

LAW OFFICES OF
CAROL E. FREIN
1880 Century Park East, Suite 1100
LOS ANGELES, CALIFORNIA 90067
(213) 555-8341

FILED

DEC - 3 1992
JAMES H. DEMPSEY, CLERK
BY D.R. CALICOTTE, DEPUTY

Attorney for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

SHARON BERCK,

Plaintiff,

vs.

MICHAEL KAMRAVA, M.D.,
CENTURY CITY HOSPITAL,
a medical corporation,
and DOES 1 through 100,
Inclusive,

Defendants.

CASE NO. 92-1087

COMPLAINT—FOR DAMAGES
FOR MEDICAL MALPRACTICE;
LACK OF INFORMED CONSENT;
FRAUD

0210
AF

COMES NOW plaintiff SHARON BERCK and for causes of action against the defendants, and each of them, complains and alleges as follows:

FIRST CAUSE OF ACTION
Medical Malpractice

1. That the true names and capacities, whether individual, corporate, associate or otherwise, of defendants DOE 1 through DOE 100, are unknown to plaintiff at this time and plaintiff therefore sues said defendants by such fictitious names. When the true names

CAROL E. PERIS, State Bar No. 45104
1880 Century Park East, Suite 1100
Los Angeles, California 90067

FILED
LOS ANGELES SUPERIOR COURT
SEP 8 1994

SEP 8 1994

Telephone:

Attorney(s) for Plaintiff

EDWARD M. KHTZMAN
[Signature]

SUPERIOR COURT
WEST DISTRICT
SANTA MONICA
LOS ANGELES

SUPERIOR COURT OF CALIFORNIA, COUNTY OF

SUPERIOR MUNICIPAL, of JUSTICE
1725 Main Street, Santa Monica, California 90401

(Name of Municipal or Justice Court District, if of such court, if any)

Plaintiff: SHARON BERCK

CASE NUMBER: SC 21087

Defendant(s): MICHAEL KARRAVA, M.D.,
et al.

REQUEST FOR DISMISSAL

TYPE OF ACTION

- Personal Injury, Property Damage and Wrongful Death
- Motor Vehicle
- Other
- Domestic Relations
- Contract Dispute
- Other (Specify)

(Addressed Title)

TO THE CLERK: Please dismiss this action as follows: (Check applicable boxes)

- With prejudice
- Without prejudice
- Entire action
- Complaint only
- Other (Specify)
- Retain only
- Cross-complaint only

Dated August 29, 1994

[Signature]

If dismissal requested is of specified parties only, or specified causes of action only or of specified cross-complaints only, state and identify the parties, causes of action or cross-complaints to be dismissed.

Attorney(s) for Plaintiff
CAROL E. PERIS
(Type or print attorney(s) name(s))

TO THE CLERK: Consent to the above dismissal is hereby given.**

Dated: _____
**When a cross-complaint (or Response (Marriage) seeking affirmative relief) is on file, the attorney(s) for the cross-complainant (respondent) must sign this consent when required by CCP 58711, (E) or (F).

Attorney(s) for _____
(Type or print attorney(s) name(s))

(To be completed by clerk)

SEP 8 - 1994

- Dismissal entered as requested on _____ as to only _____
- Dismissal entered on _____ and attorney(s) notified on _____
- Dismissal not entered as requested for the following reason(s): _____

EDWARD M. KHTZMAN

SEP 8 - 1994

Dated

[Signature]

Clerk
Clerk

NEIL C. NEWSON, ESQ. BAR NO. 41497
 NEIL C. NEWSON & ASSOCIATES, P.C.
 9465 Wilshire Boulevard, Suite 610
 Beverly Hills, California 90212-2659
 ATTORNEY FOR (NAME): Plaintiff(s)

NAME OF COURT, JUDICIAL DISTRICT OR BRANCH COURT, IF ANY, AND COURT OFFICE AND STREET ADDRESS
 SUPERIOR COURT OF THE STATE OF CALIFORNIA
 COUNTY OF LOS ANGELES, WEST DISTRICT
 1725 Main Street
 Santa Monica, CA 90401

PLAINTIFF: EVA CINDY NENEN and MICHAEL VERDI

FILED

APR 22 1994

EDWARD M. KRITZMAN

A. Smith

DEFENDANT:

MICHAEL M. KARRAVA, M.D.

PAGES 1 TO 10

COMPLAINT - Personal Injury, Property Damage, Wrongful Death
 MOTOR VEHICLE
 Property Damage
 Personal Injury
 OTHER (specify): General Negligence
 Wrongful Death
 Other Damages (specify): Loss of Consortium

CASE NUMBER:

SC029658

1. This pleading, including attachments and exhibits, consists of the following number of pages: 5

2. a. Each plaintiff named above is a competent adult

- Except plaintiff (name):
- a corporation qualified to do business in California
 - an unincorporated entity (describe):
 - a public entity (describe)
 - a minor an adult
 - for whom a guardian or conservator of the estate or a guardian ad litem has been appointed
 - other (specify):
 - other (specify):

- Except plaintiff (name):
- a corporation qualified to do business in California
 - an unincorporated entity (describe):
 - a public entity (describe)
 - a minor an adult
 - for whom a guardian or conservator of the estate or a guardian ad litem has been appointed
 - other (specify):
 - other (specify):

b. Plaintiff (name):
 is doing business under the fictitious name of (specify):

and has complied with the fictitious business name law.

c. Information about additional plaintiffs who are not competent adults is shown in Complaint - Attachment 2c.

(Continued)

SHORT TITLE

MENEN v. KAMRAVA

CASE NUMBER

FIRST

(Number)

CAUSE OF ACTION - General Negligence

Page _____

ATTACHMENT TO Complaint Cross-Complaint

(Use a separate cause of action form for each cause of action.)

CA-1 Plaintiff (name): EVA CINDY MENEN and MICHAEL VERDI

alleges that defendant (name): MICHAEL M. KAMRAVA, M.D. and

Does 1 to 10

was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant negligently caused the damage to plaintiff

on (date): or about May 3, 1993

at (place): 250 N. Robertson Blvd., Beverly Hills, CA 90211

(Description of reasons for today's Defendant, MICHAEL M. KAMRAVA, M.D. and DOES 1 to 10 were charged with the care and treatment of Plaintiff EVA CINDY MENEN. During their charge of care of Plaintiff MENEN sustained damages due to the impropriety in the care, diagnosis and treatment, including, but not limited to, over-medicating and providing for artificial insemination at inappropriate times.

1 MARGARET LEE COVEY, Esq.
2 SCHMID, NORKK & VOILES
3 3550 Wilshire Boulevard, Suite 1280
4 Los Angeles, California 90010-2419
5 Telephone: (213) 251-0700
6 State Bar No. 76137

7 Attorneys for Defendant,
8 MICHAEL M. KAMRAVA, M.D.

FILED
LOS ANGELES SUPERIOR COURT

JUL 25 1994

JUN 30 1994
SUPERIOR COURT
WEST DISTRICT
SANTA MONICA

CLERK

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 FOR THE COUNTY OF LOS ANGELES

11 EVA CINDY MENEN and MICHAEL VERDI) CASE NO. SC 029 658
12 Plaintiffs,)
13 v.) STIPULATION TO STAY ACTION
14 MICHAEL M. KAMRAVA, M.D. et al.) PENDING BINDING ARBITRATION,
15 Defendants.) ORDER

16
17
18 IT IS HEREBY STIPULATED by and between plaintiffs, EVA
19 CINDY MENEN and MICHAEL VERDI, and defendant, MICHAEL M. KAMRAVA,
20 M.D., by and through their respective counsel herein, to submit
21 this matter to binding arbitration in accordance with the procedure
22 for arbitration set forth in the contractual agreement between
23 plaintiff, EVA CINDY MENEN, and defendant. A true and correct copy

24 ///
25 ///
26 ///
27 ///

LAW OFFICES OF
CAROL E. EBBS
1800 Century Park East, Suite 1100
LOS ANGELES, CALIFORNIA 90067
(818) 992-8841

REPLACE BELOW FOR FILING OF EMPLOYER

FILED

NOV 30 1992

RECEIVED BY MAIL
L. N. Miller
BY U.S. MAIL

Attorney for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

LAURIE TYRE CARTHEW,

Plaintiff,

vs.

MICHAEL KAMRAVA, M.D.,
CENTURY CITY HOSPITAL,
a medical corporation,
and DOES 1 through 100,
inclusive,

Defendants.

CASE NO.

SC020677

COMPLAINT FOR DAMAGES
FOR MEDICAL MALPRACTICE;
LACK OF INFORMED CONSENT;
FRAUD

COMES NOW plaintiff LAURIE TYRE CARTHEW and for causes of
action against the defendants, and each of them, complains and
alleges as follows:

FIRST CAUSE OF ACTION

Medical Malpractice

1. That the true names and capacities, whether individual,
corporate, associate or otherwise, of defendants DOE 1 through DOE
100, are unknown to plaintiff at this time and plaintiff therefore
sues said defendants by such fictitious names. When the true names

CAROL E. FRIS, State Bar No. 45184
1880 Century Park East, Suite 1100
Los Angeles, California 90067

Telephone:

FI
LOS ANGELES

SEP 8 - 1994

SEP 8 1994

Assigned to Plaintiff

RECEIVED IN THE
COURT OF CALIFORNIA

SUPERIOR COURT
WEST DISTRICT
SANTA MONICA

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES
(SUPERIOR, MUNICIPAL, OR JUDICIAL)

1725 Main Street, Santa Monica, California 90401
(Name of Municipal or Justice Court District or of Branch Court, if any)

Plaintiff: LAURIE TYRK CARTHEW

CASE NUMBER SC 20677

REQUEST FOR DISMISSAL
TYPE OF ACTION

Defendant(s): MICHAEL KARRAVA, M.D.,
et al.

- Personal Injury, Property Damage and Wrongful Death
 - Motor Vehicle
 - Other
- Domestic Relations
- Eminent Domain
- Other: (Specify)

(Indorsed Title)

TO THE CLERK: Please dismiss this action as follows: (Check applicable boxes.)

- 1. With prejudice Without prejudice
- 2. Entire action Complaint only Petition only Cross-complaint only
- Other: (Specify)*

Dated: August 29, 1994

*If dismissal requested is of specified parties only, of specified causes of action only or of specified cross-complaints only, to state and identify the parties, causes of action or cross-complaints to be dismissed.

Carol E. Fris
Attorney(s) for Plaintiff

CAROL E. FRIS

(Type or print attorney(s) name(s))

TO THE CLERK: Consent to the above dismissal is hereby given.**

Dated:

**When a cross-complaint (or Recross (Mortgage) seeking affirmative relief) is on file, the attorney(s) for the cross-complainant (complainant) must sign this consent when required by CCP §§111, 112 or 113.

Attorney(s) for

(Type or print attorney(s) name(s))

(To be completed by clerk)

SEP 8 - 1994

- Dismissal entered as requested on
- Dismissal entered on
- Dismissal not entered as requested for the following reason(s), and attorney(s) notified on

SEP 8 - 1994

EDWARD M. KRITZMAN

Dated: By *Edward M. Kritzman* Clerk
Representing

FILED BY PARTY WITHOUT ATTORNEY FILING MAIL ADDRESS

AM OFFICES OF JUAN CARLOS DOMINGUEZ
978 Santa Anita Ave., Suite 205
Eagle City, California 91780
State Bar #137552

FORMER FOR PLAINTIFF

Name of court, judicial district or branch court, if any, and post office and street address

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES, CENTRAL DISTRICT
11 North Hill Street
Los Angeles, California 90012

PARTY: ESTELA RUIALCAVA CASTRO AND ADOLFO CASTRO.

FOR COURT USE ONLY

ORIGINAL FILED

DEC 13 1991

COUNTY CLERK

DEFENDANT: CLINICA DE SALUD FAMILIAR, DR. MARIO Z. ROSENBERG, M.D.,
BERTO C. PROT, M.D., MICHAEL KAPRAVA, M.D., DR. ISAAC SHIMM, M.D.,
JACOB CHODAKIEWITZ, DR. BENROUZ BROOKMAN, M.D.,
DOES 1 TO 20, INCLUSIVE

COMPLAINT—Personal Injury, Property Damage, Wrongful Death

- MOTOR VEHICLE
- Property Damage
- Personal Injury
- OTHER (specify)
- Wrongful Death
- Other Damages (specify)

Case Number
BC01-4665

MEDICAL MALPRACTICE

1. This pleading, including attachments and exhibits, consists of the following number of pages: 4

2. Each plaintiff named above is a competent adult

- Except plaintiff (name)
 - a corporation qualified to do business in California
 - an unincorporated entity (describe)
 - a public entity (describe)
 - a minor an adult
 - for whom a guardian or conservator of the estate or a guardian of the person has been appointed
 - other (specify)
 - other (specify)

Case Number
BC01-4665

- Except plaintiff (name)
 - a corporation qualified to do business in California
 - an unincorporated entity (describe)
 - a public entity (describe)
 - a minor an adult
 - for whom a guardian or conservator of the estate or a guardian of the person has been appointed
 - other (specify)
 - other (specify)

3. Plaintiff names:
Defendant's business name (specify)

4. Plaintiff names:
Defendant's business name (specify)

5. Plaintiff names:
Defendant's business name (specify)

Each approved by me
Judicial Council of California

COMPLAINT—Personal Injury, Property Damage,

The 1991 Judicial Council of California

SHORT TITLE

CASTRO v. CLINICA FAMILIAR

CASE NUMBER

FIRST CAUSE OF ACTION—General Negligence

Page

ATTACHMENT TO Complaint Cross-Complaint

(Use a separate cause of action form for each cause of action.)

CA-1. Plaintiff (name): ESTELA RUBALCAVA CASTRO AND APOLONIO CASTRO

alleges that defendant (name): CLINICA DE SALUD FAMILIAR, DR. MARIO Z. ROSENBERG, M.D., DR. ROBERTO C. PROT, M.D., MICHAEL KARRAVA, M.D., DR. ISSAC SCHMIDT, M.D., DR. JACOBO CHODAKIEWITZ, DR. BEHROUZ BROOMAN, M.D.,

Cause 1 to 20

was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant negligently caused the damage to plaintiff on (date) FEBRUARY 28, 1991 at (place) 1039 S. Alvarado St., Los Angeles, California 90006

(description of reasons for liability)

12. MRS. CASTRO, A NINETEEN YEAR-OLD HISPANIC FEMALE, WAS RECEIVING PRENATAL CARE AT DEFENDANT CLINIC FOR HER FIRST PREGNANCY. SHE WAS SEEN IN NOVEMBER AND DECEMBER 1990, AND THEN AGAIN IN JANUARY AND FEBRUARY 1991.
13. ON FEBRUARY 20, 1991 SHE PRESENTED HERSELF TO THE CLINIC DUE TO LABOR PAINS WHICH HAD BEEN A FEW HOURS EARLIER. SHE WAS TOLD THAT SHE WAS NOT IN LABOR AS HER DUE DATE WAS STILL SEVERAL WEEKS AWAY. SHE WAS SENT HOME WITHOUT ANY INSTRUCTIONS.
14. MRS. CASTRO'S PAIN CONTINUED INTERMITTENTLY OVER THE COURSE OF THE FOLLOWING TWO DAYS. MRS. CASTRO FELT THE BABY KICKING AND MOVING AROUND WITHIN HER FOR APPROXIMATELY SIX HOURS AFTER VISITING DEFENDANT CLINIC.
15. APPROXIMATELY 48 HOURS AFTER VISITING THE DEFENDANT CLINIC, MRS. CASTRO PRESENTED HERSELF TO THE MONTEREY PARK HOSPITAL. THERE SHE WAS INFORMED THAT THE BABY WAS DEAD.
16. SHE WAS IMMEDIATELY TRANSPORTED TO LOS ANGELES COUNTY GENERAL HOSPITAL WHERE A FULLY-FORMED DEAD BABY WAS DELIVERED. THE CAUSE OF DEATH WAS ASPHYXIATION.
17. ALL OF THE EVENTS LISTED IN PARAGRAPHS 12 TO 14, INCLUSIVE, WERE DUE TO THE NEGLIGENCE OF THE NAMED AND DOE DEFENDANTS.
18. AS THE RESULT OF SAID NEGLIGENT ACTS BY DEFENDANTS, AND EACH OF THEM, PLAINTIFF ESTELA CASTRO HAS SUFFERED SEVERE DAMAGE TO HER PERSON AND PSYCHE, AND PLAINTIFF APOLONIO CASTRO HAS SUFFERED DAMAGE TO HIS PSYCHE.

FILED

AUG 3 1993

WALTON COUNTY CLERK

BY A. P. HARRIS, CLERK

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

ESTELA R. CASTRO

CASE NUMBER

BC 014 665

vs. Plaintiff(s)

ARBITRATION REPORT FOR
STATUS CONFERENCE

MARGARET SUAREZ, M.D.

Defendant(s)

DATE:

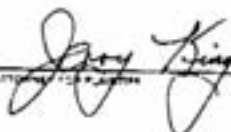
TIME:

DEPT:

THIS REPORT MUST BE FILED IN DEPARTMENT _____ AT LEAST FIVE
COURT DAYS BEFORE THE NEXT STATUS CONFERENCE.

Plaintiff submits the following Arbitration Report:

1. The arbitration was held on JULY 21, 1993
2. The arbitrator was _____
3. The award was in favor of DEFENDANTS
4. The amount of the award was _____
5. The special damages of plaintiff(s) is/are GENERAL DAMAGES
6. The award was filed on JULY 22, 1993
7. The request for trial de novo was filed by PLAINTIFF
on AUGUST 2, 1993


ATTORNEY AT LAW

MARK S. RAVIS, BAR NO. 137479
2029 CENTURY PARK EAST, SUITE 600
LOS ANGELES, CA. 90067

11/16/93

ESTELLA CASTRO

Attorney(s) for

Superior

COURT OF CALIFORNIA, COUNTY OF Los Angeles

(SUPERIOR, MUNICIPAL, OR JUSTICE)

(Name of Municipal or Justice Court (District or of branch court, if any))

Plaintiff(s)

Estella Castro

CASE NUMBER BC 044 665

REQUEST FOR DISMISSAL

TYPE OF ACTION

- Personal Injury, Property Damage and Wrongful Death
 Motor Vehicle Other
 Domestic Relations Eminent Domain
 Other (Specify)

Defendant(s)

Margaret Juarez, M.D. et al.

(Abbreviated Title)

TO THE CLERK: Please dismiss this action as follows (Check applicable boxes.)

1. With prejudice Without prejudice
 2. Entire action Complaint only Petition only Cross-complaint only
 Other (Specify)*

Plaintiff dismisses Clinica de Salud Familiar only

Ravis & Dominguez

Mark S. Ravis

Date: August 19, 1993

Attorney(s) for Plaintiff

MARK S. RAVIS, ESQ.

(Type or print attorney(s) name(s))

*If dismissal requested is of specified parties only, of specified causes of action only or of specified cross-complaints only, so state and identify the parties, causes of action or cross-complaints to be dismissed.

TO THE CLERK: Consent to the above dismissal is hereby given. **

Date:

Attorney(s) for

**When a cross-complaint (or Response (Marriage) seeking alternative relief) is on file, the attorney(s) for the cross-complainant (respondent) must sign this consent when required by CCP 581(1), (2) or (3).

(Type or print attorney(s) name(s))

(To be completed by clerk)

NOV 16 1993

- Dismissal entered as requested on _____
 Dismissal entered on _____ as to only _____
 Dismissal not entered as requested for the following reason(s), and attorney(s) notified on _____

Date:

NOV 16 1993

by

C. Navarro

Clerk

Deputy

REQUEST FOR DISMISSAL

1 TOVA LEVY
 1485 1/2 South Robertson Boulevard
 2 Los Angeles, California 90035
 (310) 858-7318

FILED
 LOS ANGELES SUPERIOR COURT

DEC 08 1999

JOHN A. CLARKE, CLERK

J. Alexander

BY S. Alexander, DEPUTY

3
 4
 5 In Propria Persona
 6
 7

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
 9 COUNTY OF LOS ANGELES, WEST DISTRICT

10 JUDGE

11 TOVA LEVY,

12 Plaintiff,

13 vs.

14 MICHAEL M. KAMRAVA, M.D., and
 15 DOES 1 through 30, Inclusive,
 and each of them,

16 Defendants.
 17

) CASE NO. **SC059686**
)
) COMPLAINT FOR DAMAGES
)
) (MEDICAL MALPRACTICE)
)
)
)

18 Plaintiff TOVA LEVY ("plaintiff") alleges as follows:
 19

20 FIRST CAUSE OF ACTION

21 (Against All Defendants, and Each of Them
 22 for Medical Negligence)
 23

24 1. The true names and capacities, whether individual,
 25 corporate, associate, or otherwise, of defendants DOE 1 through
 26 DOE 30, inclusive, are unknown to plaintiff, who therefore sues
 27 said defendants by such fictitious names. Plaintiff will ask
 leave of this Court to amend her Complaint to reflect such true

LAW OFFICES OF STEVEN ROSEMAN
 Steven Roseman, Esq., SBN 29329
 4001 Atlantic Avenue
 Long Beach, CA 90807

FILED
 LOS ANGELES SUPERIOR COURT

ATTORNEY FOR PLAINTIFF: Plaintiff, TOVA LEVY

FROM COURT OF COURT AND NAME OF JUDGE (WHERE APPLICABLE) (NAME, TITLE)

SUPERIOR COURT OF THE STATE OF CALIFORNIA
 WEST DISTRICT

RECEIVED
 AUG 03 2000
 WEST DISTRICT

AUG 03 2000

PLAINTIFF/PETITIONER: TOVA LEVY

DEPUTY

DEFENDANT/RESPONDENT: MICHAEL M. KIMRANA, M.D.

REQUEST FOR DISMISSAL

- Personal Injury, Property Damage, or Wrongful Death
 Motor Vehicle Other
 Family Law
 Eviction/Domain
 Other (specify): Medical Negligence

CASE NUMBER
 SC 059606

ENTERED
 SUSTAIN

A conformed copy will not be returned by the clerk unless a method of return is provided with the document.

1. TO THE CLERK: Please dismiss this action as follows:

- a. (1) With prejudice (2) Without prejudice
- b. (1) Complaint (2) Petition
 (3) Cross-complaint set by (name):
 (4) Cross-complaint filed by (name):
 (5) Entire action of all parties and all causes of action
 (6) Other (specify):*

01 (date)

01 (date)

Dcm August 2, 2000

Steven Roseman, Esq.

(TYPE OR PRINT NAME OF ATTORNEY PARTY WITHOUT ATTORNEY)

- * If dismissal requested in a specific action only, or specified causes of action only, or of specified cross-complaints only, so state and identify the parties, causes of action, or cross-complaints to be dismissed.

2. TO THE CLERK: Consent to the above dismissed is hereby given.**

Date:

(TYPE OR PRINT NAME OF ATTORNEY PARTY WITHOUT ATTORNEY)

- ** If a cross-complaint or Response (Family Law) seeking affirmative relief - is on file, the attorney (or cross-complaint respondent) must sign this consent if required by Code of Civil Procedure section 347.5-W.G.

(To be completed by clerk)

3. Dismissal entered as requested on (date): **AUG 03 2000**
4. Dismissal entered on (date): as to only (name):
5. Dismissal not entered as requested for the following reasons (specify):
6. a. Attorney or party without attorney notified on (date):
 b. Attorney or party without attorney not notified. Filing party failed to provide:
 a copy to plaintiff means to return claimant's copy

Date:

JOSEPH A. CLARKE, CLERK

Deputy

1 GIBSON & BEROVE
2 A PROFESSIONAL CORPORATION
3 10100 SANDEN BOULEVARD, SUITE 340
4 LOS ANGELES, CALIFORNIA 90047
5 (310) 377-4887

6 Attorney for Plaintiff

FILE

DEC 04 1987

7
8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF LOS ANGELES

SC013727

10 LAYNE LA FRANCE aka LAYNE MILLER,)

11 Plaintiff,)

12 vs.)

13 MICHAEL KARRAVA, M.D.; DAVID)
14 KLINE, M.D.; and DOES 1 through)
15 50, inclusive,)

16 Defendants.)
17

CASE NO. ~~SC013727~~

COMPLAINT FOR DAMAGES
Professional Negligence

2602
AF

18
19 COMES NOW the plaintiff and alleges against all
20 defendants:

21
22 FIRST CAUSE OF ACTION
23 (Professional Negligence by plaintiff LAYNE LA FRANCE
24 against defendants MICHAEL KARRAVA, M.D. and
25 DAVID KLINE, M.D., and DOES 1 through 50, inclusive)

26 1. All acts complained of herein took place within
27 the jurisdiction of this court.

2. The true names and capacities, whether individual,
corporate, or otherwise, of defendants named herein as DOES 1



First _____ CAUSE OF ACTION - Breach of Contract

Page _____

ATTACHMENT TO Complaint Cross-Complaint

(Use a separate cause of action form for each cause of action.)

BC-1. Plaintiff (name): Shantal Rajah

alleges that on or about (date): October 23, 1995

* written oral other (specify):

agreement was made between (name parties to agreement): Shantal Rajah, Michael Kamrava and West Coast Infertility & Reproductive Associates

 A copy of the agreement is attached as Exhibit A, or The essential terms of the agreement are stated in Attachment BC-1 are as follows (specify):

BC-2. On or about (date): December 17, 1995

defendant breached the agreement by the acts specified in Attachment BC-2 the following acts (specify): On or about December 17, 1995, plaintiff was at defendant West Coast working on a procedure which was a part of the duties she had agreed to perform under her contract. (Exhibit "A") Defendant Kamrava ordered plaintiff to cease her work, proceeded to shout at plaintiff and make false and unsubstantiated negative accusations regarding her performance. Defendant Kamrava terminated plaintiff's employment at that time, without good or just cause and without reasonable notice or pay in lieu thereof, in violation of the written contract.

BC-3. Plaintiff has performed all obligations to defendant except those obligations plaintiff was prevented or excused from performing.

BC-4. Plaintiff suffered damages legally (proximately) caused by defendant's breach of the agreement

as stated in Attachment BC-4 as follows (specify): Loss of income in the amount of \$150,000, per the contract. Loss of value of her assets, namely her house and car because she was forced to sell them at a loss to begin her employment on dates specified by defendants, and relocation costs, at the reasonable value of approximately \$15,000. Plaintiff has suffered emotional distress from the termination in violation of the contract.

BC-5. Plaintiff is entitled to attorney fees by an agreement or a statute of \$ according to proof.BC-6. Other Plaintiff is entitled to costs of suit by agreement.

PHILIP A. TOOMEY, SBN 89598
 ROBERT YAP, SBN 207575
 ARTIANO, GUZMAN & TOOMEY, LLP
 3828 Carson Street, Suite 102
 Torrance, CA 90503-6706
 Voice: (310) 543-1240
 Fax: (310) 543-9850

Attorneys for Plaintiff Shantal Rajah

FILED

LOS ANGELES SUPERIOR COURT

JUN 14 2004

JOHN A. CLARKE, CLERK

BY D. KAPO, DEPUTY

SUPERIOR COURT OF THE STATE OF CALIFORNIA
 IN AND FOR THE COUNTY OF LOS ANGELES

SHANTAL RAJAH,

Plaintiff,

vs.

MICHAEL KAMRAVA; M.D., WEST
 COAST INFERTILITY & REPRODUCTIVE
 ASSOCIATES

Defendants.

Case No. BC217963

[PROPOSED] JUDGMENT

ls-j fax

Dept. 49

Judge: Hon. Conrad R. Aragon

REC'D

MAY 26 2004

IT IS ORDERED that judgment in this matter is for Plaintiff Shantal Rajah against Defendant Michael Kamrava; Defendant West Coast Infertility and Reproductive Associates; and West Coast Infertility Clinic, Inc., a California corporation, for the following amount:

- | | | |
|----|---|--------------|
| 1. | Damages (per Final Award dated December 16, 2003) | \$275,300.44 |
| 2. | Attorney Fees (per Final Award dated December 16, 2003) | \$63,294.60 |

1	3.	Costs (per Final Award dated December 16, 2003)	\$23,573.32
2	4.	Post Arbitration award of simple interest at 10% per annum for 156 days (i.e. from December 16, 2003, the date of the Final Award, to May 20, 2004, the date of this Court's order confirming of the Final Award)	\$11,766.27
3			
4	5.	Post Arbitration Attorneys Fees and Costs for Rajah's Motion to Confirm	\$2,603.80
5			
6			
7		Total	\$376,538.43
8			
9			
10			

11 Dated: 6/14/04

12 
 13 THE HONORABLE CONRAD R. ARAGON

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 28 JAN 28 2005 Went 2A

1 J.L. O'Donnell, Jr. Esq., SBN 143598
Gerie Harrison, Esq., SBN 163641
2 O'DONNELL & MANDELL, an Affiliation of Independent Professional Corps.
11150 Olympic Boulevard, Suite 850
3 Los Angeles, CA 90064
(310) 914-4400

4
5 Attorneys for Plaintiff,
SHIRIN AFSHAR

LOS ANGELES SUPERIOR COURT

JUN 15 1998

JOHN A. CLARKE, CLERK
BY M. NIKO, DEPUTY

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF LOS ANGELES **BC192631**

10 SHIRIN AFSHAR, an individual,

11 Plaintiff,

12 vs.

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16 WEST COAST INFERTILITY CLINIC
17 INC., a California Corporation; MOSS
EMPLOYMENT AGENCY, a California
18 Corporation; DR. MICHAEL KAMRAVA,
an individual; SOHEILA "SUSIE"
19 KAMRAVA, an individual; and DOES 1
through 100, Inclusive.

20 Defendants.

CASE NO. _____

COMPLAINT FOR DAMAGES

1. PREGNANCY DISCRIMINATION IN VIOLATION OF CALIFORNIA GOVERNMENT CODE SECTION 12940 ET SEQ.
2. PREGNANCY HARASSMENT VIOLATION OF CALIFORNIA GOVERNMENT CODE SECTION 12940 ET SEQ.
3. WRONGFUL TERMINATION IN VIOLATION OF CALIFORNIA PENAL CODE SECTION 550 ET SEQ.
4. WRONGFUL TERMINATION IN VIOLATION OF CALIFORNIA BUSINESS & PROFESSIONS CODE SECTION 732;
5. WRONGFUL TERMINATION IN VIOLATION OF CALIFORNIA BUSINESS & PROFESSIONS CODE SECTION 810;
6. WRONGFUL TERMINATION IN VIOLATION OF CALIFORNIA BUSINESS & PROFESSIONS CODE SECTION 2262;
7. INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS.

JURY TRIAL DEMANDED

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SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

DATE 09/30/99

DEPT. 41

HONORABLE Ronald M. Schigian

JUDGE R. GILBERT

DEPUTY CLERK

HONORABLE

JUDGE PRO TEM

ELECTRONIC RECORDING MONITOR

83

V. KRBOYAN, CRT ASST

Deputy Sheriff

W. JANSEN, CDR #3827

Reporter

8:30 am NC192421

Plaintiff

Case#

[NO APPEARANCES]

SHIRIN APESHAR

Defendant

VS

Case#

WEST COAST INFERTILITY CLINIC I

ET AL

(170.6-KALUSTIAN, 6/26/98)

NATURE OF PROCEEDINGS:

ORDER TO SHOW CAUSE WHY CASE SHOULD NOT BE DISMISSED AS IT IS FULLY AND FINALLY SETTLED

No appearances.

Court dismisses the case pursuant to the Order To Show Cause set on calendar this date.

Court orders the case removed from the active list and all future hearing dates advanced and vacated.

IT IS SO ORDERED:

Ronald M. Schigian
 RONALD M. SCHIGIAN
 JUDGE OF THE SUPERIOR COURT.

A copy of this minute order is sent this date via U.S. Mail to the following:

Ramin R. Younessi
 LAW OFFICES OF RAMIN R. YOUNESSI
 3435 Wilshire Blvd., Suite 2210
 Los Angeles, CA 90010

Jerome Glaser
 ATTORNEY AT LAW
 4650 Whitsett Ave.
 Studio City, CA 91604

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MINUTES ENTERED
 09/30/99
 COUNTY CLERK