

SUMMONS (CITACION JUDICIAL)

NOTICE TO DEFENDANT: GRAPHIC PACKAGING INTERNATIONAL, LLC
(AVISO AL DEMANDADO):, a Delaware limited liability company, and DOES 1 through 10, inclusive

YOU ARE BEING SUED BY PLAINTIFF: ROBERT LAWSON, on behalf
(LO ESTÁ DEMANDANDO EL DEMANDANTE): of himself and all
"aggrieved employees" pursuant to Labor Code § 2698 et seq.

FOR COURT USE ONLY (SOLO PARA USO DE LA CORTE)	
FILED	FILED
Superior Court of California County of Butte	
9/29/2020	
By	Deputy
Kimberly Flener, Clerk Electronically FILED	

NOTICE! You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), or by contacting your local court or county bar association. **NOTE:** The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case. **¡AVISO!** Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información a continuación.

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California, (www.sucorte.ca.gov) o poniéndose en contacto con la corte o el colegio de abogados locales. **AVISO:** Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 ó más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desechar el caso.

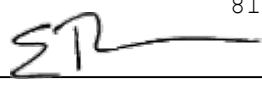
The name and address of the court is:
(El nombre y dirección de la corte es):
Superior Court of California, County of Butte
1775 Concord Avenue
Chico, California 95928

CASE NUMBER: 20CV01921
(Número del Caso):

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is: Alex P. Katofsky, Esq.
(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):

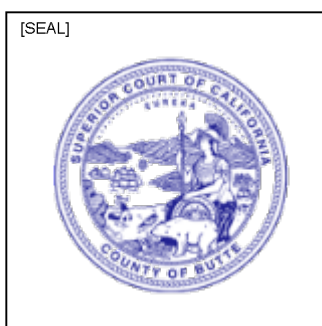
Gaines & Gaines, APLC
27200 Agoura Road, Suite 101, Calabasas, CA 91301

818-703-8985

DATE: 9/29/2020 Clerk, by Kimberly Flener (Secretario)  Deputy (Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)

(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010)).



NOTICE TO THE PERSON SERVED: You are served

- ☐ as an individual defendant.
- ☐ as the person sued under the fictitious name of (specify):
- ☐ on behalf of (specify):

under: ☐ CCP 416.10 (corporation)	☐ CCP 416.60 (minor)
☐ CCP 416.20 (defunct corporation)	☐ CCP 416.70 (conservatee)
☐ CCP 416.40 (association or partnership)	☐ CCP 416.90 (authorized person)
☐ other (specify):	
- ☐ by personal delivery on (date):

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

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

- Date: 9/29/2020

Alex P. Katofsky
(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

- 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

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



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Telephone: (818) 703-8985
Facsimile: (818) 703-8984

Attorneys for Plaintiff Robert Lawson, on behalf of himself and all “aggrieved employees” pursuant to Labor Code § 2698 *et seq.*

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF BUTTE**

ROBERT LAWSON, on behalf of himself and
all “aggrieved employees” pursuant to Labor
Code § 2698 *et seq.*,

Plaintiff,

v.

GRAPHIC PACKAGING
INTERNATIONAL, LLC, a Delaware limited
liability company, and DOES 1 through 10,
inclusive,

Defendants.

CASE NO: **20CV01921**

**REPRESENTATIVE ACTION
COMPLAINT FOR PENALTIES
PURSUANT TO LABOR CODE § 2699(f)
FOR VIOLATIONS OF LABOR CODE
§§ 201, 202, 226(a), 226.7, 510, 512, 1194,
AND 2802 AND PURSUANT TO LABOR
CODE § 2699(a) FOR VIOLATIONS OF
LABOR CODE §§ 226.3 AND 558**

Plaintiff ROBERT LAWSON (“Plaintiff”), on behalf of himself and others as an “aggrieved employee” under the Labor Code Private Attorneys General Act of 2004, complains of GRAPHIC PACKAGING INTERNATIONAL, LLC, a Delaware limited liability company, and/or any subsidiaries or affiliated companies (hereinafter referred to as “Defendants”), as follows:

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I.

INTRODUCTION AND FACTUAL BACKGROUND

1. This is a Representative Action, pursuant to Labor Code § 2698 *et seq.*, on behalf of Plaintiff and other California employees not covered by and subject to any collective bargaining agreement who currently work or formerly worked for Defendants (“Aggrieved Employees”).

2. For at least one (1) year prior to the filing of this action and at least one (1) year prior to the date Plaintiff began the process of exhausting the administrative requirements, pursuant to Labor Code § 2698 *et seq.*, and continuing to the present (the “liability period”), Defendants have had consistent policies of:

a. Failing to pay Plaintiff and non-exempt Aggrieved Employees all minimum and overtime wages earned during the course of employment, in violation of Labor Code §§ 510, 558 and 1194. Plaintiff and other non-exempt Aggrieved Employees were required to work off-the-clock after they had clocked out for the day. They were required to attend meetings and also clean their tools, all after clocking out from their shift and without pay;

b. Failing to pay premium wages to Plaintiff and other non-exempt Aggrieved Employees who were denied rest periods, in violation of Labor Code §§ 226.7 and 558 and IWC Wage Order 4-2001. Plaintiff and non-exempt Aggrieved Employees were routinely not authorized and unable to take an off-duty, 10-minute rest period for every four (4) hours of work or major fraction thereof, but were not paid premium wages of one hour’s pay for each missed rest period. When rest periods were provided, Plaintiff and non-exempt Aggrieved Employees were not permitted to leave the work premises and were also required to carry a two-way radio to which they had to be alert and respond to, resulting in impermissible on-duty rest periods. This violates Labor Code §§ 226.7 and 558 and IWC Wage Order No. 4-2001;

c. Failing to pay premium wages to Plaintiff and non-exempt Aggrieved Employees who were denied proper meal periods, in violation of Labor Code §§ 226.7, 510, 512, 558 and 1194 and IWC Wage Order 4-2001. Plaintiff and non-exempt Aggrieved Employees were routinely denied, and not authorized to take, a timely, uninterrupted, 30-minute meal period for every shift worked that exceeded five hours in duration, or a second timely, uninterrupted, 30-minute meal

1 period for every shift worked that exceeded ten hours in duration, but were not paid premium wages
2 of one hour's pay for each missed first or second meal period. When meal periods were provided,
3 Plaintiff and non-exempt Aggrieved Employees were not permitted to leave the work premises and
4 were also required to carry a two-way radio to which they had to be alert and respond to, resulting in
5 on-duty meal periods. This violates Labor Code §§ 226.7, 510, 512, 558 and 1194 and IWC Wage
6 Order 4-2001;

7 d. Failing to reimburse all business-related expenses to Plaintiff and other
8 Aggrieved Employees, in violation of Labor Code § 2802. Plaintiff and Aggrieved Employees were
9 required to use their personal cellular phones and computers as part of their work tasks for Defendants,
10 but were not fully reimbursed by Defendants for these expenses. This practice violates Labor Code §
11 2802;

12 e. Failing to provide Plaintiff and non-exempt Aggrieved Employees with wage
13 statements that fully and accurately itemized the requirements set forth in Labor Code § 226(a).
14 Plaintiff and other non-exempt Aggrieved Employees were not paid all wages due, including all
15 minimum and overtime wages and premium wages for unauthorized and denied meal and rest periods,
16 as stated above. As such, the wage statements provided by Defendants failed to accurately state all
17 gross wages earned, in violation of Labor Code §§ 226(a)(1) and 226.3, and net wages earned, in
18 violation of Labor Code §§ 226(a)(5) and 226.3. Separately, the wage statements issued to Plaintiff
19 and Aggrieved Employees failed to list the correct name of the employing entity, in violation of Labor
20 Code §§ 226(a)(8) and 226.3; and

21 f. Failing to timely pay Plaintiff and certain non-exempt Aggrieved Employees
22 all wages due at the separation of their employment based on the time frames required by Labor Code
23 §§ 201 and 202. As stated above, Plaintiff and non-exempt Aggrieved Employees were not paid all
24 wages due during the course of their employment and, as a result of this failure, they were not timely
25 paid all wages due at the separation of their employment. This violates Labor Code §§ 201-202 and is
26 alleged on behalf of Plaintiff and other non-exempt Aggrieved Employees who have ended their
27 employment with Defendants.

3. Plaintiff, on behalf of himself and all Aggrieved Employees pursuant to Labor Code § 2698 *et seq.*, seeks civil penalties for Defendants' violations of the California Labor Code.

4. Venue is proper in this judicial district, pursuant to Code of Civil Procedure § 395. The Labor Code violations alleged against Defendants herein arose in Butte County, California.

II.

PARTIES

A. Plaintiff

5. Plaintiff ROBERT LAWSON was employed by Defendants from March 2017 through May 2020 as a non-exempt, non-unionized employee in Butte County, California.

B. Defendant

6. Defendant GRAPHIC PACKAGING INTERNATIONAL, LLC, is a Delaware limited liability company. Defendant GRAPHIC PACKAGING INTERNATIONAL, LLC, employed Plaintiff and Aggrieved Employees throughout the State of California, including Butte County, California.

7. The true names and capacities, whether individual, corporate, associate, or otherwise, of Defendants sued herein as DOES 1 to 10, inclusive, are currently unknown to Plaintiff, who therefore sues Defendants by such fictitious names under Code of Civil Procedure § 474. Plaintiff is informed and believes, and based thereon alleges, that each of the Defendants designated herein as a DOE is legally responsible in some manner for the unlawful acts referred to herein. Plaintiff will seek leave of court to amend this Complaint to reflect the true names and capacities of the Defendants designated hereinafter as DOES when such identities become known.

8. Plaintiff is informed and believes, and based thereon alleges, that each Defendant acted in all respects pertinent to this action as the agent of the other Defendant, carried out a joint scheme, business plan or policy in all respects pertinent hereto, and the acts of each Defendant is legally attributable to the other Defendants.

9. The Defendants named herein as DOE 1 through DOE 10 are and were persons acting on behalf of, or acting jointly with, Defendants, who violated, or caused to be violated, one or more provisions of the California Labor Code as alleged herein.

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III.

CAUSES OF ACTION

FIRST CAUSE OF ACTION

**PLAINTIFF AND ALL AGGRIEVED EMPLOYEES AGAINST ALL DEFENDANTS
PENALTIES PURSUANT TO LABOR CODE § 2699(f) FOR VIOLATIONS OF LABOR
CODE §§ 201, 202, 226(a), 226.7, 510, 512, 1194, AND 2802 AND PURSUANT TO LABOR
CODE § 2699(a) FOR VIOLATIONS OF LABOR CODE §§ 226.3 AND 558**

10. Plaintiff incorporates paragraphs 1 through 9 of this Complaint as though fully set forth herein.

11. As a result of the acts alleged above, including the Labor Code violations set forth in paragraph 2 above, Plaintiff seeks civil penalties pursuant to Labor Code §§ 2698 *et seq.*

12. For each such violation, Plaintiff and all other Aggrieved Employees are entitled to penalties and other relief in an amount to be shown at the time of trial subject to the following formula:

a. Pursuant to Labor Code § 2699(f), \$100 for each initial violation and \$200 for each subsequent violation of Labor Code §§ 201, 202, 226(a), 226.7, 510, 512, 1194, and 2802; and

b. Pursuant to Labor Code § 2699(f), the penalties as authorized by Labor Code §§ 226.3 and 558.

13. Civil penalties recovered will be allocated 75% to the Labor and Workforce Development Agency, and 25% to the affected employees.

14. On July 22, 2020, Plaintiff sent a letter, by online submission to the LWDA and by certified mail, return receipt requested, to Defendants setting forth the facts and theories of the violations alleged against Defendant, as prescribed by Labor Code § 2698 *et seq.* Pursuant to Labor Code § 2699.3(a)(2)(A), no notice was received by Plaintiff from the LWDA within sixty-five (65) calendar days of July 22, 2020. Plaintiff may therefore commence this action to seek civil penalties pursuant to Labor Code § 2698 *et seq.*

Wherefore, Plaintiff and the Aggrieved Employees he seeks to represent request relief as described below.

1 IV.

2 **RELIEF REQUESTED**

3 WHEREFORE, Plaintiff prays for the following relief:

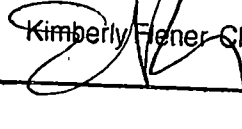
- 4 1. For civil penalties pursuant to Labor Code § 2698 *et seq.* for Plaintiff and all other
5 Aggrieved Employees;
- 6 2. An award providing for payment of costs of suit pursuant to Labor Code § 2699(g)(1)
7 and other applicable law;
- 8 3. An award of attorneys' fees pursuant to Labor Code § 2699(g)(1) and other applicable
9 law; and
- 10 4. Such other and further relief as this Court may deem just and proper.

11 Dated: September 29, 2020

Respectfully submitted,

12 GAINES & GAINES
13 A Professional Law Corporation

14 By: Daniel F. Gaines
15 DANIEL F. GAINES
16 MIRIAM S. SCHIMMEL
17 Attorneys for Plaintiff
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ATTORNEY OR PARTY WITHOUT ATTORNEY (Name & Address): TELEPHONE NO:		FOR COURT USE ONLY	
ATTORNEY FOR (Name):		Superior Court of California County of Butte SEP 29 2020 Kimberly Flener, Clerk By  Deputy	
SUPERIOR COURT OF CALIFORNIA, COUNTY OF BUTTE ☐ Butte County Courthouse One Court Street, Oroville, CA 95965 (530) 532-7002			
☒ North Butte County Courthouse 1775 Concord Avenue, Chico, CA 95928 (530) 532-7009			
PLAINTIFF(S): ROBERT LAWSON			
DEFENDANT (S): GRAPHIC PACKAGING INTERNATIONAL, LLC			
NOTICE OF ASSIGNMENT & CASE MANAGEMENT CONFERENCE		CASE NUMBER: 20CV01921	

1. NOTICE is given of Assignment of the above entitled case for all purposes to Judge **Robert A Glusman**.

2. NOTICE is given that the Case Management Conference is scheduled as follows:

Date: **April 07, 2021**

Time: **10:30 A.M.**

Court Facility: ☒ CHICO (1775 CONCORD AVE, CHICO)

PLAINTIFF/CROSS COMPLAINANT MUST SERVE THIS NOTICE WITH SUMMONS AND COMPLAINT/CROSS COMPLAINT

3. You **must** file and serve a completed Case Management Statement at least fifteen days before the conference.
4. You **must** be familiar with the case and be fully prepared to participate effectively in the Case Management Conference by personal or telephonic appearance. (Telephonic appearances are arranged by calling Court Call at 1-888-882-6878).
5. At the Case Management Conference, the court shall make pretrial orders, including but not limited to:
 - a. Establishing a discovery schedule.
 - b. Ordering the case to mediation or arbitration.
 - c. Dismissing fictitious defendants.
 - d. Scheduling exchange of expert witness information.
 - e. Setting subsequent conferences and the trial date.
 - f. Consolidating cases.
 - g. Severing trial of cross-complaints or bifurcating trial of issues.
 - h. Determining when demurrers, motions to strike and other motions are to be noticed.

* * * **Note: Counsel and Parties Should Review CRC §3.720-3.730.** * * *

Tentative Rulings: Although not applicable to Case Management Conferences, the Court advises counsel that for law and motion matters, the Court follows the tentative ruling procedure set forth in CRC § 3.1308(a)(1) and in Local Rule 2.9: tentative rulings on law and motion matters will be available on the Court's website at www.buttelcourt.ca.gov and by telephone at (530) 532-7022 by 3:00 p.m on the Court day preceding the hearing. By 4 p.m. that same day, a party must notify all other parties and the Court of their intention to argue. If timely notice is not given, no oral argument will be permitted unless the court has directed the parties to provide further argument in its tentative ruling.

**** Sanctions ****

If you do not, (1) file the Case Management Statement, (2) attend the Case Management Conference personally or by telephone (or have counsel attend for you), and/or (3) you (or counsel appearing for you) do not participate effectively in the conference, the court may impose sanctions (including dismissal of the case and payment of money).

I declare under penalty of perjury that I am not a party to this action, am at least 18 years of age and that I personally mailed a copy of this Notice of Assignment & Case Management Conference with the conference date and hearing time inserted to Alex Paul Katofsky, a person representing the plaintiff/cross-complainant.

Date: September 29, 2020

Kimberly Flener, Clerk of the Court, by Erica Piper, Deputy.