January 29, 2015, at the time  
19 and place described above, each of the Defendants SUGE, and DOES 81 - 90 intentionally,  
20 maliciously, and wrongfully drove directly at Vehicle 1 at Terry Carter.

21 47. As a legal result of the actions and failures to act by each of the Defendants  
22 KELLY, and DOES 81 through 90 as described above, Terry Carter was struck by Vehicle 1 and  
23 died.

24 48. As a further legal result of the actions and failures to act by each of the  
25 Defendants SUGE, KELLY, and DOES 81 through 90 as described above, Mrs. CARTER,  
26 NEKAYA and CRYSTAL have each suffered the loss of the love, comfort, companionship, care,  
27 assistance, society, affection, protection, and moral and financial support of Terry Carter, all in an  
28 amount to be determined according to proof at trial.

1            49.      As a further legal result of the actions and failures to act as described here, Mrs.  
2 CARTER has incurred burial and funeral expenses, all in an amount to be determined according to  
3 proof at trial.

4            50.      As a further legal result of the actions and failures to act as described here, as the  
5 Personal Representative to the ESTATE OF TERRY CARTER, Mrs. CARTER has suffered a loss  
6 of earnings in the past, as well as the loss of earning capacity in th future, all in an amount to be  
7 determined according to proof at trial.

8            51.      Mr. Carter did nothing to justify being run over by Vehicle 1. He had stepped  
9 out of his car and was trying to act as a peacemaker stopping the fight which was then occurring  
10 between SUGE and BONE. Plaintiffs are informed and believe, and on that basis allege that  
11 SUGE recklessly slammed down on the gas pedal in Vehicle 1 intending to speed his truck over  
12 Carter for no reason whatsoever. As Vehicle 1 accelerated, the Plaintiffs are informed that SUGE  
13 lost control of Vehicle 1 causing it to slam into Terry Carter. Mr. Carter did not die immediately,  
14 but lived for a period of time, before succumbing to his wounds. SUGE's decision to run Terry  
15 Carter down was malicious and oppressive, justifying the imposition of punitive damages against  
16 Defendants SUGE and DOES 81 - 90.

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**FIFTH CAUSE OF ACTION**

**- NEGLIGENT HIRING, RETENTION, and SUPERVISION -**

**(LILLIAN CARTER Individually and as the Personal Representative of the ESTATE OF  
TERRY CARTER, NEKAYA CARTER and CRYSTAL CARTER AGAINST  
DEFENDANTS UNIVERSAL, PRETTYBIRD, and DOES 71 through 80)**

52.      The Plaintiffs incorporates by reference the allegations contained in paragraphs 1  
through 51 above as if fully set forth here.

52.      On or before January 29, 2015, each of the Defendants UNIVERSAL,  
PRETTYBIRD, and DOES 71 through 80, negligently, carelessly, and without exercising  
adequate care, hired, retained, and supervised BONE to work, among other things, as a Technical  
Adviser, casting recruiter for gang members, location scout manager, and as part of the

06/03/2015

1 production's security team for the film *Straight Outta Compton*.

2 53. Plaintiffs are informed and believe, and on that basis allege, that on and before  
3 January 29, 2015, each of the Defendants UNIVERSAL, PRETTYBIRD, and DOES 71 through  
4 80 knew, or through the exercise of reasonable diligence should have known, of the long standing  
5 tensions that had existed over the years between DR. DRE and SUGE. Moreover, each of the  
6 Defendants UNIVERSAL, PRETTYBIRD, and DOES 71 through 80 knew, or through the  
7 exercise of reasonable diligence should have known, that SUGE was a violent individual, who has  
8 been arrested several times in the past and charged with violent crimes, who has many past  
9 associations with known gang members, who has himself been involved in several different  
10 shooting incidents where he, and others in his presence have been shot, and even killed.

11 54. Plaintiffs are informed and believe, and on that basis allege, that on and before  
12 January 29, 2015, each of the Defendants UNIVERSAL, PRETTYBIRD, and DOES 71 through 80  
13 knew, or through the exercise of reasonable diligence should have known, that there was a  
14 likelihood of some sort of violent confrontation between SUGE and BONE would occur if they  
15 were ever allowed to confront each other, and that such an encounter could become violent and  
16 lead to damages and injuries to members of the public, including Terry Carter.

17 55. As a legal result of the actions and failures to act by each of the Defendants  
18 UNIVERSAL, PRETTYBIRD, and DOES 71 through 80 as described above, Terry Carter was  
19 struck by Vehicle 1 and died.

20 56. As a further legal result of the actions and failures to act by each of the  
21 Defendants SUGE, KELLY, and DOES 81 through 90 as described above, Mrs. CARTER,  
22 NEKAYA and CRYSTAL have each suffered the loss of the love, comfort, companionship, care,  
23 assistance, society, affection, protection, and moral and financial support of Terry Carter, all in an  
24 amount to be determined according to proof at trial.

25 57. As a further legal result of the actions and failures to act as described here, Mrs.  
26 CARTER has incurred burial and funeral expenses, all in an amount to be determined according to  
27 proof at trial.

28 58. As a further legal result of the actions and failures to act as described here, as the

1 Personal Representative to the ESTATE OF TERRY CARTER, Mrs. CARTER has suffered a loss  
2 of earnings in the past, as well as the loss of earning capacity in th future, all in an amount to be  
3 determined according to proof at trial.

4 59. Mr. Carter did nothing to justify being run over by Vehicle 1. He had  
5 stepped out of his car and was trying to act as a peacemaker stopping the fight which was then  
6 occurring between SUGE and BONE. Plaintiffs are informed and believe, and on that basis allege  
7 that SUGE recklessly slammed down on the gas pedal in Vehicle 1 intending to speed his truck  
8 over Carter for no reason whatsoever. As Vehicle 1 accelerated, the Plaintiffs are informed that  
9 SUGE lost control of Vehicle 1 causing it to slam into Terry Carter. SUGE's decision to run  
10 Terry Carter down was malicious and oppressive, justifying May 24, 2015 the imposition of  
11 punitive damages against SUGE and DOES 81 - 90.

12  
13 **FIFTH CAUSE OF ACTION**

14 **- PREMISES LIABILITY -**

15 **(LILLIAN CARTER Individually and as the Personal Representative of the ESTATE OF**  
16 **TERRY CARTER, NEKAYA CARTER and CRYSTAL CARTER AGAINST**  
17 **DEFENDANTS TAM'S and DOES 91 through 100)**

18 60. The Plaintiffs incorporates by reference the allegations contained in paragraphs 1  
19 through 51 above as if fully set forth here.

20 61. On or before January 29, 2015, each of the Defendants TAM'S and DOES 91  
21 through 100 owned the property located at 1201 W. Rosecrans Ave., Compton, CA 90220 where  
22 TAM's Burger restaurant was positioned.

23 62. At all relevant times mentioned here, each of the Defendants TAM's and DOES  
24 91 through 100 knew or through the exercise of reasonable diligence should have known that the  
25 surrounding area was a high crime area where frequent fights, altercations, and other acts of  
26 violence regularly occurred. Each of the Defendants knew, or through the exercise of reasonable  
27 diligence should have known that the employment of aremd security guards in and around the  
28 parking lot would create a far safe customer experience. The Defendants' failure to hire armed

1 security guards created a dangerous condition on the subject property.

2 63. As a legal result of the actions and failures to act as described here, the absence  
3 off an armed security guard, a fight occurred on the subject property between SUGE and BONE,  
4 which would not have occurred had an armed guard be positioned in TAM'S parking lot.

5 64. As a further legal result of the actions and failures to act by each of the  
6 Defendants TAM'S, and DOES 91 through 100 as described above, Terry Carter was struck by  
7 Vehicle 1 and died.

8 65. As a further legal result of the actions and failures to act by each of the  
9 Defendants TAM'S and DOES 91 through 100 as described above, Mrs. CARTER, NEKAYA  
10 and CRYSTAL have each suffered the loss of the love, comfort, companionship, care, assistance,  
11 society, affection, protection, and moral and financial support of Terry Carter, all in an amount to  
12 be determined according to proof at trial.

13 66. As a further legal result of the actions and failures to act as described here, Mrs.  
14 CARTER has incurred burial and funeral expenses, all in an amount to be determined according to  
15 proof at trial.

16 67. As a further legal result of the actions and failures to act as described here, as the  
17 Personal Representative to the ESTATE OF TERRY CARTER, Mrs. CARTER has suffered a loss  
18 of earnings in the past, as well as the loss of earning capacity in th future, all in an amount to be  
19 determined according to proof at trial.

20  
21 **WHEREFORE**, the Plaintiffs pray for judgment as follows:

- 22 1. For the loss of the love, comfort, companionship, care, assistance, society,  
23 affection, protection, and moral and financial support of Terry Carter, all in an  
24 amount to be determined according to proof at trial;
- 25 2. For funeral and burial expenses in an amount to be determined according to  
26 proof at trial;
- 27 3. For loss of past and future wages and earning capacity in an amount to be  
28 determined according to proof at trial;



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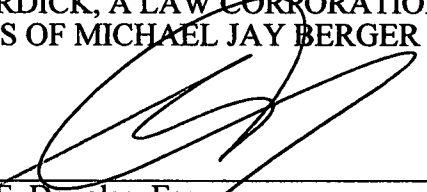
- 4. For punitive damages where appropriate;
- 5. For costs of suit incurred here; and
- 6. For such other and further relief as the Court deems just and proper.

Respectfully submitted,

DATED: June 2, 2015

DOUGLAS / HICKS LAW  
GARY A. DORDICK, A LAW CORPORATION  
LAW OFFICES OF MICHAEL JAY BERGER

By:



---

Carl E. Douglas, Esq.  
Gary A. Dordick, Esq.  
Michael Jay Berger, Esq.  
Attorneys for Plaintiffs

06 / 03 / 2015

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):  
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FOR COURT USE ONLY  
**FILED**  
Superior Court of California  
County of Los Angeles  
JUN 03 2015  
Sherri R. Carter, Executive Officer/Clerk  
By Dawn Alexander Deputy  
Dawn Alexander

ATTORNEY FOR (Name): Plaintiffs  
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 District

CASE NAME: CARTER, et al., vs. UNIVERSAL STUDIOS, INC., et al.,

**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: **BC583946**  
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:
- |   |  |  |
|---|--|--|
| <b>Auto Tort</b><br><input type="checkbox"/> Auto (22)<br><input type="checkbox"/> Uninsured motorist (46)<br><b>Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort</b><br><input type="checkbox"/> Asbestos (04)<br><input type="checkbox"/> Product liability (24)<br><input type="checkbox"/> Medical malpractice (45)<br><input checked="" type="checkbox"/> Other PI/PD/WD (23)<br><b>Non-PI/PD/WD (Other) Tort</b><br><input type="checkbox"/> Business tort/unfair business practice (07)<br><input type="checkbox"/> Civil rights (08)<br><input type="checkbox"/> Defamation (13)<br><input type="checkbox"/> Fraud (16)<br><input type="checkbox"/> Intellectual property (19)<br><input type="checkbox"/> Professional negligence (25)<br><input type="checkbox"/> Other non-PI/PD/WD tort (35)<br><b>Employment</b><br><input type="checkbox"/> Wrongful termination (36)<br><input type="checkbox"/> Other employment (15) | <b>Contract</b><br><input type="checkbox"/> Breach of contract/warranty (06)<br><input type="checkbox"/> Rule 3.740 collections (09)<br><input type="checkbox"/> Other collections (09)<br><input type="checkbox"/> Insurance coverage (18)<br><input type="checkbox"/> Other contract (37)<br><b>Real Property</b><br><input type="checkbox"/> Eminent domain/Inverse condemnation (14)<br><input type="checkbox"/> Wrongful eviction (33)<br><input type="checkbox"/> Other real property (26)<br><b>Unlawful Detainer</b><br><input type="checkbox"/> Commercial (31)<br><input type="checkbox"/> Residential (32)<br><input type="checkbox"/> Drugs (38)<br><b>Judicial Review</b><br><input type="checkbox"/> Asset forfeiture (05)<br><input type="checkbox"/> Petition re: arbitration award (11)<br><input type="checkbox"/> Writ of mandate (02)<br><input type="checkbox"/> Other judicial review (39) | <b>Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403)</b><br><input type="checkbox"/> Antitrust/Trade regulation (03)<br><input type="checkbox"/> Construction defect (10)<br><input type="checkbox"/> Mass tort (40)<br><input type="checkbox"/> Securities litigation (28)<br><input type="checkbox"/> Environmental/Toxic tort (30)<br><input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41)<br><b>Enforcement of Judgment</b><br><input type="checkbox"/> Enforcement of judgment (20)<br><b>Miscellaneous Civil Complaint</b><br><input type="checkbox"/> RICO (27)<br><input type="checkbox"/> Other complaint (not specified above) (42)<br><b>Miscellaneous Civil Petition</b><br><input type="checkbox"/> Partnership and corporate governance (21)<br><input type="checkbox"/> 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. <input type="checkbox"/> Large number of separately represented parties   | d. <input type="checkbox"/> Large number of witnesses  |
| b. <input type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve | e. <input type="checkbox"/> Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court |
| c. <input type="checkbox"/> Substantial amount of documentary evidence   | f. <input type="checkbox"/> 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): 6

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: June 2, 2015  
Gary A. Dordick, Esq. (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.

**INSTRUCTIONS ON HOW TO COMPLETE THE COVER SHEET**

**CM-010**

**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

**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

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

**This form is required pursuant to 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<sup>7-10</sup>  HOURS/  DAYS

**Item II.** Indicate 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 Local Rule 2.0.

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

- |  |  |
|--|--|
| 1. Class actions must be filed in the Stanley Mosk 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.

	<b>A</b> Civil Case Cover Sheet Category No.	<b>B</b> Type of Action (Check only one)	<b>C</b> 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., 4. 1., 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 checked="" type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death	1., 4. 1., 4. 1., 3. 1., 4.

SHORT TITLE: CARTER, et al., vs. UNIVERSAL STUDIOS, INC., et al.,

CASE NUMBER

	<b>A</b> Civil Case Cover Sheet Category No.	<b>B</b> Type of Action (Check only one)	<b>C</b> Applicable Reasons - See Step 3 Above
Non-Personal Injury/ Property Damage/ Wrongful Death Tort	Business Tort (07)	<input type="checkbox"/> A6029 Other Commercial/Business Tort (not fraud/breach of contract)	1., 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.
	Fraud (16)	<input type="checkbox"/> A6013 Fraud (no contract)	1., 2., 3.
	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.
Employment	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.
Contract	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.
Real Property	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 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- Post-Foreclosure (34)	<input type="checkbox"/> A6020F Unlawful Detainer-Post-Foreclosure	2., 6.	
Unlawful Detainer-Drugs (38)	<input type="checkbox"/> A6022 Unlawful Detainer-Drugs	2., 6.	

SHORT TITLE: CARTER, et al., vs. UNIVERSAL STUDIOS, INC., et al.,

CASE NUMBER

<b>A</b> Civil Case Cover Sheet Category No.	<b>B</b> Type of Action (Check only one)	<b>C</b> Applicable Reasons - See Step 3 Above
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.
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.

Judicial Review

Provisionally Complex Litigation

Enforcement of Judgment

Miscellaneous Civil Complaints

Miscellaneous Civil Petitions

SHORT TITLE: CARTER, et al., vs. UNIVERSAL STUDIOS,  
INC., et al.,

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 appropriate boxes for the numbers shown under Column C for the type of action that you have selected for this case.

1.  2.  3.  4.  5.  6.  7.  8.  9.  10.

ADDRESS: 1201 East Rosecrans Boulevard

CITY:

Compton

STATE:

Ca

ZIP CODE:

90220

**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 Los Angeles courthouse in the Central District of the Superior Court of California, County of Los Angeles [Code Civ. Proc., § 392 et seq., and Local Rule 2.0, subds. (b), (c) and (d)].

Dated: June 2, 2015

(SIGNATURE OF ATTORNEY/FILING PARTY)

GARY A. DORDICK, ESQ.

**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, Judicial Council form CM-010.
4. Civil Case Cover Sheet Addendum and Statement of Location form, LACIV 109, LASC Approved 03-04 (Rev. 03/11).
5. Payment in full of the filing fee, unless fees have been waived.
6. A signed order appointing the Guardian ad Litem, Judicial Council form CIV-010, if the plaintiff or petitioner is a minor under 18 years of age will be required by Court in order to issue a summons.
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.

06/03/20