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FILED
Los Angeles Superior Court

JUL 26 2012

7220
90048

John A. Clarke, Executive Officer/Clerk
By SHAUKYA WESLEY, Deputy

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Attorneys for Plaintiffs ZONG YU LIU and YAN MEI BAI

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

14 ZONG YU LIU and YAN MEI BAI,
15 Plaintiffs,
16 v.
17 NU IMAGE (CALIFORNIA), INC.,
18 a California corporation, dba
19 MILLENNIUM FILMS; CHAD
20 STAHELSKI; and DOES 1 through
21 150, inclusive,
22 Defendants.

CASE NO. BC 489101

COMPLAINT FOR DAMAGES FOR:
(1) NEGLIGENCE
(WRONGFUL DEATH); AND
(2) STRICT LIABILITY
AND DEMAND FOR JURY TRIAL
[AMOUNT DEMANDED IS GREATER
THAN \$25,000]

24 **COME NOW** the plaintiffs, ZONG YU LIU and YAN MEI BAI,
25 of action against the defendants, and each of them, allege:

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CIT/CASE# BC489101 LEA/DEF#:
RECEIPT # CCH465980080
DATE PAID: 07/26/12 03:03:55 PM
PAYMENT: \$435.00
RECEIVED FOR COURT
CHECK: 435.00
CASH:
CHANGES:
\$0.00

07/26/12

FIRST CAUSE OF ACTION

(Negligence/Wrongful Death as against all Defendants)

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1. Plaintiffs are informed and believe, and thereon allege, that at all times herein mentioned, certain actions by defendants in preparation of the acts complained of herein took place within the jurisdiction of the above-captioned court.

2. The true names and capacities, whether individual, corporate, associate, governmental, or otherwise of DOE 1 through DOE 150, inclusive, are unknown to plaintiffs at this time, who therefore sue said defendants by such fictitious names; and when the true names and capacities of said defendants are ascertained, plaintiffs will amend this complaint accordingly. Plaintiffs are informed and believe, and thereon allege, that each of the defendants designated herein as a DOE was negligent and is responsible in some manner for the events and happenings herein referred to and their negligence proximately caused the injuries and damages sustained by plaintiffs as herein alleged, either through said defendants' own negligent conduct or through the conduct of their agents, servants, or employees, or due to their ownership, rental, use, sale, designing, manufacturing or leasing of the instrumentality causing the injury, or in some other manner.

3. At all times herein mentioned, defendants, and each of them, were and are the agents, servants, employees, joint venturers and partners, each of the other, and were, at all such times, acting within the course and scope of said relationship; furthermore, that each said defendant, while acting as a principal expressly directed, consented to, approved, affirmed and ratified each and every action taken by his co-defendants, as hereinafter alleged.

4. At all times herein mentioned, each of the defendants was the co-tortfeasor of each of the other defendants.

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- 1 5. Decedent KUN LIU (hereinafter referred to as "DECEDENT"), who was born on
2 September 29, 1985, at all times herein mentioned, was a resident of Beijing, China,
3 not fluent in English, and was unable to read or write English. He died on October
4 27, 2011 due to the alleged negligence of defendants herein.
- 5 6. Plaintiffs are the surviving heirs at law of DECEDENT. The relationship of plaintiff
6 ZONG YU LIU to DECEDENT is that of father and the relationship of plaintiff
7 YAN MEI BAI to DECEDENT is that of mother.
- 8 7. Plaintiffs are informed and believe and thereon allege that, at all times herein
9 relevant, defendant NU IMAGE (CALIFORNIA), INC. (hereinafter "NU IMAGE")
10 was and is a California corporation, authorized to business and doing business in the
11 County of Los Angeles, State of California, and at all times herein relevant,
12 authorized to do business and doing business under the fictitious business name of
13 MILLENNIUM FILMS in the County of Los Angeles, State of California.
- 14 8. Plaintiffs are informed and believe and thereon allege that, at all times herein
15 relevant, defendant CHAD STAHELSKI (hereinafter "STAHELSKI") is and was
16 a resident of the County of Los Angeles, State of California.
- 17 9. Plaintiffs are informed and believe and thereon allege that, at all times herein
18 relevant, defendants NU IMAGE and DOES 1 through 20, inclusive, and each of
19 them, were and are engaged in the business of producing, directing, organizing,
20 financing and/or distributing motion pictures throughout the world and, at all times
21 herein relevant, owned, operated, managed and controlled a production unit in the
22 Country of Bulgaria.
- 23 10. Plaintiffs are informed and believe and thereon allege that, at all times herein
24 relevant, defendants NU IMAGE, STAHELSKI and DOES 1 through 50, inclusive,
25 were engaged in the pre-production activities, production, direction, organizing and
26 financing of a motion picture with the title "Expendables 2" which, at the time of the
27 incident alleged herein, was in the process of filming stunts at or near the
28 Ognyanovo Reservoir/Dam in the town of Elin Pelin and near the village of

1 Ognyanovo in the Country of Bulgaria, and in doing so engaged the resources of
2 their production unit in said country and, in doing so, contracted with other
3 individuals and business entities in the Country of Bulgaria and other countries, sued
4 herein as defendants DOES 51 through 75, inclusive, in furtherance of said pre-
5 production activities, production and creation of stunts to be used in the film. As
6 used hereinafter, the term "Expendables 2" shall refer to defendants NU IMAGE,
7 STAHELSKI and DOES 1 through 75, inclusive, and each of them, individually,
8 jointly and collectively, as the case may be, within the context of the production,
9 direction, organization and creation of the film of that name.

10 11. On or about October 27, 2011, and prior thereto, the defendants, and each of them,
11 were responsible for, organizing, planning, setting up, producing, directing, training,
12 coordinating and otherwise preparing for and implementing the stunt work for
13 Expendables 2 at or near the Ognyanovo Reservoir/Dam in the town of Elin Pelin
14 and near the village of Ognyanovo in the Country of Bulgaria, and in doing so were
15 responsible for ensuring the safety of the participants of the stunts including, without
16 limitation, DECEDENT. In this regard, and without limiting the foregoing in any
17 manner, defendants were responsible for making sure that equipment was properly
18 used, equipment was properly fastened, training the participants of stunts, ensuring
19 that the use of explosives and other similar ultra-hazardous activities for special
20 effects were properly used, that adequate warnings were made, and to obtain
21 appropriate permits required to engage in production.

22 12. Plaintiffs are informed and believe and thereon allege that, at all relevant times,
23 defendants, and each of them, defendants undertook a duty to protect participants of
24 the stunts, including DECEDENT, from foreseeable acts of harm, including harm
25 from the use of explosives and other similar ultra-hazardous activities used for
26 special effects.

- 1 13. Plaintiffs are informed and believe and thereon allege that at said time and place,
2 defendants, and each of them, negligently and carelessly failed to provide adequate
3 protection from harm to the participants of the stunts, including DECEDENT.
- 4 14. On or about October 27, 2011, DECEDENT, who was a stuntman for Expendables
5 2 by defendants, was engaged in a stunt in a rubber boat at or near the Ognyanovo
6 Reservoir/Dam in the town of Elin Pelin and near the village of Ognyanovo in the
7 Country of Bulgaria, and at said time and place, the defendants, and each of them,
8 so negligently and recklessly organized, planned, set up, produced, directed, trained,
9 coordinated and otherwise prepared for and implemented the stunt which involved
10 the use of explosives and other similar ultra-hazardous activities in the rubber boat
11 so as to cause an explosion, thereby injuring DECEDENT and causing his death on
12 said date.
- 13 15. As a direct and proximate result of the conduct of the defendants, and each of them,
14 DECEDENT was hurt and injured in his health, strength, and activity, sustaining
15 injury to plaintiff's body and shock and injury to DECEDENT's nervous system and
16 person, resulting in DECEDENT's death on or about October 27, 2011.
- 17 16. As a direct and proximate result of the negligence of defendants, and each of them,
18 and of the death of the DECEDENT, plaintiffs have sustained damages resulting
19 from the loss of society, love, comfort, attention, services, and support of
20 DECEDENT in a sum in excess of the minimum jurisdictional limits of this Court,
21 to be ascertained at time of trial.
- 22 17. As a further and proximate result of the negligence of defendants, and each of them,
23 and of the death of the DECEDENT, plaintiffs have incurred funeral and burial
24 expenses in a sum to be ascertained at time of trial.
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5/7/2012

SECOND CAUSE OF ACTION

(Strict Liability As Against All Defendants)

18. Plaintiff hereby refers to and by this reference incorporates paragraphs 1 through 17, inclusive, of this Complaint as though completely and fully set forth herein.

19. Plaintiffs are informed and believe, and thereon allege, that Defendants, and each of them, were, at all times herein relevant, engaged in pre-production activities, preparation of, production and creation of stunts to be used in the film "Expendables 2," which included the use of explosives and other similar ultra-hazardous activities for special effects.

20. On or about October 27, 2011, and prior thereto, the defendants, and each of them, were responsible for, organizing, planning, setting up, producing, directing, training, coordinating and otherwise preparing for and implementing the stunt work for Expendables 2 at or near the Ognyanovo Reservoir/Dam in the town of Elin Pelin and near the village of Ognyanovo in the Country of Bulgaria, and in doing so were responsible for ensuring the safety of the participants of the stunts including, without limitation, DECEDENT. In this regard, and without limiting the foregoing in any manner, defendants were responsible for making sure that equipment was properly used, equipment was properly fastened, training the participants of stunts, ensuring that the use of explosives and other similar ultra-hazardous activities for special effects were properly used, that adequate warnings were made, and to obtain appropriate permits required to engage in production.

21. On or about October 27, 2011, at or near the Ognyanovo Reservoir/Dam in the town of Elin Pelin and near the village of Ognyanovo in the Country of Bulgaria, defendants, and their agents and employees, caused, conducted, and detonated an explosion or blast for use in a stunt for Expendables 2.

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1 22. Plaintiffs are informed and believe and thereon allege, that at all times herein
2 relevant, the explosion or blast was caused, conducted, and detonated by defendants,
3 and their agents and employees, near the populated village of Ognyanovo, as well
4 as the production staff, actors and stunt people, working on the film Expendables 2,
5 including DECEDENT.

6 23. At the time of the above-mentioned explosion or blast, DECEDENT was employed
7 as a stuntman for Expendables 2 and engaged in a stunt in a rubber boat at or near
8 the site of the explosion or blast.

9 24. As a direct and proximate result of the explosion or blast, DECEDENT was hurt and
10 injured in his health, strength, and activity, sustaining injury to plaintiff's body and
11 shock and injury to DECEDENT's nervous system and person, resulting in
12 DECEDENT's death on or about October 27, 2011.

13 25. As a direct and proximate result of the negligence of defendants, and each of them,
14 and of the death of the DECEDENT, plaintiffs have sustained damages resulting
15 from the loss of society, love, comfort, attention, services, and support of
16 DECEDENT in a sum in excess of the minimum jurisdictional limits of this Court,
17 to be ascertained at time of trial.

18 26. As a further and proximate result of the negligence of defendants, and each of them,
19 and of the death of the DECEDENT, plaintiffs have incurred funeral and burial
20 expenses in a sum to be ascertained at time of trial.

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22 **WHEREFORE**, plaintiffs pray for judgment against defendants, and each of them,
23 as follows:

- 24 1. For general damages in a sum to be ascertained at time of trial;
- 25 2. For economic damages according to proof at time of trial;
- 26 3. For funeral and burial expenses in a sum to be ascertained at time of trial;

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- 4. For costs of suit incurred herein;
- 5. For prejudgment interest pursuant to Civil Code Section 3291; and
- 6. For such other and further relief as this Court may deem just and proper.

Dated: July 25, 2012
 CHEONG, DENOVE, ROWELL, BENNETT & KARNES
 By: *W M Karns*
 WILLIAM M. KARNES
 Attorneys for Plaintiffs

Dated: July 25, 2012
 MICHAEL H. SILVERS,
 A Law Corporation
 By: *M H Silvers*
 MICHAEL H. SILVERS
 Attorneys for Plaintiffs

DEMAND FOR JURY TRIAL

Plaintiffs hereby demands trial by jury as to all issues of law and fact to which they are entitled.

Dated: July 25, 2012
 CHEONG, DENOVE, ROWELL, BENNETT & KARNES
 By: *W M Karns*
 WILLIAM M. KARNES
 Attorneys for Plaintiffs

Dated: July 25, 2012
 MICHAEL H. SILVERS,
 A Law Corporation
 By: *M H Silvers*
 MICHAEL H. SILVERS
 Attorneys for Plaintiffs

0277260712

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

William M. Karns, CSB #238599
Cheong, Denove, Rowell, Bennett & Karns
10100 Santa Monica Boulevard #2460

Los Angeles, California 90067

TELEPHONE NO.: 310-277-4857 FAX NO.: 310-277-5254

ATTORNEY FOR (Name): Plaintiffs

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

STREET ADDRESS: 111 North Hill Street

MAILING ADDRESS:

CITY AND ZIP CODE: Los Angeles, California 90012

BRANCH NAME: CENTRAL DISTRICT

CASE NAME: LIU/BAI v. NU IMAGE/MILLENNIUM FILMS

FOR COURT USE ONLY

FILED
Los Angeles Superior Court

JUL 26 2012

John A. Clarke, Executive Officer/Clerk
By SHAUNYA WESLEY Deputy

CASE NUMBER: BC 489101

JUDGE:

DEPT:

CIVIL CASE COVER SHEET

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

Complex Case Designation

Counter **Joinder**

Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)

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

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

Auto Tort

- Auto (22)
- Uninsured motorist (46)

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

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

Non-PI/PD/WD (Other) Tort

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

Employment

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

Contract

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

Real Property

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

Unlawful Detainer

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

Judicial Review

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

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

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

Enforcement of Judgment

- Enforcement of judgment (20)

Miscellaneous Civil Complaint

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

Miscellaneous Civil Petition

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

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

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

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

4. Number of causes of action (specify): - 2 -

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: July 25, 2012

William M. Karns, CSB #238599

(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.

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

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

Item I. Check the types of hearing and fill in the estimated length of hearing expected for this case:

JURY TRIAL? YES CLASS ACTION? YES LIMITED CASE? YES TIME ESTIMATED FOR TRIAL 20 HOURS/ DAYS

Item II. Select the correct district and courthouse location (4 steps – If you checked "Limited Case", skip to Item III, Pg. 4):

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

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

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

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

1. Class Actions must be filed in the County Courthouse, Central District.
2. May be filed in Central (Other county, or no Bodily Injury/Property Damage).
3. Location where cause of action arose.
4. Location where bodily injury, death or damage occurred.
5. Location where performance required or defendant resides.
6. Location of property or permanently garaged vehicle.
7. Location where petitioner resides.
8. Location wherein defendant/respondent functions wholly.
9. Location where one or more of the parties reside.
10. Location of Labor Commissioner Office.

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

	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Auto Tort	Auto (22)	<input type="checkbox"/> A7100 Motor Vehicle - Personal Injury/Property Damage/Wrongful Death	1., 2., 4.
	Uninsured Motorist (46)	<input type="checkbox"/> A7110 Personal Injury/Property Damage/Wrongful Death – Uninsured Motorist	1., 2., 4.
Other Personal Injury/Property Damage/Wrongful Death Tort	Asbestos (04)	<input type="checkbox"/> A6070 Asbestos Property Damage	2.
		<input type="checkbox"/> A7221 Asbestos - Personal Injury/Wrongful Death	2.
	Product Liability (24)	<input type="checkbox"/> A7260 Product Liability (not asbestos or toxic/environmental)	1., 2., 3., 4., 8.
	Medical Malpractice (45)	<input type="checkbox"/> A7210 Medical Malpractice - Physicians & Surgeons	1., 2., 4.
<input type="checkbox"/> A7240 Other Professional Health Care Malpractice		1., 2., 4.	
Non-Personal Injury/Property Damage/Wrongful Death Tort	Other Personal Injury Property Damage Wrongful Death (23)	<input type="checkbox"/> A7250 Premises Liability (e.g., slip and fall)	1., 2., 4.
		<input type="checkbox"/> A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.)	1., 2., 4.
		<input type="checkbox"/> A7270 Intentional Infliction of Emotional Distress	1., 2., 3.
		<input checked="" type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death	1., 2., 4.
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.	

Non-Personal Injury/Property Damage/
 Wrongful Death Tort (Cont'd.)
 Employment
 Contract
 Real Property
 Unlawful Detainer
 Judicial Review

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

Judicial Review (Cont'd.)

Provisionally Complex Litigation

Enforcement of Judgment

Miscellaneous Civil Complaints

Miscellaneous Civil Petitions

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

SHORT TITLE: LIU/BAI v. NU IMAGE/MILLENNIUM FILMS


CASE NUMBER

Item III. Statement of Location: Enter the address of the accident, party's residence or place of business, performance, or other circumstance indicated in Item II., Step 3 on Page 1, as the proper reason for filing in the court location you selected.

REASON: CHECK THE NUMBER UNDER COLUMN C WHICH APPLIES IN THIS CASE <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.			ADDRESS: Defendants are residents of LA County 6423 Wilshire Boulevard
CITY: Los Angeles	STATE: CA	ZIP CODE: 90048	and incident occurred in Bulgaria

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

Dated: July 25, 2012


(SIGNATURE OF ATTORNEY/FILING PARTY)
Cheong, Denove, Rowell, Bennett &
By: William M. Karns

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

1. Original Complaint or Petition.
2. If filing a Complaint, a completed Summons form for issuance by the Clerk.
3. Civil Case Cover Sheet form CM-010.
4. Complete Addendum to Civil Case Cover Sheet form LACIV 109 (Rev 01/07), LASC Approved 03-04.
5. Payment in full of the filing fee, unless fees have been waived.
6. Signed order appointing the Guardian ad Litem, JC form FL-935, if the plaintiff or petitioner is a minor under 18 years of age, or if required by Court.
7. Additional copies of documents to be conformed by the Clerk. Copies of the cover sheet and this addendum must be served along with the summons and complaint, or other initiating pleading in the case.