

Electronically FILED by Superior Court of California, County of Los Angeles on 03/24/2021 11:41 AM Sherri R. Carter, Executive Officer/Clerk of Court, by M. Barel, Deputy Clerk

**EANET, PC**

Danielle G. Eanet (SBN 251369)

Laine Mervis (SBN 223235)

550 S. Hope Street, Suite 750

Los Angeles, CA 90071

Telephone: 310-775-2495

Facsimile: 310-593-2589

danielle@eanetpc.com

laine@eanetpc.com

Attorneys for Plaintiff PEDRO TOME

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES—CENTRAL DISTRICT**

PEDRO TOME, an individual,

Plaintiff,

v.

PARSONS ENVIRONMENT &  
INFRASTRUCTURE GROUP INC., a  
Delaware corporation; PARSONS  
CORPORATION, a Delaware corporation;  
and DOES 1 THROUGH 100, inclusive,

Defendants.

Case No.: **21STCV11315****COMPLAINT FOR:**

1. FAILURE TO PAY OVERTIME COMPENSATION
2. FAILURE TO PROPERLY REIMBURSE BUSINESS EXPENSES
3. FAILURE TO PROVIDE REQUIRED MEAL BREAKS
4. FAILURE TO PROVIDE REQUIRED REST BREAKS
5. FAILURE TO PAY FINAL WAGES
6. FAILURE TO TIMELY PAY ALL WAGES EARNED
7. FAILURE TO PRODUCE ACCURATE, ITEMIZED WAGE RECORDS
8. RETALIATION
9. UNFAIR BUSINESS PRACTICES
10. VIOLATION OF PRIVATE ATTORNEYS GENERAL ACT (LAB. CODE, § 2698 *ET SEQ.*)
11. WRONGFUL TERMINATION

Plaintiff PEDRO TOME complains and alleges as follows:

**INTRODUCTION**

1. This is an action by Plaintiff PEDRO TOME (“Plaintiff” or “Tome”), who was initially misclassified as exempt, and later was reclassified to an hourly position, although his job duties remained exactly the same. Plaintiff did not receive wages for all hours worked, did not receive all premium wages owed for missed meal and rest breaks, was not provided with accurate

wage statements, and was not paid all wages due at termination. Furthermore, Plaintiff was intentionally misclassified as exempt and despite participating in an “investigation,” Defendants unlawfully withheld wages due to him in violation of Labor Code, § 225.5. Following Plaintiff’s complaints for failure to comply with wage and hour laws, Plaintiff was retaliated against, his hours were reduced and eliminated, he was placed on a “leave of absence” and ultimately terminated.

2. This Complaint challenges systemic unlawful employment practices resulting in intentional violations of the California Labor Code, as well as California regulations and the California Business and Professions Code against Plaintiff. In addition to Plaintiff's personal claims, this is a Representative Action, pursuant to Labor Code section 2698 et seq. ("PAGA"), filed by Tome, on behalf of Plaintiff and Aggrieved Employees, seeking civil penalties as well as recovery of attorney's fees and costs pursuant to ("PAGA") for Defendants' violation of the California Labor Code as alleged herein.

## PARTIES

3. Plaintiff is and at all relevant times mentioned herein was an individual residing in the County of Fresno, California, except as otherwise set forth herein.

4. Defendant PARSONS ENVIRONMENT & INFRASTRUCTURE GROUP INC. (“Parsons Environment”) is and at all relevant times mentioned herein was a corporation organized under California law and registered as a foreign corporation with the California Secretary of State, with its principal place of business in Los Angeles County.

5. Defendant PARSONS CORPORATION (“Parsons”) is and at all relevant times mentioned herein was a corporation organized under Delaware law and registered as a foreign corporation with the California Secretary of State, with its principal place of business in Los Angeles County. (Parsons and Parsons Environment are together referred to herein as “Defendants” or “the Company”).

6. Plaintiff is ignorant of the true names of the Defendants sued herein as DOES 1-100, inclusive, and therefore sues such Defendants by such fictitious names. Plaintiff will amend this Complaint to insert their true names and capacities when ascertained. Plaintiff is informed and

1 believes and thereon alleges that the Defendants referred to herein as DOES 1-100 were and are in  
2 some manner responsible or legally liable for the actions, events, occurrences, transactions, and  
3 circumstances alleged herein, and that Plaintiff's damages, injuries, and things complained of in  
4 this Complaint were proximately caused by the conduct alleged herein.

5         7. Plaintiff is informed and believes and thereon alleges that at all times mentioned  
6 herein, Defendants, and each of them, compelled, coerced, aided, and/or abetted the discrimination,  
7 retaliation, and harassment alleged in this Complaint. All Defendants were responsible for the  
8 events and damages alleged herein, including on the following basis: (a) Defendants committed the  
9 acts alleged; (b) at all relevant times, one or more of the Defendants was the agent or employee,  
10 and/or acted under the control or supervision, of one or more of the remaining Defendants and, in  
11 committing the acts alleged, acted within the course and scope of such agency and employment  
12 and/or is or are otherwise liable for Plaintiff's damages; (c) at all relevant times, there existed a  
13 unity of ownership and interest between or among two or more of the Defendants such that any  
14 individuality and separateness between or among those Defendants has ceased, and Defendants are  
15 the alter egos of one another. Defendants exercised dominion and control over one another to such  
16 an extent that any individuality or separateness of Defendants does not, and at all times herein  
17 mentioned did not, exist. Adherence to the fiction of the separate existence of Defendants would  
18 permit abuse of the corporate privilege and would sanction fraud and promote injustice. All actions  
19 of all Defendants were taken by employees, supervisors, executives, officers, and directors during  
20 employment with all Defendants, were taken on behalf of all Defendants, and were engaged in,  
21 authorized, ratified, and approved by all other Defendants.

22         8. At all relevant times mentioned herein, all Defendants acted as agents of all other  
23 Defendants in committing the acts alleged herein.

#### 24                                   **JURISDICTION AND VENUE**

25         9. Jurisdiction and venue of this action in this Court is proper because Defendants  
26 principal place of business is in the County of Los Angeles and Plaintiff performed worked on  
27 behalf of Defendants in the County of Los Angeles.

28         10. The amount in controversy in this matter exceeds the sum of \$25,000.00, exclusive

1 of interest and costs.

2 **STATEMENT OF FACTS**

3 11. Plaintiff began working for the Company, which provides consulting and project  
4 management services, on or about August 15, 2016. Plaintiff was initially hired as an exempt  
5 “Construction Manager” and later was reclassified to an hourly Foreman/Crew Lead although his  
6 job duties remained exactly the same. Plaintiff was employed by the Company from approximately  
7 on or about August 15, 2016 to on or about July 2, 2020.

8 12. During his tenure with the Company, Plaintiff did not receive wages for all hours  
9 worked, did not receive all premium wages owed for missed meal and rest breaks, was not  
10 provided with accurate wage statements, and was not paid all wages due at termination.  
11 Furthermore, he was intentionally misclassified as exempt and despite participating in an  
12 “investigation,” into his request to be paid wages owed to him, Parsons unlawfully withheld wages  
13 due to him in violation of Labor Code, § 225.5.

14 13. Plaintiff frequently worked as much as twenty (20) or more hours in a single work  
15 day, including weekends, often nine (9) to twelve (12) days in a row, resulting in Plaintiff working  
16 40-70 hours per week or greater, however Plaintiff was never compensated for daily or weekly  
17 overtime that he worked regularly. Likewise, the Company never paid Plaintiff double time as  
18 required.

19 14. Plaintiff reported the failure to pay required overtime to Company representatives  
20 on a number of occasions, including, without limitation, on or about October 5, 2017 to Sherrita  
21 Neal (“Neal”), Talent leader in HR with the Company, and on or about August 29, 2019 to Paul  
22 Wadum (“Wadum”), Project Manager with the Company.

23 15. On or about September 14, 2019, following Plaintiff’s complaints to the Company,  
24 he was reclassified to a non-exempt position with the new title: Foreman/Crew Lead. However,  
25 Plaintiff’s job responsibilities remained the same. When Plaintiff requested compensation for past  
26 due wages, he was disciplined, furloughed then terminated and never paid the amounts due to him.

27 16. Plaintiff also was not reimbursed for out-of-pocket business expenses related to  
28 travel for work when Plaintiff was assigned to work at a location which was several hours each

1 way from the office to which he was assigned.

2 17. Plaintiff was provided by the Company a “per diem agreement” and requested to  
3 sign the agreement, under which Plaintiff would be required to waive his already asserted wage and  
4 hour claims in order to receive reimbursement for the business expenses to which he was entitled.  
5 Plaintiff did not sign the agreement.

6 18. Following his complaints to the Company for failure to comply with California  
7 wage and hour laws and Plaintiff’s declining to sign the agreement providing for a waiver of wage  
8 and hour claims, Plaintiff was retaliated against, was disciplined for purported performance issues,  
9 placed on a performance improvement plan, Plaintiff’s hours were reduced and eliminated, he was  
10 placed on a “leave of absence” from April 4, 2020 to May 17, 2020 and ultimately terminated on  
11 July 2, 2020.

12 19. During the period from at least one (1) year prior to the filing of this action, and as  
13 such time period is further extended due to Plaintiff’s beginning and completing the process of  
14 exhausting the administrative requirements for filing a PAGA representative action, through  
15 expiration of the approximate 65-day period allotted for such exhaustion efforts, and as further  
16 extended under the law, including but not limited to the applicable tolling while Plaintiff pursued  
17 his administrative claims before the California Labor Commissioner, through the present (the  
18 "Liability Period"), Defendants have had consistent policies of:

19 (a) requiring, permitting, and/or suffering Plaintiff and Aggrieved Employees to perform  
20 various off- the clock work-related tasks, without recording the time spent performing those  
21 tasks, and without paying employees for time spent performing such tasks, including  
22 payment of overtime premium for hours worked in excess of eight (8) hours per day and/or  
23 forty (40) per week, in violation of Labor Code, §§ 201, 202, 510, 558, 1194, 1197.1, 1198  
24 and all applicable Wage Orders;

25 (b) failing to properly reimburse Plaintiff and Aggrieved Employees for business expenses  
26 pursuant to Labor Code, § 2802(a);

27 (c) failing to provide lawful meal periods and failing to pay Plaintiff and Aggrieved  
28 Employees an additional hour of premium pay for meal period violations pursuant to the

1 applicable IWC Wage Order, and Labor Code, §§ 226.7 and 512(a);  
2 (d) failing to provide lawful rest periods and failing to pay Plaintiff and Aggrieved  
3 Employees an additional hour of premium pay for rest period violations pursuant to the  
4 applicable IWC Wage Order, and Labor Code, § 226.7(e);  
5 (e) willfully failing to timely pay Plaintiff and Aggrieved Employees all wages at the end of  
6 employment in violation of Labor Code, §§ 201, 202 and 203;  
7 (f) failing to timely pay all wages due to Plaintiff and Aggrieved Employees in violation of  
8 Labor Code, §§ 210, 204 and 218; and  
9 (g) knowingly failing to furnish Plaintiff and Aggrieved Employees with accurate and  
10 complete wage statements in violation of Labor Code, §§ 226 and 226.3; and  
11 (h) violating Labor Code § 1102.5.

#### 12 **ADMINISTRATIVE REMEDIES AND**

#### 13 **PRIVATE ATTORNEY GENERAL ACT ALLEGATIONS**

14 20. On February 24, 2020, Plaintiff filed a claim with the California Department of  
15 Industrial Relations (“DLSE”) (State Case Number WC-CM-774235) for overtime/double time  
16 violations, meal period premium wage violations and failure to reimburse business expenses. (*See*,  
17 Exhibit 1.) On or about March 2020, Plaintiff filed a retaliation complaint with the DLSE. The  
18 DLSE did not schedule a claim conference or hearing on Plaintiff’s Wage complaint. On  
19 September 3, 2020, Plaintiff submitted a withdrawal of Wage and Retaliation Complaint to the  
20 Department. (*See*, Exhibit 2.)

21 21. On September 24, 2020, Plaintiff sent a letter by certified mail to Defendants giving  
22 notice of Defendants Labor Code and Wage and Order violations, as alleged herein. A copy of said  
23 PAGA letter was also submitted on the same date to the California Labor and Workplace  
24 Development Agency (“LWDA”) via the online filing system required by the PAGA statute. (*See*,  
25 Exhibit 3.)

1 **FIRST CAUSE OF ACTION**

2 **(Failure to Pay Overtime Compensation)**

3 **(Against All Defendants)**

4 22. Plaintiff realleges and incorporates by this reference each and every allegation in the  
5 preceding Paragraphs as though fully set forth herein.

6 23. Labor Code, § 1198 makes it illegal to employ an employee under conditions of  
7 labor that are prohibited by the applicable wage order. Labor Code, § 1198 requires that “. . . the  
8 standard conditions of labor fixed by the commission shall be the . . . standard conditions of labor  
9 for employees. The employment of any employee . . . under conditions of labor prohibited by the  
10 order is unlawful.”

11 24. Labor Code, § 1198 and the applicable Industrial Welfare Commission (“IWC”)   
12 Wage Order provide that it is unlawful to employ persons without compensating them at a rate of  
13 pay either time and one-half or two-times that person’s regular rate of pay, depending on the  
14 number of hours worked by the person on a daily or weekly basis.

15 25. Specifically, the applicable IWC Wage Order provides that Defendants were  
16 required to pay Plaintiff, when working more than eight (8) hours in a day or more than forty (40)  
17 hours in a workweek, at the rate of time-and one-half for all hours worked in excess of eight (8)  
18 hours in a day or more than forty (40) hours in a workweek.

19 26. The applicable IWC Wage Order further provides that Defendants were required to  
20 pay Plaintiff, when working more than twelve (12) hours in a day, overtime compensation at a rate  
21 of two (2) times their regular rate of pay.

22 27. Labor Code, § 510 codifies the right to overtime compensation at one-and one-half  
23 times the regular hourly rate of pay for hours worked in excess of eight (8) hours in a day or forty  
24 (40) hours in a week or for the first eight (8) hours worked on the seventh day of work, and to  
25 overtime compensation at twice the regular hourly rate for hours worked in excess of twelve (12)  
26 hours in a day or in excess of eight (8) hours in a day on the seventh day.

27 28. During the relevant time period, Plaintiff worked in excess of eight (8) hours in a  
28 day, in excess of twelve (12) hours in a day, and/or in excess of forty (40) hours in a week, for

1 which Plaintiff should have been compensated at an overtime rate.

2 29. Defendants' failure to pay Plaintiff this overtime compensation, as required by  
3 California law, violates the provisions of Labor Code, §§ 510 and 1198, and is therefore unlawful.

4 30. Pursuant to Labor Code, § 1194, Plaintiff is entitled to recover unpaid overtime  
5 compensation, as well as interest, costs and attorneys' fees.

6 **SECOND CAUSE OF ACTION**

7 **(Failure to Properly Reimburse Business Expenses)**

8 **(Against All Defendants)**

9 31. Plaintiff realleges and incorporates by this reference each and every allegation in the  
10 preceding Paragraphs as though fully set forth herein.

11 32. While Plaintiff was working for Defendants and acting on the direct instruction of  
12 Defendants and discharging Plaintiff's duties for Defendants, Plaintiff incurred out of pocket  
13 business expenses related to travel for work when Plaintiff was assigned to work at a location  
14 which was several hours each way from the office to which he was assigned.

15 33. Defendants have failed to indemnify or in any manner reimburse Plaintiff for these  
16 expenditures and losses and thereby violated Labor Code, § 2802, which provides that "(a) An  
17 employer shall indemnify his or her employee for all necessary expenditures or losses incurred by  
18 the employee in direct consequence of the discharge of his or her duties, or of his or her obedience  
19 to the directions of the employer." (Lab. Code, § 2802(a).)

20 34. As a direct and proximate result of Defendants' conduct, Plaintiff suffered  
21 substantial losses according to proof, as well as pre-judgment interest, costs, and attorney fees for  
22 the prosecution of this action.

23 **THIRD CAUSE OF ACTION**

24 **(Failure to Pay Provide Meal Breaks)**

25 **(Against All Defendants)**

26 35. Plaintiff realleges and incorporates by this reference each and every allegation in the  
27 preceding Paragraphs as though fully set forth herein.

28 36. At all relevant times herein set forth, the applicable IWC Wage Order and Labor

Code, §§ 226.7 and 512(a) were applicable to Plaintiff's employment by Defendants.

37. At all relevant times herein set forth, Labor Code, § 226.7 provides that no employer shall require an employee to work during any meal period mandated by the applicable IWC Wage Order.

38. At all relevant times herein set forth, Labor Code, § 512(a) provides that an employer may not require, cause, or permit an employee to work for a period of more than five (5) hours per day without providing the employee with a meal period of not less than thirty (30) minutes, except that if the total work period per day of the employee is not more than six (6) hours, the meal period may be waived by mutual consent of both the employer and the employee.

39. During the relevant time period, Defendants willfully required Plaintiff to work during meal periods and failed to compensate Plaintiff for work performed during meal periods. At the same time, Defendants had a practice and/or policy of not paying all premiums due for meal break violations. As a result, Defendants failed to pay Plaintiff all meal period premiums due pursuant to Labor Code, § 226.7.

40. Defendants' conduct violates the applicable IWC Wage Order, and Labor Code, §§ 226.7 and 512(a).

41. Pursuant to the applicable IWC Wage Order and Labor Code, § 226.7(b), Plaintiff is entitled to recover from Defendants one (1) additional hour of pay at Plaintiff's regular hourly rate of compensation for each work day that the meal period was not provided.

#### **FOURTH CAUSE OF ACTION**

##### **(Failure to Provide Rest Breaks)**

##### **(Against All Defendants)**

42. Plaintiff realleges and incorporates by this reference each and every allegation in the preceding Paragraphs as though fully set forth herein.

43. At all relevant times herein set forth, the applicable IWC Wage Order and Labor Code, § 226.7 were applicable to Plaintiff's employment by Defendants.

44. At all relevant times, Labor Code, § 226.7 provides that no employer shall require an employee to work during any rest period mandated by an applicable order of the IWC.

45. At all relevant times, the applicable IWC Wage Order provides that “[e]very employer shall authorize and permit all employees to take rest periods, which insofar as practicable shall be in the middle of each work period” and that the “rest period time shall be based on the total hours worked daily at the rate of ten (10) minutes net rest time per four (4) hours or major fraction thereof unless the total daily work time is less than three and one-half (3 1/2) hours.”

46. During the relevant time period, Defendants required Plaintiff to work four or more hours without authorizing or permitting a ten (10) minute rest period per each four (4) hour period worked. Defendants' failure to properly staff and coordinate Plaintiff's schedule forced Plaintiff to work through all or part of his rest breaks.

47. Defendants had no policy and/or practice to pay premiums for missed rest breaks and thus failed to pay Plaintiff the full rest period premium due pursuant to Labor Code, § 226.7.

48. Defendants' conduct violates the applicable IWC Wage Orders and Labor Code, § 226.7.

49. Pursuant to the applicable IWC Wage Order and Labor Code, § 226.7(b), Plaintiff is entitled to recover from Defendants one (1) additional hour of pay at Plaintiff's regular hourly rate of compensation for each work day that the rest period was not provided.

## FIFTH CAUSE OF ACTION

### **(Failure to Pay Final Wages)**

**(Against All Defendants)**

50. Plaintiff realleges and incorporates by this reference each and every allegation in the preceding Paragraphs as though fully set forth herein.

51. At all times herein set forth, Labor Code, §§ 201 and 202 provide that if an employer discharges an employee, the wages earned and unpaid at the time of discharge are due and payable immediately.

52. As set forth herein, during the relevant time period, Defendants willfully failed to pay Plaintiff earned and unpaid wages, including but not limited to overtime wages, and meal and rest period premium wages, at the time of discharge.

53. Defendants' failure to pay Plaintiff his wages earned and unpaid at the time of

1 discharge is in violation of Labor Code, §§ 201 and 202.

2 54. Labor Code, § 203 provides that if an employer willfully fails to pay wages owed, in  
3 accordance with §§ 201 and 202, then the wages of the employee shall continue as a penalty from  
4 the due date, and at the same rate until paid or until an action is commenced; but the wages shall  
5 not continue for more than thirty (30) days.

6 55. Plaintiff is entitled to recover from Defendants the statutory penalty wages for each  
7 day he was not paid, at the regular hourly rate of pay, up to a thirty (30) day maximum pursuant to  
8 Labor Code, § 203.

9 56. Defendants' conduct in failing to timely pay all wages upon separation of  
10 employment was an unfair act and deceptive practice which caused Plaintiff to suffer substantial  
11 loss of income and caused financial, emotional, and physical distress.

12 **SIXTH CAUSE OF ACTION**

13 **(Failure to Timely Pay Wages Due)**

14 **(Against All Defendants)**

15 57. Plaintiff realleges and incorporates by this reference each and every allegation in the  
16 preceding Paragraphs as though fully set forth herein.

17 58. As set forth herein, during the relevant time period, Defendants failed to pay  
18 Plaintiff earned and unpaid wages under the terms of Plaintiff's employment, including but not  
19 limited to overtime wages, minimum wages, and meal and rest period premium wages and Plaintiff  
20 is owed such wages by Defendants.

21 59. Defendants' failure to pay Plaintiff his wages earned and unpaid is in violation of  
22 applicable law, including without limitation Labor Code, §§ 204, 210, and 218.

23 **SEVENTH CAUSE OF ACTION**

24 **(Failure to Provide Accurate, Itemized Wage Statements)**

25 **(Against All Defendants)**

26 60. Plaintiff realleges and incorporates by this reference each and every allegation in the  
27 preceding Paragraphs as though fully set forth herein.

28 61. In California, an employer must maintain and provide accurate and complete payroll

1 records. (Lab. Code, § 226(a).)

2 62. Labor Code, § 226 further provides: “An employee suffering injury as a result of a  
3 knowing and intentional failure by an employer” to maintain accurate and complete payroll records  
4 “is entitled to recover the greater of all actual damages or fifty dollars (\$50) for the initial pay  
5 period in which a violation occurs and one hundred dollars (\$100) per employee for each violation  
6 in a subsequent pay period, not to exceed an aggregate penalty of four thousand dollars (\$4,000),  
7 and is entitled to an award of costs and reasonable attorney’s fees.”

8 63. Defendants knowingly and intentionally failed to furnish Plaintiff with accurate and  
9 complete wage statements regarding, among other things, Plaintiff’s hours worked correct rates of  
10 pay including overtime, meal and rest breaks premium pay, in violation of Labor Code, § 226.

11 64. Defendants’ failure to furnish Plaintiff with complete and accurate itemized wage  
12 statements resulted in actual injury, as said failures lead to, among other things, the non-payment of  
13 all of Plaintiff’s wages, and deprived Plaintiff of the information necessary to, among other things,  
14 identify the discrepancies in Defendants’ reported data, and to know, understand and question the  
15 rate of pay and wages.

16 65. Defendants’ failures create an entitlement to recovery by Plaintiff in a civil action  
17 for all damages and/or penalties pursuant to Labor Code, § 226, including statutory penalties, civil  
18 penalties, reasonable attorneys’ fees, and costs of suit according to Labor Code, §§ 226 and 226.3.

19 66. Defendants’ conduct in failing to provide accurate itemized wage statements was an  
20 unfair act and deceptive practice which caused Plaintiff to suffer substantial loss of income and  
21 caused financial, emotional, and physical distress.

22 67. Accordingly, Plaintiff is entitled to damages and civil penalties for Defendants’  
23 failure to produce the required records in an amount to be determined at trial, plus interest,  
24 reasonable attorneys’ fees, and costs of suit.

25 **EIGHTH CAUSE OF ACTION**

26 **(Retaliation in Violation of Labor Code, § 102.5)**

27 **(Against All Defendants)**

28 68. Plaintiff realleges and incorporates by this reference each and every allegation in the

1 preceding Paragraphs as though fully set forth herein.

2         69. Labor Code, § 1102.5(b) states in pertinent part: “An employer, or any person acting  
3 on behalf of the employer, shall not retaliate against an employee for disclosing information, or  
4 because the employer believes that the employee disclosed or may disclose information, ... to a  
5 person with authority over the employer or another employee who has the authority to investigate,  
6 discover, or correct the violation or noncompliance, ... if the employee has reasonable cause to  
7 believe that the information discloses a violation of state or federal statute, or a violation of or  
8 noncompliance with a local, state, or federal rule or regulation, regardless of whether disclosing the  
9 information is part of the employee's job duties.”

10         70. Defendants violated Labor Code, § 1102.5 by retaliating against Plaintiff’s  
11 employment after Plaintiff complained to person(s) with authority over Plaintiff and/or person(s)  
12 who have authority to investigate, discover, or correct Defendants’ fraudulent and unlawful  
13 activities, about Defendants' unlawful treatment of Plaintiff because of Plaintiff’s complaints.  
14 Plaintiff had reasonable cause to believe that his complaints constituted violations of or  
15 noncompliance with state or federal statutes, rules or regulations regarding California wage and  
16 hour laws.

17         71. As a direct and proximate result of these Defendants’ conduct, Plaintiff has suffered  
18 special damages in the form of lost earnings, benefits, and/or out of pocket expenses in an amount  
19 according to proof at the time of trial.

20         72. As a further direct and proximate result of Defendants’ conduct, Plaintiff will suffer  
21 additional special damages in the form of lost future earnings, benefits, and/or other prospective  
22 damages in an amount according to proof at the time of trial.

23                                 **NINTH CAUSE OF ACTION**

24                                 **(Unfair Business Practices)**

25                                 **(Against All Defendants)**

26         73. Plaintiff realleges and incorporates by this reference each and every allegation in the  
27 preceding Paragraphs as though fully set forth herein.

28         74. Business & Professions Code, § 17200 et seq., prohibits acts of unfair competition,

1 which includes any “unlawful, unfair or fraudulent business act or practice . . . .”

2         75. Defendants have engaged and continue to engage in unfair and/or unlawful business  
3 practices in violation of Business and Professions Code, § 17200 et seq., by engaging in the  
4 conduct alleged herein, including without limitation: (i) misclassifying Plaintiff and failing to pay  
5 Plaintiff overtime wages owed pursuant to the applicable IWC Wage Order, and Labor Code,  
6 §§ 510, 1194, 1198; (ii) failing to properly reimburse Plaintiff for business expenses pursuant to  
7 Labor Code, § 2802(a); (iii) failing to pay Plaintiff an additional hour of premium pay for meal  
8 period violations pursuant to the applicable IWC Wage Order, and Labor Code, §§ 226.7 and  
9 512(a); (iv) failing to pay Plaintiff an additional hour of premium pay for rest period violations  
10 pursuant to the applicable IWC Wage Order, and Labor Code, § 226.7(b); (v) willfully failing to  
11 timely pay Plaintiff all wages at the end of employment in violation of Labor Code, §§ 201, 202  
12 and 203; (vi) failing to pay all wages due to Plaintiff in violation of Labor Code, §§ 210, 204 and  
13 218; and (vii) knowingly failing to furnish Plaintiff with accurate and complete wage statements in  
14 violation of Labor Code, §§ 226 and 226.3.

15         76. Plaintiff is informed and believes and thereon alleges that Defendants’ utilization of  
16 these unfair and/or unlawful business practices deprived Plaintiff of compensation to which  
17 Plaintiff was legally entitled, was carried out specifically for the purpose of gaining an advantage  
18 against its competitors and by violating the law and/or not abiding by the law. Plaintiff is informed  
19 and believes and thereon alleges that the aforesaid actions of Defendants, as herein alleged, resulted  
20 in an increase in profits for Defendants, enabling them to greater generate income as a direct result  
21 of the above-mentioned unlawful and unfair business practices.

22         77. Plaintiff is therefore entitled to restitution and/or disgorgement of any and all  
23 monies received by Defendants while they engaged in such practices, in addition to prejudgment  
24 interest, penalties, reasonable attorneys' fees and costs, pursuant to Business & Professions Code,  
25 § 17200 et seq.

26         78. Plaintiff seeks, an injunction to prohibit Defendants from continuing to engage in  
27 the unfair business practices complained of herein.

28         79. Plaintiff is informed and believes and based thereon alleges that at all times herein

1 mentioned Defendants have engaged in unlawful, deceptive and unfair business practices, as  
2 proscribed by Business & Professions Code, § 17200 et seq., including those set forth hereinabove,  
3 thereby depriving Plaintiff of the minimum working condition standards and conditions due to  
4 them under the California laws and Industrial Welfare Commission wage orders as specifically  
5 described therein.

6 **TENTH CAUSE OF ACTION**

7 **(Violation of Private Attorneys General Act (Lab. Code, § 2698 et seq.))**

8 **(Against All Defendants)**

9 80. Plaintiff realleges and incorporates by this reference each and every allegation in the  
10 preceding Paragraphs as though fully set forth herein.

11 81. Plaintiff is an “aggrieved employee” under PAGA, Lab. Code, § 2698, et seq., as  
12 Plaintiff was employed by Defendants during the applicable statutory period and suffered one or  
13 more Labor Code violations as set forth herein. Accordingly, Plaintiff seeks to recover on behalf of  
14 Plaintiff and all current and former aggrieved employees of Defendants who were misclassified as  
15 exempt, the civil penalties provided by PAGA, as well as recovery of reasonable attorney’s fees  
16 and costs.

17 82. Plaintiff seeks to recover PAGA civil penalties through a representative action as  
18 permitted by PAGA and applicable law.

19 83. Plaintiff has fully exhausted his administrative remedies for this cause of action and  
20 gave notice of Plaintiff’s PAGA claim, as set forth herein, and, accordingly, Plaintiff is entitled to  
21 commence this action under Labor Code, § 2699(a). Consequently, and pursuant to Labor Code,  
22 § 2699(a) plaintiff seeks to recover civil penalties for which Defendants are liable under the Labor  
23 Code. Plaintiff also seeks attorneys’ fees and costs pursuant to Labor Code, § 2699(g)(1).

24 84. Plaintiff seeks civil penalties pursuant to PAGA for violations of the following  
25 Labor Code provisions: (a) requiring, permitting, and/or suffering Plaintiff and Aggrieved  
26 Employees to perform various off- the clock work-related tasks, without recording the time spent  
27 performing those tasks, and without paying employees for time spent performing such tasks,  
28 including payment of overtime premium for hours worked in excess of eight (8) hours per day

1 and/or forty(4) per week, in violation of Labor Code, §§ 201, 202, 510, 558, 1194, 1197.1, 1198  
2 and all applicable Wage Orders; (b) failing to properly reimburse Plaintiff and Aggrieved  
3 Employees for business expenses pursuant to Labor Code, § 2802(a); (c) failing to provide lawful  
4 meal periods and failing to pay Plaintiff and Aggrieved Employees an additional hour of premium  
5 pay for meal period violations pursuant to the applicable IWC Wage Order, and Labor Code,  
6 §§ 226.7 and 512(a); (d) failing to provide lawful rest periods and failing to pay Plaintiff and  
7 Aggrieved Employees an additional hour of premium pay for rest period violations pursuant to the  
8 applicable IWC Wage Order, and Labor Code, § 226.7; (e) willfully failing to timely pay Plaintiff  
9 and Aggrieved Employees all wages at the end of employment in violation of Labor Code, §§ 201,  
10 202 and 203; (f) failing to pay all wages due to Plaintiff and Aggrieved Employees in violation of  
11 Labor Code, §§ 210, 204 and 218; and (g) knowingly failing to furnish Plaintiff and Aggrieved  
12 Employees with accurate and complete wage statements in violation of Labor Code, §§ 226 and  
13 226.3; and (h) violating Labor Code § 1102.5.

14 85. PAGA is a mechanism by which the State of California itself can enforce state labor  
15 laws through the employee suing under the PAGA who do so as the proxy or agent of the state's  
16 labor law enforcement agencies. An action to recover civil penalties under PAGA is fundamentally  
17 a law enforcement action designed to protect the public and not to benefit private parties. The  
18 purpose of the PAGA is not to recover damages or restitution, but to create a means of "deputizing"  
19 citizens as private attorneys general to enforce the Labor Code. In enacting PAGA, the California  
20 Legislature specified that "it was ... in the public interest to allow aggrieved employees, acting as  
21 private attorneys general to recover civil penalties for Labor Code violations ..." Stats. 2003, ch.  
22 906, ' 1. Accordingly, PAGA claims cannot be subject to arbitration.

23 86. Plaintiff brings this Representative Action on behalf of all exempt employees of  
24 Defendant who suffered the violations alleged in paragraph 19 during the Liability Period.

25 87. Plaintiff was compelled to retain the services of counsel to file this court action to  
26 protect his interests and the interests of other former and current employees, and to assess and  
27 collect the civil penalties owed by Defendants. Plaintiff has thereby incurred attorney's fees and  
28 costs, which he is entitled to recover under Labor Code section 2699.

1 **ELEVENTH CAUSE OF ACTION**

2 **(Wrongful Termination)**

3 **(Against All Defendants)**

4 88. Plaintiff realleges and incorporates by this reference each and every allegation in the  
5 preceding Paragraphs as though fully set forth herein.

6 89. Plaintiff was employed by the Company as set forth herein.

7 90. Following his complaints to the Company for failure to comply with California  
8 wage and hour laws and Plaintiff's declining to sign the agreement providing for a waiver of wage  
9 and hour claims, as set forth herein, Plaintiff was retaliated against, was disciplined for purported  
10 performance issues, placed on a performance improvement plan, Plaintiff's hours were reduced and  
11 eliminated, he was placed on a "leave of absence" from April 4, 2020 to May 17, 2020 and  
12 ultimately terminated on July 2, 2020. The foregoing was a substantial reason for Plaintiff's  
13 termination and constitutes wrongful termination and discharge in violation of public policy.

14 91. As a direct, foreseeable, legal, and proximate result of Defendants' acts and  
15 omissions, as herein alleged, the foregoing caused Plaintiff to suffer substantial loss of income and  
16 the caused financial, emotional, and physical distress.

17 **PRAYER FOR RELIEF**

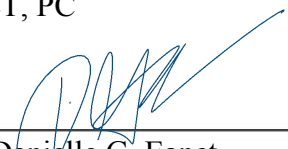
18 WHEREFORE, Plaintiff demands judgment against Defendants as follows:

- 19 1. Unpaid wages and compensation, and statutory penalties, according to proof;  
20 2. Restitution of all compensation due, including but not limited to wages and benefits,  
21 as a result of Defendants' unlawful and unfair business practices, according to  
22 proof;  
23 3. Preliminary and permanent injunctions enjoining and restraining Defendants from  
24 continuing the unfair and unlawful business practices set forth above, and requiring  
25 the establishment of appropriate and effective policies, procedures and practices in  
26 place to prevent further violations, including the maintenance of records that comply  
27 with California Labor Code section 226;  
28 4. Declaratory relief;

5. For general and special damages, in an amount according to proof, no less than \$ 1,000,000;
6. For civil penalties pursuant to California Labor Code sections 210, 225.5, 226.3, 226.8 558, 1197.1, 2802 and 2699, subdivisions (a) and (f), for Defendants' violations of the California Labor Code, according to proof;
7. For punitive and exemplary in an amount sufficient to punish and deter Defendants' future conduct;
8. For attorney's fees and costs of suit pursuant to California Labor Code sections 218.5, 226, 1194, 2699, 2802, and California Code of Civil Procedure section 1021.5;
9. Interest accrued on damages and penalties, including but not limited to pre-judgment and post-judgment interest, pursuant to, *inter alia*, California Labor Code sections 218.6, 1194, and 1194.2 and California Civil Code sections 3287 and 3288;
10. An award to Plaintiff and the Aggrieved Employees and the Labor and Workforce Development Agency of the State of California of all statutory penalties under PAGA and other sums as deemed appropriate by the court and according to proof at trial; and
11. For such other and further relief as the Court may deem just and proper.

Dated: March 24, 2021

EANET, PC

By: 

Danielle G. Eanet

Laine Mervis

Attorneys for Plaintiff PEDRO TOME

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**DEMAND FOR JURY TRIAL:**

Plaintiff demands a jury trial.

Dated: March 24, 2021

EANET, PC

By:  \_\_\_\_\_

Danielle G. Eanet  
Laine Mervis  
Attorneys for Plaintiff PEDRO TOME

# SUMMONS (CITACION JUDICIAL)

FOR COURT USE ONLY  
(SOLO PARA USO DE LA CORTE)

**NOTICE TO DEFENDANT:  
(AVISO AL DEMANDADO):**

PARSONS ENVIRONMENT & INFRASTRUCTURE GROUP INC., a  
Delaware corporation; (See Attachment)

**YOU ARE BEING SUED BY PLAINTIFF:  
(LO ESTÁ DEMANDANDO EL DEMANDANTE):**

PEDRO TOME, an individual,

**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](http://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](http://www.lawhelpcalifornia.org)), the California Courts Online Self-Help Center ([www.courtinfo.ca.gov/selfhelp](http://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](http://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](http://www.lawhelpcalifornia.org)), en el Centro de Ayuda de las Cortes de California, ([www.sucorte.ca.gov](http://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): Los Angeles Superior Court  
111 North Hill Street, Los Angeles, CA 90012

CASE NUMBER:  
(Número del Caso):

21STCV11315

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is:  
(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):  
Danielle G. Eanet 550 S. Hope St., Suite 750, Los Angeles, CA 90071 (310) 775-2495

DATE: 03/24/2021  
(Fecha)

Sherri R. Carter Executive Officer / Clerk of Court  
Clerk, by M. Barel, Deputy  
(Secretario) (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)).

[SEAL]



**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: <input type="checkbox"/> CCP 416.10 (corporation)         | <input type="checkbox"/> CCP 416.60 (minor)             |
| <input type="checkbox"/> CCP 416.20 (defunct corporation)        | <input type="checkbox"/> CCP 416.70 (conservatee)       |
| <input type="checkbox"/> CCP 416.40 (association or partnership) | <input type="checkbox"/> CCP 416.90 (authorized person) |
| <input type="checkbox"/> other (specify):                        |                                                         |
- ☐ by personal delivery on (date):

|                                                                                        |              |
|----------------------------------------------------------------------------------------|--------------|
| SHORT TITLE:<br>Pedro Tome v. Parsons Environment & Infrastructure Group, Inc., et al. | CASE NUMBER: |
|----------------------------------------------------------------------------------------|--------------|

INSTRUCTIONS FOR USE

- ➔ This form may be used as an attachment to any summons if space does not permit the listing of all parties on the summons.
- ➔ If this attachment is used, insert the following statement in the plaintiff or defendant box on the summons: "Additional Parties Attachment form is attached."

List additional parties (Check only one box. Use a separate page for each type of party.):

☐ Plaintiff    ☒ Defendant    ☐ Cross-Complainant    ☐ Cross-Defendant

PARSONS CORPORATION, a Delaware corporation; and DOES 1 THROUGH 100, inclusive,

|                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                  |                                                       |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------|
| ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):<br>Danielle G. Eanet (SBN 251369) / Laine Mervis (223235)<br>Eanet, PC<br>550 S. Hope St, Suite 750<br>Los Angeles, CA 90071<br>TELEPHONE NO.: (310) 775-2495 FAX NO.: (310) 593-2589<br>ATTORNEY FOR (Name): PLAINTIFF PEDRO TOME |                                                                                                                                                                                                  | FOR COURT USE ONLY                                    |
| SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles<br>STREET ADDRESS: 111 N. Hill Street<br>MAILING ADDRESS:<br>CITY AND ZIP CODE: Los Angeles, CA 90012<br>BRANCH NAME: Stanley Mosk Courthouse                                                                                                            |                                                                                                                                                                                                  |                                                       |
| CASE NAME:<br>Pedro Tome v. Parsons Environment & Infrastructure Group, Inc., et al.                                                                                                                                                                                                                         |                                                                                                                                                                                                  |                                                       |
| <b>CIVIL CASE COVER SHEET</b><br><input checked="" type="checkbox"/> <b>Unlimited</b><br>(Amount demanded exceeds \$25,000)<br><input type="checkbox"/> <b>Limited</b><br>(Amount demanded is \$25,000 or less)                                                                                              | <b>Complex Case Designation</b><br><input type="checkbox"/> <b>Counter</b> <input type="checkbox"/> <b>Joinder</b><br>Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402) | CASE NUMBER:<br><b>21STCV11315</b><br>JUDGE:<br>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 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 checked="" 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):
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: March 24, 2021  
Danielle G. Eanet

(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

|                                                                                         |             |
|-----------------------------------------------------------------------------------------|-------------|
| SHORT TITLE: <b>Pedro Tome v. Parsons Environment &amp; Infrastructure Group, Inc.,</b> | CASE NUMBER |
|-----------------------------------------------------------------------------------------|-------------|

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

**This form is required pursuant to Local Rule 2.3 in all new civil case filings in the Los Angeles Superior Court.**

**Step 1:** After completing the Civil Case Cover Sheet (Judicial Council form CM-010), find the exact case type in Column A that corresponds to the case type indicated in the Civil Case Cover Sheet.

**Step 2:** In Column B, check the box for the type of action that best describes the nature of the case.

**Step 3:** In Column C, circle the number which explains the reason for the court filing location you have chosen.

**Applicable Reasons for Choosing Court Filing Location (Column C)**

- |                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                             |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1. Class actions must be filed in the Stanley Mosk Courthouse, Central District.<br>2. Permissive filing in central district.<br>3. Location where cause of action arose.<br>4. Mandatory personal injury filing in North District.<br>5. Location where performance required or defendant resides.<br>6. Location of property or permanently garaged vehicle. | 7. Location where petitioner resides.<br>8. Location wherein defendant/respondent functions wholly.<br>9. Location where one or more of the parties reside.<br>10. Location of Labor Commissioner Office.<br>11. Mandatory filing location (Hub Cases – unlawful detainer, limited non-collection, limited collection, or personal injury). |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

|                                                                    |  | <b>A</b>                                                  | <b>B</b>                                                                                                                                                                                                                                                                                       | <b>C</b>                              |
|--------------------------------------------------------------------|--|-----------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------|
|                                                                    |  | Civil Case Cover Sheet Category No.                       | Type of Action (Check only one)                                                                                                                                                                                                                                                                | Applicable Reasons - See Step 3 Above |
| <b>Auto Tort</b>                                                   |  | Auto (22)                                                 | <input type="checkbox"/> A7100 Motor Vehicle - Personal Injury/Property Damage/Wrongful Death                                                                                                                                                                                                  | 1, 4, 11                              |
|                                                                    |  | Uninsured Motorist (46)                                   | <input type="checkbox"/> A7110 Personal Injury/Property Damage/Wrongful Death – Uninsured Motorist                                                                                                                                                                                             | 1, 4, 11                              |
| <b>Other Personal Injury/ Property Damage/ Wrongful Death Tort</b> |  | Asbestos (04)                                             | <input type="checkbox"/> A6070 Asbestos Property Damage<br><input type="checkbox"/> A7221 Asbestos - Personal Injury/Wrongful Death                                                                                                                                                            | 1, 11<br>1, 11                        |
|                                                                    |  | Product Liability (24)                                    | <input type="checkbox"/> A7260 Product Liability (not asbestos or toxic/environmental)                                                                                                                                                                                                         | 1, 4, 11                              |
|                                                                    |  | Medical Malpractice (45)                                  | <input type="checkbox"/> A7210 Medical Malpractice - Physicians & Surgeons<br><input type="checkbox"/> A7240 Other Professional Health Care Malpractice                                                                                                                                        | 1, 4, 11<br>1, 4, 11                  |
|                                                                    |  | Other Personal Injury Property Damage Wrongful Death (23) | <input type="checkbox"/> A7250 Premises Liability (e.g., slip and fall)                                                                                                                                                                                                                        | 1, 4, 11                              |
|                                                                    |  |                                                           | <input type="checkbox"/> A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.)<br><input type="checkbox"/> A7270 Intentional Infliction of Emotional Distress<br><input type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death | 1, 4, 11<br>1, 4, 11<br>1, 4, 11      |

|                                                                                         |             |
|-----------------------------------------------------------------------------------------|-------------|
| SHORT TITLE: <b>Pedro Tome v. Parsons Environment &amp; Infrastructure Group, Inc.,</b> | CASE NUMBER |
|-----------------------------------------------------------------------------------------|-------------|

|                                                                      | <b>A</b><br>Civil Case Cover Sheet<br>Category No.      | <b>B</b><br>Type of Action<br>(Check only one)                                                                                                                                                                                                                                                                                                                                                  | <b>C</b> Applicable<br>Reasons - See Step 3<br>Above                                   |      |
|----------------------------------------------------------------------|---------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------|------|
| <b>Non-Personal Injury/ Property<br/>Damage/ Wrongful Death Tort</b> | Business Tort (07)                                      | <input type="checkbox"/> A6029 Other Commercial/Business Tort (not fraud/breach of contract)                                                                                                                                                                                                                                                                                                    | 1, 2, 3                                                                                |      |
|                                                                      | Civil Rights (08)                                       | <input type="checkbox"/> A6005 Civil Rights/Discrimination                                                                                                                                                                                                                                                                                                                                      | 1, 2, 3                                                                                |      |
|                                                                      | Defamation (13)                                         | <input type="checkbox"/> A6010 Defamation (slander/libel)                                                                                                                                                                                                                                                                                                                                       | 1, 2, 3                                                                                |      |
|                                                                      | Fraud (16)                                              | <input type="checkbox"/> A6013 Fraud (no contract)                                                                                                                                                                                                                                                                                                                                              | 1, 2, 3                                                                                |      |
|                                                                      | Professional Negligence (25)                            | <input type="checkbox"/> A6017 Legal Malpractice<br><input type="checkbox"/> A6050 Other Professional Malpractice (not medical or legal)                                                                                                                                                                                                                                                        | 1, 2, 3<br>1, 2, 3                                                                     |      |
|                                                                      | Other (35)                                              | <input type="checkbox"/> A6025 Other Non-Personal Injury/Property Damage tort                                                                                                                                                                                                                                                                                                                   | 1, 2, 3                                                                                |      |
| <b>Employment</b>                                                    | Wrongful Termination (36)                               | <input checked="" type="checkbox"/> A6037 Wrongful Termination                                                                                                                                                                                                                                                                                                                                  | 1, 2, 3                                                                                |      |
|                                                                      | Other Employment (15)                                   | <input type="checkbox"/> A6024 Other Employment Complaint Case<br><input type="checkbox"/> A6109 Labor Commissioner Appeals                                                                                                                                                                                                                                                                     | 1, 2, 3<br>10                                                                          |      |
| <b>Contract</b>                                                      | Breach of Contract/ Warranty<br>(06)<br>(not insurance) | <input type="checkbox"/> A6004 Breach of Rental/Lease Contract (not unlawful detainer or wrongful eviction)<br><input type="checkbox"/> A6008 Contract/Warranty Breach -Seller Plaintiff (no fraud/negligence)<br><input type="checkbox"/> A6019 Negligent Breach of Contract/Warranty (no fraud)<br><input type="checkbox"/> A6028 Other Breach of Contract/Warranty (not fraud or negligence) | 2, 5<br>2, 5<br>1, 2, 5<br>1, 2, 5                                                     |      |
|                                                                      | Collections (09)                                        | <input type="checkbox"/> A6002 Collections Case-Seller Plaintiff<br><input type="checkbox"/> A6012 Other Promissory Note/Collections Case<br><input type="checkbox"/> A6034 Collections Case-Purchased Debt (Charged Off Consumer Debt Purchased on or after January 1, 2014)                                                                                                                   | 5, 6, 11<br>5, 11<br>5, 6, 11                                                          |      |
|                                                                      | Insurance Coverage (18)                                 | <input type="checkbox"/> A6015 Insurance Coverage (not complex)                                                                                                                                                                                                                                                                                                                                 | 1, 2, 5, 8                                                                             |      |
|                                                                      | Other Contract (37)                                     | <input type="checkbox"/> A6009 Contractual Fraud<br><input type="checkbox"/> A6031 Tortious Interference<br><input type="checkbox"/> A6027 Other Contract Dispute(not breach/insurance/fraud/negligence)                                                                                                                                                                                        | 1, 2, 3, 5<br>1, 2, 3, 5<br>1, 2, 3, 8, 9                                              |      |
|                                                                      | <b>Real Property</b>                                    | Eminent Domain/Inverse<br>Condemnation (14)                                                                                                                                                                                                                                                                                                                                                     | <input type="checkbox"/> A7300 Eminent Domain/Condemnation      Number of parcels_____ | 2, 6 |
|                                                                      |                                                         | Wrongful Eviction (33)                                                                                                                                                                                                                                                                                                                                                                          | <input type="checkbox"/> A6023 Wrongful Eviction Case                                  | 2, 6 |
| Other Real Property (26)                                             |                                                         | <input type="checkbox"/> A6018 Mortgage Foreclosure                                                                                                                                                                                                                                                                                                                                             | 2, 6                                                                                   |      |
|                                                                      |                                                         | <input type="checkbox"/> A6032 Quiet Title<br><input type="checkbox"/> A6060 Other Real Property (not eminent domain, landlord/tenant, foreclosure)                                                                                                                                                                                                                                             | 2, 6<br>2, 6                                                                           |      |
| <b>Unlawful Detainer</b>                                             | Unlawful Detainer-Commercial<br>(31)                    | <input type="checkbox"/> A6021 Unlawful Detainer-Commercial (not drugs or wrongful eviction)                                                                                                                                                                                                                                                                                                    | 6, 11                                                                                  |      |
|                                                                      | Unlawful Detainer-Residential<br>(32)                   | <input type="checkbox"/> A6020 Unlawful Detainer-Residential (not drugs or wrongful eviction)                                                                                                                                                                                                                                                                                                   | 6, 11                                                                                  |      |
|                                                                      | Unlawful Detainer-<br>Post-Foreclosure (34)             | <input type="checkbox"/> A6020F Unlawful Detainer-Post-Foreclosure                                                                                                                                                                                                                                                                                                                              | 2, 6, 11                                                                               |      |
|                                                                      | Unlawful Detainer-Drugs (38)                            | <input type="checkbox"/> A6022 Unlawful Detainer-Drugs                                                                                                                                                                                                                                                                                                                                          | 2, 6, 11                                                                               |      |

|                                                                                            |             |
|--------------------------------------------------------------------------------------------|-------------|
| SHORT TITLE:<br><b>Pedro Tome v. Parsons Environment &amp; Infrastructure Group, Inc.,</b> | CASE NUMBER |
|--------------------------------------------------------------------------------------------|-------------|

|                                         | <b>A</b><br>Civil Case Cover Sheet<br>Category No. | <b>B</b><br>Type of Action<br>(Check only one)                                                                                                                                                                                                                                                                                                                                                                                                 | <b>C</b> Applicable<br>Reasons - See Step 3<br>Above                                                                                                                                                                                                                                                                                                                                                                                         |                                                               |
|-----------------------------------------|----------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------|
| <b>Judicial Review</b>                  | Asset Forfeiture (05)                              | <input type="checkbox"/> A6108 Asset Forfeiture Case                                                                                                                                                                                                                                                                                                                                                                                           | 2, 3, 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<br><input type="checkbox"/> A6152 Writ - Mandamus on Limited Court Case Matter<br><input type="checkbox"/> A6153 Writ - Other Limited Court Case Review                                                                                                                                                                                                                          | 2, 8<br>2<br>2                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                               |
|                                         | Other Judicial Review (39)                         | <input type="checkbox"/> A6150 Other Writ /Judicial Review                                                                                                                                                                                                                                                                                                                                                                                     | 2, 8                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                               |
| <b>Provisionally Complex Litigation</b> | 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                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                               |
| <b>Enforcement of Judgment</b>          | Enforcement of Judgment (20)                       | <input type="checkbox"/> A6141 Sister State Judgment<br><input type="checkbox"/> A6160 Abstract of Judgment<br><input type="checkbox"/> A6107 Confession of Judgment (non-domestic relations)<br><input type="checkbox"/> A6140 Administrative Agency Award (not unpaid taxes)<br><input type="checkbox"/> A6114 Petition/Certificate for Entry of Judgment on Unpaid Tax<br><input type="checkbox"/> A6112 Other Enforcement of Judgment Case | 2, 5, 11<br>2, 6<br>2, 9<br>2, 8<br>2, 8<br>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<br><input type="checkbox"/> A6040 Injunctive Relief Only (not domestic/harassment)<br><input type="checkbox"/> A6011 Other Commercial Complaint Case (non-tort/non-complex)<br><input type="checkbox"/> A6000 Other Civil Complaint (non-tort/non-complex)                                                                                                                              | 1, 2, 8<br>2, 8<br>1, 2, 8<br>1, 2, 8                                                                                                                                                                                                                                                                                                                                                                                                        |                                                               |
|                                         | Partnership Corporation Governance (21)            | <input type="checkbox"/> A6113 Partnership and Corporate Governance Case                                                                                                                                                                                                                                                                                                                                                                       | 2, 8                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                               |
|                                         | <b>Miscellaneous Civil Petitions</b>               | Other Petitions (Not Specified Above) (43)                                                                                                                                                                                                                                                                                                                                                                                                     | <input type="checkbox"/> A6121 Civil Harassment<br><input type="checkbox"/> A6123 Workplace Harassment<br><input type="checkbox"/> A6124 Elder/Dependent Adult Abuse Case<br><input type="checkbox"/> A6190 Election Contest<br><input type="checkbox"/> A6110 Petition for Change of Name/Change of Gender<br><input type="checkbox"/> A6170 Petition for Relief from Late Claim Law<br><input type="checkbox"/> A6100 Other Civil Petition | 2, 3, 9<br>2, 3, 9<br>2, 3, 9<br>2<br>2, 7<br>2, 3, 8<br>2, 9 |

|                                                                                 |             |
|---------------------------------------------------------------------------------|-------------|
| SHORT TITLE:<br>Pedro Tome v. Parsons Environment & Infrastructure Group, Inc., | CASE NUMBER |
|---------------------------------------------------------------------------------|-------------|

**Step 4: Statement of Reason and Address:** Check the appropriate boxes for the numbers shown under Column C for the type of action that you have selected. Enter the address which is the basis for the filing location, including zip code. (No address required for class action cases).

|                                                                                                                                                                                                                                                                                                                                                                          |              |                    |                                |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|--------------------|--------------------------------|
| <b>REASON:</b><br><input type="checkbox"/> 1. <input checked="" type="checkbox"/> 2. <input checked="" type="checkbox"/> 3. <input type="checkbox"/> 4. <input type="checkbox"/> 5. <input type="checkbox"/> 6. <input type="checkbox"/> 7. <input type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10. <input checked="" type="checkbox"/> 11. |              |                    | ADDRESS:<br>111 N. Hill Street |
| CITY:<br>Los Angeles                                                                                                                                                                                                                                                                                                                                                     | STATE:<br>CA | ZIP CODE:<br>90012 |                                |

**Step 5: Certification of Assignment:** I certify that this case is properly filed in the Los Angeles District of the Superior Court of California, County of Los Angeles [Code Civ. Proc., §392 et seq., and Local Rule 2.3(a)(1)(E)].

Dated: March 24, 2021

  
 (SIGNATURE OF ATTORNEY/FILING PARTY)

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

1. Original Complaint or Petition.
2. If filing a Complaint, a completed Summons form for issuance by the Clerk.
3. Civil Case Cover Sheet, Judicial Council form CM-010.
4. Civil Case Cover Sheet Addendum and Statement of Location form, LACIV 109, LASC Approved 03-04 (Rev. 02/16).
5. Payment in full of the filing fee, unless there is court order for waiver, partial or scheduled payments.
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.

|                                                                                                         |  |                                                                                                                                                                                                             |
|---------------------------------------------------------------------------------------------------------|--|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p align="center"><b>SUPERIOR COURT OF CALIFORNIA</b><br/><b>COUNTY OF LOS ANGELES</b></p>              |  | <p align="center">Reserved for Clerk's File Stamp</p>                                                                                                                                                       |
| <p>COURTHOUSE ADDRESS:<br/>Stanley Mosk Courthouse<br/>111 North Hill Street, Los Angeles, CA 90012</p> |  | <p align="center"><b>FILED</b><br/>Superior Court of California<br/>County of Los Angeles<br/><b>03/24/2021</b><br/>Sherri R. Carter, Executive Officer / Clerk of Court<br/>By: <u>M. Barel</u> Deputy</p> |
| <p align="center"><b>NOTICE OF CASE ASSIGNMENT</b><br/><b>UNLIMITED CIVIL CASE</b></p>                  |  |                                                                                                                                                                                                             |
| <p><b>Your case is assigned for all purposes to the judicial officer indicated below.</b></p>           |  | <p>CASE NUMBER:<br/><b>21STCV11315</b></p>                                                                                                                                                                  |

**THIS FORM IS TO BE SERVED WITH THE SUMMONS AND COMPLAINT**

|   | ASSIGNED JUDGE     | DEPT | ROOM |  | ASSIGNED JUDGE | DEPT | ROOM |
|---|--------------------|------|------|--|----------------|------|------|
| ✓ | Rupert A. Byrdsong | 28   |      |  |                |      |      |

Given to the Plaintiff/Cross-Complainant/Attorney of Record

Sherri R. Carter, Executive Officer / Clerk of Court

on 03/24/2021  
(Date)

By M. Barel, Deputy Clerk

## **INSTRUCTIONS FOR HANDLING UNLIMITED CIVIL CASES**

The following critical provisions of the California Rules of Court, Title 3, Division 7, as applicable in the Superior Court, are summarized for your assistance.

### **APPLICATION**

The Division 7 Rules were effective January 1, 2007. They apply to all general civil cases.

### **PRIORITY OVER OTHER RULES**

The Division 7 Rules shall have priority over all other Local Rules to the extent the others are inconsistent.

### **CHALLENGE TO ASSIGNED JUDGE**

A challenge under Code of Civil Procedure Section 170.6 must be made within **15** days after notice of assignment for all purposes to a judge, or if a party has not yet appeared, within 15 days of the first appearance.

### **TIME STANDARDS**

Cases assigned to the Independent Calendaring Courts will be subject to processing under the following time standards:

### **COMPLAINTS**

All complaints shall be served within 60 days of filing and proof of service shall be filed within 90 days.

### **CROSS-COMPLAINTS**

Without leave of court first being obtained, no cross-complaint may be filed by any party after their answer is filed. Cross-complaints shall be served within 30 days of the filing date and a proof of service filed within 60 days of the filing date.

### **STATUS CONFERENCE**

A status conference will be scheduled by the assigned Independent Calendar Judge no later than 270 days after the filing of the complaint. Counsel must be fully prepared to discuss the following issues: alternative dispute resolution, bifurcation, settlement, trial date, and expert witnesses.

### **FINAL STATUS CONFERENCE**

The Court will require the parties to attend a final status conference not more than 10 days before the scheduled trial date. All parties shall have motions in limine, bifurcation motions, statements of major evidentiary issues, dispositive motions, requested form jury instructions, special jury instructions, and special jury verdicts timely filed and served prior to the conference. These matters may be heard and resolved at this conference. At least five days before this conference, counsel must also have exchanged lists of exhibits and witnesses, and have submitted to the court a brief statement of the case to be read to the jury panel as required by Chapter Three of the Los Angeles Superior Court Rules.

### **SANCTIONS**

The court will impose appropriate sanctions for the failure or refusal to comply with Chapter Three Rules, orders made by the Court, and time standards or deadlines established by the Court or by the Chapter Three Rules. Such sanctions may be on a party, or if appropriate, on counsel for a party.

**This is not a complete delineation of the Division 7 or Chapter Three Rules, and adherence only to the above provisions is therefore not a guarantee against the imposition of sanctions under Trial Court Delay Reduction. Careful reading and compliance with the actual Chapter Rules is imperative.**

### **Class Actions**

Pursuant to Local Rule 2.3, all class actions shall be filed at the Stanley Mosk Courthouse and are randomly assigned to a complex judge at the designated complex courthouse. If the case is found not to be a class action it will be returned to an Independent Calendar Courtroom for all purposes.

### **\*Provisionally Complex Cases**

Cases filed as provisionally complex are initially assigned to the Supervising Judge of complex litigation for determination of complex status. If the case is deemed to be complex within the meaning of California Rules of Court 3.400 et seq., it will be randomly assigned to a complex judge at the designated complex courthouse. If the case is found not to be complex, it will be returned to an Independent Calendar Courtroom for all purposes.