

AUG 16 2006

John A. Gabb, Executive Officer/Clerk
By S. Gabb Deputy
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Case assigned
to Judge
EDWARD A. FERNS

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

D-69

11 DENNIS PRAGER, an individual,
12 Plaintiff,
13 v.
14 THE PRAGER PERSPECTIVE, LLC, a
California limited liability company; SCOTT
15 WEBLEY, an individual, and Does 1 through
16 10, inclusive,
17 Defendants.

Case No. BC357131
COMPLAINT FOR
(1) INVOLUNTARY DISSOLUTION OF
LIMITED LIABILITY COMPANY;
(2) AN ACCOUNTING;
(3) CONVERSION;
(4) CYBER PIRACY IN VIOLATION OF
B&P CODE § 17525;
(5) INTERFERENCE WITH
PROSPECTIVE BUSINESS
ADVANTAGE; AND
(6) BREACHES OF FIDUCIARY DUTY

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C11/CASE: BC357131 LEA/SEH:
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Plaintiff Dennis Prager alleges:

FIRST CAUSE OF ACTION

**(For Dissolution of Limited Liability Company Pursuant to Corporations Code § 17351
Against All Defendants)**

1. Plaintiff is an individual and is one of two members of The Prager Perspective, LLC.

2. Defendant The Prager Perspective, LLC (“TPP”) is a limited liability company organized and existing under the laws of the State of California.

3. Defendant Scott Webley (“Webley”) is an individual and is the other of the two members of TPP.

4. Defendants Does 1 through 10 are sued herein by these fictitious names because their true names are unknown to plaintiff. Plaintiff will seek leave to amend this complaint to allege the true names when the same are ascertained. Plaintiff is informed, believes and thereon alleges that these fictitiously-named defendants are responsible as agents, principals, alter egos, co-conspirators or in some other manner for the matters alleged herein.

5. Dissolution of TPP is reasonably necessary for the protection of the rights and interests of plaintiff.

6. The management of TPP is deadlocked and subject to internal dissension.

7. Defendant Webley, who has been managing TPP, has been guilty of persistent mismanagement and abuse of authority.

8. For the reasons alleged herein, plaintiff is entitled to an order dissolving TPP and winding up its affairs.

SECOND CAUSE OF ACTION

(For An Accounting Against All Defendants)

9. Plaintiff incorporates herein by reference paragraphs 1 through 8 of this complaint.

10. As a member of TPP, plaintiff is entitled to an accounting of the company’s business and in particular to an accounting of all revenues and expenses of the company from its

1 formation to the date of the accounting. Plaintiff is also entitled to an order that defendants hold
2 all assets of the company as constructive trustees for plaintiff's benefit to the extent of plaintiff's
3 ownership interest in TPP.

4 **THIRD CAUSE OF ACTION**

5 **(For Conversion Against All Defendants)**

6 11. Plaintiff incorporates herein by reference paragraphs 1 through 8 of this
7 complaint.

8 12. At all times relevant hereto, plaintiff has been and is the true owner of the domain
9 name "dennisprager.com" and is entitled to the exclusive use and possession of that domain
10 name.

11 13. Plaintiff agreed to allow TPP to use the "dennisprager.com" domain name in its
12 business and, pursuant to that agreement, allowed TPP to register itself as the owner of that
13 domain name. As part of this agreement, plaintiff and defendants agreed that plaintiff was and
14 would remain the true owner of the domain name and would be entitled to the return of the
15 domain name upon demand.

16 14. In or around April 2006, plaintiff made demand on defendants to cease TPP's use
17 of the domain name and to return the domain name to plaintiff. Since that date, despite
18 plaintiff's demand, defendants have refused to return the "dennisprager.com" domain name to
19 plaintiff and have continued to use the domain name for their own benefit.

20 15. As the true owner of the "dennisprager.com" domain name who is entitled to its
21 exclusive possession and use, plaintiff is entitled to an order compelling defendants to deliver the
22 domain name to plaintiff and to execute all documents necessary to restore the domain name to
23 plaintiff.

24 16. As a proximate result of defendants' wrongful possession and retention of the
25 "dennisprager.com" domain name, plaintiff has suffered damages and continues to suffer
26 damages, in an amount to be proven at trial, but which plaintiff is informed, believes and thereon
27 alleges exceeds the limited civil jurisdiction of this court.

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1 17. Defendants' refusal to return the "dennisprager.com" domain name to plaintiff
2 was willful and malicious, done in conscious derogation of plaintiff's rights, and done with the
3 specific intention to damage plaintiff. Plaintiff is therefore entitled to an award of punitive
4 damages against defendants, and each of them, in amounts sufficient to punish defendants and
5 make an example of them.

6 **FOURTH CAUSE OF ACTION**

7 **(For Cyber Piracy In Violation Of Business & Professions Code § 17525 Against All**
8 **Defendants)**

9 18. Plaintiff incorporates herein by reference paragraphs 1 through 8 and 12 through
10 14 of this complaint.

11 19. Plaintiff is informed, believes and thereon alleges that defendants, in addition to
12 registering TPP as the owner of the domain name "dennisprager.com," also registered TPP as the
13 owner of the domain name "dennisprager.net."

14 20. Plaintiff is informed, believes and thereon alleges that defendants, in registering
15 TPP as the owner of the domain name "dennisprager.net," thereby using plaintiff's name as the
16 domain name, did so in bad faith, without plaintiff's permission, for the purpose of profiting
17 from the use of plaintiff's name and trafficking in that domain name by forcing plaintiff to
18 compensate defendants to stop defendants from using that domain name and to induce
19 defendants to transfer the domain to plaintiff.

20 21. In refusing to return the "dennisprager.com" domain to plaintiff upon his demand
21 and converting that domain name for their own use and benefit, as more fully alleged above,
22 defendants acted in bad faith with the intent to use and traffic in the "dennisprager.com" domain
23 name by forcing plaintiff to compensate defendants to stop defendants from using that domain
24 name and to induce defendants to transfer the domain to plaintiff.

25 22. As a direct and proximate result of defendants' cyber piracy of the
26 "dennisprager.com" and "dennisprager.net" domain names, plaintiff has plaintiff has suffered
27 damages and continues to suffer damages, in an amount to be proven at trial, but which plaintiff
28 is informed, believes and thereon alleges exceeds the limited civil jurisdiction of this court.

1 23. As a direct and proximate result of defendants' cyber piracy of the
2 "dennisprager.com" and "dennisprager.net" domain names, plaintiff is entitled to an order,
3 pursuant to Business & Professions Code section 17528.5, to transfer these domain names to
4 plaintiff.

5 24. Defendants' cyber piracy of the "dennisprager.com" and "dennisprager.net"
6 domain names was willful and malicious, done in conscious derogation of plaintiff's rights, and
7 done with the specific intention to damage plaintiff. Plaintiff is therefore entitled to an award of
8 punitive damages against defendants, and each of them, in amounts sufficient to punish
9 defendants and make an example of them.

10 **FIFTH CAUSE OF ACTION**

11 **(For Intentional Interference With Prospective**
12 **Business Advantage Against All Defendants)**

13 25. Plaintiff incorporates herein by reference paragraphs 1 through 8, 12 through 14
14 and 19 through 22 of this complaint.

15 26. In or around July 2005, plaintiff and Salem Radio Network Incorporated
16 ("Salem") entered into negotiations for a new contract whereby Salem would employ plaintiff as
17 a radio talk show host and market recordings of the radio shows through the worldwide web. An
18 integral part of this negotiation was plaintiff's and Salem's desire to market recordings of the
19 radio show on a website using the domain name "dennisprager.com." In connection with these
20 negotiations, plaintiff made demand on defendants to cease TPP's use of the "dennisprager.com"
21 domain name and return the domain name to plaintiff.

22 27. Defendants knew about the ongoing negotiations between plaintiff and Salem and
23 knew that plaintiff was demanding that TPP return the "dennisprager.com" domain name to
24 plaintiff in part to make possible the new contractual relationship which plaintiff and Salem were
25 negotiating.

26 28. Defendants intentionally interfered with the prospective economic relationship
27 between plaintiff and Salem by wrongfully converting the "dennisprager.com" domain name to
28 their own use and by engaging in cyber piracy, as alleged above. Defendants interfered with

1 shows, and to enter into a license agreement to permit TPP to merchandise and sell tangible
2 expressions of the copyrighted content of plaintiff's radio show and related content, including
3 lectures, courses, former radio shows and other Dennis Prager content, and by rejecting all such
4 proposals, thereby causing Salem to sue TPP, exposing TPP to liability for substantial damages,
5 and depriving TPP of substantial revenues, all for the purpose of maximizing defendant
6 Webley's prospects for financial gain at the expense of plaintiff.

7 35. In or around June 2006, plaintiff became aware that defendant Webley breached
8 his fiduciary duties to plaintiff by causing TPP to hire his personal attorney, David C. Gurnick,
9 as TPP's attorney, despite the actual and potential conflicts of interest inherent in this joint
10 representation and without plaintiff's informed written consent to this joint representation, all for
11 the purpose of managing the affairs of TPP so as to maximize the prospects of financial gain for
12 Webley at the expense of plaintiff.

13 36. In or around July 2006, after plaintiff objected to Mr. Gurnick's representation of
14 TPP, defendant Webley breached his fiduciary duties to plaintiff by causing TPP to hire another
15 attorney, Alisa S. Edelson of Kulik Gottesman Mouton & Siegel LLP, to represent both TPP and
16 defendant Webley in the Ventura County Superior Court lawsuit Salem filed against TPP and
17 Webley relating to TPP's allegedly unauthorized marketing and sale of plaintiff's radio show.
18 Defendant Webley caused TPP to hire attorney Edelson to represent both TPP and Webley
19 despite the actual and potential conflicts of interest inherent in this joint representation, without
20 plaintiff's informed written consent to this joint representation and despite plaintiff's previous
21 objection to any joint representation of TPP and Webley, all for the purpose of managing the
22 affairs of TPP so as to maximize the prospects of financial gain for Webley at the expense of
23 plaintiff.

24 37. As a direct and proximate result of defendant Webley's breaches of fiduciary
25 duty, plaintiff has been damaged in that TPP has lost substantial potential revenues, is now
26 exposed to Salem's damages claim of not less than \$300,000, and has incurred and will incur
27 substantial legal fees in connection with the Salem lawsuit, all in amounts according to proof at
28 trial.

1 38. Defendant Webley's breaches of fiduciary duty were willful and malicious, done
2 in conscious derogation of plaintiff's rights, and done with the specific intention to damage
3 plaintiff. Plaintiff is therefore entitled to an award of punitive damages against defendants, and
4 each of them, in amounts sufficient to punish defendants and make an example of them.

5 WHEREFORE, plaintiff prays for judgment against defendants as follows:

6 On the First Cause of Action:

7 1. For an order dissolving TPP and winding up its affairs;

8 On the Second Cause of Action;

9 2. For an accounting of all of TPP's financial matters from TPP's inception to the
10 date of the accounting;

11 3. For the imposition of a constructive trust on all of the assets of TPP for plaintiff's
12 benefit to the extent of plaintiff's ownership interest in TPP;

13 On the Third Cause of Action:

14 4. For an order commanding defendants to deliver the "dennisprager.com" domain
15 name and the "dennisprager.net" domain name to plaintiff and to execute all documents
16 necessary to restore the domain name to plaintiff;

17 5. For compensatory damages according to proof;

18 6. For punitive damages according to proof;

19 On the Fourth Cause of Action:

20 7. For compensatory damages according to proof;

21 8. For an order commanding defendants to transfer the "dennisprager.com" and
22 "dennisprager.net" domain names to plaintiff and to execute all documents necessary to restore
23 these domain names to plaintiff;

24 9. For punitive damages according to proof;

25 On the Fifth Cause of Action:

26 10. For compensatory damages according to proof;

27 11. For punitive damages according to proof;

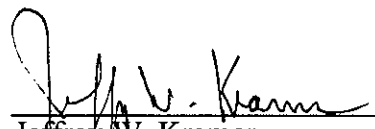
28 On the Sixth Cause of Action:

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- 12. For compensatory damages according to proof;
- 13. For punitive damages according to proof;
- On all causes of action:
- 14. For plaintiff's costs of suit incurred herein; and
- 15. For such other and further relief as the Court deems just and proper.

Dated: August 16, 2006

TROY & GOULD
Professional Corporation

By: 
 Jeffrey W. Kramer
 Attorneys for Plaintiff Dennis Prager

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):

FOR COURT USE ONLY

Jeffrey W. Kramer (SBN 71547) 71547
TROY & GOULD Professional Corporation
1801 Century Park East, 16th Floor
Los Angeles, California 90067-2367

TELEPHONE NO.: (310) 553-4441

FAX NO.: (310) 201-4746

ATTORNEY FOR (Name): Dennis Prager

FILED
LOS ANGELES SUPERIOR COURT

AUG 16 2006

John A. ...
By S. Gabb Deputy

SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles

STREET ADDRESS: 111 North Hill St.

MAILING ADDRESS: SAME

CITY AND ZIP CODE: Los Angeles, California 90012

BRANCH NAME: CENTRAL DISTRICT

CASE NAME: DENNIS PRAGER V. THE PRAGER PERSPECTIVE, LLC. et al.

CASE NUMBER: **BC357131**

JUDGE:

DEPT:

CIVIL CASE COVER SHEET

Unlimited Amount demanded exceeds \$25,000
 Limited (Amount) demanded is \$25,000 or less

Complex Case Designation

Counter **Joinder**

Filed with first appearance by defendant (Cal. Rules of Court, rule 1811)

Items 1-5 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)
- 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 1800-1812)

- 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 1800 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. Type of remedies sought (check all that apply):

- a. monetary
- b. nonmonetary; declaratory or injunctive relief
- c. punitive

4. Number of causes of action (specify): 6

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 16, 2006

Jeffrey W. Kramer (SBN 71547)

(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 201.8.) 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 1800 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 complex case, this cover sheet will be used for statistical purposes only

INSTRUCTIONS ON HOW TO COMPLETE THE COVER SHEET

To Plaintiffs and Others Filing First Papers

If you are filing a first paper (for example, a complaint) in a civil case, you must complete and file, along with your first paper, the *Civil Case Cover Sheet* contained on page 1. This information will be used to compile statistics about the types and numbers of cases filed. You must complete items 1 through 5 on the sheet. In item 1, you must check **one** box for the case type that best describes the case. If the case fits both a general and a more specific type of case listed in item 1, check the more specific one. If the case has multiple causes of action, check the box that best indicates the **primary** cause of action. To assist you in completing the sheet, examples of the cases that belong under each case type in item 1 are provided below. A cover sheet must be filed only with your initial paper. You do not need to submit a cover sheet with amended papers. Failure to file a cover sheet with the first paper filed in a civil case may subject a party, its counsel, or both to sanctions under rules 201.8(c) and 227 of the California Rules of Court.

To Parties in Complex Cases

In complex cases only, parties must also use the *Civil Case Cover Sheet* to designate whether the case is complex. If a plaintiff believes the case is complex under rule 1800 of the California Rules of Court, this must be indicated by completing the appropriate boxes in items 1 and 2. If a plaintiff designates a case as complex, the cover sheet must be served with the complaint on all parties to the action. A defendant may file and serve no later than the time of its first appearance a joinder in the plaintiff's designation, a counter-designation that the case is not complex, or, if the plaintiff has made no designation, a designation that the case is complex.

CASE TYPES AND EXAMPLES

Auto Tort

- Auto (22)-Personal Injury/Property Damage/Wrongful Death
- Uninsured Motorist (46) *(if the case involves an uninsured motorist claim subject to arbitration, check this item instead of Auto)*

Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort

- Asbestos (04)
 - Asbestos Property Damage
 - Asbestos Personal Injury/Wrongful Death
- Product Liability *(not asbestos or toxic/environmental)* (24)
- Medical Malpractice (45)
 - Medical Malpractice-Physicians & Surgeons
 - Other Professional Health Care Malpractice
- Other PI/PD/WD (23)
 - Premises Liability (e.g., slip and fall)
 - Intentional Bodily Injury/PD/WD (e.g., assault, vandalism)
 - Intentional Infliction of Emotional Distress
 - Negligent Infliction of Emotional Distress
 - Other PI/PD/WD

Non-PI/PD/WD (Other) Tort

- Business Tort/Unfair Business Practice (07)
- Civil Rights (e.g., discrimination, false arrest) *(not civil harassment)* (08)
- Defamation (e.g., slander, libel) (09)
- Fraud (16)
- Intellectual Property (19)
- Professional Negligence (25)
 - Legal Malpractice
 - Other Professional Malpractice *(not medical or legal)*
- Other Non-PI/PD/WD Tort (35)

Employment

- Wrongful Termination (36)
- Other Employment (15)

Contract

- Breach of Contract/Warranty (06)
 - Breach of Rental/Lease Contract *(not unlawful detainer or wrongful eviction)*
 - Contract/Warranty Breach-Seller Plaintiff *(not fraud or negligence)*
 - Negligent Breach of Contract/Warranty
 - Other Breach of Contract/Warranty
- Collections (e.g., money owed, open book accounts) (09)
 - Collection Case-Seller Plaintiff
 - Other Promissory Note/Collections Case
- Insurance Coverage *(not provisionally complex)* (18)
 - Auto Subrogation
 - Other Coverage
- Other Contract (37)
 - Contractual Fraud
 - Other Contract Dispute

Real Property

- Eminent Domain/Inverse Condemnation (14)
- Wrongful Eviction (33)
- Other Real Property (e.g., quiet title) (26)
 - Writ of Possession of Real Property
 - Mortgage Foreclosure
 - Quiet Title
 - Other Real Property *(not eminent domain, landlord/tenant, or foreclosure)*

Unlawful Detainer

- Commercial (31)
- Residential (32)
- Drugs (38) *(if the case involves illegal drugs, check this item; otherwise, report as Commercial or Residential)*

Judicial Review

- Asset Forfeiture (05)
- Petition Re: Arbitration Award (11)
- Writ of Mandate (02)
 - Writ-Administrative Mandamus
 - Writ-Mandamus on Limited Court Case Matter
- Writ-Other Limited Court Case Review
- Other Judicial Review (39)
 - Review of Health Officer Order
 - Notice of Appeal-Labor Commissioner Appeals

Provisionally Complex Civil Litigation (Cal. Rules of Court Rules 1800-1812)

- Antitrust/Trade Regulation (03)
- Construction Defect (10)
- Claims Involving Mass Tort (40)
- Securities Litigation (28)
- Environmental/Toxic Tort (30)
- Insurance Coverage Claims *(arising from provisionally complex case type listed above)* (41)

Enforcement of Judgment

- Enforcement of Judgment (20)
 - Abstract of Judgment (Out of County)
 - Confession of Judgment *(non-domestic relations)*
 - Sister State Judgment
 - Administrative Agency Award *(not unpaid taxes)*
 - Petition/Certification of Entry of Judgment on Unpaid Taxes
 - Other Enforcement of Judgment Case

Miscellaneous Civil Complaint

- RICO (27)
- Other Complaint *(not specified above)* (42)
- Declaratory Relief Only
- Injunctive Relief Only *(non-harassment)*
- Mechanics Lien
- Other Commercial Complaint Case *(non-tort/non-complex)*
- Other Civil Complaint *(non-tort/non-complex)*

Miscellaneous Civil Petition

- Partnership and Corporate Governance (21)
- Other Petition *(not specified above)* (43)
 - Civil Harassment
 - Workplace Violence
 - Elder/Dependent Adult Abuse
 - Election Contest
 - Petition for Name Change
 - Petition for Relief from Late Claim
 - Other Civil Petition

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

This form is required pursuant to LASC Local Rule 2.0 in all new civil case filings in the Los Angeles Superior Court.

Item I. Check the types of hearing and fill in the estimated length of hearing expected for this case:
 JURY TRIAL? YES CLASS ACTION? YES LIMITED CASE? YES TIME ESTIMATED FOR TRIAL 3 HOURS/ DAYS.
 Item II. Select the correct district and courthouse location (4 steps - if you checked "Limited Case", skip to Item III, Pg. 4):

Step 1: After first completing the Civil Case Cover Sheet Form, find the main civil case cover sheet heading for your case in the left margin below, and, to the right in Column **A**, the Civil Case Cover Sheet case type you selected.

Step 2: Check one Superior Court type of action in Column **B** below which best describes the nature of this case.

Step 3: In Column **C**, circle the reason for the court location choice that applies to the type of action you have checked. For any exception to the court location, see Los Angeles Superior Court Local Rule 2.0.

Applicable Reasons for Choosing Courthouse Location (see Column C below)

- | | |
|---|--|
| 1. Class Actions must be filed in the County Courthouse, Central District.
2. May be filed in Central (Other county, or no Bodily Injury/Property Damage).
3. Location where cause of action arose.
4. Location where bodily injury, death or damage occurred.
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. |
|---|--|

Step 4: Fill in the information requested on page 4 in Item III; complete Item IV. Sign the declaration.

	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)	<input type="checkbox"/> A7100 Motor Vehicle - Personal Injury/Property Damage/Wrongful Death	1., 2., 4.
	Uninsured Motorist (46)	<input type="checkbox"/> A7110 Personal Injury/Property Damage/Wrongful Death - Uninsured Motorist	1., 2., 4.
Other Personal Injury/Property Damage/Wrongful Death Tort	Asbestos (04)	<input type="checkbox"/> A6070 Asbestos Property Damage <input type="checkbox"/> A7221 Asbestos- Personal Injury/Wrongful Death	2. 2.
	Product Liability (24)	<input type="checkbox"/> A7260 Product Liability (not asbestos or toxic/environmental)	1., 2., 3., 4., 8.
	Medical Malpractice (45)	<input type="checkbox"/> A7210 Medical Malpractice - Physicians & Surgeons <input type="checkbox"/> A7240 Other Professional Health Care Malpractice	1., 2., 4. 1., 2., 4.
	Other Personal Injury Property Damage Wrongful Death (23)	<input type="checkbox"/> A7250 Premises Liability (e.g., slip and fall)	1., 2., 4.
		<input type="checkbox"/> A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.)	1., 2., 4.
<input type="checkbox"/> A7270 Intentional Infliction of Emotional Distress <input type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death		1., 2., 3. 1., 2., 4.	
Non-Personal Injury/Property	Business Tort (07)	<input type="checkbox"/> A6029 Other Commercial/Business Tort (not fraud/breach of contract)	1., 2., 3.
	Civil Rights (08)	<input type="checkbox"/> A6005 Civil Rights/Discrimination	1., 2., 3.
	Defamation (13)	<input type="checkbox"/> A6010 Defamation (slander/libel)	1., 2., 3.
	Fraud (16)	<input type="checkbox"/> A6013 Fraud (no contract)	1., 2., 3.
	Intellectual Property (19)	<input type="checkbox"/> A6016 Intellectual Property	2., 3.



SHORT TITLE: DENNIS PRAGER v. THE PRAGER PERSPECTIVE, LLC. et al.	CASE NUMBER
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A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons -See Step 3 Above
Professional Negligence (25)	<input type="checkbox"/> A6017 Legal Malpractice	1., 2., 3.
	<input type="checkbox"/> A6050 Other Professional Malpractice (not medical or legal)	1., 2., 3.
Other (35)	<input type="checkbox"/> A6025 Other Non-Personal Injury/Property Damage tort	2., 3.
Wrongful Termination (36)	<input type="checkbox"/> A6037 Wrongful Termination	1., 2., 3.
Other Employment (15)	<input type="checkbox"/> A6024 Other Employment Complaint Case	1., 2., 3.
	<input type="checkbox"/> A6109 Labor Commissioner Appeals	10.
Breach of Contract/ Warranty (06) (not insurance)	<input type="checkbox"/> A6004 Breach of Rental/Lease Contract (not Unlawful Detainer or wrongful eviction)	2., 5.
	<input type="checkbox"/> A6008 Contract/Warranty Breach -Seller Plaintiff (no fraud/negligence)	2., 5.
	<input type="checkbox"/> A6019 Negligent Breach of Contract/Warranty (no fraud)	1., 2., 5.
	<input type="checkbox"/> A6028 Other Breach of Contract/Warranty (not fraud or negligence)	1., 2., 5.
Collections (09)	<input type="checkbox"/> A6002 Collections Case-Seller Plaintiff	2., 5., 6
	<input type="checkbox"/> A6012 Other Promissory Note/Collections Case	2., 5.
Insurance Coverage (18)	<input type="checkbox"/> A6015 Insurance Coverage (not complex)	1., 2., 5., 8.
Other Contract (37)	<input type="checkbox"/> A6009 Contractual Fraud	1., 2., 3., 5.
	<input type="checkbox"/> A6031 Tortious Interference	1., 2., 3., 5.
	<input type="checkbox"/> A6027 Other Contract Dispute(not breach/insurance/fraud/negligence)	1., 2., 3., 8.
Eminent Domain/Inverse Condemnation (14)	<input type="checkbox"/> A7300 Eminent Domain/Condemnation Number of parcels _____	2.
Wrongful Eviction (33)	<input type="checkbox"/> A6023 Wrongful Eviction Case	2., 6.
Other Real Property (26)	<input type="checkbox"/> A6018 Mortgage Foreclosure	2., 6.
	<input type="checkbox"/> A6032 Quiet Title	2., 6.
	<input type="checkbox"/> A6060 Other Real Property(not eminent domain, landlord/tenant, foreclosure)	2., 6.
Unlawful Detainer- Commercial (31)	<input type="checkbox"/> A6021 Unlawful Detainer-Commercial (not drugs or wrongful eviction)	2., 6.
Unlawful Detainer- Residential (32)	<input type="checkbox"/> A6020 Unlawful Detainer-Residential (not drugs or wrongful eviction)	2., 6.
Unlawful Detainer- Drugs (38)	<input type="checkbox"/> A6022 Unlawful Detainer-Drugs	2., 6.
Asset Forfeiture (05)	<input type="checkbox"/> A6108 Asset Forfeiture Case	2., 6.
Petition re Arbitration (11)	<input type="checkbox"/> A6115 Petition to Compel/Confirm/Vacate Arbitration	2., 5.

SHORT TITLE: DENNIS PRAGER v. THE PRAGER PERSPECTIVE, LLC. et al. CASE NUMBER

Judicial Review (Cont'd.)
Provisionally Complex Litigation
Enforcement of Judgment
Miscellaneous Civil Complaints
Miscellaneous Civil Petitions

A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Writ of Mandate (02)	<input type="checkbox"/> A6151 Writ - Administrative Mandamus <input type="checkbox"/> A6152 Writ - Mandamus on Limited Court Case Matter <input type="checkbox"/> A6153 Writ - Other Limited Court Case Review	2., 8. 2. 2.
Other Judicial Review (39)	<input type="checkbox"/> A6150 Other Writ /Judicial Review	2., 8.
Antitrust/Trade Regulation (03)	<input type="checkbox"/> A6003 Antitrust/Trade Regulation	1., 2., 8.
Construction Defect (10)	<input type="checkbox"/> A6007 Construction defect	1., 2., 3.
Claims Involving Mass Tort (40)	<input type="checkbox"/> A6006 Claims Involving Mass Tort	1., 2., 8.
Securities Litigation (28)	<input type="checkbox"/> A6035 Securities Litigation Case	1., 2., 8.
Toxic Tort Environmental (30)	<input type="checkbox"/> A6036 Toxic Tort/Environmental	1., 2., 3., 8.
Insurance Coverage Claims from Complex Case (41)	<input type="checkbox"/> A6014 Insurance Coverage/Subrogation (complex case only)	1., 2., 5., 8.
Enforcement of Judgment (20)	<input type="checkbox"/> A6141 Sister State Judgment <input type="checkbox"/> A6160 Abstract of Judgment <input type="checkbox"/> A6107 Confession of Judgment (non-domestic relations) <input type="checkbox"/> A6140 Administrative Agency Award (not unpaid taxes) <input type="checkbox"/> A6114 Petition/Certificate for Entry of Judgment on Unpaid Tax <input type="checkbox"/> A6112 Other Enforcement of Judgment Case	2., 9. 2., 6. 2., 9. 2., 8. 2., 8. 2., 8., 9.
RICO (27)	<input type="checkbox"/> A6033 Racketeering (RICO) Case	1., 2., 8.
Other Complaints (Not Specified Above) (42)	<input type="checkbox"/> A6030 Declaratory Relief Only <input type="checkbox"/> A6040 Injunctive Relief Only (not domestic/harassment) <input type="checkbox"/> A6011 Other Commercial Complaint Case (non-tort/non-complex) <input checked="" type="checkbox"/> A6000 Other Civil Complaint (non-tort/non-complex)	1., 2., 8. 2., 8. 1., 2., 8. 1., 2., 8.
Partnership Corporation Governance(21)	<input type="checkbox"/> A6113 Partnership and Corporate Governance Case	2., 8.
Other Petitions (Not Specified Above) (43)	<input type="checkbox"/> A6121 Civil Harassment <input type="checkbox"/> A6123 Workplace Harassment <input type="checkbox"/> A6124 Elder/Dependent Adult Abuse Case <input type="checkbox"/> A6190 Election Contest <input type="checkbox"/> A6110 Petition for Change of Name <input type="checkbox"/> A6170 Petition for Relief from Late Claim Law <input type="checkbox"/> A6100 Other Civil Petition	2., 3., 9. 2., 3., 9. 2., 3., 9. 2. 2., 7. 2., 3., 4., 8. 2., 9.

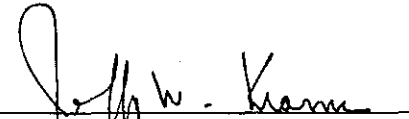
SHORT TITLE: DENNIS PRAGER v. THE PRAGER PERSPECTIVE, LLC. et al.	CASE NUMBER
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Item III. Statement of Location: Enter the address of the accident, party's residence or place of business, performance, or other circumstance indicated in Item II., Step 3 on Page 1, as the proper reason for filing in the court location you selected.

REASON: CHECK THE NUMBER UNDER COLUMN C WHICH APPLIES IN THIS CASE			ADDRESS: 19528 VENTURA BLVD
<input type="checkbox"/> 1. <input checked="" type="checkbox"/> 2. <input type="checkbox"/> 3. <input type="checkbox"/> 4. <input type="checkbox"/> 5. <input type="checkbox"/> 6. <input type="checkbox"/> 7. <input type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10.			
CITY: TARZANA	STATE: CA	ZIP CODE: 91356	

Item IV. Declaration of Assignment: I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that the above-entitled matter is properly filed for assignment to the Superior courthouse in the Central District of the Los Angeles Superior Court (Code Civ. Proc., § 392 et seq., and LASC Local Rule 2.0, subds. (b), (c) and (d)).

Dated: August 16, 2006


 (SIGNATURE OF ATTORNEY/FILING PARTY)
 Jeffrey W. Kramer (SBN 71547)

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 form CM-010.
4. Complete Addendum to Civil Case Cover Sheet form LASC Approved CIV 109, 03-04 (Rev. 03/06).
5. Payment in full of the filing fee, unless fees have been waived.
6. Signed order appointing the Guardian ad Litem, JC form 982(a)(27), if the plaintiff or petitioner is a minor under 18 years of age, or if required by Court.
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.

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