

CITY OF LOS ANGELES

PUBLIC HEARING NOTICE

Heating: Associate Zoning Administrator Date: January 12, 2023... Place: Due to COVID-19 and continued concerns that meeting in person would present imminent risks to the health and safety of attendees...

CIVIL

SUMMONS (CITACION JUDICIAL)

CASE NUMBER (Número del Caso): 21NWC03537 NOTICE TO DEFENDANT (AVISO AL DEMANDADO): MARIA BONILLA, an individual, and DOES 1 to 5, inclusive...

GENERAL INFORMATION

FILE REVIEW - The complete file will be available for public inspection by appointment only. Please email the staff identified on the front page of this summons...

TESTIMONY AND CORRESPONDENCE

Your attendance is optional; oral testimony can only be given at the public hearing and may be limited due to the time constraints of the hearing.

REMEDIES AND JUDICIAL REVIEW

If you challenge these agenda items in court, you may be limited to raising only those issues you or someone else raised at the public hearing...

COMPLAINT FOR DAMAGES

BATTERY

INTENTIONAL INFLECTION OF EMOTIONAL DISTRESS

JURY DEMANDED

COMES NOW Plaintiff, CRISTOFHER POCASANGRE, and alleges against Defendants, and each of them, as follows:

1. At all times relevant herein, Plaintiff

delivered to this agency at or prior to the public hearing. If you seek judicial review of any decision of the City pursuant to California Code of Civil Procedure Section 1094.5, the petition for writ of mandate pursuant to that section must be filed no later than the 90th day following the date on which the agency's decision becomes final pursuant to California Code of Civil Procedure Section 1094.6.

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COMES NOW Plaintiff, CRISTOFHER POCASANGRE, and alleges against Defendants, and each of them, as follows:

1. At all times relevant herein, Plaintiff

que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protege. 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.sucrte.ca.gov).

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COMES NOW Plaintiff, CRISTOFHER POCASANGRE, and alleges against Defendants, and each of them, as follows:

1. At all times relevant herein, Plaintiff

respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más que avisarlo. Si no puede pagar 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 formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.sucrte.ca.gov).

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COMES NOW Plaintiff, CRISTOFHER POCASANGRE, and alleges against Defendants, and each of them, as follows:

1. At all times relevant herein, Plaintiff

intersección and colliding with Plaintiff DOSIE'S motor vehicle. 7. As a result, while Plaintiff DOSIE was attempting to negotiate a left-hand turn to head northbound on 14th Street, Defendant SUTTON failed to control the speed and movement of her vehicle, failed to keep a proper lookout for other vehicles, failed to stop for a red light traffic signal and negligently and recklessly caused the head-on collision with Plaintiff DOSIE'S vehicle.

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COMES NOW Plaintiff, CRISTOFHER POCASANGRE, and alleges against Defendants, and each of them, as follows:

1. At all times relevant herein, Plaintiff

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 formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.sucrte.ca.gov).

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COMES NOW Plaintiff, CRISTOFHER POCASANGRE, and alleges against Defendants, and each of them, as follows:

1. At all times relevant herein, Plaintiff

before the court will dismiss the case. ¡AVISO! Lo han demandado. Si no responde dentro de 30 días, la corte le quitará su sueldo, dinero y bienes sin más que avisarlo. Si no puede pagar 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 formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.sucrte.ca.gov).

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JURY DEMANDED

COMES NOW Plaintiff, CRISTOFHER POCASANGRE, and alleges against Defendants, and each of them, as follows:

1. At all times relevant herein, Plaintiff

LEGAL NOTICES

Continued from Page 9

CRISTOPHER POCASANGRE ("Plaintiff"), was and is a resident of the County of Los Angeles, State of California.

2. Plaintiff is informed and believes, and based upon such information and belief alleges that at all times relevant hereto Defendants JONATHAN LYNDALE KIRK, an individual; DABABY AKA BABY JESUS; BILLION DOLLAR BABY ENT, unknown entity; and DOES 1 TO 100, inclusive, are, and at all times herein mentioned were individuals, corporations, sole proprietors, shareholders, associations, partners and partnerships, joint ventures, and/or business entities unknown, primarily residing and doing business in the County of Los Angeles, State of California.

3. Defendants DOES 1 - 100, inclusive, are sued herein under fictitious names, their true names and capacities being unknown to Plaintiff. Plaintiff will amend this complaint to allege their true names and capacities when ascertained. Plaintiff is informed and believes and thereon alleges that each of the fictitiously named Defendants is responsible in some manner for the occurrences herein alleged, and that Plaintiffs damages as herein alleged were proximately caused by those Defendants.

4. At all times herein mentioned, Defendants, and each of them, were the agents, servants, and employees of their co-defendants, and in doing the things hereinafter alleged were acting in the scope of their authority as agents, servants, and employees, and with permission and consent of their co-defendants. Plaintiff is further informed and believes, and thereon alleges, that each of the Defendants herein gave consent to, ratified, and authorized the acts alleged herein to each of the remaining Defendants.

5. The location of the incident(s) giving rise to this action occurred at or near 6399 Wilshire Blvd., Los Angeles, CA 90048, in the state of California, County of Los Angeles. The Subject Premises is located at:

GENERAL ALLEGATIONS

6. On or about December 19, 2019, Plaintiff was at the subject premises under the course and scope of his employment. At said time and place, Plaintiff was informed of Defendant's presence at the hotel and approached him to ask for a photograph. Defendant denied his request and as Plaintiff was away he took a selfie with the Defendant in the background. Defendant JONATHAN LYNDALE KIRK; DABABY AKA BABY JESUS became verbally abusive towards Plaintiff and demanded that the image be deleted from his device. Plaintiff complied with Defendant's request and deleted the image of his device. Plaintiff is further informed and believes, and thereon alleges, that Defendant followed him and, suddenly and without warning, physically assaulted Plaintiff thereby causing Plaintiff to endure severe injury and pain.

7. The force of Defendant JONATHAN LYNDALE KIRK; DABABY AKA BABY JESUS assault to Plaintiffs body caused Plaintiff to suffer physical injuries and damages.

8. At no time before, during or after the attack did Plaintiff batter or attempt to batter Defendant JONATHAN LYNDALE KIRK; DABABY AKA BABY JESUS. As a result of the aforementioned conduct, Plaintiff was physically and psychologically damaged, incurred medical bills, sustained disability and had to retain an attorney and has incurred legal costs in connection therewith in order to prosecute this action.

FIRST CAUSE OF ACTION

(Assault Against Plaintiff JONATHAN LYNDALE KIRK; DABABY AKA BABY JESUS)

10. Plaintiff hereby incorporates into this first cause of action paragraphs 1 through 9, inclusive, of this Complaint.

11. Believing he was about to be touched in a harmful manner, the Plaintiff attempted to avoid contact with Defendant JONATHAN LYNDALE KIRK; DABABY AKA BABY JESUS.

12. Defendant JONATHAN LYNDALE KIRK; DABABY AKA BABY JESUS aggressively approached Plaintiff, leaning forward and getting within inches of his person, and in a loud bellicose manner threatened to touch and/or grab Plaintiff in a harmful manner such that it reasonably appeared that Defendant JONATHAN LYNDALE KIRK; DABABY AKA BABY JESUS was about to carry out the threat.

13. Plaintiff did not consent to Defendant JONATHAN LYNDALE KIRK; DABABY AKA BABY JESUS' conduct.

14. As a result of Defendant JONATHAN LYNDALE KIRK; DABABY AKA BABY JESUS' conduct the Plaintiff was physically and psychologically damaged, incurred medical bills, sustained disability and had to retain an attorney and has incurred legal costs in connection therewith in order to prosecute this action.

15. Defendant JONATHAN LYNDALE KIRK; DABABY AKA BABY JESUS' threatening and aggressive behavior was a substantial factor in Plaintiffs fear for Plaintiffs reasonable physical person and his sense of personal dignity.

16. Defendant JONATHAN LYNDALE KIRK; DABABY AKA BABY JESUS' malicious and oppressive despicable conduct set forth above was intended to cause injury to the Plaintiff and subjected the Plaintiff to cruel and unjust hardship with a willful and conscious disregard for the Plaintiffs rights and safety such that Defendant is subject to punitive damages as set forth in California Civil Code § 3294.

SECOND CAUSE OF ACTION

(Battery Against Defendant JONATHAN LYNDALE KIRK; DABABY AKA BABY JESUS)

17. Plaintiff re-alleges each and every allegation contained in the above Paragraphs 1 through 16, and by this reference incorporates said paragraphs as

though fully set forth herein.

18. On or about December 19, 2019 Defendant JONATHAN LYNDALE KIRK; DABABY AKA BABY JESUS intentionally and with the intent to harm, forcefully and physically attacked Plaintiff; Defendant JONATHAN LYNDALE KIRK; DABABY AKA BABY JESUS became verbally abusive towards Plaintiff and demanded that the image be deleted from his device. Plaintiff complied with Defendant's request and deleted the image of his device. As Plaintiff walked away, Defendant followed him and, suddenly and without warning, physically assaulted Plaintiff thereby causing Plaintiff to endure severe injury and pain.

19. Plaintiff did not consent to Defendant's conduct.

20. As a result of Defendant JONATHAN LYNDALE KIRK; DABABY AKA BABY JESUS' conduct, the Plaintiff was physically and psychologically damaged, incurred medical bills, sustained disability and had to retain an attorney and has incurred legal costs in connection therewith in order to prosecute this action.

21. Reasonable persons in Plaintiffs situation would have been offended by the manner in which Defendant JONATHAN LYNDALE KIRK; DABABY AKA BABY JESUS touched Plaintiff.

22. Defendants JONATHAN LYNDALE KIRK; DABABY AKA BABY JESUS' malicious and oppressive despicable conduct set forth above was intended to cause injury to the Plaintiff and subjected the Plaintiff to cruel and unjust hardship with a willful and conscious disregard for the Plaintiff's rights and safety such that Defendant is subject to punitive damages as set forth in California Civil Code § 3294.

THIRD CAUSE OF ACTION

(Intentional Infliction of Emotional Distress Against Defendant JONATHAN LYNDALE KIRK; DABABY AKA BABY JESUS)

23. Plaintiff re-alleges each and every allegation contained in the above Paragraphs 1 through 22, and by this reference incorporates said paragraphs as though fully set forth herein.

24. Defendant JONATHAN LYNDALE KIRK; DABABY AKA BABY JESUS acted with the intention of causing or reckless disregard of the probability of causing emotional distress when Defendant JONATHAN LYNDALE KIRK; DABABY AKA BABY JESUS became verbally abusive towards Plaintiff and demanded that the image be deleted from his device.

25. Plaintiff complied with Defendant's request and deleted the image of his device. As Plaintiff walked away, Defendant followed him and, suddenly and without warning, physically assaulted Plaintiff thereby causing Plaintiff to endure severe injury and pain.

26. Defendants JONATHAN LYNDALE KIRK; DABABY AKA BABY JESUS' malicious and oppressive despicable conduct set forth above was intended to cause injury to the Plaintiff and subjected the Plaintiff to cruel and unjust hardship with a willful and conscious disregard for the Plaintiffs rights and safety such that Defendant is subject to punitive damages as set forth in California Civil Code § 3294.

FOURTH CAUSE OF ACTION

(Negligence Against Plaintiff JONATHAN LYNDALE KIRK; DABABY AKA BABY JESUS)

29. Plaintiff re-alleges each and every allegation contained in the above Paragraphs 1 through 28, and by this reference incorporates said paragraphs as though fully set forth herein.

30. Defendants, and each of them, had an affirmative legal duty to use due care for the protection of Plaintiff against unreasonable risk of harm.

31. Defendants, and each of them, breached their duty of care for the protection of Plaintiff when Defendant JONATHAN LYNDALE KIRK; DABABY AKA BABY JESUS in the presence of others, aggressively approached Plaintiff on the subject premises, leaned forward and getting within inches of his person, and in a loud bellicose manner threatened to touch and/or grab Plaintiff in a harmful manner such that it reasonably appeared that Defendant JONATHAN LYNDALE KIRK; DABABY AKA BABY JESUS was about to carry out the threat; Defendant JONATHAN LYNDALE KIRK; DABABY AKA BABY JESUS became verbally abusive towards Plaintiff and demanded that the image be deleted from his device.

32. Plaintiff complied with Defendant's request and deleted the image of his device. As Plaintiff walked away, Defendant followed him and suddenly and without warning, physically assaulted Plaintiff, thereby causing Plaintiff to endure severe injury and pain.

33. As a direct result of the breach of their affirmative duty to protect Plaintiff from physical or psychological injury while at the subject premises, the malfeasance and/or nonfeasance of Defendants, and each of them, was the proximate or legal cause of Plaintiffs injuries.

34. As a direct and proximate result

of the negligence, carelessness and recklessness of Defendants, and each of them, as aforesaid, Plaintiff was hurt in his health, strength and activity, sustaining severe shock and injuries to his person, all of which said injuries have caused, continue to cause, and will in the future cause Plaintiff great physical and emotional pain and suffering; Plaintiff is informed and believes, and therefore alleges, that said injuries are permanent in nature, all to his damage in a sum according to proof.

34. The conduct of Defendants, and each of them, was a substantial factor in causing Plaintiffs harm.

35. As a result of the conduct of Defendants, and each of them, the Plaintiff was physically and psychologically damaged, incurred medical bills, sustained disability and had to retain an attorney and has incurred legal costs in connection therewith in order to prosecute this action.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff demands judgment against Defendants as follows:

1. AS TO THE FIRST CAUSE OF ACTION AGAINST DEFENDANT JONATHAN LYNDALE KIRK; DABABY AKA BABY JESUS, AS FOLLOWS:

a. For general damages in a sum according to proof at time of trial;

b. For special damages in a sum according to proof at time of trial;

c. For punitive and/or exemplary damages in an amount appropriate to punish Defendant and deter others from engaging in similar misconduct;

2. AS TO THE SECOND CAUSE OF ACTION AGAINST DEFENDANT JONATHAN LYNDALE KIRK; DABABY AKA BABY JESUS, AS FOLLOWS:

a. For general damages in a sum according to proof at time of trial;

b. For special damages in a sum according to proof at time of trial;

c. For punitive and/or exemplary damages in an amount appropriate to punish Defendant and deter others from engaging in similar misconduct;

3. AS TO THE THIRD CAUSE OF ACTION AGAINST DEFENDANT JONATHAN LYNDALE KIRK; DABABY AKA BABY JESUS, AS FOLLOWS:

a. For general damages in a sum according to proof at time of trial;

b. For special damages in a sum according to proof at time of trial;

c. For punitive and/or exemplary damages in an amount appropriate to punish Defendant and deter others from engaging in similar misconduct;

4. AS TO THE FOURTH CAUSE OF ACTION AGAINST ALL DEFENDANTS, AS FOLLOWS:

a. For costs of suit herein incurred;

b. For prejudgment interest at the legal rate;

c. For such other and further relief as the court may deem just proper.

DATED: September 15, 2020
DOWNTOWN LA. LAW GROUP

/s/ illegible
By: Anthony Werbin, Esq.
Attorney for Plaintiff,

CRISTOPHER POCASANGRE
DEMAND FOR JURY TRIAL

Plaintiff demands trial by jury of all issues so triable.

DATED: September 15, 2020
DOWNTOWN LA. LAW GROUP

/s/ illegible
By: Anthony Werbin, Esq.
Attorney for Plaintiff,

CRISTOPHER POCASANGRE
11/29, 12/6, 12/13, 12/20/2022

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download the RFP documents. Any questions or clarifications may be sent via email to morelos.lilbeth@lacoee.edu, or by telephoning (562)401-5775. Los Angeles County Office of Education Karen Kimmel Chief Financial Officer 12/20, 12/27/22

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