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FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

JUN 30 2010

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By Mary E Garcia Deputy

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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **COUNTY OF LOS ANGELES - CENTRAL DISTRICT**

10 **BC 440 716**

11 **JEREMY LONDON,**
12 **Plaintiff,**
13 **vs.**
14 **JASON LONDON, DEBORAH**
15 **NIELSEN AND SOFIA KARSTENS,**
16 **and DOES 1 - 10, Inclusive,**
17 **Defendants.**

CASE NO. _____
COMPLAINT FOR PERMANENT
INJUNCTION

19 Plaintiff alleges:

20 **FIRST CAUSE OF ACTION**
21 **General Allegations**

- 22 1. Defendants, and each of them, at all times herein mentioned, were residents of the City
23 and County of Los Angeles, State of California.
24 2. Plaintiff is ignorant of the true names and capacities of defendants sued
25 1 - 10, inclusive, and therefore sues said defendants by such fictitious names. Plaintiff will amend
26 this complaint to allege their true names and capacities when ascertained.

27 **COMPLAINT**

CIT/CASE: BC440716 LEA/DEF#: _____
RECEIPT #: CCH478057016
DATE PRINTED: 06/30/10 09:47:01 AM
RECEIVED: _____
PAYMENT \$ 355.00
CHECK: 355.00
CASH: _____
CHANGES: _____
Cdn: _____
0310

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**SECOND CAUSE OF ACTION
FOR PERMANENT INJUNCTION
AGAINST ALL DEFENDANTS**

3 Plaintiff refers to paragraphs 1 and 2 of the First Cause of Action and by this reference
4 makes them a part hereof.

5 4. On or about June, 2010, and continuing to the present time, defendants, and each of
6 them, wrongfully and maliciously have been granting unauthorized interviews to the media,
7 periodicals and internet websites, making false statements about plaintiff which are damaging to
8 both his personal reputation and to his career in the entertainment business.

9 5. On or about June 18, 2010, plaintiff's attorney prepared a letter to defendants, and
10 each of them, demanding that each of said defendants cease and desist from making any further
11 statements to the media about the plaintiff without prior approval of plaintiff's publicist.

12 6. Defendants, and each of them, failed to heed the demands set forth in the letter, and
13 continued to give interview and post false information regard plaintiff on the internet.

14 7. There is an ongoing criminal investigation in Palm Springs, California, involving the
15 kidnapping of the plaintiff. There is one suspect in custody and there are two other suspects that
16 are being investigated. The detective in charge of the investigation is concerned that the media
17 frenzy caused by the actions of the defendants will compromise his investigation into the criminal
18 matter.

19 8. Defendants wrongful conduct as set forth above, will continue unless and until enjoined
20 and restrained by order of this court, and if allowed to continue will cause great and irreparable
21 injury to plaintiff.

22 9. Plaintiff has no adequate remedy at law for the injuries currently being suffered in that
23 it is impossible for plaintiff to determine the precise amount of damages plaintiff will suffer if
24 defendants conduct is not restrained.

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26 ///

27 **COMPLAINT**

1 WHEREFORE, plaintiff prays for judgment against defendants, and each of them, as
2 follows:

3 1. For an order requiring defendants, and each of them to show cause, if any they have,
4 why they should not be enjoined as hereinafter set forth, during the pendency of this action;

5 2. For a temporary restraining order, a preliminary injunction and a permanent injunction
6 enjoining all defendants, and each of them, and all other persons acting under, in concert with,
7 or for them from the date of this hearing until judgment is rendered in this action;

8 3. For damages in an amount to be ascertained prior to judgment in this action;

9 4. For attorney fees incurred;

10 5. For costs of suit incurred; and,

11 6. For such other and further relief as the court deems just and proper.

12 DATED: June 25, 2010.

13 LOMBARDO LAW OFFICE

14 By: 

15 CATHERINE R. LOMBARDO
16 Attorney for Plaintiff



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27 COMPLAINT

VERIFICATION [Code Civ. Proc. §§ 446, 2015.5]

I, Jeremy London, am the plaintiff in the above entitled action. I have read the foregoing complaint and know the contents thereof. The same is true of my/our own knowledge, except as to those matters which are therein stated on information and belief, and, as to those matters, I/we believe to be true.

We declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on _____, at _____, California.


JEREMY LONDON

