

**SUMMONS
(CITACION JUDICIAL)**

**NOTICE TO DEFENDANT:
(AVISO AL DEMANDADO):**
KEYPOINT CREDIT UNION and DOES ONE-TEN

FOR COURT USE ONLY
(SOLO PARA USO DE LA CORTE)
**ENDORSED
FILED
ALAMEDA COUNTY**
MAY 7 2009
CLERK OF THE SUPERIOR COURT
By Dorothy L. Lee, Deputy

**YOU ARE BEING SUED BY PLAINTIFF:
(LO ESTÁ DEMANDANDO EL DEMANDANTE):**
MEGG R. DAVIS and COLIN PIOTROWSKI, on behalf of themselves
and all others similarly situated

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

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), or by contacting your local court or county bar association.

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.courtinfo.ca.gov/selfhelp/espanol/), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California, (www.courtinfo.ca.gov/selfhelp/espanol/) o poniéndose en contacto con la corte o el colegio de abogados locales.

The name and address of the court is:
(El nombre y dirección de la corte es):
Alameda Superior Court
1225 Fallon Street, Room 109, Oakland, CA 94612

CASE NUMBER
(Número de Caso) **451050**

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):
Ronald Elsberry, Disability Rights Advocates
2001 Center Street, Fourth Floor, Berkeley, CA 94704

DOROTHY L. LEE
Clerk, by _____, Deputy
(Secretario) (Adjunto)

DATE: **MAY - 7 2009**
(Fecha)

PAT S. SWEETEN

(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): **Keypoint Credit Union and Does One-Ten**
under: CCP 416.10 (corporation) CCP 416.60 (minor)
 CCP 416.20 (defunct corporation) CCP 416.70 (conservatee)
 CCP 416.40 (association or partnership) CCP 416.90 (authorized person)
 other (specify):
 - by personal delivery on (date):

1 LAURENCE W. PARADIS (California Bar No. 122336)
2 RONALD ELSBERRY (California Bar No. 130338)
3 DISABILITY RIGHTS ADVOCATES
4 2001 Center Street, Third Floor
5 Berkeley, California 94704
6 Telephone: (510) 665-8644
7 Facsimile: (510) 665-8511
8 TTY: (510) 665-8716

ENDORSED
FILED
ALAMEDA COUNTY

MAY 7 2009

CLERK OF THE SUPERIOR COURT
By Dorothy L. Lee, Deputy

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 COUNTY OF ALAMEDA

11 MEGG R. DAVIS and COLIN
12 PIOTROWSKI, on behalf of themselves and
13 all others similarly situated,

14 Plaintiffs,

15 v.

16 KEYPOINT CREDIT UNION and DOES
17 ONE-TEN,

18 Defendants.

Case No. *RC* 09 - 451050

CLASS ACTION

COMPLEX LITIGATION

COMPLAINT FOR DISCRIMINATION
IN VIOLATION OF THE UNRUH CIVIL
RIGHTS ACT, CIV. CODE, § 51;
DISABLED PERSONS ACT, CIV. CODE,
§ 54, 54.1; SECTION 504 OF THE
REHABILITATION ACT OF 1973; GOV.
CODE, § 11135

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INTRODUCTION

1. This class action seeks to end systemic civil rights violations committed by defendant KeyPoint Credit Union (KeyPoint) against the deaf in California. KeyPoint is denying deaf Californians equal access to the financial services, products, and information KeyPoint provides its non-disabled customers through telephone communications. KeyPoint repeatedly has refused and continues to refuse to accept telephone relay service calls from deaf customers and potential customers. KeyPoint thus excludes the deaf from full and equal participation in the wide array of financial services and products it offers to other Californians.

JURISDICTION

2. This is a civil action under the Unruh Civil Rights Act (Civ. Code, § 51), the Disabled Persons Act (Civ. Code, §§ 54, 54.1), section 504 of the federal Rehabilitation Act of 1973 (29 U.S.C. § 794(a)), and Government Code section 11135. This Court has jurisdiction over the California claims alleged herein pursuant to California Civil Code §§ 51, *et seq.*, §§ 54 *et seq.*, and California Government Code §§ 11135, *et seq.*, and concurrent jurisdiction over the federal claim pursuant to 29 U.S.C. §§ 794 *et seq.*

3. This Court has jurisdiction over KeyPoint because KeyPoint is a credit union chartered by the State of California, authorized to do business in California, and conducting substantial business in California. KeyPoint owns, maintains, and operates branches throughout California and in Alameda County.

VENUE

4. Venue is proper in Alameda County under Code of Civil Procedure sections 395 and 395.5 because injury occurred and liability arose in Alameda County, and Defendants offered and/or provided services, loans, or extensions of credit to residents of Alameda County, including Plaintiffs. KeyPoint has been and is committing the acts alleged herein in Alameda County, has been and is violating the rights of consumers in Alameda County, and has been and is causing injury to consumers in Alameda County. Plaintiffs bring suit in the Oakland division of Alameda County.

1 being denied their civil rights to full and equal access to, and use and enjoyment of, KeyPoint's
2 services, products, and/or information due to the inability to transact financial services with and
3 obtain information from KeyPoint by TRS calls as required by law for persons with disabilities.

4 22. Common questions of law and fact predominate.

5 23. The claims of the named Plaintiffs are typical of those of the class and Plaintiffs
6 will fairly and adequately represent the interests of the class.

7 24. References to Plaintiffs shall be deemed to include the named Plaintiffs and each
8 member of the class, unless otherwise indicated.

9 **FACTS**

10 25. Title IV of the Americans with Disabilities Act of 1990 (ADA) requires common
11 carriers providing interstate and intrastate telecommunication services to provide deaf
12 individuals with telephone services that are functionally equivalent to those provided to hearing
13 individuals. (47 U.S.C. § 225.)

14 26. The ADA defines "telecommunications relay services" (TRS) as "telephone
15 transmission services that provide the ability for an individual who has a hearing impairment or
16 speech impairment to engage in communication by wire or radio with a hearing individual in a
17 manner that is functionally equivalent to the ability of an individual who does not have a hearing
18 impairment or speech impairment to communicate using voice communication services by wire
19 or radio." (47 U.S.C. § 225, subd. (a)(3).)

20 27. An IP relay service (IP relay) allows individuals with hearing and/or speech
21 disabilities to place calls using the internet. In this form of TRS, the relay user types what he or
22 she would like to say and transmits that text over the internet to a communications assistant. The
23 communications assistant then reads the text and speaks those words verbatim to the listener on
24 the other end of the call. Next, the communications assistant types the non-disabled person's
25 response back to the disabled caller. Through this means, the disabled person is able to
26 communicate by phone with non-disabled individuals.

27 28. A video relay service (VRS) allows persons with hearing and/or speech
28 disabilities to place calls using the internet and a webcam or other video device. With VRS, the

1 user communicates with sign language to a communications assistant, who then speaks the words
2 verbatim to the listener. The communications assistant then signs the non-disabled person's
3 response back to the disabled caller. Through this means, the disabled person is able to
4 communicate by phone with non-disabled individuals.

5 29. On or about December 3, 2007, Plaintiff Davis purchased a new automobile from
6 a dealer in Fremont, California, pursuant to a retail installment sale contract.

7 30. This form contract includes standard provisions pursuant to which the dealer
8 lends a portion of the purchase price to the buyer, and the buyer agrees to repay the loan in
9 monthly installments with interest.

10 31. The contract is assignable by the dealer.

11 32. The dealer assigned the retail installment sale contract to Defendant KeyPoint.

12 33. Plaintiff Davis has never been a member of KeyPoint and never had done
13 business with KeyPoint before.

14 34. Plaintiff Davis is deaf and thus substantially limited in the major life activities of
15 hearing and speaking.

16 35. Davis is not able to communicate using an ordinary voice telephone.

17 36. Davis uses TRS calls to communicate with people who communicate by
18 telephone.

19 37. KeyPoint provides "24/7 On-Call Telephone Service" at 1-888-255-3637, where
20 customers can call to speak with a live customer service representative and engage in financial
21 transactions or obtain information about KeyPoint's products and services.

22 38. On or about December 11, 2007, Davis called KeyPoint using IP relay to obtain
23 technical assistance because she was having difficulty making her car payment online via the
24 internet.

25 39. Before Davis was able to identify herself, the KeyPoint customer service
26 representative who answered the call stated that KeyPoint policy did not authorize the
27 acceptance of any telephone relay calls.
28

1 40. The KeyPoint representative stated that in order to obtain service from a KeyPoint
2 representative, Davis must physically go to a branch and present two forms of identification.

3 41. After Davis requested to speak to a supervisor, a different KeyPoint representative
4 stated to Davis that KeyPoint does not accept telephone relay calls because of security concerns.

5 42. Davis subsequently has attempted to contact KeyPoint on several occasions via
6 telephone relay calls, but each time her calls were refused by KeyPoint representatives.

7 43. Thus, whereas customers without disabilities can obtain information and services
8 from KeyPoint by voice telephone, Davis has been precluded from obtaining information about
9 or arranging for the refinancing of her automobile loan, for example, via TRS calls.

10 44. Plaintiff Piotrowski is deaf and thus substantially limited in the major life
11 activities of hearing and speaking.

12 45. Piotrowski is not able to communicate using an ordinary voice telephone.

13 46. Piotrowski uses TRS calls to communicate with people who communicate by
14 telephone.

15 47. On or about January 23, 2009, Piotrowski made a VRS call to KeyPoint to inquire
16 about opening an account.

17 48. The customer service representative stated to Piotrowski that KeyPoint's policy is
18 not to accept telephone relay calls.

19 49. When Piotrowski asked to speak with a supervisor, another representative
20 explained that the KeyPoint's policy is not to accept telephone relay calls, and she therefore had
21 to follow this policy and could not accept his call.

22 50. Piotrowski instead was invited to visit a KeyPoint branch physically to obtain
23 information about opening an account.

24 51. Thus, whereas hearing individuals may communicate with KeyPoint and obtain
25 information about and engage in financial services by telephone, Piotrowski has been precluded
26 from obtaining such information and engaging in such services through TRS calls.

27 52. Acting on behalf of Plaintiff Davis, an attorney with the National Association of
28 the Deaf discussed the issues raised in this complaint with representatives of KeyPoint and sent

1 three demand letters to KeyPoint requesting that it revise its policies and procedures to
2 communicate with deaf customers through TRS calls. KeyPoint has not changed its policies or
3 procedures to do so, and did not respond at all to the third demand letter.

4 53. Piotrowski subsequently sent his own demand letter to KeyPoint, similarly asking
5 that it revise its policy to communicate with deaf customers through TRS calls. KeyPoint did not
6 respond to the letter.

7 **FIRST CAUSE OF ACTION**

8 (Violation of Civil Code Section 51 – Unruh Civil Rights Act)

9 54. Plaintiffs incorporate by reference each of the preceding allegations as if fully set
10 forth herein.

11 55. Civil Code section 51 (the Unruh Civil Rights Act) guarantees equal access for
12 people with disabilities to the accommodations, advantages, facilities, privileges, and services of
13 all business establishments of any kind whatsoever.

14 56. KeyPoint is a “business establishment” within the meaning of Civil Code
15 section 51.

16 57. Each KeyPoint branch also is a “business establishment” within the meaning of
17 Civil Code section 51.

18 58. Customers and potential customers of KeyPoint who are class members have been
19 denied full and equal access to KeyPoint, have not been provided services and information that
20 are provided to other customers who are not disabled, and/or have been provided services and
21 information that are inferior to those provided to non-disabled customers.

22 59. KeyPoint denies class members the services and information KeyPoint
23 representatives provide other customers by voice telephone.

24 60. Financial services and information provided by KeyPoint customer service
25 representatives by ordinary voice telephone are services and information provided by and
26 integrated with these brick-and-mortar branches.

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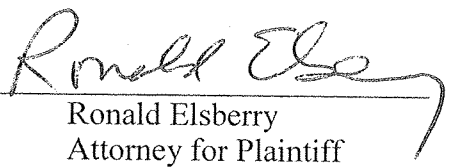
RELIEF REQUESTED

WHEREFORE, Plaintiffs pray for judgment as follows:

1. An order enjoining KeyPoint from violating the Unruh Civil Rights Act, the Disabled Persons Act, Section 504 of the Rehabilitation Act of 1973, and Government Code section 11135;
2. A declaration that KeyPoint is conducting its business in a manner that discriminates against class members and fails to provide access for persons with disabilities as required by law;
3. Damages in an amount to be determined by proof, including applicable statutory damages pursuant to Civil Code section 52 or, in the alternative, Civil Code section 54.3;
4. Plaintiffs' reasonable attorneys' fees and costs as authorized by Civil Code sections 52, subdivision (a), and section 54.3, subdivision (a); the Rehabilitation Act of 1973; and/or other applicable laws;
5. Such other and further relief as the Court deems just and proper.

DATED: May 7, 2009

DISABILITY RIGHTS ADVOCATES

By: 
Ronald Elsberry
Attorney for Plaintiff

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address) Ronald Elsberry, 130880, Disability Rights Advocates, 2001 Center St, Berkeley, CA TELEPHONE NO: 510-665-8644 FAX NO: 510-665-8511 ATTORNEY FOR (Name): Pltfs. Megg Davis and Colin Piotrowski	FOR COURT USE ONLY ENDORSED FILED ALAMEDA COUNTY MAY 7 2009 CLERK OF THE SUPERIOR COURT By Dorothy L. Lee, Deputy
SUPERIOR COURT OF CALIFORNIA, COUNTY OF STREET ADDRESS: 1225 Fallon Street, Room 109 MAILING ADDRESS: CITY AND ZIP CODE: Oakland, CA 94612 BRANCH NAME: Rene C. Davidson Courthouse	CASE NUMBER: RC 09 - 451050
CASE NAME: Davis, et al. vs. Keypoint Credit Union, et al.	JUDGE: DEPT:
CIVIL CASE COVER SHEET <input checked="" type="checkbox"/> Unlimited (Amount demanded exceeds \$25,000) <input type="checkbox"/> Limited (Amount demanded is \$25,000 or less)	Complex Case Designation <input type="checkbox"/> Counter <input type="checkbox"/> Joinder Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)

Items 1-6 below must be completed (see instructions on page 2).

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

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

a. <input type="checkbox"/> Large number of separately represented parties b. <input checked="" type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve c. <input type="checkbox"/> Substantial amount of documentary evidence	d. <input type="checkbox"/> Large number of witnesses 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 f. <input type="checkbox"/> Substantial postjudgment judicial supervision
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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: May 7, 2009
 Ronald Elsberry
 (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.

F. ADDENDUM TO CIVIL CASE COVER SHEET

Short Title:

Davis, et al. vs. Keypoint, et al.

Case Number:

CIVIL CASE COVER SHEET ADDENDUM

THIS FORM IS REQUIRED IN ALL NEW UNLIMITED CIVIL CASE FILINGS IN THE SUPERIOR COURT OF CALIFORNIA, COUNTY OF ALAMEDA

Oakland, Rene C. Davidson Alameda County Courthouse (446) Hayward Hall of Justice (447) Pleasanton, Gale-Schenone Hall of Justice (448)

Auto Tort	Auto tort (22)	<input type="checkbox"/> 34 Auto tort (G) Is this an uninsured motorist case? <input type="checkbox"/> yes <input type="checkbox"/> no
Other PI/PD / WD Tort	Asbestos (04) Product liability (24) Medical malpractice (45) Other PI/PD/WD tort (23)	<input type="checkbox"/> 75 Asbestos (D) <input type="checkbox"/> 89 Product liability (not asbestos or toxic tort/environmental) (G) <input type="checkbox"/> 97 Medical malpractice (G) <input type="checkbox"/> 33 Other PI/PD/WD tort (G)
Non-PI/PD / WD Tort	Bus tort / unfair bus. practice (07) Civil rights (08) Defamation (13) Fraud (16) Intellectual property (19) Professional negligence (25) Other non-PI/PD/WD tort (35)	<input type="checkbox"/> 79 Bus tort / unfair bus. practice (G) <input checked="" type="checkbox"/> 80 Civil rights (G) <input type="checkbox"/> 84 Defamation (G) <input type="checkbox"/> 24 Fraud (G) <input type="checkbox"/> 87 Intellectual property (G) <input type="checkbox"/> 59 Professional negligence - non-medical (G) <input type="checkbox"/> 03 Other non-PI/PD/WD tort (G)
Employment	Wrongful termination (36) Other employment (15)	<input type="checkbox"/> 38 Wrongful termination (G) <input type="checkbox"/> 85 Other employment (G) <input type="checkbox"/> 53 Labor comm award confirmation <input type="checkbox"/> 54 Notice of appeal - L.C.A.
Contract	Breach contract / Wrnty (06) Collections (09) Insurance coverage (18) Other contract (37)	<input type="checkbox"/> 04 Breach contract / Wrnty (G) <input type="checkbox"/> 81 Collections (G) <input type="checkbox"/> 86 Ins. coverage - non-complex (G) <input type="checkbox"/> 98 Other contract (G)
Real Property	Eminent domain / Inv Cdm (14) Wrongful eviction (33) Other real property (26)	<input type="checkbox"/> 18 Eminent domain / Inv Cdm (G) <input type="checkbox"/> 17 Wrongful eviction (G) <input type="checkbox"/> 36 Other real property (G)
Unlawful Detainer	Commercial (31) Residential (32) Drugs (38)	<input type="checkbox"/> 94 Unlawful Detainer - commercial <input type="checkbox"/> 47 Unlawful Detainer - residential <input type="checkbox"/> 21 Unlawful detainer - drugs Is the deft. in possession of the property? <input type="checkbox"/> Yes <input type="checkbox"/> No
Judicial Review	Asset forfeiture (05) Petition re: arbitration award (11) Writ of Mandate (02) Other judicial review (39)	<input type="checkbox"/> 41 Asset forfeiture <input type="checkbox"/> 62 Pet. re: arbitration award <input type="checkbox"/> 49 Writ of mandate Is this a CEQA action (Publ.Res.Code section 21000 et seq) <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> 64 Other judicial review
Provisionally Complex	Antitrust / Trade regulation (03) Construction defect (10) Claims involving mass tort (40) Securities litigation (28) Toxic tort / Environmental (30) Ins covrg from cmplx case type (41)	<input type="checkbox"/> 77 Antitrust / Trade regulation <input type="checkbox"/> 82 Construction defect <input type="checkbox"/> 78 Claims involving mass tort <input type="checkbox"/> 91 Securities litigation <input type="checkbox"/> 93 Toxic tort / Environmental <input type="checkbox"/> 95 Ins covrg from complex case type
Enforcement of Judgment	Enforcement of judgment (20)	<input type="checkbox"/> 19 Enforcement of judgment <input type="checkbox"/> 08 Confession of judgment
Other Complaint	RICO (27) Partnership / Corp. governance (21) Other complaint (42)	<input type="checkbox"/> 90 RICO (G) <input type="checkbox"/> 88 Partnership / Corp. governance (G) <input type="checkbox"/> 68 All other complaints (G)
Other Civil Petition	Other petition (43)	<input type="checkbox"/> 06 Change of name <input type="checkbox"/> 69 Other petition