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Attorneys for Petitioners
Healthsmart Pacific, Inc. dba Pacific Hospital of Long Beach and Michael D. Drobot

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

HEALTHSMART PACIFIC, INC. dba PACIFIC HOSPITAL OF LONG BEACH, and MICHAEL D. DROBOT, Petitioners, v. DEPARTMENT OF INDUSTRIAL RELATIONS OF THE STATE OF CALIFORNIA; GEORGE PARISOTTO, an individual; and PAIGE LEVY, an individual, Respondents.	Case No. VERIFIED PETITION FOR WRITS OF MANDATE [CCP § 1085]

Petitioners Healthsmart Pacific, Inc. dba Pacific Hospital of Long Beach (hereinafter, "Pacific Hospital") and Michael D. Drobot (hereinafter, "Mr. Drobot") (together, "Petitioners") bring this petition seeking peremptory or alternative and peremptory writs of mandate, pursuant to Code of Civil Procedure section 1085, compelling Respondents Department of Industrial Relations of the State of California (hereinafter, the "DIR"), George Parisotti (hereinafter, "Mr. Parisotti" or the "administrative director"), who is the Acting Director of the Division of Workers' Compensation of the DIR (hereinafter, the "DWC"), and the "chief judge" of the DWC

and of the Workers' Compensation Appeal Board (the "WCAB"), Paige Levy (hereinafter, chief judge Levy) (together, "Respondents") to take the following actions:

(1) as to the DIR and Mr. Parisotto, to forthwith vacate the Order of Suspension issued on April 29, 2017 (Exhibit 2 hereto) by Mr. Parisotto purporting to suspend Mr. Drobot as a "provider," under Labor Code section 139.21(a)(1)(A);

(2) as to the DIR and Mr. Parisotto, to forthwith provide written notice to chief judge Levy that the previous notice given by them to said chief judge that Mr. Drobot was so suspended, purportedly under Labor Code section 139.21(d), was issued in error, and has been withdrawn, and that Mr. Drobot is not so suspended;

(3) as to the DIR and chief judge Levy, to forthwith vacate her order issued July 17, 2017 subjecting the liens of Pacific Hospital on file with the WCAB to a special consolidation proceeding under Labor Code section 139.21(e)(2); and

(4) as to the DIR and Mr. Parisotto, to forthwith remove Mr. Drobot from the list on the DIR website of "suspended providers"; or

(5) in the alternative, as to chief judge Levy, if Mr. Drobot is found to have been lawfully designated to be a "provider" within the meaning of Labor Code section 139.21, to schedule a hearing at the WCAB district office in Van Nuys within 60 days of the issuance of a writ of mandate, in order to permit Pacific Hospital to establish that liens filed by Pacific Hospital when Mr. Drobot did not have an ownership interest in Pacific Hospital should not be subject to the consolidated WCAB proceeding under Labor Code section 139.21(e).

INTRODUCTION

1. The facts bearing on this writ petition are essentially undisputed or not subject to reasonable dispute. Mr. Drobot had an indirect ownership interest in Pacific Hospital from 1997 to 2005, and regained such an interest again five years later, starting in 2010. Mr. Drobot never himself provided medical treatment or service to any person; nor was he licensed to do so. In 2014 Mr. Drobot pleaded guilty in federal court to causing the

payment of kickbacks to induce certain physicians to perform certain procedures at Pacific Hospital.

2. In March 2017 Mr. Parisotto mailed Mr. Drobot a letter advising him he would be "suspended" as a workers' compensation "provider" under Labor Code section 139.21 if he did not file a request with the DIR within ten calendar days for an administrative hearing to dispute such action. Under the circumstances alleged below, this procedure did not afford Mr. Drobot procedural due process, and he was otherwise unable to timely request such a hearing. Thereafter, in April 2017, Mr. Parisotto issued an order so suspending Mr. Drobot. But Mr. Drobot is not and was not a "provider" subject to suspension under Labor Code section 139.21.

3. Because Mr. Drobot has an indirect ownership interest in Pacific Hospital Respondents erroneously determined, pursuant to Labor Code section 139.21(e) and (f), that all of Pacific Hospital's liens on file with the WCAB should be consolidated in a special proceeding in which a presumption operated that all of the services billed for by Pacific Hospital arose as a result of the unlawful conduct set forth in Mr. Drobot's plea agreement, regardless of their dates of service. On July 17, 2017, chief judge Levy issued an order so consolidating all liens of Pacific Hospital on file with the WCAB in a special proceeding at the WCAB in Van Nuys, in which the case *Juan Torres v. Pierre Sprinkler and Landscape*, WCAB case no. 7804777, was designated as the "master file" (hereinafter, the "consolidation proceeding"). As a result of the above presumption, Pacific Hospital will have the burden of proving in the consolidation proceeding that the vast majority of its liens, which are untainted, did not arise from Mr. Drobot's unlawful conduct, rather than the defendant carriers and employers, who would normally bear the burden of proof, having to prove as to each lien that it arose during Mr. Drobot's ownership and from the unlawful conduct set forth in his plea agreement.

4. As a direct result of the foregoing, carriers and employers now refuse and will continue to refuse to negotiate or pay Pacific Hospital's legitimate workers' compensation bills and liens, choking off Petitioners' cash flow and thereby putting at risk

Petitioners' ability to retain counsel to defend themselves in the WCAB consolidation proceeding, which proceeding will likely take years to resolve.

5. Respondents DIR and Mr. Parisotto had a clear duty to determine whether Mr. Drobot was a "provider" according to the meaning of that term in Labor Code section 139.21, but failed to do so. Because Mr. Drobot is not a provider within the meaning of this statutory provision Respondent DIR and its chief judge Respondent Levy have a statutory duty not to proceed with a special consolidation at the WCAB as to the liens of Pacific Hospital. Alternatively, if Mr. Drobot is found to be a provider within the meaning of Labor Code section 139.21, Respondent Levy has a duty to include in the consolidation proceeding only those liens filed by Pacific Hospital during the time period when Mr. Drobot had an ownership interest in Pacific Hospital, per subdivision (e) of Labor Code section 139.21.

6. Respondents exceeded their powers and acted in excess of their jurisdiction in taking the actions complained of above. Petitioners have a clear, present and beneficial right to the lawful performance of Respondents' duties. Petitioners are entitled to the writ relief sought herein.

PARTIES

5. Petitioner Pacific Hospital is and at all times relevant was a corporation incorporated under the laws of the State of California. Pacific Hospital ceased treating patients in the fall of 2013, when it sold its physical hospital plant to an unrelated purchaser, College Health Enterprises. Pacific Hospital retained its then existing accounts receivables and workers' compensation liens after that sale.

6. Petitioner Michael D. Drobot is and at all times relevant was an individual residing in Newport Beach, California.

7. Respondent DIR is and at all relevant times was an agency of the State of California. Pursuant to statute the DIR includes the DWC.

8. Respondent George Parisotto is and at all relevant times was the Acting Administrative Director of the DWC.

9. Respondent Paige Levy is and at all times relevant was the "chief judge" of the DWC, and of the WCAB.

JURISDICTION AND VENUE

10. This Court has general jurisdiction to issue writs of mandate pursuant to Code of Civil Procedure section 1085. The Court also has express jurisdiction to issue writs of mandate where, as here, Petitioner Michael D. Drobot failed to timely request an administrative hearing regarding suspension, under the applicable DIR regulation, Tit. 8 Cal Code Regs. § 9788.2(b), which regulation provides that "All appeals from the Order of Suspension issued pursuant to this subdivision shall be made to the Superior Court of California by writ as provided in the Code of Civil Procedure."

11. Venue is proper in this Court because part of the cause of action arose in this County, including the consolidation of all of Pacific Hospital's liens at the WCAB in Van Nuys. Code Civ. Proc. § 393(b).

12. Petitioners have a clear, present, and beneficial right to the performance of the actions sought herein.

13. Petitioners have no plain, speedy, and adequate remedy at law.

14. Petitioner Michael D. Drobot need not exhaust any available administrative remedies in that (a) he is entitled, under Tit. 8 Cal Code Regs. § 9788.2(b), to seek writ relief even if he did not timely request an administrative hearing; (b) he was not provided adequate procedural due process as to an opportunity to request an administrative hearing; and (c) such a hearing would be futile since the issue is essentially one of law, that is, whether or not he is a "provider" within the meaning of Labor Code section 139.21. Petitioner Pacific Hospital need not exhaust any administrative remedies because it has not been afforded any such remedies, including with respect to the orders of the administrative director and of chief judge Levy (i) causing its liens to be placed in a special consolidation proceeding at the WCAB, (ii) imposing a presumption upon it that its liens arose from the unlawful conduct of Mr. Drobot, and (iii) shifting the burden of proof to Pacific Hospital to prove otherwise as to each such lien.

COMMON ALLEGATIONS

15. Mr. Drobot had an indirect ownership interest in Pacific Hospital from 1997 to August 31, 2005, and regained such an interest again as of October 12, 2010. Mr. Drobot has never been licensed as a physician or other medical provider, and has never personally rendered medical treatment to any person. No liens were ever filed with the WCAB under Mr. Drobot's name.

16. In February, 2014, Mr. Drobot entered a plea of guilty in the United States District Court for the Central District of California, case number SACR14-00034, to causing the payment of kickbacks to certain physicians and marketers in order to induce a select number of physicians to perform certain medical procedures on workers' compensation patients at Pacific Hospital, primarily spinal surgeries, which plea the federal court accepted. The plea did not provide for the dismissal of any liens in which Mr. Drobot had an indirect ownership interest, including those of Pacific Hospital.

17. In 2016 the California Legislature enacted a statute, effective January 1, 2017, which provides that the "administrative director" (of the DWC, see Labor Code § 110(b)) "shall promptly suspend … any physician, practitioner, or provider from participating in the workers' compensation system as a physician, practitioner, or provider" if, in the case of an "individual" such as Mr. Drobot, as opposed to an "entity" such as a hospital, "the individual has been convicted of any felony or misdemeanor that … involves fraud or abuse of the Medi-Cal program, Medicare program, or workers' compensation system" or "a financial crime that relates to the Medi-Cal program, Medicare program, or workers' compensation system." Labor Code § 139.21(a).

18. Labor Code section 139.21 further directs the administrative director to give written notice to the physician, practitioner, or provider of an intention to suspend under section 139.21(a), and that the person or entity receiving notice "may request a hearing within 10 days from the date the notice is sent by the administrative director." See Lab. Code § 139.21(b)(2). This provision further provides that if a hearing is not timely requested, or, if after hearing the administrative director determines the person or entity is

subject to suspension, the administrative director must immediately suspend that person or entity.

19. Under Labor Code section 139.21(d), the administrative director also must give notice of any suspension to the chief judge of the DWC, who is also the chief judge of the WCAB, and the chief judge must promptly thereafter provide written notification of the suspension to WCAB district offices and all workers' compensation judges.

20. Under Labor Code section 139.21, subdivisions (e) and (f), if the criminal proceeding that gives rise to a suspension does not expressly provide for dismissal of the liens of the suspended physician, practitioner, or provider, "including any liens filed by or on behalf of the physician, practitioner, or provider or any clinic, group or corporation in which the suspended physician, practitioner, or provider has an ownership interest," the liens shall be consolidated for determination in a special proceeding at the WCAB.

21. In such a consolidated proceeding, under Labor Code section 139.21(g), "it shall be a presumption affecting the burden of proof that all liens to be adjudicated in the special lien proceeding, and all underlying bills for service and claims for compensation asserted therein, arise from the conduct subjecting the physician, practitioner, or provider to suspension, and that payment is not due and should not be made on those liens because they arise from, or are connected to, criminal, fraudulent, or abusive conduct or activity," and a "lien claimant shall not have the right to payment unless he or she rebuts that presumption by a preponderance of the evidence."

22. On information and belief, on or about March 28, 2017, Mr. Parisotto caused a letter to be mailed to Mr. Drobot's home address in Newport Beach, California, giving notice of an intention to suspend him as a "provider," under Labor Code section 139.21, subd. (a), and giving him ten calendar days—until Friday, April 7, 2017—to "file" in Oakland with the administrative director, pursuant to Title 8 Cal. Code Regs. § 9788.2(d), and not just serve,[1] a written request for a hearing to contest whether Mr. Drobot was a

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[1] Labor Code section 139.21(b)(1) required the administrative director to adopt regulations for suspending a physician, practitioner, or provider from participating in the

"provider" subject to suspension. A true and correct copy of said letter notice is attached hereto as Exhibit 1. No proof of service accompanied the letter, so Petitioners do not know at this time the date it was actually mailed from the DWC in Oakland. On information and belief, Mr. Drobot did not see the letter notice until the weekend of April 8, 2017, so he otherwise was not able to file a request for hearing by April 7, 2017.

23. On April 27, 2017 counsel for Petitioners sent a letter by email to John W. Cummings of the DWC Legal Unit, who had been quoted concerning an impending suspension of Mr. Drobot in the online publication workcompcentral. The letter advised that Mr. Drobot was not a provider within the meaning of Labor Code section 139.21.

24. On April 28, 2017 Mr. Parisotto issued an "Order of Suspension" as to Mr. Drobot, under Labor Code section 139.21(b) and Tit. 8 Cal. Code Regs. 9788.2(d), since Mr. Drobot had not filed a request for a hearing by April 7, 2017. A true and correct copy of said Order is attached hereto as Exhibit 2 hereto. The DIR subsequently listed Mr. Drobot on its website as a suspended "Hospital Operator" provider. (See https://www.dir.ca.gov/fraud_prevention/suspension-list.htmlisitng).

25. On information and belief, at some point in time on or after April 28, 2017 Mr. Parisotti and the DIR also gave notice of Mr. Drobot's suspension to chief judge Levy. Chief judge Levy subsequently, on July 17, 2017, issued a written "Order of Consolidation" as to all liens of Pacific Hospital, setting them for a special consolidated proceeding, and staying said liens pending determination in that proceeding. A true and correct copy of that Order is attached hereto as Exhibit 3. The Order was sent to all WCAB district offices and all workers' compensation judges, per Labor Code § 139.21(d). The Order set an initial status conference in the consolidated proceeding for August 23, 2017 in the Van Nuys district office of the WCAB.

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workers' compensation system, "subject to the notice and hearing requirements" in subparagraph (b)(2). The regulation in question requires filing with the DWC in Oakland, and service on the DWC Legal Unit at that same address, whereas the statute only says that the provider "may request" a hearing.

26. Pacific Hospital as an "entity" was not subject to suspension, and was not suspended under Labor Code section 139.21(a)(1)(B), because it had not "been suspended, due to fraud or abuse, from the federal Medicare or Medicaid programs."

27. Affording Mr. Drobot ten days to file a written request for a hearing in Oakland did not afford him procedural due process, because he had insufficient time to make such a request. Not only did Mr. Drobot not have time to prepare a request for a hearing and arrange to file it with the DIR in Oakland by April 7, 2017, rather than merely serve it by mail, he was required under Tit. 8 Cal. Code Regs. § 9788.2(a) to "set forth the legal and factual reasons for the request for hearing" by the DIR's regulations. As a practical matter complying with those requirements would have required him to obtain the assistance of an attorney. It is common knowledge that mail sent from the San Francisco Bay area to southern California can often take five days or even several days more to arrive. In drafting its regulation the DIR could have added five extra days for mailing to the time to respond, which is the norm in California. Or the DIR could have arranged personal or overnight mail service on Mr. Drobot. On information and belief, as so happened, Mr. Drobot did not even see the suspension letter until after the April 7, 2017 deadline. Under these circumstances the March 28, 2017 notice did not comport with constitutional standards of procedural due process.

28. As a direct result of said denial of procedural due process, Mr. Drobot was denied the opportunity to attempt to convince the administrative director that he is not a "provider" within the meaning of Labor Code section 139.21(a). Mr. Drobot was also denied the opportunity to present evidence that he did not own Pacific Hospital for over a five-year time period (August 31, 2005 to October 12, 2010), such that even if he is or was a "provider," liens arising from that time period should not, by virtue of Labor Code section 139.21(e), be subjected to the consolidation proceeding instituted on July 23 at the WCAB.

29. In finding that Mr. Drobot was a "provider" within the meaning of Labor Code section 139.21(a), Respondents have misread and distorted the most reasonable if not

the plain meaning of the statutory language, thereby exceeding their power. In the case of an individual such as Mr. Drobot, a medical provider, like a physician or practitioner, means in plain parlance an individual, typically licensed, who personally provides some sort of medical service or treatment to an injured worker. Other language in section 139.21 strongly indicates that was the intended meaning of an individual provider. The Legislature did not define providers in section 139.21 so as to include individuals who were owners or operators of hospitals or other medical facilities who did not themselves personally provide medical treatment, services, medications or medical devices. The Legislature instead addressed in section 129.21(e) individuals (such as physicians receiving kickbacks) who personally provide such treatment or services, and then extended special consolidation treatment to liens filed with the WCAB under those persons individual names, as well as to liens filed "on behalf of such persons, or those of any clinic, group or corporation in which such a provider has an ownership interest." This language runs from an individual who is a service provider to entities in which the provider has an ownership interest, not from an individual who does not provide medical services or treatment, and then to entities such as hospitals in which the individual may have an ownership interest.

30. The legislative history of the statute shows that the Legislature had specifically identified Mr. Drobot's plea regarding payment to physicians of kickbacks as a major motivation and justification behind the enactment of section 139.21. Had the Legislature intended to include an individual such as Mr. Drobot, who merely owned or operated a facility within the meaning of a provider, it would have expressly done so. The Legislature did not do so.

31. Petitioners are immediately and greatly harmed by Respondents' misinterpretation of Labor Code section 139.21. As a result of the foregoing, insurance carriers and employers will now not negotiate or pay Pacific Hospital's bills and liens even if they do not implicate Mr. Drobot's unlawful conduct, thereby choking off Petitioners' cash flow. Consolidation proceedings at the WCAB historically have taken years to run

their course. This effectively puts Pacific Hospital in the position of becoming unable to retain legal counsel to prove in the WCAB consolidation that it has valid, untainted liens that should be paid. Finally, because Mr. Drobot is required under his criminal plea agreement entered in federal court to forfeit substantial assets to the federal government, and to make restitution to the victims of his unlawful conduct in the federal criminal proceeding, depriving Pacific Hospital of payment on legitimate liens will substantially interfere with Mr. Drobot's ability to fulfill those important obligations.

FIRST CAUSE OF ACTION

(For Writs of Mandate By All Petitioners Against All Respondents)

32. Petitioners reallege and incorporate by reference the allegations set forth above in paragraphs 1 through 31, inclusive.

33. By mailing the letter dated March 28, 2017, by issuing the Orders attached hereto as Exhibits 2 and 3, and by listing Petitioner Michael D. Drobot on the DIR website as a "suspended provider," Respondents have:

(i) denied Petitioner Michael D. Drobot his right to adequate notice of a hearing to dispute that he is a "provider" within the meaning of Labor Code section 139.21, and that he should not be deemed an "owner" as to all of Pacific Hospital's WCAB liens, thereby depriving him of procedural due process,

(ii) failed to properly exercise their duties owed as to both Petitioners, by purporting to suspend Petitioner Michael D. Drobot under Labor Code section 139.21, when he is not a "provider" within the meaning of said provision;

(iii) failed to properly exercise their duties as to both Petitioners by causing and ordering the liens of Pacific Hospital to be put into a special consolidation proceeding at the WCAB, purportedly under Labor Code section 139.21(e) and (f); and

(iv) failed to properly exercise their duties as to both Petitioners by wrongly listing Petitioner Michael D. Drobot as a "suspended provider" on the DIR website; or, alternatively,

(v) if Petitioner Michael D. Drobot was properly determined to be a provider under Labor Code section 139.21, failing to exercise their duties as to both Petitioners by failing to limit the liens of Pacific Hospital subject to a special consolidation proceeding at the WCAB to those arising when Petitioner Michael D. Drobot had an ownership interest in Pacific Hospital, under Labor Code section 139.21.

34. Respondents exceeded their powers and acted in excess of their jurisdiction in taking the actions complained of herein. Petitioners have clear, present and beneficial rights to the lawful performance of Respondents' duties. By reason of the above Petitioners are entitled to the writ relief sought herein.

PRAYER

WHEREFORE, Petitioners pray for judgment as follows:

1. That this Court issue either a peremptory writ of mandate or alternative and peremptory writs of mandate commanding Respondents, as follows:

a. as to the DIR and Mr. Parisotto, to forthwith vacate the Order of Suspension issued on April 29, 2017 by Mr. Parisotto (Exhibit 2 hereto) purporting to suspend Mr. Drobot as a "provider," under Labor Code section 139.21(a)(1)(A);

b. as to the DIR and Mr. Parisotto, to forthwith provide written notice to chief judge Levy that the previous notice given by them to said chief judge that Mr. Drobot was so suspended, purportedly under Labor Code section 139.21(d), was issued in error, and has been withdrawn, and that Mr. Drobot is not so suspended;

c. as to the DIR and chief judge Levy, to forthwith vacate her order issued July 17, 2017 subjecting the liens of Pacific Hospital on file with the WCAB to a special consolidation proceeding under Labor Code section 139.21(e)(2); and

d. as to the DIR and Mr. Parisotto, to forthwith remove Mr. Drobot from the list on the DIR website of "suspended providers"; or, in the alternative,

e. as to the DIR and chief judge Levy, if Mr. Drobot is found to have been lawfully designated to be a "provider" within the meaning of Labor Code section 139.21, to schedule a hearing at the WCAB district office in Van Nuys within 60 days of the

issuance of the writ of mandate, in order to permit Pacific Hospital to establish that liens of Pacific Hospital arising when Mr. Drobot did not have an ownership interest in Pacific Hospital should not be subject to the consolidated WCAB proceeding under Labor Code section 139.21(e).

2. That this Court award Petitioners their costs of suit herein, including out-of-pocket expenses and reasonable attorneys' fees; and

3. That this Court grant Petitioners such other, different, or further relief as the Court may deem just and proper.

Dated: August 1, 2017

Donald G. Norris

DONALD G. NORRIS, A LAW CORPORATION

By _____

Donald G. Norris
Attorneys for Petitioners
Healthsmart Pacific, Inc., dba Pacific Hospital of Long Beach and Michael D. Drobot

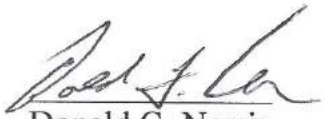
VERIFICATION

I, Donald G. Norris, declare:

I am the attorney for Petitioners in the above-entitled action. I have read the foregoing Verified Petition for Writ of Mandate and know the contents thereof to be true of my own knowledge, except as to those matters that are alleged on information and belief, and as to those matters I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this first day of August, 2017 at Los Angeles, California.



Donald G. Norris

EXHIBIT 1

STATE OF CALIFORNIA
EDMUND G. BROWN JR., *Governor*

DEPARTMENT OF INDUSTRIAL RELATIONS
DIVISION OF WORKERS' COMPENSATION
LEGAL UNIT
1515 Clay Street, Suite 1700
Oakland, California 94612
Tel (510) 286 -7100 Fax (510) 286-0687

March 28, 2017

Michael D. Drobot
1933 Bayside Drive
Corona Del Mar, CA 92625

NOTICE OF PROVIDER SUSPENSION – WORKERS' COMPENSATION

Dear Mr. Drobot:

The Acting Administrative Director of the Division of Workers' Compensation (DWC) is required by Labor Code section 139.21(a)(1)(A) to suspend you from participation in the California workers'compensation system because you have been convicted of a crime described in Labor Code section 139.21(a)(1)(A). Enclosed are copies of the documents relied upon by the Acting Administrative Director as the basis for taking this action.

Your suspension will start 30 calendar days after the date of mailing of this notice, unless you submit a written request for a hearing, which will stay the suspension pending the outcome of the hearing. Your request must be made within 10 calendar days of the date of mailing of this notice. If you do not request a hearing within the 10-day time limit, you will be suspended from participation in the California workers' compensation system pursuant to California Code of Regulations, title 8, section 9788.2(b).

Your request for a hearing must contain:

- Your current mailing address;
- The legal and factual reasons as to why you do not believe Labor Code section 139.21(a)(1) is applicable to you; and
- Your original signature or the original signature of your legal representative.

The scope of the hearing is limited to whether or not Labor Code section 139.21(a)(1) is applicable to you. The Acting Administrative Director is required to suspend you unless you provide proof in the hearing that Labor Code section 139.21(a)(1) does not apply.

Your original request for a hearing and one copy of the request must be filed with the Acting Administrative Director. Additionally, you must also serve one copy of the request for a hearing on the DWC Legal Unit. The addresses for the Acting Administrative Director and the Legal Unit are:

Michael D. Drobot
March 28, 2017

Hearing Request
Acting Administrative Director
Division of Workers' Compensation
1515 Clay Street, Suite 1800
Oakland, California 94612

and

Hearing Request
Legal Unit, Division of Workers' Compensation
1515 Clay Street, Suite 1800
Oakland, California 94612

The original and all copies of the request for hearing must have a proof of service attached. A sample proof of service, containing all necessary elements, can be found on the DWC website at https://www.dir.ca.gov/dwc/forms.html, under the category "Court Forms," and then "Proof of Service." The Acting Administrative Director is required to hold your hearing within 30 days of the receipt of your written request. The hearing will be conducted by a hearing officer appointed by the Acting Administrative Director. You will be notified shortly after the receipt of your request of the date and time of the hearing.

For more information about the suspension procedure, please refer to Provider Suspension Regulations, California Code of Regulations, title 8, sections 9788.1 - 9788.4, which can be found on the DWC website at http://www.dir.ca.gov/dwc/DWCPropRegs/Provider-Suspension-Procedure/Clean-Version/Text-of-Regulations.pdf.

Sincerely,

George Parisotto
Acting Administrative Director
Division of Workers' Compensation

EXHIBIT 2

STATE OF CALIFORNIA
DEPARTMENT OF INDUSTRIAL RELATIONS
DIVISION OF WORKERS' COMPENSATION
BEFORE THE ADMINISTRATIVE DIRECTOR

In Re: PROVIDER SUSPENSION MICHAEL D. DROBOT, Respondent.	**ORDER OF SUSPENSION**

WHEREAS, Labor Code section 139.21(a)(1)(A) requires the Administrative Director to suspend any physician, practitioner, or provider from participating in the workers' compensation system as a physician, practitioner, or provider if the individual has been convicted of any felony or misdemeanor described in Labor Code section 139.21(a)(1)(A); and

WHEREAS, on or about April 24, 2014, Michael D. Drobot pled guilty to or was found guilty of one or more felonies or misdemeanors described in Labor Code section 139.21(a)(1)(A) in the United States District Court, Central District of California, Southern Division; and

WHEREAS, on or about March 28, 2017, the Administrative Director mailed to Michael D. Drobot a written notice of the right to a hearing regarding the suspension and the procedure to follow to request a hearing, as provided in Labor Code section 139.21(b)(2) and title 8, California Code of Regulations section 9788.1; and

WHEREAS, pursuant to Labor Code section 139.21(b)(2) and title 8, California Code of Regulations section 9788.1(d), the written notice advised Michael D. Drobot that the suspension would start thirty (30) calendar days after the date of mailing of written notice, unless Michael D. Drobot submitted a written request for a hearing within ten (10) calendar days of the date of mailing of the notice; and

WHEREAS, Michael D. Drobot did not submit a written request for hearing within ten (10) calendar days of the date of mailing of the notice; and

WHEREAS, the Administrative Director is required to suspend any physician, practitioner, or

provider pursuant to Labor Code section 139.21 and title 8, California Code of Regulations section 9788.2, after thirty (30) days from the date the notice was mailed, unless the physician, practitioner, or provider submits a written request for a hearing within ten (10) calendar days of the date of mailing of the notice;

IT IS HEREBY ORDERED that Michael D. Drobot is hereby suspended from participating in the workers' compensation system as a physician, practitioner, or provider.

Date: April 28, 2017

GEORGE PARISOTTO
Acting Administrative Director
Division of Workers' Compensation

EXHIBIT 3

STATE OF CALIFORNIA
WORKERS' COMPENSATION APPEALS BOARD
DIVISION OF WORKERS' COMPENSATION

Juan Torres,

Applicant,

v.

Pierre Sprinkler and Landscape,

Defendant,

Michael D. Drobot and Pacific Hospital of Long Beach, Lien Claimants

Designated Case No(s): ADJ7804777

ORDER OF CONSOLIDATION, DESIGNATION OF MASTER FILE, ORDER STAYING LIENS, AND NOTICE OF HEARING

GOOD CAUSE SHOWN, the liens set forth in cases identified in Attachment A, filed by and on behalf of suspended provider Michael D. Drobot and lien claimant Pacific Hospital of Long Beach are hereby consolidated for adjudication and disposition in a special lien proceeding under Labor Code section 139.21. The above-captioned case is hereby ordered designated as the master file. The parties are ordered to use only the designated case number when referencing the consolidated matter. All liens of Michael D. Drobot and Pacific Hospital of Long Beach are hereby ordered stayed pending further determination. Judge William Gunn at the Van Nuys district office is designated as the assigned Judge for purposes of this consolidation. All documents regarding this consolidation shall be filed either by JET, e-filing or at the Van Nuys district office, unless otherwise ordered. If it is later determined that additional matters should be included in this consolidation an additional order shall issue.

This case is set for status conference on August 23, 2017 at 10:30 a.m. in front of Judge William Gunn:

6150 Van Nuys Blvd. Suite 215
Van Nuys, CA 91401-3370
(818) 901-5367

DATED: July 14, 2017

PAIGE S. LEVY
Chief Judge

SUM-100

SUMMONS
(CITACION JUDICIAL)

FOR COURT USE ONLY
(SOLO PARA USO DE LA CORTE)

NOTICE TO DEFENDANT:
(AVISO AL DEMANDADO):
DEPARTMENT OF INDUSTRIAL RELATIONS OF THE STATE OF CALIFORNIA; GEORGE PARISOTTO; PAIGE LEVY

YOU ARE BEING SUED BY PLAINTIFF:
(LO ESTÁ DEMANDANDO EL DEMANDANTE):
HEALTHMART PACIFIC , INC dba PACIFIC HOSPITAL OF LONG BEACH; MICHAEL D. DROBOT

NOTICE! You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

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. **NOTE:** The court has a statutory lien for waived fees and costs on any settlement or arbitration award of $10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case.

¡AVISO! *Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información a continuación.*

*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.sucorte.ca.gov*), 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.sucorte.ca.gov*) o poniéndose en contacto con la corte o el colegio de abogados locales. AVISO: Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de $10,000 ó más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desechar el caso.*

The name and address of the court is:
(El nombre y dirección de la corte es): LOS ANGELES SUPERIOR COURT
111 N. Hill St.
Los Angeles, CA 90012

CASE NUMBER:
(Número del Caso):

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):
Donald G. Norris, 500 S. Grand Ave., Fl. 18, Los Angeles, CA 90071 (213) 232-0855

DATE: *(Fecha)*
Clerk, by *(Secretario)* _____ , Deputy *(Adjunto)*

(For proof of service of this summons, use Proof of Service of Summons *(form POS-010).)*
(Para prueba de entrega de esta citatión use el formulario Proof of Service of Summons, *(POS-010)).*

[SEAL]

NOTICE TO THE PERSON SERVED: You are served
1. ☐ as an individual defendant.
2. ☐ as the person sued under the fictitious name of *(specify):*
3. ☐ on behalf of *(specify):*

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):*

4. ☐ by personal delivery on *(date):*

Form Adopted for Mandatory Use
Judicial Council of California
SUM-100 [Rev. July 1, 2009]

SUMMONS

Code of Civil Procedure §§ 412.20, 465
www.courtinfo.ca.gov

CM-010

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):	FOR COURT USE ONLY
Donald G. Norris (SBN 90000) DONALD G. NORRIS, A LAW CORPORATION 500 S. Grand Ave., Fl. 18 Los Angeles, CA 90071 TELEPHONE NO.: (213) 232-0855 FAX NO.: (213) 286-9499 ATTORNEY FOR (Name): Petitioners	
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES STREET ADDRESS: 111 N. Hill St. MAILING ADDRESS: 111 N. Hill St. CITY AND ZIP CODE: Los Angeles 90012 BRANCH NAME: Central	
CASE NAME: HEALTHSMART PACIFIC v. DEPARTMENT OF IND. RELATIONS	

CIVIL CASE COVER SHEET	Complex Case Designation	CASE NUMBER:
☐ Unlimited (Amount demanded exceeds $25,000) ☑ Limited (Amount demanded is $25,000 or less)	☐ Counter ☐ Joinder Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)	JUDGE: DEPT:

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
- ☐ Auto (22)
- ☐ Uninsured motorist (46)

Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort
- ☐ Asbestos (04)
- ☐ Product liability (24)
- ☐ Medical malpractice (45)
- ☐ Other PI/PD/WD (23)

Non-PI/PD/WD (Other) Tort
- ☐ Business tort/unfair business practice (07)
- ☐ Civil rights (08)
- ☐ Defamation (13)
- ☐ Fraud (16)
- ☐ Intellectual property (19)
- ☐ Professional negligence (25)
- ☐ Other non-PI/PD/WD tort (35)

Employment
- ☐ Wrongful termination (36)
- ☐ Other employment (15)

Contract
- ☐ Breach of contract/warranty (06)
- ☐ Rule 3.740 collections (09)
- ☐ Other collections (09)
- ☐ Insurance coverage (18)
- ☐ Other contract (37)

Real Property
- ☐ Eminent domain/Inverse condemnation (14)
- ☐ Wrongful eviction (33)
- ☐ Other real property (26)

Unlawful Detainer
- ☐ Commercial (31)
- ☐ Residential (32)
- ☐ Drugs (38)

Judicial Review
- ☐ Asset forfeiture (05)
- ☐ Petition re: arbitration award (11)
- ☑ Writ of mandate (02)
- ☐ Other judicial review (39)

Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400–3.403)
- ☐ Antitrust/Trade regulation (03)
- ☐ Construction defect (10)
- ☐ Mass tort (40)
- ☐ Securities litigation (28)
- ☐ Environmental/Toxic tort (30)
- ☐ Insurance coverage claims arising from the above listed provisionally complex case types (41)

Enforcement of Judgment
- ☐ Enforcement of judgment (20)

Miscellaneous Civil Complaint
- ☐ RICO (27)
- ☐ Other complaint *(not specified above)* (42)

Miscellaneous Civil Petition
- ☐ Partnership and corporate governance (21)
- ☐ Other petition *(not specified above)* (43)

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. ☐ Large number of separately represented parties
   b. ☐ Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve
   c. ☐ Substantial amount of documentary evidence
   d. ☐ Large number of witnesses
   e. ☐ Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court
   f. ☐ Substantial postjudgment judicial supervision
3. Remedies sought *(check all that apply)*: a. ☐ monetary b. ☑ nonmonetary; declaratory or injunctive relief c. ☐ punitive
4. Number of causes of action *(specify)*: 1-Writ of Mandate
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: August 1, 2017

Donald G. Norris
(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.

Form Adopted for Mandatory Use
Judicial Council of California
CM-010 [Rev. July 1, 2007]

CIVIL CASE COVER SHEET

Cal. Rules of Court, rules 2.30, 3.220, 3.400–3.403, 3.740;
Cal. Standards of Judicial Administration, std. 3.10
www.courtinfo.ca.gov

SHORT TITLE: HEALTHSMART PACIFIC v. DEPT. OF INDUSTRIAL RELATIONS	CASE NUMBER

CIVIL CASE COVER SHEET ADDENDUM AND STATEMENT OF LOCATION (CERTIFICATE OF GROUNDS FOR ASSIGNMENT TO COURTHOUSE LOCATION)

This form is required pursuant to Local Rule 2.3 in all new civil case filings in the Los Angeles Superior Court.

Step 1: After completing the Civil Case Cover Sheet (Judicial Council form CM-010), find the exact case type in Column A that corresponds to the case type indicated in the Civil Case Cover Sheet.

Step 2: In Column B, check the box for the type of action that best describes the nature of the case.

Step 3: In Column C, circle the number which explains the reason for the court filing location you have chosen.

Applicable Reasons for Choosing Court Filing Location (Column C)

1. Class actions must be filed in the Stanley Mosk Courthouse, Central District.
2. Permissive filing in central district.
3. Location where cause of action arose.
4. Mandatory personal injury filing in North District.
5. Location where performance required or defendant resides.
6. Location of property or permanently garaged vehicle.
7. Location where petitioner resides.
8. Location wherein defendant/respondent functions wholly.
9. Location where one or more of the parties reside.
10. Location of Labor Commissioner Office.
11. Mandatory filing location (Hub Cases – unlawful detainer, limited non-collection, limited collection, or personal injury).

	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Auto Tort	Auto (22)	☐ A7100 Motor Vehicle - Personal Injury/Property Damage/Wrongful Death	1, 4, 11
	Uninsured Motorist (46)	☐ A7110 Personal Injury/Property Damage/Wrongful Death – Uninsured Motorist	1, 4, 11
Other Personal Injury/ Property Damage/ Wrongful Death Tort	Asbestos (04)	☐ A6070 Asbestos Property Damage ☐ A7221 Asbestos - Personal Injury/Wrongful Death	1, 11 1, 11
	Product Liability (24)	☐ A7260 Product Liability (not asbestos or toxic/environmental)	1, 4, 11
	Medical Malpractice (45)	☐ A7210 Medical Malpractice - Physicians & Surgeons ☐ A7240 Other Professional Health Care Malpractice	1, 4, 11 1, 4, 11
	Other Personal Injury Property Damage Wrongful Death (23)	☐ A7250 Premises Liability (e.g., slip and fall) ☐ A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.) ☐ A7270 Intentional Infliction of Emotional Distress ☐ A7220 Other Personal Injury/Property Damage/Wrongful Death	1, 4, 11 1, 4, 11 1, 4, 11 1, 4, 11

SHORT TITLE: HEALTHSMART PACIFIC v. DEPT. OF INDUSTRIAL RELATIONS	CASE NUMBER

	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Non-Personal Injury/ Property Damage/ Wrongful Death Tort	Business Tort (07)	☐ A6029 Other Commercial/Business Tort (not fraud/breach of contract)	1, 2, 3
	Civil Rights (08)	☐ A6005 Civil Rights/Discrimination	1, 2, 3
	Defamation (13)	☐ A6010 Defamation (slander/libel)	1, 2, 3
	Fraud (16)	☐ A6013 Fraud (no contract)	1, 2, 3
	Professional Negligence (25)	☐ A6017 Legal Malpractice ☐ A6050 Other Professional Malpractice (not medical or legal)	1, 2, 3 1, 2, 3
	Other (35)	☐ A6025 Other Non-Personal Injury/Property Damage tort	1, 2, 3
Employment	Wrongful Termination (36)	☐ A6037 Wrongful Termination	1, 2, 3
	Other Employment (15)	☐ A6024 Other Employment Complaint Case ☐ A6109 Labor Commissioner Appeals	1, 2, 3 10
Contract	Breach of Contract/ Warranty (06) (not insurance)	☐ A6004 Breach of Rental/Lease Contract (not unlawful detainer or wrongful eviction) ☐ A6008 Contract/Warranty Breach -Seller Plaintiff (no fraud/negligence) ☐ A6019 Negligent Breach of Contract/Warranty (no fraud) ☐ A6028 Other Breach of Contract/Warranty (not fraud or negligence)	2, 5 2, 5 1, 2, 5 1, 2, 5
	Collections (09)	☐ A6002 Collections Case-Seller Plaintiff ☐ A6012 Other Promissory Note/Collections Case ☐ A6034 Collections Case-Purchased Debt (Charged Off Consumer Debt Purchased on or after January 1, 2014)	5, 6, 11 5, 11 5, 6, 11
	Insurance Coverage (18)	☐ A6015 Insurance Coverage (not complex)	1, 2, 5, 8
	Other Contract (37)	☐ A6009 Contractual Fraud ☐ A6031 Tortious Interference ☐ A6027 Other Contract Dispute(not breach/insurance/fraud/negligence)	1, 2, 3, 5 1, 2, 3, 5 1, 2, 3, 8, 9
Real Property	Eminent Domain/Inverse Condemnation (14)	☐ A7300 Eminent Domain/Condemnation Number of parcels_____	2, 6
	Wrongful Eviction (33)	☐ A6023 Wrongful Eviction Case	2, 6
	Other Real Property (26)	☐ A6018 Mortgage Foreclosure ☐ A6032 Quiet Title ☐ A6060 Other Real Property (not eminent domain, landlord/tenant, foreclosure)	2, 6 2, 6 2, 6
Unlawful Detainer	Unlawful Detainer-Commercial (31)	☐ A6021 Unlawful Detainer-Commercial (not drugs or wrongful eviction)	6, 11
	Unlawful Detainer-Residential (32)	☐ A6020 Unlawful Detainer-Residential (not drugs or wrongful eviction)	6, 11
	Unlawful Detainer-Post-Foreclosure (34)	☐ A6020F Unlawful Detainer-Post-Foreclosure	2, 6, 11
	Unlawful Detainer-Drugs (38)	☐ A6022 Unlawful Detainer-Drugs	2, 6, 11

SHORT TITLE: HEALTHSMART PACIFIC v. DEPARTMENT OF IND. RELATIONS	CASE NUMBER

	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Judicial Review	Asset Forfeiture (05)	☐ A6108 Asset Forfeiture Case	2, 3, 6
	Petition re Arbitration (11)	☐ A6115 Petition to Compel/Confirm/Vacate Arbitration	2, 5
	Writ of Mandate (02)	☑ A6151 Writ - Administrative Mandamus	2, 8
		☐ A6152 Writ - Mandamus on Limited Court Case Matter	2
		☐ A6153 Writ - Other Limited Court Case Review	2
	Other Judicial Review (39)	☐ A6150 Other Writ /Judicial Review	2, 8
Provisionally Complex Litigation	Antitrust/Trade Regulation (03)	☐ A6003 Antitrust/Trade Regulation	1, 2, 8
	Construction Defect (10)	☐ A6007 Construction Defect	1, 2, 3
	Claims Involving Mass Tort (40)	☐ A6006 Claims Involving Mass Tort	1, 2, 8
	Securities Litigation (28)	☐ A6035 Securities Litigation Case	1, 2, 8
	Toxic Tort Environmental (30)	☐ A6036 Toxic Tort/Environmental	1, 2, 3, 8
	Insurance Coverage Claims from Complex Case (41)	☐ A6014 Insurance Coverage/Subrogation (complex case only)	1, 2, 5, 8
Enforcement of Judgment	Enforcement of Judgment (20)	☐ A6141 Sister State Judgment	2, 5, 11
		☐ A6160 Abstract of Judgment	2, 6
		☐ A6107 Confession of Judgment (non-domestic relations)	2, 9
		☐ A6140 Administrative Agency Award (not unpaid taxes)	2, 8
		☐ A6114 Petition/Certificate for Entry of Judgment on Unpaid Tax	2, 8
		☐ A6112 Other Enforcement of Judgment Case	2, 8, 9
Miscellaneous Civil Complaints	RICO (27)	☐ A6033 Racketeering (RICO) Case	1, 2, 8
	Other Complaints (Not Specified Above) (42)	☐ A6030 Declaratory Relief Only	1, 2, 8
		☐ A6040 Injunctive Relief Only (not domestic/harassment)	2, 8
		☐ A6011 Other Commercial Complaint Case (non-tort/non-complex)	1, 2, 8
		☐ A6000 Other Civil Complaint (non-tort/non-complex)	1, 2, 8
	Partnership Corporation Governance (21)	☐ A6113 Partnership and Corporate Governance Case	2, 8
Miscellaneous Civil Petitions	Other Petitions (Not Specified Above) (43)	☐ A6121 Civil Harassment	2, 3, 9
		☐ A6123 Workplace Harassment	2, 3, 9
		☐ A6124 Elder/Dependent Adult Abuse Case	2, 3, 9
		☐ A6190 Election Contest	2
		☐ A6110 Petition for Change of Name/Change of Gender	2, 7
		☐ A6170 Petition for Relief from Late Claim Law	2, 3, 8
		☐ A6100 Other Civil Petition	2, 9

SHORT TITLE: HEALTHSMART PACIFIC v. DEPT. OF INDUSTRIAL RELATION	CASE NUMBER

Step 4: Statement of Reason and Address: Check the appropriate boxes for the numbers shown under Column C for the type of action that you have selected. Enter the address which is the basis for the filing location, including zip code. (No address required for class action cases).

REASON:	ADDRESS:		
☐ 1. ☑ 2. ☐ 3. ☐ 4. ☐ 5. ☐ 6. ☐ 7. ☐ 8. ☐ 9. ☐ 10. ☐ 11.	6150 Van Nuys Blvd.		
CITY: Van Nuys	STATE: CA	ZIP CODE: 91401	

Step 5: Certification of Assignment: I certify that this case is properly filed in the Central District of the Superior Court of California, County of Los Angeles [Code Civ. Proc., §392 et seq., and Local Rule 2.3(a)(1)(E)].

Dated: August 1, 2017

(SIGNATURE OF ATTORNEY/FILING PARTY)

PLEASE HAVE THE FOLLOWING ITEMS COMPLETED AND READY TO BE FILED IN ORDER TO PROPERLY COMMENCE YOUR NEW COURT CASE:

1. Original Complaint or Petition.
2. If filing a Complaint, a completed Summons form for issuance by the Clerk.
3. Civil Case Cover Sheet, Judicial Council form CM-010.
4. Civil Case Cover Sheet Addendum and Statement of Location form, LACIV 109, LASC Approved 03-04 (Rev. 02/16).
5. Payment in full of the filing fee, unless there is court order for waiver, partial or scheduled payments.
6. A signed order appointing the Guardian ad Litem, Judicial Council form CIV-010, if the plaintiff or petitioner is a minor under 18 years of age will be required by Court in order to issue a summons.
7. Additional copies of documents to be conformed by the Clerk. Copies of the cover sheet and this addendum must be served along with the summons and complaint, or other initiating pleading in the case.