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Superior Court Of California
County Of Los Angeles

JAN 14 2015

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

9
10 A.S., a minor, by and through her
11 guardian ad litem, TIFFANY T.

12 Plaintiff,

13 vs.

14 CULVER CITY UNIFIED SCHOOL
15 DISTRICT; JEREMY WEAVER, an
16 individual; STUDENT A, a minor;
17 STUDENT B, a minor; and DOES 1
through 100, Inclusive

18 Defendants.
19
20

CASE NO.:

BC 5 6 9 4 3 8

COMPLAINT FOR DAMAGES

- 1. NEGLIGENT SUPERVISION OF STUDENTS (Gov't. Code §815.6)
- 2. NEGLIGENT HIRING, SUPERVISION, TRAINING, and RETENTION (Gov't. Code §815.6)
- 3. NEGLIGENCE

DEMAND FOR JURY TRIAL

21 COME NOW Plaintiff A.S., a minor, by and through her guardian ad litem,
22 TIFFANY T., to complain of Defendants CULVER CITY UNIFIED SCHOOL DISTRICT;
23 JEREMY WEAVER, an individual; Student A, a minor; Student B, a minor; and DOES 1
24 through 100, inclusive, based on information and belief, as follows:
25

26 _____
27 1 Due to the nature of the allegations contained herein, the Plaintiff, as a victim of childhood sexual
28 molestation, is identified using only her initials in order to preserve her confidentiality and privacy
pursuant to applicable law including Cal.Wel. & Inst. Code § 827; T.N.G. v. Superior Court (1971) 4 Cal.3d
767; People v. Ramirez (1997) 55 Cal.App.4th 47.

1 **GENERAL ALLEGATIONS**

2 1. Plaintiff A.S. (hereinafter "A.S." or "Plaintiff") was at all times relevant to
3 this Complaint a freshman student at Culver City High School (hereinafter "Culver
4 High") within Defendant CULVER CITY UNIFIED SCHOOL DISTRICT (hereinafter
5 "DISTRICT") in Culver City, California.

6 2. Plaintiff is informed and believes that all relevant events in this case
7 occurred within the County of Los Angeles, State of California on or about December 4,
8 2013 through on or about December 22, 2013 when she was fourteen (14) years of age
9 and a student at Culver High within DISTRICT.

10 3. Plaintiff was born on April 30, 1999, and at all relevant times was a
11 resident of the county of Los Angeles, California.

12 4. At all material times mentioned herein, Defendants DISTRICT and DOES
13 1-50 owned, managed, controlled, maintained, operated, administered, and were
14 otherwise responsible for Culver High and the safety of its students. At Culver High,
15 Defendant DISTRICT provided educational, instructional, recreational, health and
16 related services to A.S. and other children.

17 5. At all material times mentioned herein, Plaintiff was a minor born on
18 April 30, 1999.

19 6. Plaintiff was not required to submit a government claim as all of Plaintiff's
20 claims arise out of C.C.P. §340.1 and those claims involve conduct that occurred after
21 January 1, 2009. Although Plaintiff's claims against the DISTRICT are exempt from the
22 claims presentation requirements of the *Gov. Code §905(m)*, Plaintiff did file said claim
23 on May 30, 2014 against DISTRICT. The claim was thereby rejected on July 24, 2014 by
24 Mike Reynolds, assistant Superintendent of business services at DISTRICT.

25 7. Plaintiff's claim for negligent supervision of students against DISTRICT is
26 based upon *Government Code §815.6*, and the mandatory duties set forth in *Education*
27 *Code §44807* and *California Code of Regulations §5531*, which provide for the mandatory
28 supervision of students at school and during school-sponsored activities.

1 8. Plaintiff's claim for negligent hiring, supervision, training and retention
2 against DISTRICT is based on *Government Code* §815.6 and *Education Code* §§44660,
3 44662, 44664, 44830, 44870, 44932, which provide for certain qualifications for the hiring,
4 supervising, evaluating and assessing teachers and for the dismissal of personnel for
5 certain conduct.

6 9. Plaintiff A.S. alleges upon information and belief that between on or about
7 December 4, 2013 through on or about December 22, 2013, A.S. was sexually assaulted
8 by three upper-classmen, Defendant Jeremy Weaver (hereinafter referred to as
9 "Weaver" or "Jeremy Weaver"), Student A, and Student B (collectively referred to as
10 "ASSAILANTS") at Culver High within DISTRICT. ASSAILANTS, fellow students at
11 Culver High, were also under DISTRICT's control and supervision.

12 10. Plaintiff alleges upon information and belief that Defendant Jeremy
13 Weaver was an adult at all relevant times. As a student at Culver High, Defendant
14 Weaver was legally dependent upon the supervision of DISTRICT. As such, DISTRICT
15 was and is responsible for the negligent and/or intentional acts committed by
16 Defendant Weaver.

17 11. Plaintiff alleges upon information and belief that Student A was a minor
18 during all relevant times. Due to Student A's status as a minor, Student A was legally
19 dependent upon the supervision of DISTRICT. As such, District was and is responsible
20 for the negligent and/or intentional acts committed by Student A.

21 12. Plaintiff alleges upon information and belief that Student B was a minor
22 during all relevant times. Due to Student B's status as a minor, Student B was legally
23 dependent upon the supervision of DISTRICT. As such, District was and is responsible
24 for the negligent and/or intentional acts committed by Student B.

25 13. Plaintiff alleges upon information and belief that DISTRICT had and/or
26 should have had prior notice of ASSAILANTS inappropriate, harassing, and violent
27 conduct and propensities, and therefore were aware of the potential danger and direct
28 threat to DISTRICT students including Plaintiff. Despite this knowledge, Plaintiff

1 alleges upon information and belief that DISTRICT failed to take reasonable and
2 appropriate measures to protect students, including Plaintiff, from foreseeable harm,
3 including but not limited to, the rape, physical assault, sexual molestation and sexual
4 battery A.S. suffered as alleged herein.

5 14. Plaintiff's claims against DISTRICT arise from the mandatory and
6 statutory duties imposed on DISTRICT in order to ensure that the special relationship
7 created between students and DISTRICT is upheld. The DISTRICT's special
8 relationship with students is based upon various principles, namely, its underlying role
9 in educating children, the naiveté of children, and the compulsory nature of attending
10 school.

11 15. At all relevant times, ASSAILANTS were all starting athletes on Culver
12 High's varsity football team. As starting players, ASSAILANTS were in peak physical
13 condition, extremely strong, and physically intimidating. Furthermore, ASSAILANTS
14 were all upper-class seniors believed to already be at the age of majority and/or 17
15 years of age.

16 16. The true names and capacities, whether individual, corporate, associate,
17 partnership, or otherwise, of Defendants herein named DOES 1-100 are unknown to
18 Plaintiff, who therefore sues said defendants by such fictitious names. Plaintiff is
19 informed and believes, and thereupon alleges, that each Defendant fictitiously named
20 herein as a DOE is legally responsible for the bullying, threatening and harassing
21 behavior Plaintiff endured, which ultimately resulted in her rape, physical assault,
22 sexual molestation, sexual battery, mental and emotional distress as hereinafter alleged.
23 The tortious liability imposed on DISTRICT is based upon the law of intentional tort,
24 general negligence, premises liability, government liability, volunteer liability, and any
25 other statutory and common law tort liability laws giving rise to third-party standing
26 on the part of Plaintiff. When the true names of said DOE Defendants have been
27 ascertained, Plaintiff will seek leave of court to amend this Complaint to insert such true
28 names.

1 level of supervision. As such, DISTRICT owed A.S. a higher duty of care to take all
2 reasonable measures to carry out their mandatory and statutory duties to protect
3 students and to prevent foreseeable harm. Based on Defendants' failure to provide the
4 requisite level of supervision to Plaintiff A.S., ASSAILANTS and DOES 51-100 were
5 able to target A.S. and to victimize her by, amongst other things, raping, sexually
6 abusing, physically assaulting, sexually molesting, sexually battering and harassing A.S.
7 during school hours while she was on school grounds.

8 20. ASSAILANTS' misconduct includes, but is not limited to: threatening,
9 physically and verbally harassing, sexually abusing, battering, raping, attempting to
10 coerce A.S. into rescinding her report of the rape, and sexually molesting Plaintiff A.S.
11 At all relevant times, defendant DISTRICT was directly responsible for the supervision,
12 guidance, and care of its minor student A.S. as well as for the supervision of Assailants.

13 21. More specifically, ASSAILANTS' misconduct includes, but is not limited
14 to: coercing A.S.- a high school freshman to "hang out" with the three senior boys in
15 the school parking lot during school hours; forcing A.S.'s head onto ASSAILANTS'
16 penis; raping A.S.; sexually "tag-teaming" A.S.; forcing A.S. to perform oral sex and
17 other sex acts with ASSAILANTS while the other(s) were watching; Surreptitiously
18 video-taping A.S. while she was forced to commit these sexual acts; disseminating the
19 video-images throughout the school to other students; spreading malicious rumors
20 regarding A.S.'s "sexual promiscuity"; threatening A.S. if she told anyone of the
21 incident; verbally and emotionally harassing A.S. following the incident; and physically
22 intimidating A.S. following the incident. These incidents occurred multiple times
23 between the dates of December 4, 2013 and December 22, 2013

24 22. Plaintiff is informed and believes and thereupon alleges that Defendants
25 Weaver and Student B were alerted by school personnel that A.S. reported the rapes to
26 school officials. In an attempt to protect themselves from liability, both Weaver and
27 Student B confronted A.S. in an attempt to coerce her to lie and recant her allegations.
28

1 23. Plaintiff is informed and believes and thereupon alleges that Defendant
2 DISTRICT knew or should have known that such similar misconduct as alleged herein
3 had occurred on school grounds in the past.

4 24. Plaintiff is informed and believes and thereupon alleges that Defendant
5 DISTRICT knew or should have known that ASSAILANTS were students within the
6 DISTRICT with a history of and/or a propensity for misconduct.

7 25. At the time of incident, A.S. was in her freshman English class. Weaver
8 and Student A invited her to hang out and in the school's parking lot and listen to some
9 music. Unexpectedly, both individuals sexually assaulted, orally copulated, and
10 vaginally raped A.S.

11 26. Prior to the rape, A.S. was a virgin.

12 27. On or about the next day, Weaver again forced A.S to engage in sexual
13 acts, this time with the assistance of Student B.

14 28. Throughout the next several days, Defendants repeatedly raped and
15 sexually assaulted A.S. on school grounds and during school hours.

16 29. ASSAILANTS spread many rumors regarding A.S.'s "promiscuity", even
17 video-taping the rape and showing the footage to other students in an attempt to
18 humiliate A.S.

19 30. As the only legal adult at the time, Defendant Jeremy Weaver was
20 criminally charged and convicted of four felony criminal counts, including: 3 counts of
21 ORAL COPULATION OF A PERSON UNDER 18, in violation of PENAL CODE
22 SECTION 288a(b)(1), a felony, and one count of DISSUADING A WITNESS FROM
23 COMMITTING A CRIME, in violation of PENAL CODE SECTION 136.1(b)(1), a felony,

24 31. The DISTRICT and DOES 1-50, inclusive, failed to adequately supervise
25 ASSAILANTS and the other DISTRICT Students, including Plaintiff A.S. Based upon
26 the defendant DISTRICT's negligent failure to take any reasonable precautions to
27 safeguard A.S., ASSAILANTS were able to repeatedly harass, threaten, sexually assault
28 and rape A.S. while she attended DISTRICT's Culver High.

1 37. Plaintiff repeats and re-alleges each and every allegation contained in the
2 preceding paragraphs 1 through 36 and incorporates the same herein by this reference
3 as though set forth in full.

4 38. Plaintiff is informed and believes, and thereon alleges, that defendant
5 DISTRICT failed to adequately supervise Plaintiff while she was a minor student on
6 school campus, during school hours.

7 39. At all times relevant to the acts and omissions herein alleged, DOES 1-50
8 were school officers and/or agents acting in the course and scope of their employment
9 with DISTRICT.

10 40. Plaintiff's claim for negligent supervision of students against the
11 DISTRICT is based upon *Government Code* § 815.6, and the mandatory duties set forth in
12 *Education Code* § 44807, which provide that the DISTRICT and DOES 1-50 had a duty to
13 supervise pupils while at school.

14 41. Defendants DISTRICT and DOES 1-50, and each of them, have a special
15 relationship with the students enrolled at Culver High. Plaintiff A.S. is a member of
16 that group of people with whom Defendants have a special relationship.

17 42. Based on their special relationship to Plaintiff, Defendants DISTRICT and
18 DOES 1-50, and each of them, had a duty at all times to Plaintiff A.S., who was under
19 their custody and care, to provide for her health, well-being, protection, safety and
20 security, and to implement reasonable measures to maintain a safe environment for her
21 while attending Culver High during school hours. Public school authorities are
22 responsible for the safety of children during school hours and are "bound to exercise an
23 amount of care for their safety during that period commensurate with the immaturity of
24 their charges and the importance of their trust." *Satariano v. Sleight*, (1942) 54
25 Cal.App.2d 278, 284. Further, it "is well settled that the amount of care due to minors
26 increases with their immaturity and consequent heedlessness to danger." *Id* at 283.

27 43. Pursuant to *Government Code* § 815.6, "[w]here a public entity is under a
28 mandatory duty imposed by an enactment that is designed to protect against the risk of

1 a particular kind of injury, the public entity is liable for any injury of that kind
2 proximately caused by its failure to discharge the duty..."

3 44. The mandatory duties pursuant to statute and regulations are to ensure
4 that the special relationship between the DISTRICT and its students are maintained and
5 are designed to prevent the type of injury that occurred in this case, which is the sexual
6 abuse and harassment of a minor student by both another adult student and another
7 minor student.

8 45. At all times mentioned herein, *California Education Code* § 44807 provides
9 that the DISTRICT had mandatory duties to supervise pupils on school property during
10 school hours. Said statute was designed to protect A.S. from the type of harm alleged
11 herein and Plaintiff, a student at Culver High, was a member of the class that said
12 statutes were enacted to protect.

13 46. At all times mentioned herein, *California Education Code* § 44807 was
14 designed to protect against the risk of the particular kind of injury alleged herein, as
15 required by *Government Code* § 815.6, including the foreseeable molestation, rape,
16 harassment, abuse, and assault as alleged herein.

17 47. Defendants failed to discharge, and breached each of their duties to
18 Plaintiff herein in that Defendants, upon Plaintiff's information and belief, knew that
19 Plaintiff A.S. and ASSAILANTS were high school students who required an adequate
20 level of supervision, and that similar misconduct as alleged herein had occurred on
21 school grounds in the past. Plaintiff was reliant upon defendants DISTRICT and DOES
22 1-50 to provide ongoing supervision at all times to prevent foreseeable harm.
23 Nonetheless, defendants failed to carefully supervise, monitor, and observe Plaintiff in
24 light of her age, cognitive challenges, emotional maturity, and her need for supervision
25 in a school setting, while she was on campus during school hours (including during
26 breaks and before and after class). Defendants' failure to provide the requisite level of
27 supervision allowed ASSAILANTS and, upon information and belief, DOES 51-100, to
28 rape, harass, and sexually assault Plaintiff A.S. as alleged herein.

1 incompetent and/or unfit to be employees of DISTRICT, including but not limited to
2 their failure to provide adequate supervision to Plaintiff A.S. and ASSAILANTS.

3 54. Plaintiff is informed and believes, and thereon alleges, that Defendants
4 DISTRICT and DOES 1-50 knew or should have known that A.S. was subject to a risk of
5 harm as a fourteen-year-old student under their exclusive custody and control on
6 school property during school hours. Accordingly, Defendants knew or should have
7 known that the assault of A.S. was likely to occur absent reasonable and appropriate
8 safeguards.

9 55. Plaintiff is informed and believes, and thereupon alleges, that at all
10 relevant times, DISTRICT employees, including but not limited to teachers, substitute
11 teachers, principals, and other administrative and/or supervisory personnel at Culver
12 High, owed the following mandatory and/or statutory duties of care to A.S., a minor,
13 student receiving education services as follows:

14 a. All DISTRICT employees had a duty arising from the special relationship
15 entered into between a school and its students, to supervise students and take
16 reasonable steps to protect students including, but not limited to, taking
17 reasonable steps in hiring, screening, selecting, retaining, and supervising
18 teachers, and other personnel with supervisory authority over students, and
19 providing comprehensive education, training, and supervision of management
20 and/or supervisory personnel, in order to protect its students. The special
21 relationship described herein is established when an organization or entity
22 endeavors to provide educational, recreational, or other related services to a
23 minor and/or because of the compulsory nature of the public school system, as
24 described in *M.W. v. Panama Buena Vista Union School District* (2003) 110
25 Cal.App.4th 508, 518-520, *Virginia G. v. ABC Unified School District* (1993) 15
26 Cal.App.4th 1848, 1853, and like cases.

27 b. All DISTRICT employees had a duty arising from the special relationship
28 entered into between a school and the parents of its students, pursuant to

1 applicable law, including but not limited to *Phyllis P. v. Superior Court* (1986) 183
2 Cal. App. 3d 1193.

- 3 c. All DISTRICT employees, including teachers, principals, coaches and other
4 supervisory and/or administrative employees, had a duty of care in supervising
5 students like A.S. based on Plaintiff's information and belief that the DISTRICT
6 had prior notice of misconduct by Student and/or that similar instances of
7 misconduct had occurred on school grounds in the past.

8 56. Plaintiff is informed and believes, and thereon alleges, that Defendants
9 breached their duties to Plaintiff A.S. as alleged in the paragraphs above, all within the
10 course and scope of the employees' duties within Defendant DISTRICT, and failed to
11 follow or comply with the standards of care set forth herein, in that they, *inter alia*:

- 12 a. Failed to carefully screen all potential employees, including DOES 1-50, to
13 assure they could properly supervise students including but not limited to A.S.,
14 to prevent injury to students based upon the unique vulnerability of minor
15 students and Defendants' knowledge thereof;
- 16 b. Failed to carefully screen all potential employees, including DOES 1-50, to
17 assure they could properly supervise student-assailants, including but not
18 limited to ASSAILANTS and DOES 51-100;
- 19 c. Failed to provide proper training to all teachers, administrators and/or
20 supervisory personnel prior to placing A.S., ASSAILANTS, and DOES 51-100
21 under the direct supervision of said administrators, teachers and supervisory
22 personnel who had a duty to supervise A.S. at all times relevant, including but
23 not limited to, during school hours on school grounds, particularly after, upon
24 Plaintiff's information and belief, DISTRICT officials and/or administrators had
25 reason to know that such acts of threats, harassment, physical abuse, and sexual
26 abuse had occurred to other DISTRICT student(s) on school grounds in the past.
- 27 d. Failed to adequately supervise teachers, administrators and/or supervisory
28 personnel, or to provide adequate follow-up measures to ensure they were

1 appropriately protecting students like A.S. supervising A.S. and potential
2 student-assailants at all relevant times including, but not limited to, during
3 school hours on school grounds;

4 e. Failed to take reasonable, adequate, and appropriate measures to ensure that its
5 teachers, administrators and/or supervisory personnel were fit to supervise
6 minor students like A.S., ASSAILANTS, DOES 51-100, and other DISTRICT
7 students, particularly after DISTRICT officials and/or administrators, upon
8 Plaintiff's information and belief, had reason to know that such acts of threats,
9 harassment, physical abuse, and sexual abuse had occurred to other DISTRICT
10 student(s) on school grounds in the past;

11 f. Failed to ensure that all students enrolled in Culver High maintained residence
12 within the geographic school attendance boundaries of their home;

13 g. Failed to take reasonable, adequate, and appropriate measures to ensure that
14 A.S. would be safe on school grounds during school hours, including, but not
15 limited to, providing supervision to A.S. to protect her from ASSAILANTS and
16 DOES 51-100;

17 h. Failed to adequately monitor and survey school premises, including the school's
18 parking lot, despite knowing that students would frequent the areas for
19 inappropriate activities during school hours;

20 i. Failed to take reasonable, adequate, and appropriate measures to ensure that
21 A.S. would be safe on school grounds following her report of the incident to
22 school personnel, including, but not limited to, providing supervision to A.S. to
23 protect her from future confrontations with ASSAILANTS and DOES 51-100;

24 j. Failed to take reasonable, adequate, and appropriate measures to investigate
25 A.S.'s reporting of the incident and provide adequate care, supervision,
26 protection and handling of the situation following the report;

27 k. Failed to properly or sufficiently warn, train, or educate teachers and students
28 regarding the detection and reporting of harassment, bullying, threats and

1 abuse as well as other similar tortious and criminal conduct within Culver High
2 by other students, teachers and/or other supervisory adults, particularly after
3 DISTRICT officials and/or administrators, upon Plaintiff's information and
4 belief, had reason to know that such conduct had occurred to other DISTRICT
5 student(s) on school grounds in the past;

6 57. Said breaches were the actual, proximate, and legal cause of the student-
7 assailants' tortious actions and harmful misconduct, including, but not limited to, the
8 rape, harassment, threatening, and sexual abuse and molestation of A.S. as alleged
9 hereinabove.

10 58. As a proximate, direct, and legal result of Defendants' failure to discharge
11 mandatory duties, and comply with California law, and other tortious conduct as
12 alleged herein, Plaintiff A.S. suffered physical injuries including, but not limited to,
13 rape, physical assault, sexual battery, and molestation. Further, A.S. suffered and
14 continues to suffer from emotional injuries including, but not limited to, suicidal
15 ideations, attempted suicide, severe emotional distress, psychological injury,
16 sleeplessness, anxiety, Post-Traumatic Stress Disorder, and mental anguish affecting
17 A.S.'s future academic and career prospects.

18 59. Defendants have further legally caused special damages in the form of
19 past, present, and future medical and psychological care expenses, loss of earnings and
20 future earning capacity, consequential and incidental expenses incurred, and all
21 additional economic losses, all damages in an amount to be proven at trial and well in
22 excess of the jurisdiction of the Court.

23
24 **THIRD CAUSE OF ACTION**

25 **NEGLIGENCE**

26 **(Against all Defendants)**

1 60. Plaintiff repeats and re-alleges each and every allegation contained in
2 paragraphs 1-59 and incorporates the same herein by this reference as though set forth
3 in full.

4 61. Defendant DISTRICT, and DOES 1-50, and each of them, have a special
5 relationship with the students enrolled at Culver High. A.S. is a member of that group
6 of people with whom Defendants had a special relationship.

7 62. Based on their special relationship with A.S., Defendant DISTRICT and
8 DOES 1-50, and each of them, had a duty at all times to Plaintiff to provide for her
9 health, well-being, protection, safety and security while under their custody and care,
10 and to implement reasonable measures to maintain a safe environment for student
11 children such as A.S.

12 63. Defendant DISTRICT and DOES 1-50, and each of them owed A.S. a duty
13 of due care, and that duty was breached by failing to supervise A.S. and ASSAILANTS,
14 ultimately leading to the rape of A.S. by ASSAILANTS on school grounds during school
15 hours.

16 64. Defendants, and each of them, improperly, negligently, wrongfully,
17 recklessly and intentionally failed to protect A.S. from the known and/or apparent
18 dangerous tendencies of ASSAILANTS, which resulted in severe and debilitating
19 injuries to A.S. Specifically, said Defendants improperly, wrongfully, negligently,
20 and/or intentionally allowed ASSAILANTS to rape A.S., and then continued to allow
21 ASSAILANTS to be on school grounds so that ASSAILANTS were able to, harass,
22 assault, intimidate, and ultimately re-victimize A.S. following the incident.

23 65. At all times herein mentioned, Defendant DISTRICT and DOES 1-50,
24 breached their duty of care owed to A.S. by failing to exercise reasonable care in
25 evaluating, hiring, employing, training, supervising, and retaining its employees.

26 66. As individuals, ASSAILANTS, and each of them, were responsible for the
27 improper, negligent, wrongful, reckless and intentional acts of sexually abusing A.S.
28 and attempting to coerce her into not report the incidents. Furthermore, ASSAILANTS

1 showed actual knowledge of the wrongfulness of their acts and abuse towards A.S. by
2 attempting to coerce her into rescinding her report of their abuse.

3 67. As a direct and proximate result of the Defendant's negligent conduct,
4 A.S. sustained severe and permanent personal injuries including, but not limited to,
5 emotional distress, pain, suffering, and loss of enjoyment of life in an amount to be
6 determined at the time of trial.

7
8
9 **PRAYER FOR DAMAGES**

10 WHEREFORE, Plaintiff A.S. prays for judgment against Defendants, and each of
11 them, as follows:

12
13 **FIRST CAUSE OF ACTION**

14 **NEGLIGENT SUPERVISION OF STUDENTS**

15 **BASED ON GOVERNMENT CODE § 815.6**

16 **(Against DISTRICT and DOES 1-50, Inclusive)**

- 17 1. General damages for emotional distress, physical pain, and mental suffering
18 according to proof;
- 19 2. Special damages, for loss of earnings and future earning capacity and medical
20 and psychological care, including expenses, past, present, future, consequential
21 and incidental expenses incurred, and all additional economic losses legally
22 caused by Defendant DISTRICT'S and Defendants DOES 1-50s' conduct
23 according to proof;
- 24 3. Interest at the legal rate;
- 25 4. Costs of suit incurred herein, and;
- 26 5. Such other and further relief as the Court deems just and proper.

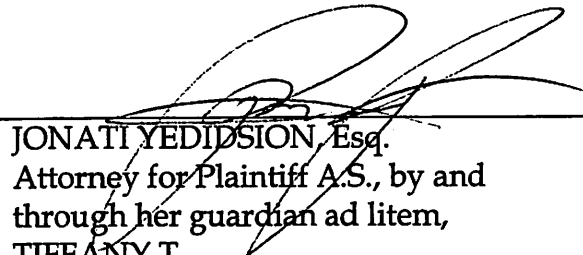
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1 DATED: January 14, 2015

YEDIDSION SEBER YEDIDSION LLP

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3 By:

4 
5 JONATI YEDIDSION, Esq.
6 Attorney for Plaintiff A.S., by and
7 through her guardian ad litem,
8 TIFFANY T.

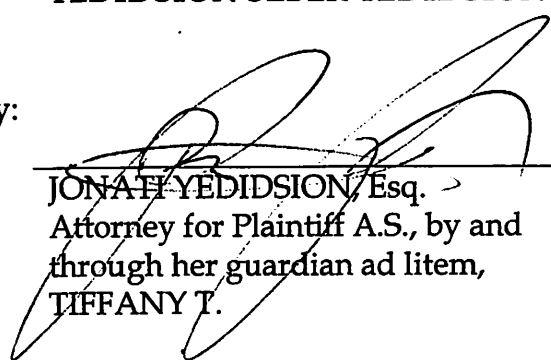
9 DEMAND FOR JURY TRIAL

10 Plaintiff hereby demands trial by jury on all issues so triable in the Complaint.
11

12
13 DATED: January 14, 2015

YEDIDSION SEBER YEDIDSION LLP

14
15 By:

16 
17 JONATI YEDIDSION, Esq.
18 Attorney for Plaintiff A.S., by and
19 through her guardian ad litem,
20 TIFFANY T.