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17 *Counsel for Plaintiff*18 **SUPERIOR COURT OF CALIFORNIA**
19 **COUNTY OF LOS ANGELES**

20 C.D.,

Case No. **22STCV35370**

21 Plaintiff,

COMPLAINT

22 v.

1. Sexual Assault

2. Sexual Battery

3. Sexual Harassment

4. Gender Violence

5. Assault

6. Battery

7. Intentional Infliction of
Emotional Distress

8. Negligence

23 ERIC WEINBERG and DOES 1-10,

24 Defendants.

Jury Trial Demanded25
26
27 Eric Weinberg Sexual Assault Lawsuit

1 **INTRODUCTION**

2 1. In February 2019, Defendant Eric Weinberg lured Plaintiff C.D. to his
3 home where he sexually assaulted her. Weinberg had offered to help C.D. start a
4 modeling career and booked her for a photo shoot, but once he had her alone on his
5 property, he touched her breasts, demanded sexual poses, forcibly inserted his fingers
6 into her anus, performed oral sex on her, and demanded her to perform oral sex on him.

7 2. This was not an isolated incident for Weinberg, a Hollywood producer
8 who has been criminally charged for sexually assaulting multiple women after luring
9 them to his home. As Judge Victoria B. Wilson found at a recent bail revocation hearing,
10 the allegations against Weinberg indicate “that he cannot stop and will not stop his
11 sexual assaults on women; and, therefore, he poses a danger to the safety of women.”

12 3. Plaintiff C.D. suffered physical, emotional, and economic harm as a result
13 of Weinberg’s assault and brings this action for sexual assault, sexual battery, sexual
14 harassment, gender violence, assault, battery, intentional infliction of emotional
15 distress, and negligence.

16 **JURISDICTION AND VENUE**

17 4. This Court has jurisdiction over the subject matter of this action pursuant
18 to Article VI, section 10 of the California Constitution and section 410.10 of the
19 California Code of Civil Procedure.

20 5. Venue is proper in this Court under Code of Civil Procedure section 395
21 because Eric Weinberg resides in Los Angeles County. In addition, a substantial part of
22 the conduct and omissions giving rise to the violations of law alleged herein occurred in
23 Los Angeles County.

24 **PARTIES**

25 6. Plaintiff C.D. is a citizen and resident of Los Angeles, California. Plaintiff
26 is using a pseudonym in this litigation to protect her privacy and, if required by the
27 Court, will seek permission to proceed under this pseudonym.

7. Defendant Eric Weinberg is a citizen and resident of Los Angeles, California. He was an executive producer and writer known for such hit TV shows as *Scrubs*, *Californication*, *Veronica's Closet*, and *Anger Management*, among others.

8. The true names and capacities, whether individual, corporate, partnership, joint venture, or otherwise of Defendants DOES 1 through 10, inclusive, are unknown to Plaintiff who thus sues them by such fictitious names. When the true names and capacities of Does 1 through 10 are ascertained, Plaintiff will amend this complaint by inserting their true names and capacities herein.

9. Plaintiff is informed and believes, and on that basis alleges, that the named Defendant and each of the fictitiously named Defendants are legally responsible in some manner for the occurrences alleged in this complaint, and that the injuries alleged herein were proximately and legally caused by the acts and/or omissions of the Defendants.

10. Plaintiff is further informed and believes, and on that basis alleges, that each Defendant acted as an agent, servant, employee, co-conspirator, alter-ego and/or joint venturer of the other Defendants, and in doing the things alleged herein acted within the course and scope of such agency, employment, alter-ego and/or in furtherance of the joint venture. Each of the Defendant's acts alleged herein was done with the permission and consent of each of the other Defendants.

GENERAL ALLEGATIONS

A. Weinberg sexually assaulted C.D. in February 2019 after luring her to his house for a photo shoot.

11. One of the ways Weinberg targets women to sexually assault is by introducing himself as a successful television producer and offering them the opportunity for a photo shoot.

12. Weinberg approached Plaintiff C.D. in a grocery store parking lot in February 2019 and introduced himself as the executive producer of *Scrubs*.

1 13. C.D. is a neurodivergent young woman who has been diagnosed with
2 ADHD, which makes her less attuned to social cues and particularly vulnerable to a
3 sexual predator like Weinberg.¹

4 14. When Weinberg first approached C.D., and in their subsequent text
5 messages, he presented himself as a safe and respectful Hollywood figure that she
6 could trust. He showed her examples of prior photo shoots on his phone, as well as
7 photos of his wife and three children in an attempt to build credibility.

8 15. Weinberg told C.D. he had done photo shoots for a lot of Disney stars and
9 offered her the opportunity to participate in a photo shoot as well.

10 16. When Weinberg followed up with C.D. about the photoshoot via text
11 message, he told her that she could make money modeling and respectfully discussed
12 with her the types of photos that she would want to shoot. C.D. emphasized that her
13 main interest was in candid shots and shots featuring costumes or artistic lighting. She
14 sent examples of the types of photos she was comfortable with.

15 17. Weinberg assured her that he would only take pictures of her that she felt
16 proud of, and emphasized that his more provocative photos were what those models
17 wanted to shoot and not what he was telling them to shoot.

18 18. C.D. told Weinberg she would like to try a photo shoot as long as there
19 was no erotica. Weinberg booked her for a 12:00 p.m. photo shoot, sent her the shooting
20 address, and later reminded her of the appointment.

21 19. On February 22, 2019, C.D. arrived at the address Weinberg had given her
22 for her photo shoot: Weinberg's house in Los Feliz. Once he had lured her to his home,
23 he disregarded his prior assurances. He led C.D. to his daughter's bedroom and
24 directed C.D. to take off her shirt and pose on his child's bed. He then "positioned" her
25 breasts.

26
27 ¹ See, e.g., Brian Wymbs & Christine Gidycz, *Examining Link Between Childhood*
28 *ADHD and Sexual Assault Victimization*, 11 J. of Attention Disorders 1612 (2020), available
at <https://pubmed.ncbi.nlm.nih.gov/32468904/>.

1 20. C.D. responded as many victims of sexual assault respond: she recognized
2 the situation was odd and unexpected, but avoided making a scene and rationalized to
3 herself that this was her first photo shoot and Weinberg must know what he was doing
4 given his experience in Hollywood and as a photographer. C.D. was undergoing a
5 trauma response where an overload of stress chemicals alters brain functioning:
6 survival reflexes and passivity habits often take over, and the victim avoids creating a
7 scene or bruising the sexual offender's ego in order to ensure survival.²

8 21. When Weinberg took C.D. outside and instructed her to engage in sexual
9 poses, she attempted to passively diffuse the situation by striking funny poses. But
10 Weinberg became angry and yelled at her to shut up and do what he instructed. C.D.
11 complied out of fear of being harmed.

12 22. Weinberg next positioned C.D. in a hallway, told her to stick her butt out,
13 and without warning or consent forcefully inserted his fingers into her anus. C.D. went
14 numb with fear and survived the experience largely by dissociating – a common
15 response to severe trauma.³

16 23. C.D. again attempted to diffuse the situation without inciting Weinberg's
17 anger, telling Weinberg that she was asexual and not interested in sex with him or
18 anyone else. But Weinberg continued his assault by forcibly performing oral sex on C.D.
19 and aggressively demanded she perform oral sex on him.

20 24. After Weinberg had finished assaulting C.D., he stood between her and
21 the door and demanded assurance that she would not tell the police he had raped her.
22 C.D. assured Weinberg she would not, and he let her leave.

23 25. As a result of Weinberg's assault, C.D. suffered, and continues to suffer,
24 physical, emotional, and economic injuries.

26 ² Jim Hopper, *Important Things to Get Right About the "Neurobiology of Trauma."* Part
27 2: *Victim Responses During Sexual Assault*, 2020 End Violence Against Women Int'l 6,
28 available at <https://evawintl.org/wp-content/uploads/TB-Trauma-Informed-Combined-1-3.pdf>.

³ *Id.*

1 **B. Weinberg's sexual assault of C.D. was part of a pattern of predatory behavior.**

2 26. Weinberg's sexual assault of C.D. was not an isolated incident and was
3 not a misunderstanding. Weinberg has recently been publicly exposed as a sexual
4 predator who has repeatedly lured women to his home with the intent to sexually
5 assault them.⁴

6 27. On July 14, 2022, authorities arrested Weinberg on multiple allegations of
7 sexual assault, including rape, between 2012 and 2019.⁵ And on October 4, 2022,
8 authorities arrested Weinberg again, this time for 18 felony counts related to sexual
9 crimes involving five different victims dating back to 2014.⁶ The charges include six
10 counts of sexual penetration by use of force, four counts of oral copulation, three counts
11 of forcible rape, two counts of sexual battery by restraint, and one count each of assault
12 by means of force likely to cause great bodily injury, attempted sexual penetration by
13 use of force, and false imprisonment by violence.⁷

14 28. Weinberg was previously arrested in 2014 as well, after he allegedly raped
15 a woman after luring her to his home for a photo shoot, but the L.A. District Attorney's
16 office declined to prosecute.⁸ Even after a second woman reported sexual misconduct
17 during a photo shoot with Weinberg later that same year, the District Attorney's office
18 still declined to prosecute.⁹

19
20
21 ⁴ Richard Winton, *TV producer Eric Weinberg Arrested, Accused of Sexual Assault on*
22 *Multiple Women*, L.A. Times, (July 14, 2022, 6:08 PM),
23 [https://www.latimes.com/california/story/2022-07-14/hollywood-producer-eric-](https://www.latimes.com/california/story/2022-07-14/hollywood-producer-eric-weinberg-maker-of-scrubs-arrested-by-lapd-on-suspicion-of-serial-sexual-assault)
[weinberg-maker-of-scrubs-arrested-by-lapd-on-suspicion-of-serial-sexual-assault](https://www.latimes.com/california/story/2022-07-14/hollywood-producer-eric-weinberg-maker-of-scrubs-arrested-by-lapd-on-suspicion-of-serial-sexual-assault).

⁵ *Id.*

24 ⁶ Press Release, L.A. Dist. Attorney's Office, TV Producer Eric Weinberg Charged with
25 Forcible Rape, Assault (Oct. 5, 2022), [https://da.lacounty.gov/media/news/tv-](https://da.lacounty.gov/media/news/tv-producer-eric-weinberg-charged-forcible-rape-assault)
[producer-eric-weinberg-charged-forcible-rape-assault](https://da.lacounty.gov/media/news/tv-producer-eric-weinberg-charged-forcible-rape-assault).

26 ⁷ *Id.*

27 ⁸ Samuel Braslow, *Is Eric Weinberg Hollywood's Most Prolific Predator?*, Hollywood Rep.,
28 (Sept. 1, 2022), [https://www.hollywoodreporter.com/news/general-news/eric-](https://www.hollywoodreporter.com/news/general-news/eric-weinberg-alleged-victims-speak-out-sexual-assault-1235209912/)
[weinberg-alleged-victims-speak-out-sexual-assault-1235209912/](https://www.hollywoodreporter.com/news/general-news/eric-weinberg-alleged-victims-speak-out-sexual-assault-1235209912/).

⁹ *Id.*

1 29. Since Weinberg's July 2022 arrest, however, prosecutors say dozens more
2 potential victims have come forward about their encounters with Weinberg.¹⁰ At last
3 report, the LAPD had received over 70 tips about Weinberg.¹¹

4 30. Weinberg is now being held without bail after Judge Victoria B. Wilson
5 found that Weinberg “has engaged in a pattern of violence for over six years” and that
6 “his behavior is predatory.”¹² “[H]e targets women doing everyday things,” lures them
7 to his home, and once “he gets them into his private nest of his home ... he commits the
8 sexual assaults.”¹³ The allegations against Weinberg indicate that he is a serial rapist,
9 “that he cannot stop and will not stop his sexual assaults on women; and, therefore, he
10 poses a danger to the safety of women.”¹⁴

11 31. The criminal allegations against Weinberg and accounts from several of
12 Weinberg’s victims indicate that Weinberg habitually pursued women in everyday
13 settings, used predatory techniques to gain their trust, and lured them to his property
14 with the intent to sexually assault them.

15 32. Plaintiff is informed and believes, and on that basis alleges, that Weinberg
16 regularly lured and attempted to lure victims by offering women the opportunity to
17 participate in a photo shoot set up by a Hollywood producer – as he did with C.D. For
18 example, *The Hollywood Reporter* reports having interviewed more than two dozen
19 women who say Weinberg approached them in Los Angeles-area parking lots, in
20 grocery stores, at cafes and on sidewalks, commenting on their appearance before
21 listing his Hollywood credits and showing them examples of his photography.¹⁵

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¹⁰ Press Release, *supra* note 6.

25 ¹¹ Transcript of Record at 6, *People v. Weinberg*, No. BA509407 (Cal. Super. Ct., Los
26 Angeles Cnty. Oct. 25, 2022).

27 ¹² *Id.* at 18-19, 22.

28 ¹³ *Id.* at 19.

¹⁴ *Id.* at 19.

¹⁵ Braslow, *supra* note 8.

33. In other instances, Plaintiff is informed and believes, and on that basis alleges, Weinberg lured victims by approaching them on television sets or through online dating apps.¹⁶

34. Published accounts reflect that, as with C.D., Weinberg was calculating in his efforts to gain victims' trust. He appeared charming and often mentioned his kids or his Hollywood credentials so that women would feel comfortable meeting him at his Los Feliz home. Only once in the privacy of his home would Weinberg become angry, forceful, or violent.¹⁷

35. According to an investigative report published by *The Hollywood Reporter* on September 1, 2022, it appears that Weinberg may even have kept a record of his sexual assaults or attempted sexual assaults. Along with photographs of potential victims, Weinberg's ex-wife reports finding sheets of paper in Weinberg's golf bag with handwritten names and numbers of hundreds of women that frequently included apparent locations beside the women's names, such as "Ralphs," "library," "gym," and "Glendale."¹⁸

FIRST CAUSE OF ACTION

Sexual Assault (Cal. Civ. Code § 340.16)

36. Plaintiff incorporates the allegations contained in the preceding paragraphs as though fully set forth herein.

37. Weinberg committed a sexual assault, as defined in Civil Code §340.16(b)(1) (referencing sections of the California Penal Code).

38. Weinberg committed assault with the intent to commit the crimes delineated in the above-referenced sections of the California Penal Code.

16 *Id.*

¹⁷ *Id.*

18 *Id.*

1 39. Weinberg's actions identified in this complaint were his attempts to
2 commit the crimes delineated in the above-referenced sections of the California Penal
3 Code.

4 40. Weinberg's conduct as described in this complaint was done with
5 oppression, fraud, and/or malice.

6 **SECOND CAUSE OF ACTION**

7 **Sexual Battery (Cal. Civ. Code § 1708.5)**

8 41. Plaintiff incorporates the allegations contained in the preceding
9 paragraphs as though fully set forth herein.

10 42. Plaintiff brings this claim for sexual battery under California Civil Code
11 § 1708.5 against Weinberg in his individual capacity.

12 43. Weinberg willfully violated Plaintiff's statutory right to be free from
13 sexual battery, including by touching her breasts, inserting his fingers into her anus,
14 performing oral sex on her, and demanding her to perform oral sex on him, all without
15 her consent.

16 44. Weinberg's sexual assault of Plaintiff was deeply offensive to her personal
17 dignity and would offend a person of ordinary sensitivity.

18 45. Given the deeply offensive nature of the sexual assault, Plaintiff's explicit
19 assertions of her boundaries before and during their encounter, and Weinberg's
20 longstanding history of sexual assault and rape, Weinberg committed these acts with
21 intent to cause harmful or offensive contact with Plaintiff's person.

22 46. By intentionally subjecting Plaintiff to sexual assault, Weinberg acted
23 maliciously and in a manner that is deeply offensive to human dignity.

24 47. As a direct, proximate, and foreseeable result of Weinberg's unlawful
25 conduct, Plaintiff has suffered severe humiliation, mental anguish, emotional distress,
26 embarrassment, anger, loss of enjoyment of life, and has been injured in mind and
27 body, the precise amount of which will be proven at trial.

1 48. As a direct, proximate, and foreseeable result of Weinberg's unlawful
2 conduct, Plaintiff has incurred special and general damages, the precise amount of
3 which will be proven at trial.

4 49. Weinberg acted maliciously and oppressively, and his conduct constitutes
5 conscious disregard for Plaintiff's rights and safety, entitling her to punitive damages.

6 **THIRD CAUSE OF ACTION**

7 **Sexual Harassment (Cal. Civ. Code § 51.9)**

8 50. Plaintiff incorporates the allegations contained in the preceding
9 paragraphs as though fully set forth herein.

10 51. Plaintiff was in a business, service, or professional relationship with
11 Weinberg as, among other things, he offered her his services as a photographer and
12 offered to help her start a modeling career.

13 52. In the course of their photography session at Weinberg's home, Weinberg
14 made several sexual advances, solicitations, and demands of C.D., including touching
15 her breasts, demanding sexual poses, inserting his fingers into her anus, performing
16 oral sex on her, and demanding that she perform oral sex on him.

17 53. Weinberg engaged in verbal, visual, and physical conduct of a sexual and
18 hostile nature based on Plaintiff's gender, including touching her breasts, demanding
19 sexual poses, inserting his fingers into her anus, performing oral sex on her, and
20 demanding her to perform oral sex on him.

21 54. Weinberg's conduct was unwelcome, severe and pervasive.

22 55. Plaintiff has suffered, and will continue to suffer, severe physical,
23 psychological, and emotional harm, humiliation, embarrassment, anger, and loss of
24 enjoyment of life as a result of Weinberg's conduct. She has also lost her professional
25 footing and has suffered economically as a result of Weinberg's actions, as well. The
26 precise amount of her damages will be proven at trial.

27 56. In addition to damages, Plaintiff seeks exemplary damages and attorneys'
28 fees.

1 **FOURTH CAUSE OF ACTION**

2 **Gender Violence (Cal. Civ. Code § 52.4)**

3 57. Plaintiff incorporates the allegations contained in the preceding
4 paragraphs as though fully set forth herein.

5 58. Plaintiff brings this claim for gender violence under California Civil Code
6 § 52.4 against Weinberg in his individual capacity.

7 59. Under California statute, any person subjected to gender violence may
8 bring a civil action for damages against a responsible party. Gender violence is a form
9 of sex discrimination that includes a physical intrusion or invasion of a sexual nature
10 under coercive conditions.

11 60. Weinberg discriminated against Plaintiff on the basis of her female gender
12 when he sexually assaulted her, including by touching her breasts, inserting his fingers
13 into her anus, performing oral sex on her, and demanding her to perform oral sex on
14 him, all without her consent.

15 61. By subjecting Plaintiff to sexual assault, Weinberg caused her to suffer
16 physical, mental, and emotional injuries as well as injuries to her personal dignity.

17 62. As a direct, proximate, and foreseeable result of Weinberg's unlawful
18 conduct, Plaintiff has suffered mental anguish, emotional distress, embarrassment,
19 anger, and loss of enjoyment of life, and has been injured in mind and body, the precise
20 amount of which will be proven at trial.

21 63. As a direct, proximate, and foreseeable result of Weinberg's unlawful
22 conduct, Plaintiff has incurred special and general damages, the precise amount of
23 which will be proven at trial.

24 64. Weinberg acted maliciously and oppressively. His conduct constitutes
25 conscious disregard for Plaintiff's rights and safety, entitling her to punitive damages.

26 65. Plaintiff seeks attorneys' fees and costs, as expressly authorized by statute.
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1 **FIFTH CAUSE OF ACTION**

2 **Assault**

3 66. Plaintiff incorporates the allegations contained in the preceding
4 paragraphs as though fully set forth herein.

5 67. Weinberg intended to cause harmful or offensive contact.

6 68. Plaintiff reasonably believed she was about to be touched in a harmful or
7 offensive manner, or that Weinberg threatened to touch Plaintiff in a harmful or
8 offensive manner.

9 69. It reasonably appeared to Plaintiff that Weinberg was about to carry out
10 the threat.

11 70. Plaintiff did not consent to Weinberg's conduct.

12 71. Plaintiff was harmed.

13 72. Weinberg's conduct was a substantial factor in causing her harm.

14 73. As a direct and proximate result of Weinberg's conduct, Plaintiff has
15 suffered injuries, damages, and losses – including, without limitation, severe emotional
16 distress, humiliation, economic loss, and other consequential damages.

17 74. Weinberg's behavior as alleged herein was willful, wanton, and malicious,
18 and was intended to oppress and cause injury to Plaintiff, entitling Plaintiff to an award
19 of punitive damages.

20 **SIXTH CAUSE OF ACTION**

21 **Battery**

22 75. Plaintiff incorporates the allegations contained in the preceding
23 paragraphs as though fully set forth herein.

24 76. Weinberg touched Plaintiff with the intent to harm or offend her,
25 including by touching her breasts, inserting his fingers into her anus, performing oral
26 sex on her, and demanding her to perform oral sex on him, all without her consent.

27 77. Plaintiff did not consent to any of this touching.

28 78. Plaintiff was harmed or offended by Weinberg's conduct.

1 79. A reasonable person in Plaintiff's situation would have been harmed or
2 offended by the touching.

3 80. As a direct and proximate result of Weinberg's conduct, Plaintiff has
4 suffered injuries, damages, and losses – including, without limitation, severe emotional
5 distress, humiliation, economic loss, and other consequential damages.

6 81. Weinberg's behavior as alleged herein was willful, wanton, and malicious
7 and was intended to oppress and cause injury to Plaintiff, entitling Plaintiff to an award
8 of punitive damages.

9 SEVENTH CAUSE OF ACTION

10 Intentional Infliction of Emotional Distress

11 82. Plaintiff incorporates the allegations contained in the preceding
12 paragraphs as though fully set forth herein.

13 83. Weinberg's actions, including sexually assaulting and battering Plaintiff,
14 constitute intentionally causing Plaintiff, or recklessly disregarding causing her, to
15 experience severe mental anguish and suffering.

16 84. Weinberg's conduct and actions in assaulting Plaintiff went beyond all
17 possible bounds of decency and was shocking, atrocious, and utterly intolerable in a
18 civilized society.

19 85. Weinberg's conduct was extreme and outrageous and caused Plaintiff to
20 suffer severe mental anguish and suffering, including post-traumatic stress, loss of
21 sleep, flashbacks, severe anxiety, fear of repeat sexual violence, an unfounded sense of
22 shame, and depression, all of which have occasioned and may continue to require
23 psychological and other counseling.

24 86. As the direct and proximate result of Weinberg's intentional or reckless
25 infliction of emotional distress, Plaintiff has suffered injuries, damages, and losses –
26 including, without limitation, past and future emotional and mental distress, pain and
27 suffering, impaired earnings capacity, past and future, and past and future losses of the
28 enjoyment of life.

1 87. As the direct and proximate result of Weinberg's conduct, Plaintiff has
2 suffered injuries, damages, and losses – including, without limitation, severe emotional
3 distress, humiliation, economic loss, and other consequential damages.

4 88. Weinberg's behavior as alleged herein was willful, wanton, and malicious
5 and was intended to oppress and cause injury to Plaintiff, entitling her to an award of
6 punitive damages.

7 EIGHTH CAUSE OF ACTION

8 Negligence

9 89. Plaintiff incorporates the allegations contained in the preceding
10 paragraphs as though fully set forth herein.

11 90. Weinberg owed Plaintiff a duty to exercise ordinary care in
12 photographing her and not to make sexual contact without her consent.

13 91. Weinberg breached that duty when he made sexual contact she did not
14 consent to, including by touching her breasts, inserting his fingers into her anus,
15 performing oral sex on her, and demanding her to perform oral sex on him, all without
16 her consent.

17 92. Weinberg also owed Plaintiff a duty of reasonable care to give adequate
18 warning of anything that could reasonably be expected to harm her on his property.

19 93. Weinberg breached that duty by failing to warn her of his intentions of
20 sexually assaulting her, and photographing her while doing so, which he did to many
21 other women in his home before her, which he likely intended to do to her, and which
22 would likely cause her serious harm.

23 94. Weinberg's breach of one or both of these duties was a substantial factor
24 in causing Plaintiff's harm.

25 95. As the direct and proximate result of Weinberg's conduct, Plaintiff has
26 suffered injuries, damages, and losses – including, without limitation, severe emotional
27 distress, humiliation, economic loss, and other consequential damages.

1 96. Weinberg's behavior as alleged herein was willful, wanton, and malicious,
2 and was intended to oppress and cause injury to Plaintiff, entitling her to an award of
3 punitive damages.

4 97. Plaintiff's requests for relief are set forth below.

5 **PRAYER FOR RELIEF**

6 WHEREFORE, Plaintiff requests that the Court enter a judgment awarding the
7 following relief:

- 8 (1) General damages according to proof;
9 (2) Special damages, including but not limited to medical and incidental
10 expenses according to proof;
11 (3) Punitive damages, as permitted by law;
12 (4) Attorneys' fees, as permitted by law;
13 (5) Costs of suit;
14 (6) Prejudgment interest as permitted by law; and
15 (7) Such other relief as the Court deems proper.

16
17 November 7, 2022

Respectfully submitted,

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19 By:  _____

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1 **JURY DEMAND**

2 Plaintiff demands a trial by jury for all issues so triable under the law.

3
4 November 7, 2022

Respectfully submitted,

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6 By:  _____

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