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A Professional Corporation
3731 Wilshire Blvd. – Suite 940
Los Angeles, California 90010
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Attorney for Plaintiff,
MATTHEW FLANIGAN, an individual

FILED
Superior Court of California
County of Los Angeles

JAN 05 2018

herri R. Carter
By: *[Signature]*
Glorietta K. Davis

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – CENTRAL DISTRICT**

MATTHEW FLANIGAN an individual,
Plaintiff,

vs.

RHEUMATOLOGY DIAGNOSTICS
LABORATORY, INC., a California
Corporation; and DOES 1 through 60,
inclusive,

Defendants.

Case No.:

BC 6 888 04

COMPLAINT FOR DAMAGES:

- (1) VIOLATION OF LABOR CODE
SECTION 1102.5;
- (2) RETALIATION – FEHA;
- (3) WRONGFUL TERMINATION IN
VIOLATION OF PUBLIC POLICY

[DAMAGES SOUGHT EXCEED \$25,000]

JURY TRIAL DEMANDED

COMPLAINT

01/05/18

CIT/CASE: BC688804

LEA/DEF#:

RECEIPT #: CCH505376075

DATE PAID: 01/05/18 03:11 PM

PAYMENT: \$435.00 310

RECEIVED:

CHECK: \$435.00

CASH: \$0.00

CHANGE: \$0.00

CARD: \$0.00

25

1 COMES NOW, PLAINTIFF MATTHEW FLANIGAN (hereinafter "Plaintiff"), an individual,
2 who complains and alleges the following:

3 **THE PARTIES**

4 1. Plaintiff, an individual, is a competent adult and a resident of Los Angeles County,
5 California.

6 2. Defendant, RHEUMATOLOGY DIAGNOSTICS LABORATORY INC. (hereinafter
7 "RDL" or Defendant) is a California corporation duly formed under the laws of the State of California
8 Plaintiff is informed and believes and thereon alleges, at all relevant times herein, on information and
9 belief, at all relevant times herein, a principal place of business in Los Angeles, California.

10 3. Plaintiff is informed and believes, and based thereon alleges, that at all times herein
11 relative and material, Defendants, and each of them, were the agents, co-conspirators, servants,
12 employees, partner, joint ventures, predecessors in interest, successors in interest, and/or authorized
13 representatives of each of the other Defendants, and were all time relevant herein acting within the
14 purpose, course, and scope of their agency, conspiracy, service, employment, partnership, joint
15 ventures and/or representation, and with knowledge, permission, and consent of their principal,
16 employer, partners, joint venturers, co-conspirators, and Co-Defendants.

17 4. The true names and capacities, whether individual, a public entity, corporate, or
18 otherwise, of Defendants DOES 1 through 60, inclusive, are unknown to Plaintiff, who therefore sues
19 said Defendants by such fictitious names and will ask leave of the court to amend this Complaint to
20 show their true names and capacities when the same have been ascertained.

21 5. Plaintiff is informed and believes and based thereon alleges that at all times mentioned
22 herein, the Defendants, and each of them, were servants, agents, and employees of each of the
23 remaining Defendants, and were acting in the course and scope of such agency and employment.

24 6. Plaintiff is informed and believes, and based thereon alleges that all relevant time herein,
25 each Defendant was acting as the agent, servant, co-conspirator, or representative of each of the other
26 Defendants, and was at all times mentioned herein acting within the course or scope of such agency,
27 servitude, conspiracy or representation, and that all acts of each Defendant were authorized, directed,
28 supervised, and/or ratified by each of the other Defendants.

1 **JURISDICTION AND VENUE**

2 7. Plaintiff is informed and believes and thereupon alleges that the relief sought in this
3 Complaint is within the jurisdiction of this Court.

4 8. The acts that are the subject of this Complaint and that give rise to the causes of action
5 asserted herein occurred in Los Angeles County, in the State of California at the relevant time(s)
6 disclosed herein.

7 **GENERAL ALLEGATIONS**

8 9. At all relevant times disclosed herein, Plaintiff was an employee at RDL.

9 10. On or about April 14, 2017, after discovering that an RDL employee, Kristine Azarraga,
10 (hereinafter "Azarraga"), had plugged a non-RDL external hard drive into the RDL network importing,
11 from previous employers, copies of their standard operating procedures ("SOP") including billing data,
12 patient demographics, patient test results, and other proprietary information, Mr. Flanigan reported his
13 discovery of this conduct to RDL senior management, Samuel Morris, Richard Kazdan and Allan
14 Metzger who directed that Ms. Azarraga be restricted from access to RDL's SOP's. When Azarraga
15 discovered that she was locked out of access to the proprietary information, she went to directly to Mr.
16 Metzger to protest her lack of access. Mr. Metzger reacted by unilaterally affirming and reinstating
17 Ms. Azarraga's access to the RDL network and SOP's, despite his knowledge that Azarraga had
18 previously downloaded SOP's from prior employers.

19 11. Plaintiff is informed and believes and thereon alleges that Ms. Azarraga's and Mr.
20 Metzger's actions are a violation of the Health Insurance Portability and Accountability Act of 1996.

21 12. Thereafter, a lawsuit was filed on August 15, 2017 by Samuel Morris and Richard
22 Kazdan versus Mr. Metzger, Ms. Azarraga and a Dr. E. Robert Harris, claiming breach of fiduciary
23 duty owed by Defendants to RDL due to mismanagement of the business and/or misappropriation of
24 corporate assets. (Samuel Morris, etc., et al v. Allan Lawrence Metzger, et al., BC672340, hereinafter
25 the "Morris Action"). Soon thereafter, on August 29, 2017, Plaintiffs in the Morris Action proceeded
26 ex parte seeking to enjoin Mr. Metzger, Azarraga and Dr. Harris from continuing the above described
27 illegal acts. Once Metzger, Azarraga and Harris were served with the complaint they solicited
28 Matthew Flanigan's assistance to prepare a false declaration in opposition to the Morris Action.

COMPLAINT

1 (Draft Declaration of Matthew Flanigan attached hereto as Exhibit "1"). However, Mr. Flanigan
2 declined to perjure himself for the named RDL Defendants and instead agreed to provide a truthful
3 declaration to the Plaintiffs' Morris and Kazdan in support of their August 29, 2017 ex parte motion.
4 (Declaration of Matthew Flanigan submitted in the Morris Action attached hereto as Exhibit "2").

5 13. On August 29, 2017, immediately after receiving the ex parte motion (containing the
6 Flanigan Declaration) of Plaintiffs in the Morris Action, Metzger put Flanigan on investigatory leave
7 and terminated Flanigan on September 12, 2017, precipitating this action.

8 14. Plaintiff has met all of the jurisdictional requirements for proceeding with his claims
9 under the Fair Employment and Housing Act ("FEHA"), pursuant to California Government Code
10 section 12960 *et seq.*, by timely filing his Administrative Complaint with the Department of Fair
11 Employment and Housing ("DFEH") against Defendant on or about January 5, 2017 and receiving his
12 Right to Sue Letter dated January 5, 2017. A true and correct copy of Plaintiff's
13 Administrative Complaint and Right-to-Sue Letter is attached hereto as Exhibit "3" and incorporated
14 herein by reference.

15 **FIRST CAUSE OF ACTION**

16 **VIOLATION OF LABOR CODE SECTION 1102.5**

17 **(Against Defendant RDL and DOES 1 through 20)**

18 15. Plaintiff refers to paragraphs 1 through 14 above, and incorporates such paragraphs
19 herein by reference as though said paragraphs were set forth in full herein.

20 16. That Defendants were Plaintiff's employer.

21 17. That Defendants believed that Plaintiff had disclosed or might disclose to a government
22 agency/law enforcement agency/ person with authority over Plaintiff the aforementioned acts and/or
23 that Plaintiff refused to engage in the aforementioned illegal activities.

24 18. That Plaintiff had reasonable cause to believe that the information disclosed a violation
25 of the Health Insurance Portability and Accountability Act of 1996 and/or that Plaintiff's participation
26 in the aforementioned illegal acts would result in a violation of law.

27 19. That Defendants discharged Plaintiff.

1 20. That Plaintiff's disclosure of information was a contributing factor in Defendants'
2 decision to discharge Plaintiff.

3 21. That Plaintiff was harmed.

4 22. That Defendants' conduct was a substantial factor in causing Plaintiff's harm.

5 **SECOND CAUSE OF ACTION**

6 **RETALIATION - FEHA**

7 **(Against Defendant RDL and DOES 21 through 40)**

8 23. Plaintiff refers to paragraphs 1 through 22 above, and incorporates such paragraphs
9 herein by reference as though said paragraphs were set forth in full herein.

10 24. Plaintiff engaged in a protected activity.

11 25. That Defendants discharged Plaintiff.

12 26. That Plaintiff's protected activity was a substantial motivating reason for Defendants to
13 discharge Plaintiff.

14 27. That Plaintiff was harmed.

15 28. That Defendants' conduct was a substantial factor in causing Plaintiff's harm.

16 29. Plaintiff also requests an award of attorneys' fees pursuant to California Labor Code
17 section 2699.

18 **THIRD CAUSE OF ACTION**

19 **WRONGFUL TERMINATION – VIOLATION OF PUBLIC POLICY**

20 **(Against Defendant RDL and DOES 41 through 60)**

21 30. Plaintiff refers to paragraphs 1 through 29 above, and incorporates such paragraphs
22 herein by reference as though said paragraphs were set forth in full herein.

23 31. That Plaintiff was employed by Defendants.

24 32. That Defendants discharged Plaintiff.

25 33. That Plaintiff's acts discussed herein, were a substantial motivating reason for
26 Defendants to discharge Plaintiff.

27 34. That Plaintiff was harmed.

28 35. That the discharge caused Plaintiff's harm.

COMPLAINT

1 36. Plaintiff also requests an award of attorneys' fees pursuant to California Labor Code
2 section 2699.

3 **PRAYER FOR RELIEF**

4 WHEREFORE, Plaintiff prays for judgment against Defendant(s) and each of them as follows:

5 **On All Causes of Action:**

- 6 1. For general damages, in an amount according to proof;
7 2. For compensatory damages, in an amount according to proof;
8 3. For incidental damages, in an amount according to proof;
9 4. For costs incurred by Plaintiff herein;
10 5. For such other and further relief as the Court may deem just and proper.

11 **On The First Cause Of Action:**

- 12 1. For civil penalties as allowed by law, including, but not limited to Labor Code Section
13 1102.5(f);
14

15 **On The Second and Third Causes Of Action:**

- 16 1. For attorneys' fees incurred by Plaintiff herein; and
17 2. For exemplary and punitive damages in amounts pursuant to California Civil Code
18 Section 3294(a) according to proof at the time of trial.
19

20 Dated: January 5, 2017

LAW OFFICES OF EDWARD Y. LEE
A Professional Corporation

21
22 By: 

23 Edward Y. Lee, Esq.
24 Christopher P. Fields, Esq.
25 Matthew Hillix, Esq.
26 Attorneys for Plaintiff,
27 MATTHEW FLANIGAN
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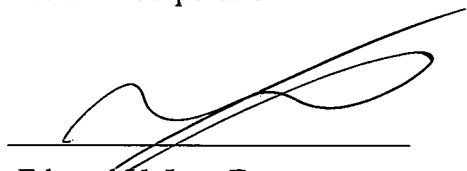
JURY DEMAND

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

Dated: January 5, 2017

LAW OFFICES OF EDWARD Y. LEE
A Professional Corporation

By: _____


Edward Y. Lee, Esq.
Christopher P. Fields, Esq.
Matthew Hillix, Esq.
Attorneys for Plaintiff,
MATTHEW FLANIGAN

COMPLAINT

01/05/2017

EXHIBIT “1”

1 BLANK ROME LLP
Jonathan A. Loeb (SBN 162758)
2 JLoeb@BlankRome.com
Jeffrey M. Rosenfeld (SBN 02623)
3 JRosenfeld@BlankRome.com
4 2029 Century Park East, 6th Floor
Los Angeles, CA 90067
5 Telephone: 424.239.3400
Facsimile: 424.239.3434
6
7 Attorneys for Nominal Defendant,
RHEUMATOLOGY DIAGNOSTICS LABORATORY, INC.

8
9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **COUNTY OF LOS ANGELES**
11

12 SAMUEL MORRIS, Trustee of the Robert and
Barbara Morris Trust dated October 26, 1987, as
13 amended; RICHARD KAZDAN, Trustee of the
Morris Irrevocable 2012 Trust for Kazdan
14 Children dated December 21, 2012, each
individually and derivatively on behalf of
15 Rheumatology Diagnostics Laboratory, Inc.,

16 Plaintiffs,

17 vs.

18 ALLAN LAWRENCE METZGER, an
individual; E. ROBERT HARRIS, an
19 individual; KRISTINE AZARRAGA, an
individual and DOES 1-20 inclusive,

20 Defendants,

21 and

22 RHEUMATOLOGY DIAGNOSTICS
23 LABORATORY, INC., a California
corporation,

24 Nominal Defendant
25
26
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Case No. BC672340

**DECLARATION OF MATTHEW
FLANIGAN**

Date:
Time:
Dept:

Complaint Filed:
Trial Date:

DECLARATION OF MATTHEW FLANIGAN

I, Matthew Flanigan, declare that:

1. I am the Information Technology Director of Rheumatology Diagnostics Laboratory, Inc. ("RDL"), and have held this position since January 2016. I am providing this declaration in opposition to plaintiffs' ex parte application in this action. Since I do not know what relief plaintiffs are seeking, or the basis for that relief, I am providing this declaration to address what appears to be the more significant concerns raised in plaintiffs' complaint, to the extent that they fall within my job responsibilities as RDL's IT Director. I have personal knowledge of the facts set forth herein, and, if called as a witness, I could and would testify competently thereto.

2. The issue in the complaint that is most related to my responsibilities as RDL's IT Director relates to the allegations of improprieties related to access to RDL's electronically stored information ("ESI"). It is my responsibility to ensure, as much as reasonably possible, that RDL's electronically stored trade secrets remains secure, and the HIPAA protected information stored by RDL remains secure as required by HIPAA. Prior to working at RDL, I worked in other IT security positions, including for a U.S. Government contractor involved in the war in Afghanistan.

3. During my time at RDL, I have been responsible for increasing the security on RDL's data systems, as well as designing systems and standard operating procedures to make RDL's data more secure. While data security requires constant vigilance, I have made significant improvements to RDL's Information Technology infrastructure and employee operating procedures, resulting in RDL's ESI being more secure today than ever before. To my knowledge, there has never been a data breach at RDL.

4. The complaint contains allegations related to RDL's protections of its trade secrets and intellectual property. It alleges in paragraph 5 that Kristine Azarraga "unlawfully accessed, downloaded, and printed [RDL's] entire SOP library." I am not aware of any evidence that would support that allegation. Similarly, the complaint alleges at paragraph 43 that "Kristine Azarraga had used a thumb drive to upload SOPs from her previous employer into the RDL server." I am not aware of evidence that would support that allegation either. Nonetheless, when Morris and Kazdan

1 raised issues regarding the ways in which access to certain information was managed, I responded by
2 having RDL implement new procedures designed to ensure that data remains safe, including new
3 procedures that Ms. Azarraga must follow. I am not aware of any evidence of Ms. Azarraga
4 breaching those new procedures.

5 I declare under penalty of perjury under the laws of the State of California that the foregoing
6 is true and correct. Executed on August 28, 2017.

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8 Matthew Flanigan
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EXHIBIT “2”

ADAM D.H. GRANT (SBN 153271)
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JEFFREY S. GOODFRIED (SBN 253804)
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PHONE: (818) 881-5000; FAX: (818) 881-1150

Attorneys for Plaintiffs
Samuel Morris, Trustee of the Robert and
Barbara Morris Trust dated October 26, 1987,
as amended, and Richard Kazdan, Trustee of the
Morris Irrevocable 2012 Trust for Kazdan Children
dated December 21, 2012

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF LOS ANGELES**

SAMUEL MORRIS, Trustee of the Robert
and Barbara Morris Trust dated October 26,
1987, as amended; RICHARD KAZDAN,
Trustee of the Morris Irrevocable 2012 Trust
for Kazdan Children dated December 21,
2012, each individually and derivatively on
behalf of Rheumatology Diagnostics
Laboratory, Inc.,

Plaintiffs,

vs.

ALLAN LAWRENCE METZGER, an
individual; E. ROBERT HARRIS, an
individual; KRISTINE AZARRAGA, an
individual; and DOES 1-20, inclusive,

Defendants

and

RHEUMATOLOGY DIAGNOSTICS
LABORATORY, INC., a California
corporation,

Nominal Defendant

CASE NO. BC672340

**DECLARATION OF MATTHEW
FLANNIGAN IN SUPPORT OF
PLAINTIFFS' EX PARTE
APPLICATION FOR TEMPORARY
RESTRAINING ORDER AND ORDER
TO SHOW CAUSE WE
PRELIMINARY INJUNCTION**

Hon. Mary H. Strobel
Department 82 – Stanley Mosk

Hearing Date: August 29, 2017
Hearing Time: 8:30 a.m.
Complaint Filed: August 15, 2017
Trial Date: None Set

1 I, Matthew Flannigan, declare as follows:

2 1. I am employed at Rheumatology Diagnostics Laboratory, Inc., a California
3 corporation ("RDL" or the "Company") at all times relevant in this declaration. I have been the
4 employed since January 2016. I do not supervise any employees at RDL, and I am not part of
5 senior management. I am not an officer, director, or managing agent for RDL. I do not attend
6 board meetings, officer meetings, or any similar high-level meetings. I am not authorized to bind
7 RDL into contracts, and I do not set corporate policy. I cannot hire or fire any employees at
8 RDL. Except as where stated, I make this declaration of my own personal knowledge and, if
9 called upon as a witness, I could and would testify competently to the matters stated herein.

10 2. In or about April 2017, I notified senior management, including Richard Kazdan,
11 of my findings that Kristine Azarraga had used a thumb drive to view proprietary standard
12 operating procedures ("SOPs") from her previous employer. At the time, Azarraga had complete
13 access to the entire SOP library on RDL's MediaLab. Because of her history of downloading
14 SOPs to a thumb drive, there was concern amongst senior management that before RDL lays off
15 a friend of Azarraga's, they wanted to cut Azarraga's access to RDL's SOPs. I was then tasked
16 with moving the SOPs into a different security level in MediaLab that would not be accessible to
17 Azarraga. Once this was achieved, the friend was laid off. Shortly thereafter, Azarraga
18 discovered that she was locked out of access to the proprietary information. Azarraga stormed
19 into my office and demanded access, but I denied it as instructed by the senior management.
20 Azarraga then immediately went to Metzger and complained about her lack of access. Although
21 Metzger was fully aware that Azarraga downloaded SOPs from a prior employer, Metzger
22 ordered me to give her full access to all SOPs in the RDL library, and yelled at me something to
23 the effect of, "I'm the CEO and you'll give full access to Kristine and do what I tell you to do!"
24 RDL's Chief Operating Officer (COO) Eugene Karayev witnessed this incident, and was even
25 instructed by Metzger to stay and listen. Within a matter of weeks, Azagarra logged into
26 MediaLab from her personal computer. She did this through a computer not issued by RDL and
27 not secured, so that anyone could then hack into the system and steal the SOPs. In addition,
28 Azagarra printed uncontrolled copies of the SOPs.

1 3. In or about July 2017, Manny Loya, the Chief Operating Officer of RDL, called
2 me into his office to meet two individuals. The first individual was an IT consultant and the
3 second individual was a private detective. Metzger and Loya instructed me to show these two
4 individuals whatever they wanted to see. I escorted the two individuals into my office, and for
5 the next four to six hours, they interrogated me on several subjects, including whether anyone
6 was allowed access into Metzger's email accounts. Also, they asked me to provide all passwords
7 to all servers at RDL, which I gave to them as instructed by Metzger and Loya. They informed
8 me that they would be there for a few weeks to a month, but I never saw them again.

9 4. I have a camera on my desk that records any motion in my office. I leave this
10 camera on to monitor anyone that comes in my office when I am not there. On or about July 13,
11 2017, at about midnight when I was not in the office, several non-employees of RDL accessed
12 my office without my approval. The private detective hired by Metzger was one of the non-
13 employees. These individuals were not being escorted by an RDL employee, and they could
14 have reviewed or taken confidential patient records, billing records, and social security numbers.
15 One of the individuals even went behind my desk.

16 5. In or about August 2017, Loya and Metzger said there was a rumor that
17 somebody had access to Metzger's RDL email account. I pulled up the logs that show offsite
18 access to his email account, and using external IP addresses, I determined that the only offsite
19 access to his email mailbox was from Metzger's own home.

20 6. On or about August 18, 2017, Metzger again called me into his office and this
21 time had attorney Jeffrey Richter on the speaker phone. They asked me to shut the door. They
22 told me that Samuel Morris and Richard Kazdan sent a Cease and Desist Letter to Kristine
23 Azarraga. He also showed me an email that contained various allegations against Metzger for
24 mismanagement of RDL. From there, Richter and Metzger started to ask me if there are any
25 rules in place regarding employees accessing data offsite or accessing any company data offsite,
26 and specifically whether Morris or Kazdan accessed data from offsite locations. I explained to
27 them that nobody has that type of access, and if so, it is heavily monitored. I then explained that
28 when Azarraga was Chief Compliance Officer, she did have that level of access to MediaLab,

1 which is where RDL stores its most sensitive intellectual property and trade secrets. At that
2 point, I reminded both Richter and Metzger that we initially took Azarraga's access away, but
3 that Metzger yelled at me to give it back.

4 7. During this meeting, I also reminded them that I previously told them how
5 Azarraga took trade secrets from her last employer through a flash drive, and plugged that flash
6 drive into the RDL system. Then they asked me if in that flash drive contained proprietary
7 documents from her previous employer. I said I would check again. They asked me to not email
8 about this, and instead orally report back to Metzger whether it's "good" or "bad." So, I then
9 checked the records and verified my recollection that Azarraga did indeed take specific and
10 proprietary trade secrets from her previous employer. As instructed, I went back to Metzger and
11 said "bad." He responded with something to the effect of, "well, the facts are the facts."

12 8. On or about August 21, 2017, Metzger called me into the office for the third time
13 regarding the lawsuit. This time Blanca Denize was sitting with him. They were wondering why
14 Metzger was listed as a doctor in RDL's laboratory information system. During the
15 conversation, Metzger admitted to me that they found at least two results from reviewing the
16 records in the system that Metzger ordered blood tests despite not having a medical license.

17 9. On or about August 22, 2017, Kristine Azarraga came into my office. She asked
18 me if I could print up her logins so she could correlate them with her records for a legal response.
19 I gave her a 90-day report of her log-ins to MediaLab. After she received those documents, she
20 asked for login information going all the way back to April 2017. I told her that I would get the
21 information and send it to her. Before I had a chance to do that, Metzger called me into his
22 office. He was forwarded an email with the same request that RDL needed Azarraga's login
23 information dating back to April 2017. During that conversation, Metzger's phone rang – it was
24 his girlfriend Linda calling him. Linda said that we not only want Azarraga's login information
25 dating back to April 2017, but we also want my login information and the new compliance
26 officer's login information. As instructed, I sent Metzger this information. These records show
27 how many proprietary documents were printed offsite. The records show that neither I nor
28 Narine have ever printed proprietary documents offsite. Only Azarraga has printed proprietary

1 documents offsite. Also, during this call Metzger was hypothetically trying to come up with an
2 idea of why someone would want to access this information offsite. I explained that this is not
3 about *accessing* offsite, but rather evidence that Azarraga is printing documents offsite, which is
4 especially troubling due to her history of misappropriating trade secrets from previous
5 employers.

6 10. During this meeting, Metzger also brought up that according to Azarraga's
7 records, she was onsite on July 3, 2017, even though the records show her accessing from offsite.
8 That jogged my memory and I do recall that she was in her office that day working from her
9 personal laptop. The external IP Address means that she was not working from RDL's wifi, but
10 from an unsecured hotspot. On information and believe, she did this to circumvent the IT policy.
11 Apparently she told others that she was working from her personal laptop because she likes to
12 work while facing the door to her office, but had no explanation as to why she was not using
13 RDL's wifi.

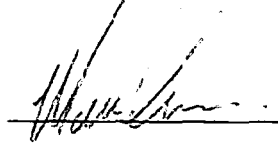
14 11. I have remote access installed on each computer at RDL. Azarraga disabled the
15 remote access on her computer so that I could not remotely access her machine. When I learned
16 of this, I wrote an IT policy that no local user could disable or quit or modify the remote access
17 application. When Azarraga found out about that, she started turning the computer off at the end
18 of the day to prevent access by the IT Department to her machine. I wrote another policy that
19 restricted the user's ability to turn the computer off.

20 12. Within the last two months, I went into Metzger's office to help him with a
21 computer issue. I overheard him cold calling doctors' offices to offer RDL services. I heard him
22 identify himself as Dr. Alan Metzger and as a fellow rheumatologist when making these calls.

23 13. Around the office everyone calls Metzger "Dr. Metzger." It is so commonplace
24 in the officer to refer to him as a Doctor that it would be awkward and disrespectful for anyone
25 to call him "Mr. Metzger" or "Alan." Moreover, the receptionists regularly page Metzger as
26 "Dr. Metzger" over the intercom system.

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

Executed this 28th day of August, in San Diego California.

A handwritten signature in black ink, appearing to read 'Matthew Flannigan', is written over a horizontal line.

Matthew Flannigan

EXHIBIT “3”

2025 RELEASE UNDER E.O. 14176



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
(800) 884-1684 | TDD (800) 700-2320
<http://www.dfeh.ca.gov> | email: contact.center@dfeh.ca.gov

January 5, 2018

RE: Notice of Filing of Discrimination Complaint

DFEH Matter Number: 201712-00574527

Right to Sue: Flanigan / RHEUMATOLOGY DIAGNOSTICS LABORATORY, INC

To All Respondent(s):

Enclosed is a copy of a complaint of discrimination that has been filed with the Department of Fair Employment and Housing (DFEH) in accordance with Government Code section 12960. This constitutes service of the complaint pursuant to Government Code section 12962. The complainant has requested an authorization to file a lawsuit. This case is not being investigated by DFEH and is being closed immediately. A copy of the Notice of Case Closure and Right to Sue is enclosed for your records.

Please refer to the attached complaint for a list of all respondent(s) and their contact information.

No response to DFEH is requested or required.

Sincerely,

Department of Fair Employment and Housing

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DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
(800) 884-1684 | TDD (800) 700-2320
<http://www.dfeh.ca.gov> | email: contact.center@dfeh.ca.gov

January 5, 2018

Matthew Flanigan
3731 Wilshire Blvd. Suite #940
Los Angeles, California 90010

RE: **Notice of Case Closure and Right to Sue**
DFEH Matter Number: 201712-00574527
Right to Sue: Flanigan / RHEUMATOLOGY DIAGNOSTICS LABORATORY, INC

Dear Matthew Flanigan,

This letter informs you that the above-referenced complaint was filed with the Department of Fair Employment and Housing (DFEH) has been closed effective January 5, 2018 because an immediate Right to Sue notice was requested. DFEH will take no further action on the complaint.

This letter is also your Right to Sue notice. According to Government Code section 12965, subdivision (b), a civil action may be brought under the provisions of the Fair Employment and Housing Act against the person, employer, labor organization or employment agency named in the above-referenced complaint. The civil action must be filed within one year from the date of this letter.

To obtain a federal Right to Sue notice, you must contact the U.S. Equal Employment Opportunity Commission (EEOC) to file a complaint within 30 days of receipt of this DFEH Notice of Case Closure or within 300 days of the alleged discriminatory act, whichever is earlier.

Sincerely,

Department of Fair Employment and Housing

2018 JAN 05 PM 03:00

**In the Matter of the Complaint of
Matthew Flanigan**

Complainant,

**RHEUMATOLOGY DIAGNOSTICS
LABORATORY, INC**
10755 Venice Blvd
Los Angeles, California 90034

1. Respondent **RHEUMATOLOGY DIAGNOSTICS LABORATORY, INC** is an **employer** subject to suit under the California Fair Employment and Housing Act (FEHA) (Gov. Code, § 12900 et seq.).

3. Complainant alleges that on or about **September 12, 2017**, respondent took the following adverse actions:

Complainant experienced retaliation because complainant reported or resisted any form of discrimination or harassment, participated as a witness in a discrimination or harassment claim and as a result was terminated, reprimanded, suspended, demoted, denied any employment benefit or privilege.

Additional Complaint Details: At all relevant times disclosed herein, Matthew Flanigan was an employee at RHEUMATOLOGY DIAGNOSTICS LABORATORY INC. (hereinafter “RDL”). On or about April 14, 2017, after discovering that an RDL employee, Kristine Azarraga, (hereinafter “Azarraga”), had plugged a non-RDL external hard drive into the RDL network importing, from previous employers, copies of their standard operating procedures (“SOP”) including billing data, patient demographics, patient test results, and other proprietary information, Mr. Flanigan reported his discovery of this conduct to RDL senior management, Samuel Morris.

1 Richard Kazdan and Allan Metzger who directed that Ms. Azarraga be restricted
2 from access to RDL's SOP's. When Azarraga discovered that she was locked out of
3 access to the proprietary information, she went to directly to Mr. Metzger to protest
4 her lack of access. Mr. Metzger reacted by unilaterally affirming and reinstating Ms.
5 Azarraga's access to the RDL network and SOP's, despite his knowledge that
6 Azarraga had previously downloaded SOP's from prior employers.

7 Mr. Flanigan is informed and believes and thereon alleges that Ms. Azarraga's and
8 Mr. Metzger's actions are a violation of the Health Insurance Portability and
9 Accountability Act of 1996.

10 Thereafter, a lawsuit was filed on August 15, 2017 by Samuel Morris and Richard
11 Kazdan versus Mr. Metzger, Ms. Azarraga and a Dr. E. Robert Harris, claiming
12 breach of fiduciary duty owed by Defendants to RDL due to mismanagement of the
13 business and/or misappropriation of corporate assets. (Samuel Morris, etc., et al v.
14 Allan Lawrence Metzger, et al., BC672340, hereinafter the "Morris Action"). Soon
15 thereafter, on August 29, 2017, Plaintiffs in the Morris Action proceeded ex parte
16 seeking to enjoin Mr. Metzger, Azarraga and Dr. Harris from continuing the above
17 described illegal acts. Once Metzger, Azarraga and Harris were served with the
18 complaint they solicited Matthew Flanigan's assistance to prepare a false declaration
19 in opposition to the Morris Action. However, Mr. Flanigan declined to perjure himself
20 for the named RDL Defendants and instead agreed to provide a truthful declaration
21 to the Plaintiffs' Morris and Kazdan in support of their August 29, 2017 ex parte
22 motion. (Declaration of Matthew Flanigan submitted in the Morris Action attached
23 hereto as Exhibit "2").

24 On August 29, 2017, immediately after receiving the ex parte motion (containing
25 the Flanigan Declaration) of Plaintiffs in the Morris Action, Metzger put Flanigan on
26 investigatory leave and terminated Flanigan on September 12, 2017, precipitating
27 this action.
28

1 VERIFICATION

2 I, **Matthew Hillix**, am the **Attorney** in the above-entitled complaint. I have read the
3 foregoing complaint and know the contents thereof. The matters alleged are based
4 on information and belief, which I believe to be true.

5 On January 5, 2018, I declare under penalty of perjury under the laws of the State of
6 California that the foregoing is true and correct.

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Los Angeles California

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):
 Edward Y. Lee, Esq. (SBN 171996) and/or Matthew Hillix, Esq. (SBN 305924)
 LAW OFFICES OF EDWARD Y. LEE
 3731 Wilshire Blvd., Suite 940
 Los Angeles, CA 90010
 TELEPHONE NO.: (213) 380-5858 FAX NO.: (213) 380-5860
 ATTORNEY FOR (Name): ed@edwardylee.com

SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles

STREET ADDRESS: 111 N. Hill St.

MAILING ADDRESS: - Same as above -

CITY AND ZIP CODE: Los Angeles 90012

BRANCH NAME: CENTRAL DISTRICT

CASE NAME:

Matthew Flanigan v. Rheumatology Diagnostics Laboratory, Inc., et al.

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:

BC 6 8 8 8 0 4

JUDGE:

DEPT:

Items 1-6 below must be completed (see instructions on page 2).

1. Check one box below for the case type that best describes this case:

Auto Tort

☐ Auto (22)
☐ Uninsured motorist (46)

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

☐ Asbestos (04)
☐ Product liability (24)
☐ Medical malpractice (45)
☐ Other PI/PD/WD (23)

Non-PI/PD/WD (Other) Tort

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

Employment

☒ Wrongful termination (36)
☐ Other employment (15)

Contract

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

Real Property

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

Unlawful Detainer

☐ Commercial (31)
☐ Residential (32)
☐ Drugs (38)

Judicial Review

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

Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403)

☐ Antitrust/Trade regulation (03)
☐ Construction defect (10)
☐ Mass tort (40)
☐ Securities litigation (28)
☐ Environmental/Toxic tort (30)
☐ Insurance coverage claims arising from the above listed provisionally complex case types (41)

Enforcement of Judgment

☐ Enforcement of judgment (20)

Miscellaneous Civil Complaint

☐ RICO (27)
☐ Other complaint (not specified above) (42)

Miscellaneous Civil Petition

☐ Partnership and corporate governance (21)
☐ Other petition (not specified above) (43)

2. This case ☐ is ☒ is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:

- a. ☐ Large number of separately represented parties d. ☐ Large number of witnesses
 b. ☐ Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve e. ☐ Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court
 c. ☐ Substantial amount of documentary evidence f. ☐ Substantial postjudgment judicial supervision

3. Remedies sought (check all that apply): a. ☒ monetary b. ☐ nonmonetary; declaratory or injunctive relief c. ☐ punitive

4. Number of causes of action (specify): Three (3)

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: January 5, 2018

Matthew Hillix, Esq.

(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.

Page 1 of 2

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
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) (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

SHORT TITLE: Matthew Flanigan v. Rheumatology Diagnostics Laboratory., et al.

CASE NUMBER

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

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

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

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

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

Applicable Reasons for Choosing Court Filing Location (Column C)

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

Auto
Tort

Other Personal Injury/ Property
Damage/ Wrongful Death Tort

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

SHORT TITLE:

Matthew Flanigan v. Rheumatology Diagnostics Laboratory., et al.

CASE NUMBER

Non-Personal Injury/ Property
Damage/ Wrongful Death Tort

Employment

Contract

Real Property

Unlawful Detainer

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

SHORT TITLE: Matthew Flanigan v. Rheumatology Diagnostics Laboratory., 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
Judicial Review	Asset Forfeiture (05)	<input type="checkbox"/> A6108 Asset Forfeiture Case	2, 3, 6
	Petition re Arbitration (11)	<input type="checkbox"/> A6115 Petition to Compel/Confirm/Vacate Arbitration	2, 5
	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
Provisionally Complex Litigation	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	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, 5, 11 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 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/Change of Gender <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, 8 2, 9

SHORT TITLE: Matthew Flanigan v. Rheumatology Diagnostics Laboratory., et al.	CASE NUMBER
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Step 4: Statement of Reason and Address: Check the appropriate boxes for the numbers shown under Column C for the type of action that you have selected. Enter the address which is the basis for the filing location, including zip code. (No address required for class action cases).

REASON: <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. <input type="checkbox"/> 11.			ADDRESS: 10755 Venice Blvd
CITY: Los Angeles	STATE: CA	ZIP CODE: 90034	

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

Dated: 1/5/2018


 (SIGNATURE OF ATTORNEY/FILING PARTY)

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

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

FILED
 IN
 THE
 CLERK'S
 OFFICE
 OF THE
 SUPERIOR
 COURT
 OF
 CALIFORNIA
 COUNTY OF
 LOS ANGELES
 JAN 5 2018
 CLERK