

INFORMATION REDACTED PURSUANT TO THE FREEDOM  
OF INFORMATION ACT (FOIA), 5 U.S.C. 552(B)(6)



07/27/2020

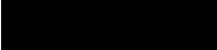
CT Log Number 

**TO:** Chris Dzbanski  
FORD MOTOR COMPANY  
1 American Rd Whq 421-E6  
Dearborn, MI 48126-2701


**RE: Process Served in California**

**FOR:** Ford Motor Company (Domestic State: DE)

**ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:**

**TITLE OF ACTION:**  Pltf. vs. FORD MOTOR COMPANY, et al., Dfts.

**DOCUMENT(S) SERVED:** -

**COURT/AGENCY:** None Specified  
Case 

**NATURE OF ACTION:** Product Liability Litigation - Lemon Law

**ON WHOM PROCESS WAS SERVED:** C T Corporation System, Los Angeles, CA

**DATE AND HOUR OF SERVICE:** By Process Server on 07/27/2020 at 14:55

**JURISDICTION SERVED :** California

**APPEARANCE OR ANSWER DUE:** None Specified

**ATTORNEY(S) / SENDER(S):** None Specified

**ACTION ITEMS:** CT has retained the current log, Retain Date: 07/28/2020, Expected Purge Date: 08/02/2020  
  
Image SOP  
  
Email Notification, Chris Dzbanski cdzbansk@ford.com

**SIGNED:** C T Corporation System  
**ADDRESS:** 1999 Bryan St Ste 900  
Dallas, TX 75201-3140

**For Questions:** 877-564-7529  
MajorAccountTeam2@wolterskluwer.com

## PROCESS SERVER DELIVERY DETAILS

**Date:** Mon, Jul 27, 2020

**Server Name:** [REDACTED]

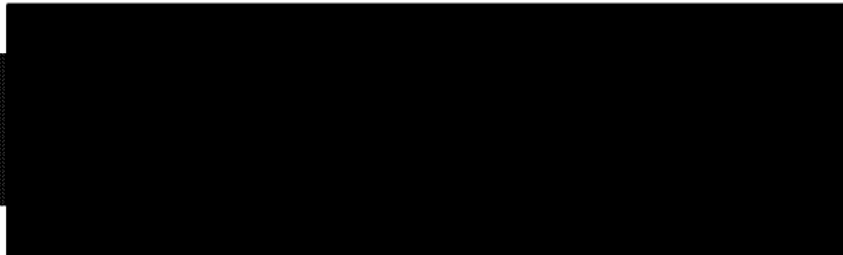
**Location:** LOS ANGELES, CA-LA

**Entity Served:** FORD MOTOR COMPANY

**Agent Name:** C T CORPORATION SYSTEM

**Case Number:** [REDACTED]

**Jurisdiction:** CA-LA



**SUMMONS  
(CITACION JUDICIAL)**

**NOTICE TO DEFENDANT:  
(AVISO AL DEMANDADO):**

FORD MOTOR COMPANY; and DOES 1-10

**YOU ARE BEING SUED BY PLAINTIFF:  
(LO ESTÁ DEMANDANDO EL DEMANDANTE):**



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

**FILED**

SUPERIOR COURT OF CALIFORNIA  
COUNTY OF SAN BERNARDINO  
SAN BERNARDINO DISTRICT

JUN 08 2020

*JRP*

LaShondra Richardson

**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](http://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](http://www.lawhelpcalifornia.org)), the California Courts Online Self-Help Center ([www.courtinfo.ca.gov/selfhelp](http://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](http://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](http://www.lawhelpcalifornia.org)), en el Centro de Ayuda de las Cortes de California, ([www.sucorte.ca.gov](http://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): County of San Bernardino  
247 West Third Street  
San Bernardino, CA 924158

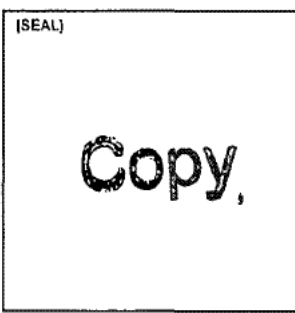
CASE NUMBER:  
(Número del Caso)

**CIV DS**

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):  
Kimberli C. Zazzi at Lemon Law Pro; 3017 Douglas Boulevard #300, Roseville, CA 95661; (916) 836-8565

DATE: **JUN 08 2020** Clerk, by **LaShondra Richardson**, Deputy  
(Fecha) (Secretario) (Adjunto)

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



- NOTICE TO THE PERSON SERVED:** You are served
- as an individual defendant.
  - as the person sued under the fictitious name of (specify):
  - on behalf of (specify): Ford Motor Company  
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):
  - by personal delivery on (date):

1 Kimberli C. Zazzi (SBN 249638)  
2 Vincent M. Onorio (SBN 117699)  
3 LEMON LAW PRO  
4 3017 Douglas Boulevard Suite 300  
5 Roseville, CA 95661  
6 legal@lemonlawpro.com  
7 Telephone: (916) 836-8565  
8 Facsimile: (916) 836-8583

9 Attorney for Plaintiff  
10 [REDACTED]

**FILED**  
SUPERIOR COURT OF CALIFORNIA  
COUNTY OF SAN BERNARDINO  
SAN BERNARDINO DISTRICT

JUN 08 2020

*[Signature]*  
LaShondra Richardson

11 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
12 FOR THE COUNTY OF SAN BERNARDINO

13 [REDACTED]

14 Plaintiff,

15 v.

16 FORD MOTOR COMPANY;  
17 and DOES 1 - 10,

18 Defendants.

CASE No.: CIV DS [REDACTED]

**COMPLAINT FOR VIOLATION OF THE  
SONG-BEVERLY CONSUMER  
WARRANTY ACT**

**Unlimited Civil Jurisdiction -  
Damages Exceed \$25,000**

**JURY TRIAL DEMANDED**

19 Plaintiff [REDACTED] hereafter "Plaintiff"), by and through his attorney,  
20 hereby alleges the following upon information and belief:

21 **GENERAL ALLEGATIONS**

- 22 1. Plaintiff is a natural person residing in Perris, California.
- 23 2. Plaintiff is a "buyer" as defined in Civil Code §2981(c) and §1791(b).
- 24 3. FORD MOTOR COMPANY (hereafter "Defendant" or "FORD") is and was a  
25 corporation and registered to do business in the State of California and doing business in the  
26 County of SAN BERNARDINO.
- 27 4. Defendant FORD MOTOR COMPANY is a "manufacturer" and/or "distributor"  
28 under the Act.

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1           5. Defendants DOE 1-10 inclusive are sued herein pursuant to California Code of  
2 Civil Procedure §474. The true names, capacities and nature and extent of participation in the  
3 alleged activities complained of herein by DOES 1-10, inclusive, are currently unknown to  
4 Plaintiff. Therefore, Plaintiff sues these defendants by such fictitious names and will amend the  
5 Complaint to allege their true names and capacities when ascertained.

6           6. On or about December 20, 2018, Plaintiff purchased a brand new 2018 Ford  
7 Focus, VIN [REDACTED] (hereinafter "vehicle") at Sunrise Ford located in Fontana,  
8 California. The subject vehicle is a new motor vehicle that was purchased primarily for personal,  
9 family, or household purposes or it is a new motor vehicle with a gross vehicle weight under  
10 10,000 pounds that was purchased or used primarily for business purposes by an entity to which  
11 not more than five motor vehicle are registered in this state. The subject vehicle is a "new motor  
12 vehicle" under the Song-Beverly Consumer Warranty Act, Civil Code §§1790 *et seq.* (the  
13 "Act".)

14           7. Defendant FORD MOTOR COMPANY issued an "express warranty" to Plaintiff  
15 pursuant to the Act.

16           8. The sale of the subject vehicle was also accompanied by an implied warranty  
17 which represented that the vehicle was merchantable. The sale was also accompanied by  
18 Defendant's implied warranty of fitness.

19           9. The subject vehicle has suffered from serious defects and nonconformities to  
20 warranty, including, but not limited to, recurrent and/or intermittent severe engine issues  
21 affecting drivability such as repeatedly running and idling rough during operation, violent  
22 shaking and vibration while driving, regular loud and distracting hissing sounds upon  
23 acceleration, numerous oil leaks, and multiple check engine light warnings.

24           10. The aforementioned nonconformities and defects manifested themselves within  
25 the applicable express warranty period. Said nonconformities have substantially impaired the  
26 vehicle's use, value, or safety to Plaintiff.

27           11. From the time of purchase until the present, the vehicle has suffered ongoing  
28 problems including but not limited to the following:

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Problems	Date	Odo.	Days	RO #
<p><b>Engine/Drivability - Repair Attempt -</b>            Customer states the engine runs rough when coming down to an idle.</p> <p>Confirmed rough idle CEL on, self test codes P0012, P0014. PP test HK1Y-HK10-HK12N-HK13- checked engine oil pressure, no oil pressure at 0 psi, performed teardown and inspection of engine. Found timing belt broken and teeth missing/disintegrated and contaminated complete engine oil pump, turbo damaged, intake manifold covered with fine belt particles. Performed cost cap and prior approval code THNR912975 for engine replacement. Removed and replaced longblock per workshop manual. During transfer of vacuum pump found pump seized and replaced. Replaced contaminated turbo and intake manifold with new parts. Roadtest vehicle after repair, vehicle stalling. Self test no codes. Performed PID monitor with roadtest and found ICP signal glitching. Replaced fault ICP sensor, clear codes, and reroadtest, verify ok.</p> <p>Long block performed diag and confirmed that at idle there was not enough oil pressure preformed tear down and noticed that belt had broken teeth causing it to disintegrate and contaminate complete engine. Engine block did not have any oil pressure causing internal failure. Inspected turbo and turbo was damaged had to performed replacement of intake manifold and all oil lines to the turbo due to contamination. Once performed long block was installing all components noticed that vacuum pump had failed- once all components were replaced and test drive operated in perfect condition. No further action is needed.</p>	<p>12-6-19 - 2-3-20</p>	<p>32,680</p>	<p>60</p>	<p>660561 Lake Elsinore Ford</p>
<p><b>Engine/Oil leakage - 2<sup>nd</sup> Repair Attempt -</b>            Customer states the engine was replaced here last month but now the customer is seeing an oil leak</p> <p>Verified concern, found both VCT solenoids leaking engine oil. Removed both units and found both missing seals. Cleaned solenoids and installed new seals and bolts. Cleaned engine bay and test drove re inspected and verified leak was corrected.</p>	<p>3-6-20 - 3-11-20</p>	<p>35,193</p>	<p>6</p>	<p>663639 Lake Elsinore Ford</p>

<p>1 <b>Engine/Drivability - 3<sup>rd</sup> Repair Attempt</b> –  2 Customer states the engine was replaced  3 here last month. 2<sup>nd</sup>. Time back. Now he  4 hears a hissing sound on accel and now the  5 check engine light is on.</p> <p>6 Inspected vehicle and verified concern,  7 vehicle's engine was recently replaced and  8 found that after even drying and trying to re  9 use catalytic convert still failed with CAT  10 pressure tool, when engine failed  11 determined that oil damaged catalytic  12 converter, replaced CAT converter per  13 WSM and re tested vehicles gas light is on  14 so was only able to test drive down the  15 street and back</p>	<p>4-3-20  -  5-27-20</p>	<p>36,617</p>	<p>55</p>	<p>664351  Lake  Elsinore  Ford</p>
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12. Plaintiff has delivered the vehicle to FORD or its authorized repair facility(s) for repairs of said defects and nonconformities. Defendant has been unable and/or refused to conform Plaintiff's vehicle to the applicable express and implied warranties under the Act after a reasonable number of repair attempts; to begin repairs within a reasonable time; and/or to complete repairs within thirty (30) days.

13. Defendant breached the implied warranty of merchantability and implied warranty of fitness in that the subject vehicle was not fit for the ordinary purposes for which such goods are used and was not of the same quality as those generally acceptable in trade. Therefore, the Plaintiff is entitled to revoke acceptance of the subject vehicle under the Act.

14. Notwithstanding knowledge of Plaintiff's entitlement, Defendant intentionally failed to comply with its obligations under the Act to repurchase the vehicle and make restitution.

15. By failure of Defendant to comply with its obligations under the Act to repurchase the vehicle and make restitution, Defendant is in breach of its obligations under the Act.

16. Plaintiff is entitled to justifiably revoke acceptance of the aforementioned vehicle under the Act.

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1           17. Pursuant to the Act, Plaintiff is entitled to restitution in an amount equal to the  
2 actual price paid or payable by Plaintiff and collateral charges such as sales tax, license fees,  
3 registration fees, and other official fees less an amount directly attributable to use by Plaintiff  
4 prior to the time Plaintiff first delivered the vehicle for repair.

5           18. Plaintiff is entitled to recover incidental, consequential, and general damages  
6 actually incurred by Plaintiff resulting from Defendant's failure to comply with its obligations  
7 under the Act.

8           19. Plaintiff is entitled to recover a sum equal to the aggregate amount of costs and  
9 expenses, including attorney's fees based on actual time expended and reasonably incurred in  
10 connection with the commencement and prosecution of this action.

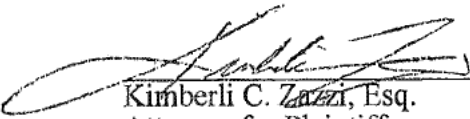

11           20. Plaintiff is entitled to recover, in addition to the amounts recovered, a civil  
12 penalty up to two times the amount of actual damages for Defendant's willful refusal to comply  
13 with its responsibilities under the Act.

14           WHEREFORE, Plaintiff prays for judgment against Defendant as follows:

- 15           (1) For rescission of the contract and restitution of all consideration;  
16           (2) For actual compensation and general damages according to proof at time of trial;  
17           (3) For civil penalty up to two times the amount of actual damages;  
18           (4) For prejudgment interest from the date of rescission;  
19           (5) For actual attorney fees, reasonably incurred;  
20           (6) For costs and expenses reasonably incurred with the commencement and  
21 prosecution of this action; and  
22           (7) For such other and further relief as the Court deems just and proper.

23  
24 Dated: June 2, 2020

LEMON LAW PRO

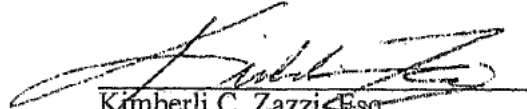
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26   
27 Kimberli C. Zazzi, Esq.  
28 Attorney for Plaintiff  


**JURY TRIAL DEMANDED**

Plaintiff demands a trial by jury on all issues so triable.

Dated: June 2, 2020

LEMON LAW PRO



Kimberli C. Zazzi, Esq.  
Attorney for Plaintiff



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1 Kimberli C. Zazzi (SBN 249638)  
2 Vincent M. Onorio (SBN 117699)  
3 LEMON LAW PRO  
4 3017 Douglas Boulevard Suite 300  
5 Roseville, CA 95661  
6 Telephone: (916) 836-8565  
7 Facsimile: (916) 836-8583

8 Attorney for Plaintiff  
9 [REDACTED]

FILED  
SUPERIOR COURT OF CALIFORNIA  
COUNTY OF SAN BERNARDINO  
SAN BERNARDINO DISTRICT

JUN 08 2020

LaShondra Richardson

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
11 FOR THE COUNTY OF SAN BERNARDINO

12 [REDACTED]

13 Plaintiff,

14 v.

15 FORD MOTOR COMPANY;  
16 and DOES 1 - 10,

17 Defendants.

CASE No.: CIV DS [REDACTED]

DECLARATION OF KIMBERLI ZAZZI  
FOR FILING OF COMPLAINT

18 I, [REDACTED] declare:

- 19 1. I am an attorney at law duly admitted to practice before the courts of the State of  
20 California and am the attorney of record for Plaintiff [REDACTED]
- 21 2. The following declaration is made upon my own true knowledge and belief of the  
22 events which have occurred in this matter.

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*Declaration of Kimberli Zazzi for Filing of Complaint*

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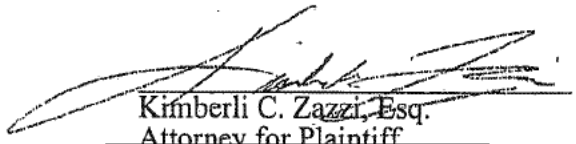
3. The Complaint filed concurrently herewith is filed in a proper place for the trial thereof, for the reason(s) checked below:

- This is the county in which the subject matter of the action, or a substantial portion thereof, occurred;
- This is the county in which the person against whom the action is brought resides;
- This is the county in which the person against whom the action is brought has its principal place of business or is doing business; and/or
- This is the county in which the parties entered into the subject transaction.

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

Dated: June 2, 2020

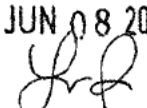
LEMON LAW PRO



Kimberli C. Zazzi, Esq.  
Attorney for Plaintiff



ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):  
Kimberli C. Zazzi (SBN 249638)  
Lemon Law Pro  
3017 Douglas Boulevard Suite 300  
Roseville, CA 95661  
TELEPHONE NO.: (916) 836-8565 FAX NO.: (916) 836-8583  
ATTORNEY FOR (Name): Plaintiff, [REDACTED]

FOR COURT USE ONLY  
**FILED**  
SUPERIOR COURT OF CALIFORNIA  
COUNTY OF SAN BERNARDINO  
SAN BERNARDINO DISTRICT  
  
JUN 08 2020  
  
LaShondra Richardson

SUPERIOR COURT OF CALIFORNIA, COUNTY OF San Bernardino  
STREET ADDRESS: 247 West Third Street  
MAILING ADDRESS:  
CITY AND ZIP CODE: San Bernardino, CA 92415  
BRANCH NAME: Civil

CASE NAME:  
[REDACTED] v. Ford Motor Company; and Does 1-10

**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 3.402)

CASE NUMBER:  
**CIV DS** [REDACTED]  
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:
- |  |  |  |
|--|--|--|
| <b>Auto Tort</b><br><input type="checkbox"/> Auto (22)<br><input type="checkbox"/> Uninsured motorist (46)   | <b>Contract</b><br><input checked="" type="checkbox"/> Breach of contract/warranty (06)<br><input type="checkbox"/> Rule 3.740 collections (09)<br><input type="checkbox"/> Other collections (09)<br><input type="checkbox"/> Insurance coverage (18)<br><input type="checkbox"/> Other contract (37) | <b>Provisionally Complex Civil Litigation</b><br>(Cal. Rules of Court, rules 3.400-3.403)<br><input type="checkbox"/> Antitrust/Trade regulation (03)<br><input type="checkbox"/> Construction defect (10)<br><input type="checkbox"/> Mass tort (40)<br><input type="checkbox"/> Securities litigation (28)<br><input type="checkbox"/> Environmental/Toxic tort (30)<br><input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41) |
| <b>Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort</b><br><input type="checkbox"/> Asbestos (04)<br><input type="checkbox"/> Product liability (24)<br><input type="checkbox"/> Medical malpractice (45)<br><input type="checkbox"/> Other PI/PD/WD (23)  | <b>Real Property</b><br><input type="checkbox"/> Eminent domain/Inverse condemnation (14)<br><input type="checkbox"/> Wrongful eviction (33)<br><input type="checkbox"/> Other real property (26)  | <b>Enforcement of Judgment</b><br><input type="checkbox"/> Enforcement of judgment (20)  |
| <b>Non-PI/PD/WD (Other) Tort</b><br><input type="checkbox"/> Business tort/unfair business practice (07)<br><input type="checkbox"/> Civil rights (08)<br><input type="checkbox"/> Defamation (13)<br><input type="checkbox"/> Fraud (16)<br><input type="checkbox"/> Intellectual property (19)<br><input type="checkbox"/> Professional negligence (25)<br><input type="checkbox"/> Other non-PI/PD/WD tort (35) | <b>Unlawful Detainer</b><br><input type="checkbox"/> Commercial (31)<br><input type="checkbox"/> Residential (32)<br><input type="checkbox"/> Drugs (38)   | <b>Miscellaneous Civil Complaint</b><br><input type="checkbox"/> RICO (27)<br><input type="checkbox"/> Other complaint (not specified above) (42)  |
| <b>Employment</b><br><input type="checkbox"/> Wrongful termination (36)<br><input type="checkbox"/> Other employment (15)  | <b>Judicial Review</b><br><input type="checkbox"/> Asset forfeiture (05)<br><input type="checkbox"/> Petition re: arbitration award (11)<br><input type="checkbox"/> Writ of mandate (02)<br><input type="checkbox"/> Other judicial review (39)   | <b>Miscellaneous Civil Petition</b><br><input type="checkbox"/> Partnership and corporate governance (21)<br><input type="checkbox"/> 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. <input type="checkbox"/> Large number of separately represented parties   | d. <input type="checkbox"/> Large number of witnesses  |
| b. <input type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve | e. <input type="checkbox"/> Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court |
| c. <input type="checkbox"/> Substantial amount of documentary evidence   | f. <input type="checkbox"/> 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): One
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: June 2, 2020  
Kimberli C. Zazzi  
(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.

**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 6 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. 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 2.30 and 3.220 of the California Rules of Court.

**To Parties in Rule 3.740 Collections Cases.** A "collections case" under rule 3.740 is defined as an action for recovery of money owed in a sum stated to be certain that is not more than \$25,000, exclusive of interest and attorney's fees, arising from a transaction in which property, services, or money was acquired on credit. A collections case does not include an action seeking the following: (1) tort damages, (2) punitive damages, (3) recovery of real property, (4) recovery of personal property, or (5) a prejudgment writ of attachment. The identification of a case as a rule 3.740 collections case on this form means that it will be exempt from the general time-for-service requirements and case management rules, unless a defendant files a responsive pleading. A rule 3.740 collections case will be subject to the requirements for service and obtaining a judgment in rule 3.740.

**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 3.400 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

**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) (13)
- 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 3.400–3.403)**

- 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

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN BERNARDINO

San Bernardino District - Civil  
247 West Third Street

San Bernardino, CA. 924150210

CASE NO: [REDACTED]

LEMON LAW PRO  
3017 DOUGLAS BLVD STE 300  
ROSEVILLE CA 95661

NOTICE OF TRIAL SETTING CONFERENCE

IN RE: [REDACTED] V-FORD MOTOR COMPANY

THIS CASE HAS BEEN ASSIGNED TO: BRYAN F FOSTER IN DEPARTMENT S22  
FOR ALL PURPOSES.

Notice is hereby given that the above-entitled case has been set for  
Trial Setting Conference at the court located at 247 W. 3RD ST  
SAN BERNARDINO, CA 92415-0210.

HEARING DATE: 12/08/20 at 9:00 in Dept. S22

The Trial Setting Conference will be held in chambers without the  
appearance of the parties -except for good cause shown. (see Emergency  
Local Rule 411.1).

Parties shall file and serve no later than 15 days prior to the trial  
setting conference the mandatory Initial Trial Setting Conference  
Statement form (local for # [REDACTED] included with this notice.  
Prior to the date of the initial trial setting conference, the court  
may entertain a written stipulation by all appearing parties to con-  
tinue the initial trial setting conference if filed at least 30 days  
prior to the conference.

DATE: 06/19/20 Nancy Eberhardt, Court Executive Officer

By: LASHONDRA RICHARDSON

CERTIFICATE OF SERVICE

I am a Deputy Clerk of the Superior Court for the County of San  
Bernardino at the above listed address. I am not a party to this  
action and on the date and place shown below, I served a copy of the  
above listed notice:

Enclosed in a sealed envelope mailed to the interested party  
addressed above, for collection and mailing this date, following  
standard Court practices.

Enclosed in a sealed envelope, first class postage prepaid in the  
U.S. mail at the location shown above, mailed to the interested party  
and addressed as shown above, or as shown on the attached listing.

A copy of this notice was given to the filing party at the counter

A copy of this notice was placed in the bin located at this office  
and identified as the location for the above law firm's collection of

file stamped documents.

Date of Mailing: 06/19/20

I declare under penalty of perjury that the foregoing is true and correct. Executed on 06/19/20 at San Bernardino, CA

BY: LASHONDRA RICHARDSON

civ-ntsc



V

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN BERNARDINO

CASE NO.: CIV DS

vs.

CERTIFICATE OF ASSIGNMENT

Ford Motor Company; and Does 1-10

A civil action or proceeding presented for filing must be accompanied by this Certificate. If the ground is the residence of a party, name and residence shall be stated.

The undersigned declares that the above-entitled matter is filed for proceedings in the San Bernardino County District of the Superior Court under Rule 404 of this court for the

checked reason:

General

Collection

Nature of Action

Ground

- 1. Adoption
2. Conservator
3. Contract
4. Equity
5. Eminent Domain
6. Family Law
7. Guardianship
8. Harassment
9. Mandate
10. Name Change
11. Personal Injury
12. Personal Property
13. Probate
14. Prohibition
15. Review
16. Title to Real Property
17. Transferred Action
18. Unlawful Detainer
19. Domestic Violence
20. Other Breach of Contract
21. THIS FILING WOULD NORMALLY FALL WITHIN JURISDICTION OF SUPERIOR COURT

The address of the accident, performance, party, detention, place of business, or other factor which qualifies this case for filing in the above-designed district is:

Sunrise Ford 16005 Valley Blvd
NAME - INDICATE TITLE OR OTHER QUALIFYING FACTOR ADDRESS
Fontana California 92335
CITY STATE ZIP CODE

I declare, under penalty of perjury, that the foregoing is true and correct and that this declaration was executed on June 2, 2020 at Roseville, California

CERTIFICATE OF ASSIGNMENT