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FILED
Superior Court of California
County of San Francisco

OCT 23 2020

CLERK OF THE COURT

BY: ANGELICA SUNGA Deputy Clerk

6 Attorneys for Plaintiff DARRION BRADLEY
7 on behalf of himself and similarly situated employees

8
9 **SUPERIOR COURT OF CALIFORNIA**
10 **FOR THE COUNTY OF SAN FRANCISCO**

CGC-20-587511

11 DARRION BRADLEY, individually and
12 on behalf of all others similarly situated,

13 Plaintiff,

14 vs.

15 MOTIVATE, LLC; Does 1 through 20,
16 inclusive,

17 Defendants.
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Case No.

CLASS ACTION

COMPLAINT FOR DAMAGES:

1. Violation of California Unfair Competition Law (Business & Professions Code § 17200 *et seq.*)
2. Waiting Time Penalties;
3. Failure to Provide Final Paycheck at Place of Termination;
4. Civil Penalties Pursuant to Private Attorney General Act, Labor Code § 2698 *et seq.*

JURY TRIAL DEMANDED

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23 **BY FAX**
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1 Plaintiff DARRION BRADLEY ("Plaintiff"), on behalf of himself and all other similarly
2 situated employees hereby files this Complaint against Defendants MOTIVATE, LLC; a Delaware
3 Limited Liability Company; Does 1 through 20 (collectively referred to as "Defendants"). Plaintiff
4 alleges the following:

5 **INTRODUCTION**

6 1. This is a class action brought by Plaintiff seeking damages due to Defendants' failure
7 to failure to pay all wages on separation from employment, and failure to provide their employees'
8 final paycheck at the place of termination. Plaintiff seeks these damages and penalties, plus interest
9 and attorney's fees, on behalf of himself and similarly situated employees.

10 **JURISDICTION AND VENUE**

11 2. The San Francisco County Superior Court has jurisdiction in this matter due to
12 alleged violations of California Labor Code §§ 201-203, 208, 2698 *et seq.*, Business and Professions
13 Code § 17200 *et seq.*

14 3. Venue is proper pursuant to Civil Procedure Code §§ 395(a) and 395.5, in that some
15 of the wrongful acts and violations of law asserted herein occurred within San Francisco County.

16 **PARTIES**

17 4. Plaintiff DARRION BRADLEY is over the age of eighteen (18) and is a resident of
18 the State of California and a former employee of Defendants.

19 5. Plaintiff is informed and believes, and thereupon alleges, that Defendant
20 MOTIVATE, LLC is now and/or at all times mentioned in this Complaint a Delaware Limited
21 Liability Company and the owner and operator of an industry, business and/or facility licensed to do
22 business and actually doing business in the State of California.

23 6. Plaintiff is informed and believes, and based thereon alleges, that Defendants, jointly
24 and severally, have acted with deliberate indifference and conscious disregard to the rights of all
25 employees. Plaintiff is further informed and believes, and based thereon alleges, that Defendants
26 were at all relevant times advised by skilled California employment law attorneys and knew the
27 requirements of the California Labor Code with respect to employee wage statements, payment of
28 wages, reimbursement of business expenses, and provision of meal and rest periods.

7. Defendants proximately caused Plaintiff and similarly situated employees to be subjected to the unlawful practices, wrongs, complaints, injuries, and/or damages alleged in this Complaint.

8. Plaintiff is further informed and believes, and thereon alleges, that each of the Defendants herein was, at all times relevant to this action, the agent, employee, or joint employer or joint venturer of the remaining defendants and was acting within the course and scope of that relationship. Plaintiff is further informed and believes, and thereon alleges, that each of the Defendants herein gave consent to, ratified and authorized the acts alleged herein to each of the remaining defendants. The true names and capacities of the defendants named herein Does 1 through 20, inclusive, whether individual, corporate, associate, or otherwise are unknown to Plaintiff, who therefore sues such defendants by fictitious names pursuant to California Code of Civil Procedure section 474. Plaintiff will amend this complaint to show such true names and capacities of Does 1 through 20, inclusive, when they have been determined.

9. On August 10, 2020, Plaintiff filed his Labor Code § 2699.3 Private Attorney General Act (“PAGA”) notice with the California Labor & Workforce Development Agency (“LWDA”). The LWDA did not respond within 65 days of filing of the PAGA notice.

CLASS ALLEGATIONS

10. Plaintiff brings this action, on behalf of himself and all others similarly situated, as a class action pursuant to California Code of Civil Procedure section 382. The class that Plaintiff seeks to represent are composed of and defined as follows:

All non-exempt employees who were employed by Defendants in California at any time four (4) years prior to the filing of this Action up to the date that this matter is certified as a class action, who either resigned or were terminated by Defendants during the relevant period.

11. This action has been brought and may be properly maintained as a class action, pursuant to the provision of California Code of Civil Procedure section 382, because there is a well-defined community of interest in the litigation and the proposed class is easily ascertainable.

- 1 (a) Numerosity: The Plaintiff Class is so numerous that the individual joinder of all
2 members is impracticable under the circumstances of this case. While the exact
3 number of class members is unknown to Plaintiff at this time, Plaintiff is informed
4 and believes that Defendants may have employed hundreds of individuals falling
5 within the above stated class definitions throughout the State of California during the
6 applicable statute of limitations, who were subjected to the practices outlined in this
7 Complaint. As such, joinder of all members of the Plaintiff Class is not practicable.
- 8 (b) Common Questions Predominate: Common questions of law and fact exist as to all
9 members of the Plaintiff Class and predominate over questions that affect only
10 individual members of the class. These common questions of law and fact include,
11 without limitation, the following:
- 12 (1) Whether Defendants provided final paychecks to employees being
13 terminated at the time of termination;
- 14 (2) Whether Defendants provided final paychecks to resigning employees
15 within 72 hours of resignation, or on the final date of employment if
16 72 hours notice or more was given;
- 17 (3) Whether Defendants provided final paychecks to terminating and/ or
18 resigning employees at the place of termination.
- 19 (c) Typicality: Plaintiff's claims are typical of the claims of the members of the Plaintiff
20 Class. Plaintiff also sustained damages arising out of Defendants' common course of
21 conduct in violation of the law as complained of herein. As a result, each putative
22 class member will have the same basis for their legal claims.
- 23 (d) Adequacy: Plaintiff will fairly and adequately protect the interests of the members of
24 the putative classes. Plaintiff resides in California, worked for Defendants in
25 California, and is an adequate representative of the putative class as he has no
26 interests that are adverse to those of absent class members. Additionally, Plaintiff has
27 retained counsel who have substantial experience in complex civil litigation and wage
28 and hour matters.

1 (e) Superiority: A class action is superior to other available means for the fair and
2 efficient adjudication of the controversy since individual joinder of all members of
3 the class is impracticable. Class action treatment will permit a larger number of
4 similarly situated persons to prosecute their common claims in a single forum
5 simultaneously, efficiently, and without the unnecessary duplication of effort and
6 expense that numerous individual actions would engender. Further, as damages
7 suffered by each individual member of the classes may be relatively small, the
8 expenses and burden of the individual litigation would make it difficult or impossible
9 for individual members of the class to redress the wrongs done to them, and an
10 important public interest will be served by addressing the matter as a class action.
11 The cost to the court system of adjudication of such individualized litigation would be
12 substantial. Individualized litigation would also present the potential for inconsistent
13 or contradictory judgments.

14 12. Plaintiff is unaware of any difficulties that are likely to be encountered in the
15 management of this action that would preclude its maintenance as a class action.

16 GENERAL ALLEGATIONS

17 13. Plaintiff incorporates by reference and re-alleges paragraphs 1 through 12 as
18 though fully set forth herein.

19 14. Defendants provide a bicycle sharing system in and around the Bay Area in San
20 Francisco and Alameda counties, as well as in other locations around the United States.

21 15. Plaintiff worked for Defendants from approximately March 2020 through
22 approximately July 2020 as a bicycle mechanic.

23 16. Defendants maintained a policy and practice of requiring all terminated employees
24 to receive their final paycheck via US Mail. Defendants did not allow Plaintiff and other
25 similarly aggrieved employees the option of picking up their final paycheck at their place of
26 termination, as is required under the Labor Code.

17. Plaintiff was terminated via email on July 31, 2020, and Defendants did not immediately provide Plaintiff's final paycheck at the place of termination, nor did they provide his final paycheck at Defendants' place of business.

18. Instead, in his termination notice, Defendants informed Plaintiff that they would mail his final paycheck to him, and that he was not allowed to pick it up in Defendants' place of business.

19. Although Defendants stated that Plaintiff's final paycheck would be available on July 31, 2020, it was not in fact, available to Plaintiff on that day. Defendants informed Plaintiff that it would be mailed to him and did not allow Plaintiff any other option. In fact, Plaintiff did not receive his final paycheck until August 11, 2020.

20. On information and belief, Defendants' policy is to require employees to receive their final paycheck by mail. As a result, Defendants did not provide Plaintiff and similarly aggrieved employees all wages owed upon their termination or within seventy-two (72) hours of their separation from employment.

FIRST CAUSE OF ACTION
(Unfair Competition)

21. Plaintiff incorporates by reference and re-alleges paragraphs 1 through 20 as though fully set forth herein.

22. Unfair competition shall mean and include any unlawful, unfair or fraudulent business act or practice and unfair, deceptive, untrue or misleading advertising and any act prohibited by Chapter 1 (commencing with Section 17500) of Part 3 of Division 7 of the Business and Professions Code. *See* Cal. Bus. and Prof. Code §§ 17200 *et seq.*

23. Defendants violated the California Labor Code by failing to timely provide final paychecks as required under statute, and by failing to provide final paychecks at the place of termination.

24. Plaintiff is also informed and believes and thereon alleges that such actions and/or conduct constitute a violation of the California Unfair Competition Law ("UCL") (Business and

1 Professions Code section 17200 *et seq.*) pursuant to *Cortez v. Purolator Air Filtration Products*
2 *Co.*, 23 Cal. 4th 163 (2000).

3 25. As a direct and legal result of Defendant's conduct, as alleged herein, pursuant to
4 the UCL (including B&P Code §17203), Plaintiff and similarly situated employees are entitled to
5 restitution as a result of its unfair business practices, including, but not limited to, public
6 injunctive relief, pursuant to B&P Code § 17203, and interest and penalties pursuant to B&P §§
7 17203, 17208, violations of Labor Code §§ 201-203, and 208, all in an amount as yet
8 unascertained but subject to proof at trial, for four (4) years from the filing of this Action.

9 **SECOND CAUSE OF ACTION**
10 **(Waiting Time Penalties)**

11 26. Plaintiff incorporates by reference and re-alleges paragraphs 1 through 25 as
12 though fully set forth herein.

13 27. An employer must pay an employee who is terminated all unpaid wages
14 immediately upon termination. California Labor Code § 201.

15 28. An employer who willfully fails to pay an employee wages in accordance with
16 California Labor Code sections 201 and/or 202 must pay the employee a waiting time penalty of
17 up to thirty (30) days. California Labor Code § 203.

18 29. Plaintiff and similarly situated employees did not receive all wages at their
19 termination or separation from employment.

20 30. Defendants knew of their obligation to pay Plaintiff and Class Members and
21 Defendants' failure to pay all wages was in complete disregard of their obligations. Such
22 conduct shows Defendants' knowledge of their obligation to pay all wages owed upon
23 termination and willful refusal.

24 31. As a proximate result of the Defendants' conduct, Plaintiff and Class members
25 have been damaged and deprived of their wages and thereby seek their daily rate of pay
26 multiplied by thirty (30) days for Defendants' failure to pay all wages due.

THIRD CAUSE OF ACTION
(Failure to Provide Final Paycheck at Place of Termination)

32. Plaintiff incorporates by reference and re-alleges paragraphs 1 through 32 as though fully set forth herein.

33. Labor Code section 208 requires that "Every employee who is discharged shall be paid at the place of discharge, and every employee who quits shall be paid at the office or agency of the employer in the county where the employee has been performing labor."

34. For the reasons stated above, Defendants failed to provide the final paycheck to persons quitting or terminating employment in accordance with the Labor Code by requiring all checks for terminated employees be mailed to them and by failing to provide final checks at the place of termination.

35. Defendants' conduct described herein violates California Labor Code section 208. As a proximate result of Defendants' conduct, Plaintiff and Class members have been damaged and seek applicable fees and penalties.

FOURTH CAUSE OF ACTION
CIVIL PENALTIES PURSUANT TO PAGA § 2698 ET SEQ.

36. Plaintiff incorporates by reference and re-alleges paragraphs 1 through 35 as though fully set forth herein.

37. Plaintiff brings this cause of action as a proxy for the State of California and in this capacity, seeks penalties on behalf of all Aggrieved Employees for Defendants' violations of the California Labor Code, including but not necessarily limited to, those Labor Code violations identified above.

38. On or about August 10, 2020, Plaintiff sent written notice to the LWDA regarding Defendant's violations of the California Labor Code, pursuant to Labor Code section 2698, *et seq.*, PAGA. As of the date of the filing of this Complaint, the LWDA has not informed Plaintiff whether the LWDA intends to investigate Plaintiff's PAGA claims. As such, Plaintiff has exhausted his administrative remedies under PAGA and may proceed in this Court.

39. Plaintiff is thus entitled to recover civil penalties on behalf of the State of California and all Aggrieved Employees for all violations of the Labor Code from August 10, 2019, through trial on this matter.

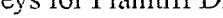
DAMAGES

WHEREFORE Plaintiff requests relief as follows:

1. A jury trial;
2. For an order certifying the class;
3. For an order certifying Plaintiff's counsel as class counsel;
4. For an order appointing Plaintiff as class representative;
5. For penalties and damages under the California Labor Code according to proof allowed by law;
6. For compensatory damages, including, but not limited to, unpaid wages, plus interest, according to proof allowed by law;
7. For an award to Plaintiff of costs of suit incurred herein and reasonable attorney's fees;
8. For injunctive relief;
9. For an award of prejudgment and post-judgment interest; and
10. For an award to Plaintiff of such other and further relief as the Court deems just and proper.

Dated: October 20, 2020

Castle Law: California Employment Counsel

By: 
Kent L. Bradbury
Timothy B. Del Castillo
Attorneys for Plaintiff DARRION BRADLEY and the
Class

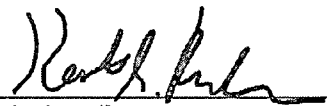
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JURY TRIAL DEMAND

Plaintiff hereby demands a trial by jury.

Dated: October 20, 2020

Castle Law: California Employment Counsel

By: 
Kent L. Bradbury
Timothy B. Del Castillo
Attorneys for Plaintiff DARRION BRADLEY and the
Class

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Timothy B. Del Castillo (SBN 277296) Kent L. Bradbury (SBN 279402) Castle Law: California Employment Counsel 3200 Douglas Blvd. Suite 300, Roseville, CA 95661 TELEPHONE NO.: 916-245-0122 FAX NO.: ATTORNEY FOR (Name): DARRION BRADLEY		FOR COURT USE ONLY FILED Superior Court of California County of San Francisco OCT 23 2020 CLERK OF THE COURT BY: <u>ANGELICA SUNGA</u> Deputy Clerk	
SUPERIOR COURT OF CALIFORNIA, COUNTY OF San Francisco STREET ADDRESS: 400 McAllister Street MAILING ADDRESS: CITY AND ZIP CODE: San Francisco, CA 94102 BRANCH NAME:		CASE NUMBER: CGC-20-587511 JUDGE: DEPT:	
CASE NAME: DARRION BRADLEY v. MOTIVATE, LLC			
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)	

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)
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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): 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: October 20, 2020

Kent L. Bradbury

(TYPE OR PRINT NAME)

(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

NOTICE

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

Page 1 of 2

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