

Superior Court of California, County of Los Angeles North Valley District, Chatsworth Courthouse 9425 Penfield Avenue, Chatsworth, CA 91311		Reserved for Clerk's File Stamp ORIGINAL FILED Superior Court of California County of Los Angeles NOV 01 2016 Sherri R. Carter, Executive Officer/Clerk By Suzette Stein, Deputy
PLAINTIFF		
VAN LAAR		
DEFENDANT		
ACOSTA		
NOTICE OF ALL PURPOSE CASE ASSIGNMENT and NOTICE OF CASE MANAGEMENT CONFERENCE		CASE NUMBER PC057373

Notice of Civil Assignment:

Dept. F49

Plaintiff/Attorney(s) for Plaintiff are hereby ORDERED to serve a copy of this Notice on all parties at the time of service of the complaint and summons. Cross-complainants and plaintiffs-in-intervention are ordered to serve a copy on each new party brought into the case. This case is randomly assigned to **Judge Stephen P. Pfahler** for all purposes, in **Department F49** of the North Valley District of this Court. All law and discovery matters must be calendared on-line through the Court Reservation System on the Court's website at www.LACourt.org.

Notice of Case Management Conference: All parties are ordered to appear at a Case Management Conference in **Department F49** at the courthouse address shown above at **8:30 a.m.** on

Date: March 29, 2017

*****NOTICE: READ PAGE 2 OF 2 FOR IMPORTANT INFORMATION**

You are hereby notified that failure of any party to comply with these Orders may result in sanctions, including dismissal of the complaint and/or striking a pleading, such as an answer, and payment of money. This Order continues on Page 2 of 2. You are further given notice that failure to comply with the provisions of California Rules of Court, Rule 3.110 will result in the setting of an OSC re sanctions. Please read Rule 3.110 and page 2 of this Notice, and all applicable rules and statutes mentioned.

Dated: 10-28-16

ANN I. JONES

Hon. Ann I. Jones, Supervising Judge

CERTIFICATE OF SERVICE

I, the below named Executive Officer/Clerk of the above-entitled court, do hereby certify that I am not a party to this action and that on 10-28-16 I served the Notice of All Purpose Case Assignment and Notice of Case Management Conference upon each party or counsel named below:

☐ by personally giving the party notice upon filing of the complaint.

☐ by depositing in the United States mail at the courthouse at Chatsworth, California, one copy of the original filed herein in a separate sealed envelope to each address shown on page 2 herein with postage fully prepaid.

Date: 10-28-16

John A. Clarke, Executive Officer/Clerk

By S. STEIN, Deputy Clerk
S. STEIN

Notice of All Purpose Case Assignment and Case Management Conference
 PAGE 1 OF 2

All counsel and/or self-represented parties must be fully knowledgeable on all applicable statutes, California Rules of Court ["CRC"] and all Local Rules of the Los Angeles Superior Court ["LASC"] including Chapter 7

SUMMONS
(CITACION JUDICIAL)

SUM-100

NOTICE TO DEFENDANT: DANTE ACOSTA; and DOES 1 through
(AVISO AL DEMANDADO): 20

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

CONFORMED COPY
ORIGINAL FILED
Superior Court of California
County of Los Angeles

NOV 01 2016

Sherri R. Carter, Executive Officer/Clerk
By Suzette Stein, Deputy

YOU ARE BEING SUED BY PLAINTIFF: JENNIFER VAN LAAR
(LO ESTÁ DEMANDANDO EL DEMANDANTE):

NOTICE! You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), or by contacting your local court or county bar association. **NOTE:** The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case. **¡AVISO!** Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información a continuación.

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California, (www.sucorte.ca.gov) o poniéndose en contacto con la corte o el colegio de abogados locales. **AVISO:** Por ley, la corte tiene derecho a reclamar las cuotas y los costos oxentos por imponer un gravamen sobre cualquier recuperación de \$10,000 ó más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desechar el caso.

The name and address of the court is:

(El nombre y dirección de la corte es):

Superior Court, County of Los Angeles
111 North Hill Street
Los Angeles, CA 90012
Stanley Mosk Courthouse

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is:

(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):

Daniel M. Gilleon (SBN 195200) 619.702.8623 619.702.6337
The Gilleon Law Firm
1320 Columbia Street, Suite 200
San Diego, CA 92101

DATE: NOV 01 2016

(Fecha)

Sherri R. Carter

Clerk, by

(Secretario)

Deputy

(Adjunto)

CASE NUMBER:
(Número del Caso): 057373

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)

(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010)).

[SEAL]

NOTICE TO THE PERSON SERVED: You are served

1. ☐ as an individual defendant.

2. ☐ as the person sued under the fictitious name of (specify):

3. ☐ on behalf of (specify):

under: ☐ CCP 416.10 (corporation)

☐ CCP 416.20 (defunct corporation)

☐ CCP 416.40 (association or partnership)

☐ other (specify):

☐ CCP 416.60 (minor)

☐ CCP 416.70 (conservatee)

☐ CCP 416.90 (authorized person)

4. ☐ by personal delivery on (date):

Page 1 of 1

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Daniel M. Gilleon (SBN 195200) The Gilleon Law Firm 1320 Columbia Street, Suite 200 San Diego, CA 92101 TELEPHONE NO.: 619.702.8623 FAX NO.: 619.702.6337 ATTORNEY FOR (Name): Plaintiff Jennifer Van Laar		FOR COURT USE ONLY CONFORMED COPY ORIGINAL FILED Superior Court of California County of Los Angeles NOV 01 2016 Sherri R. Carter, Executive Officer/Clerk By Suzette Stein, Deputy
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles STREET ADDRESS: 9425 Penfield Ave. MAILING ADDRESS: 9425 Penfield Ave. CITY AND ZIP CODE: Chatsworth, CA 91311 BRANCH NAME: Chatsworth Courthouse		
CASE NAME: Van Laar v. Acosta		
CIVIL CASE COVER SHEET <input checked="" type="checkbox"/> Unlimited (Amount demanded exceeds \$25,000)	<input type="checkbox"/> Limited (Amount demanded is \$25,000 or less)	CASE NUMBER: 057373
Complex Case Designation <input type="checkbox"/> Counter <input type="checkbox"/> Joinder Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)		JUDGE: DEPT:

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

BY FAX

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

Auto Tort <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46) Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort <input type="checkbox"/> Asbestos (04) <input type="checkbox"/> Product liability (24) <input type="checkbox"/> Medical malpractice (45) <input type="checkbox"/> Other PI/PD/WD (23) Non-PI/PD/WD (Other) Tort <input type="checkbox"/> Business tort/unfair business practice (07) <input type="checkbox"/> Civil rights (08) <input checked="" type="checkbox"/> Defamation (13) <input type="checkbox"/> Fraud (16) <input type="checkbox"/> Intellectual property (19) <input type="checkbox"/> Professional negligence (25) <input type="checkbox"/> Other non-PI/PD/WD tort (35) Employment <input type="checkbox"/> Wrongful termination (36) <input type="checkbox"/> Other employment (15)	Contract <input type="checkbox"/> Breach of contract/warranty (06) <input type="checkbox"/> Rule 3.740 collections (09) <input type="checkbox"/> Other collections (09) <input type="checkbox"/> Insurance coverage (18) <input type="checkbox"/> Other contract (37) Real Property <input type="checkbox"/> Eminent domain/Inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (26) Unlawful Detainer <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38) Judicial Review <input type="checkbox"/> Asset forfeiture (05) <input type="checkbox"/> Petition re: arbitration award (11) <input type="checkbox"/> Writ of mandate (02) <input type="checkbox"/> Other judicial review (39)	Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403) <input type="checkbox"/> Antitrust/Trade regulation (03) <input type="checkbox"/> Construction defect (10) <input type="checkbox"/> Mass tort (40) <input type="checkbox"/> Securities litigation (28) <input type="checkbox"/> Environmental/Toxic tort (30) <input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41) Enforcement of Judgment <input type="checkbox"/> Enforcement of judgment (20) Miscellaneous Civil Complaint <input type="checkbox"/> RICO (27) <input type="checkbox"/> Other complaint (not specified above) (42) Miscellaneous Civil Petition <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> Other petition (not specified above) (43)
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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): 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: 10/31/2016

Daniel M. Gilleon (SBN 195200)

(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

Daniel M. Gilleon (SBN 195200)
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 Tel: 619.702.8623
 Fax: 619.702.6337

Attorneys for Plaintiff Jennifer Van Laar

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 Superior Court of California
 County of Los Angeles

NOV 01 2016

Sherri R. Carter, Executive Officer/Clerk
 By Suzette Stein, Deputy

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES
(Chatsworth Courthouse)

JENNIFER VAN LAAR,

Plaintiff,

vs.

DANTE ACOSTA; and
 DOES 1 through 20,

Defendants.

CASE NO.: PC 057373

COMPLAINT FOR:

1. Defamation Per Se;
2. Negligent Interference With Prospective Economic Relations; and
3. Intentional Interference With Prospective Economic Relations.

Plaintiff Jennifer Van Laar ("Van Laar") alleges:

BY FAX

GENERAL ALLEGATIONS

1. Van Laar is and at all material times was an adult female residing in Ventura County, California. Her maiden name is "Van Laar," but she is also known as Jennifer Knight. Van Laar is a single mother of three children. At the time of the defamatory statements alleged below, Van Laar was employed as a public relations manager for a private non-profit organization, and was not involved in any political campaigns or other political work. However, Van Laar plans to work with political campaigns in the future. At no time prior to the defamatory statements did Van Laar voluntarily inject herself into the particular public controversy described below, nor had she attempted to thrust herself in front of the public in any manner that would make her a public figure for purposes of this action.

1 2. Defendant, Dante Acosta ("Acosta") is and at all material times was an adult residing
2 in Los Angeles County, California. At the time he made the defamatory statements alleged below,
3 Acosta was a candidate for political office.

4 3. The true names and capacities, whether individual or otherwise, of defendants Does
5 1 through 20 are unknown to Plaintiff who, therefore, sues them by such fictitious names pursuant
6 to CCP § 474. Plaintiff is informed and believes that each of the Doe defendants is responsible in
7 some manner for the acts of omissions alleged in this complaint or caused Plaintiff's damages.

8 4. At all material times, all of the defendants were agents and employees of the other
9 defendants and, when doing the acts alleged in this complaint, they acted within the course and
10 scope of such agency and employment.

11 5. Van Laar and Acosta first met in August 2014 when she was working on a campaign
12 for a politician who employed Acosta as a staffer.

13 6. Within a few months, Acosta began engaging in sexual harassment toward Van Laar,
14 as defined by Cal. Civil Code § 51.9, including unwelcome, persistent and pervasive verbal and
15 physical conduct of a sexual and hostile nature, all because Van Laar was a woman whom Acosta
16 found attractive. Examples of such sexual harassment include:

- 17 a. Unwelcome leering, the proverbial "undressing with the eyes" type of stare,
18 from head to toe;
- 19 b. Unwelcome touching in non-sexual ways (e.g., his hand on her shoulder), but
20 with the touching lasting too long to be innocent;
- 21 c. Sexually suggestive comments and flirtation, such as that which occurred on
22 January 6, 2015, when they were both in Washington, D.C. for political
23 activities. Acosta invited Van Laar to have drinks with him at a hotel bar to
24 discuss his political ambitions, and she accepted. After one glass of wine
25 each, Acosta began leering at Van Laar in a sexual way, and said, "You are
26 very beautiful. I would never cheat on my wife, but I would with you," with
27 other comments affirming his desire to have sex with Van Laar. Plaintiff
28 quickly ended the meeting and returned to her hotel room;

- 1 d. Two days later, on January 8, 2015, Acosta sent Van Laar a text confirming
2 his sexual desires for her and suggesting that more wine would have been in
3 order: "I enjoyed our chat the other night. Could have used more wine
4 though. :[smiley face emoji] . . . But on the other night, I meant what I said."
5 (Attached as Exhibit 1 is a true and accurate copy of screen shots of the
6 above texts).
- 7 e. The following year, on March 10, 2016, Van Laar sent Acosta a text asking
8 if he were running for a certain political seat, saying, "Sooooo are you in? ??
9 Call me". Acosta telephoned her shortly thereafter and in a sexually
10 flirtatious tone said, "I'm always in for you, baby."
- 11 f. Another example of unwanted flirtation, both by text and in a telephone call
12 — during which Acosta acknowledged his flirtations were unwanted —
13 occurred on March 14, 2016, when Acosta was in a bar in Sacramento,
14 California. Van Laar wanted to speak with Acosta about a business matter.
15 In a text to Acosta letting him know that she wanted to speak with him, but
16 also that she wanted to go to sleep, she stated, "Ugh it's almost 11 pm - I need
17 to go get my beauty sleep haha". Acosta replied, "No, no - I know you hate
18 it when I say things like this but I'm gonna say it anyway . . . But you don't
19 need your beauty sleep. You shouldn't be allowed to get any more beauty
20 sleep!" (Attached as Exhibit 2 is a true and accurate copy of screen shots of
21 the above texts). Shortly thereafter, Acosta called Van Laar and continued
22 with the same line of unwanted flirtations about Van Laar not needing more
23 beauty sleep, even adding that it would be "unfair" to other women if she got
24 more beauty sleep.

25 ///

26 ///

27 ///

28 ///

1 7. At no time prior to the defamation alleged in this complaint had Van Laar filed a
2 formal complaint against Acosta, or made any official protests to any person or governmental body
3 alleging that Acosta had committed sexual harassment against her, or that Acosta's conduct had
4 caused her significant harm.

5 8. Nonetheless, Van Laar was deeply disturbed by Acosta's persistent sexual advances.
6 In addition to repeatedly telling him this outright (for example, she replied to his March 14 text
7 saying, "You're right, I do hate that"), Van Laar reached out to multiple female friends for emotional
8 support.

9 9. In May 2016, while on the campaign trail, a woman approached Van Laar and told
10 her that she and others knew of multiple women in Santa Clarita, California that Acosta had sexually
11 harassed with "handsy" conduct and verbal flirtations. This woman told Van Laar that they had
12 heard Acosta had also treated Van Laar this way, asking her, "Is this true?" Van Laar responded,
13 "Yes." The woman said that she and the others planned to "make it an issue," to which Van Laar
14 responded, "Don't use my name."

15 10. Van Laar decided to warn a friend and politician (and Acosta's employer) whom she
16 believed would be harmed if news about Acosta's sexual harassment came to light. On May 30,
17 2016, Van Laar began attempts to contact the friend/politician, and they were able to speak the next
18 day, May 31, 2016. During this conversation, she informed her friend of the conversation she had
19 with the woman on the campaign trail, and also shared her own experiences of being sexually
20 harassed by Acosta. Van Laar also spoke to the wife of another politician on the same date, who
21 asked Van Laar to keep quiet about Acosta's behavior (to protect Acosta's wife), except to notify the
22 local Republican Party leaders of what Van Laar had learned and what she had experienced with
23 Acosta.

24 11. Two days later, on June 2, 2016, Van Laar sent the politician's wife an email, cc'ing
25 the two politicians mentioned above (hereinafter, "the email"). The purpose of the email was to
26 comply with the request to warn the Republican Party leaders of the threat to publicly expose Acosta
27 and to disclose the sexual harassment Van Laar had experienced herself. The email was meant to
28 remain a private, confidential communication, and was not designed in any way to make a formal

1 complaint of harm caused by Acosta's conduct, or to expose Acosta's conduct to the public.

2 12. The email remained private until Monday, October 24, 2016, when it first came to
3 light in a news article. The following day, October 25, 2016, the email was published by the same
4 media outlet in another article. Van Laar's name was redacted from the email, and was not disclosed
5 in either of the two news articles.

6 13. However, later that day, reporters from KHTS Hometown Station and the Los
7 Angeles Times contacted Van Laar, seeking a comment. Van Laar did not respond.

8 14. The following day, October 26, 2016, another media outlet published a news article
9 that identified Van Laar as the email's author, after Acosta had already made a public statement that
10 also identified her. Thereafter, a flood of media stories were published identifying Van Laar by
11 name, with varying details about contents of the email.

12 15. Knowing that Van Laar's name was in the public domain as the author of the email,
13 Acosta commenced a campaign to smear her name, all to protect himself and his political ambitions.
14 Acosta made, and continues to make, false statements that:

- 15 a. Van Laar is a liar;
- 16 b. Van Laar is "dishonest";
- 17 c. Van Laar is "malicious";
- 18 d. Van Laar is trying to punish him for not hiring her; and
- 19 e. Van Laar engages in "dirty politics".

20 16. To orchestrate this victim smearing campaign, Acosta and Does 1 to 20 omitted the
21 January 8, 2015 texts ("more wine" / "meant what I said") from those they provided to the media.
22 Worse, Acosta and Does 1 to 20 doctored the March 14, 2016 texts ("I know you hate it"), all to
23 dupe the media into publishing his false statements that Van Laar was a dishonest liar who engaged
24 in dirty politics.

25
26 **FIRST CAUSE OF ACTION**
(Defamation Per Se Against All Defendants)

27 17. Plaintiff realleges paragraphs 1 through 16.

28 18. Acosta and Does 1 to 20 made the defamatory statements alleged above to persons

1 other than Plaintiff, and caused them to be published in media that is accessible by millions of
2 people. The persons to whom Defendants made the false statements, and the people who read, saw
3 or heard the false statements in the media, reasonably understood that the statements were about Van
4 Laar, and reasonably understood them to mean she was a malicious, vengeful, dishonest liar who
5 engaged in dirty politics. Because of the facts and circumstances known to the listeners, viewers,
6 and readers of the statements, the false statements tended to injure Van Laar in her occupation in
7 public relations and future political campaign work. The false statements exposed Van Laar to
8 hatred, contempt, ridicule, and shame, and tended to discourage others from associating or dealing
9 with her.

10 19. Acosta knew the statements were false. Does 1 to 20 either knew they were false or
11 failed to use reasonable care to determine the truth or falsity of the statements.

12 20. Defendants' wrongful conduct was a substantial factor in causing Plaintiff to suffer
13 damages, including:

- 14 a. Harm to Van Laar's business, trade, profession and occupation, present and
15 future;
- 16 b. Harm to Van Laar's reputation;
- 17 c. Expenses Van Laar had to pay as a result of the defamatory statements;
- 18 d. Special damages for lost wages; and
- 19 e. Shame, mortification, hurt feelings, anxiety, and other emotional distress
20 resulting in bodily injury.

21 21. Defendants knew their statements were false and would harm plaintiff, which they
22 intended, or they acted with conscious and reckless disregard of the truth, or without reasonable
23 grounds for believing the truth of the statements. As such, defendants acted with malice, fraud and
24 oppression, and with conscious disregard for Plaintiff's rights and well-being, as defined by CCP §
25 3294, entitling Plaintiff to recover punitive damages.

26 **SECOND CAUSE OF ACTION**
27 **(Negligent Interference With Prospective Economic Relations**
28 **Against All Defendants)**

22. Plaintiff realleges paragraphs 1 through 21.

23. Van Laar and a consulting group were in an economic relationship that probably would have resulted in a future economic benefit to Van Laar. Acosta and Does 1 to 20 knew or should have known of this relationship. These defendants knew or should have known that this relationship would be disrupted if they failed to act with reasonable care.

24. These defendants failed to act with reasonable care when they engaged in the defamation as alleged above.

25. As a legal result of defendants' conduct, the relationship was disrupted and plaintiff was harmed, suffering special damages for lost income and benefits, reputation, and good will, as well as general damages for emotional distress.

THIRD CAUSE OF ACTION
(Intentional Interference With Prospective Economic Relations
Against All Defendants)

26. Plaintiff realleges paragraphs 1 through 25.

27. Van Laar and a consulting group were in an economic relationship that probably would have resulted in a future economic benefit to Van Laar. Acosta and Does 1 to 20 knew of this relationship. These defendants intended to disrupt the relationship, and did so by engaging in the defamation as alleged above.

28. As a legal result of defendants' conduct, the relationship was disrupted and plaintiff was harmed, suffering special damages for lost income and benefits, reputation, and good will, as well as general damages for emotional distress.

29. Defendants acted with malice, fraud and oppression, and with conscious disregard for Plaintiff's rights and well-being, as defined by CCP § 3294, entitling Plaintiff to recover punitive damages.

REQUEST FOR RELIEF

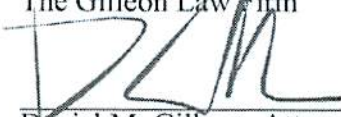
THEREFORE, plaintiff Jennifer Van Laar requests a judgment against defendants Dante Acosta and Does 1 to 20 for:

- a. Past and future economic and non-economic damages;
- b. Punitive damages;
- c. Attorneys' fees and costs;

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- d. Costs of suit; and
- e. Any other proper relief.

Date: October 31, 2016

The Gilleon Law Firm

Daniel M. Gilleon, Attorneys for
Plaintiff Jennifer Van Laar



661-433-2961

MORE

Made it through TSA with
minimal groping - hope you
made it home ok


Text Message 2:44 PM

We're just getting home.
Huge delays in PHX. Made
me want to get in a car and
drive to BUR.

Text Message 2:45 PM

Glad you made it safe.

Text Message 2:46 PM

I enjoyed our chat the other
night. Could have used
more wine though. : 

Text Message 2:47 PM

EXHIBIT 1



661-433-2961

MORE

night. Could have used
more wine though. :~:

Text Message 2:47 PM

Haha...yeah, hopefully we'll
be able to work together on
your future races.

Text Message 2:49 PM

Yes, definitely. But on the
other night, I meant what I
said.

Text Message 2:53 PM

Boarding now. Will be glad
to leave this frozen tundra!

Text Message 2:58 PM

Yes, it was sooooo nice to
be back in sunny CA!

Text Message 3:04 PM

Ugh it's almost 11 pm - I
need to go get my beauty
sleep haha

Text Message 10:45 PM

No, no - I know you hate it
when I say things like this
but I'm gonna say it
anyway

Text Message 10:45 PM

But you don't need your
beauty sleep. You shouldn't
be allowed to get any more
beauty sleep!

Text Message 10:45 PM

You're right, I do hate that -
but seriously need to talk to
you

EXHIBIT 2

SHORT TITLE: Van Laar v. Acosta

CASE NUMBER

PC 057373

**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.

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 HOURS/ DAYS

Item II. Indicate 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 Local Rule 2.3.

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

- | | |
|--|--|
| 1. Class actions must be filed in the Stanley Mosk Courthouse, central district. | 6. Location of property or permanently garaged vehicle. |
| 2. May be filed in central (other county, or no bodily injury/property damage). | 7. Location where petitioner resides. |
| 3. Location where cause of action arose. | 8. Location wherein defendant/respondent functions wholly. |
| 4. Location where bodily injury, death or damage occurred. | 9. Location where one or more of the parties reside. |
| 5. Location where performance required or defendant resides. | 10. Location of Labor Commissioner Office |
| | 11. Mandatory Filing Location (Hub Case) |

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

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

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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	
Non-Personal Injury/Property Damage/ Wrongful Death Tort	Business Tort (07)	<input type="checkbox"/> A6029 Other Commercial/Business Tort (not fraud/breach of contract)	1., 3.	
	Civil Rights (08)	<input type="checkbox"/> A6005 Civil Rights/Discrimination	1., 2., 3.	
	Defamation (13)	<input checked="" 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	2., 3.	
Employment	Wrongful Termination (36)	<input 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.	
Contract	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)	2., 5., 6, 11 2., 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.	
		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.
Real Property	Other Real Property (26)	<input type="checkbox"/> A6018 Mortgage Foreclosure	2., 6.	
		<input type="checkbox"/> A6032 Quiet Title	2., 6.	
		<input type="checkbox"/> A6060 Other Real Property (not eminent domain, landlord/tenant, foreclosure)	2., 6.	
Unlawful Detainer	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- Post-Foreclosure (34)	<input type="checkbox"/> A6020F Unlawful Detainer-Post-Foreclosure	2., 6.	
	Unlawful Detainer-Drugs (38)	<input type="checkbox"/> A6022 Unlawful Detainer-Drugs	2., 6.	

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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., 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	2., 9.
		<input type="checkbox"/> A6180 Abstract of Judgment	2., 8.
		<input type="checkbox"/> A6107 Confession of Judgment (non-domestic relations)	2., 9.
		<input type="checkbox"/> A6140 Administrative Agency Award (not unpaid taxes)	2., 8.
		<input type="checkbox"/> A6114 Petition/Certificate for Entry of Judgment on Unpaid Tax	2., 8.
		<input type="checkbox"/> A6112 Other Enforcement of Judgment Case	2., 8., 9.
Miscellaneous Civil Complaints	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	1., 2., 8.
		<input type="checkbox"/> A6040 Injunctive Relief Only (not domestic/harassment)	2., 8.
		<input type="checkbox"/> A6011 Other Commercial Complaint Case (non-tort/non-complex)	1., 2., 8.
<input type="checkbox"/> A6000 Other Civil Complaint (non-tort/non-complex)		1., 2., 8.	
Miscellaneous Civil Petitions	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	2., 3., 9.
		<input type="checkbox"/> A6123 Workplace Harassment	2., 3., 9.
		<input type="checkbox"/> A6124 Elder/Dependent Adult Abuse Case	2., 3., 9.
		<input type="checkbox"/> A6190 Election Contest	2.
		<input type="checkbox"/> A6110 Petition for Change of Name	2., 7.
		<input type="checkbox"/> A6170 Petition for Relief from Late Claim Law	2., 3., 4., 8.
		<input type="checkbox"/> A6100 Other Civil Petition	2., 9.

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

REASON: Check the appropriate boxes for the numbers shown under Column C for the type of action that you have selected for this case.		ADDRESS: Dante Acosta, 16654 Soledad Canyon Rd., #188 Santa Clarita, CA 91387	
<input type="checkbox"/> 1. <input checked="" type="checkbox"/> 2. <input checked="" type="checkbox"/> 3. <input type="checkbox"/> 4. <input type="checkbox"/> 5. <input type="checkbox"/> 6. <input type="checkbox"/> 7. <input checked="" type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10. <input type="checkbox"/> 11.			
CITY:	STATE:	ZIP CODE:	
Chatsworth	CA	91311	

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 Chatsworth courthouse in the Chatsworth District of the Superior Court of California, County of Los Angeles [Code Civ. Proc., § 392 et seq., and Local Rule 2.3, subd. (a)].

Dated: 10/31/2016
(SIGNATURE OF ATTORNEY/FILING PARTY)

Daniel M. Gilleon

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. 03/15).
5. Payment in full of the filing fee, unless fees have been waived.
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.

thereof. All CRC and LASC Rules will be enforced. So please, READ THE RULES! For your convenience, some of the more significant rules are summarized below.

Service of Complaints and Cross-Complaints (CRC 3.110(b) and (c))

The complaint must be served on all named defendants and proofs of service on those defendants must be filed with the court within 60 days after the filing of the complaint. When the complaint is amended to add a defendant, the added defendant must be served and proof of service must be filed within 30 days after the filing of the amended complaint. A cross-complaint against a party who has appeared in the action must be accompanied by proof of service of the cross-complaint at the time it is filed. If the cross-complaint adds new parties, the cross-complaint must be served on all parties and proofs of service on the new parties must be filed within 30 days of the filing of the cross-complaint.

Requests for Default (CRC 3.110 (g) and (h))

Requests to enter clerk's default relating to a defendant or cross-defendant who has failed to timely respond to a complaint or cross-complaint shall be filed no later than 10 days after the time has run within which said defendant or cross-defendant was to have responded. When a default is entered, the party who requested the entry of default must obtain a default judgment against the defaulting party within 45 days after entry of default, unless the Court has granted an extension of time.

Case Management Conference Statements and Conferences (CRC 3.720 – 3.730)

You are hereby given NOTICE that: No later than 30 calendar days before the date set for the Case Management Conference or review, the parties shall meet and confer, in person or by telephone, to consider each of the issues identified in CRC 3.724 and 3.727. No later than 15 calendar days before the date set for the Case Management Conference or review, each party must file a case management statement using Judicial Council Form CM-110, and serve it on all parties in the case. (CRC 3.725). At the case management conference, counsel and self-represented parties shall appear and be fully prepared to discuss all of the matters set forth in CRC 3.724 and 3.727, and the court may make orders concerning all of the matters set forth in CRC 3.728. At the Case Management Conference, the Court may make pretrial orders including, but not limited to, establishing a discovery schedule, reference to a form of alternate dispute resolution, RECLASSIFYING THE CASE AS A LIMITED JURISDICTION case [*Stern v. Superior Court* (2003) 105 Cal.App. 4th 223], dismissing unserved defendants, setting the case for mandatory settlement conference, final status conference, trial, and other hearings, and to achieve the goals of the Trial Court Delay Reduction Act, Govt. Code section 68600 et seq. Failure to file a CM-110, timely file a CM-110, comprehensively complete the CM-110, appear at the Case Management Conference, or effectively participate in the Case Management Conference, may result in the Court imposing sanctions (including dismissal of the action, striking of an answer, and monetary sanctions) pursuant to CRC 2.30, LASC Chapter 7, Code of Civ. Proc. sections 177.5 and 583.150, and Govt. Code section 68608(b).

OSC re Sanctions: An Order to Show cause hearing will be noticed pursuant to CRC Rule 3.110(f) for the failure to meet the time deadlines for service of the complaint and proof of service thereon. This OSC will be calendared between 70 and 85 days after the filing of the complaint unless there is service of the complaint as to all defendants and proof of service thereon filed in compliance with Rule 3.110. You are given NOTICE that at the hearing on the OSC, the Court will consider whether failure to comply with these rules will result in the issuance of sanctions, including dismissal for failure to prosecute (Code of Civ. Proc. section 583.150, Govt. Code section 68608(b), and CRC Rule 2.30) or, alternatively, why other actions should not be taken. At the hearing on the OSC the Court may (1) impose such sanctions as authorized by law and (2) make further appropriate orders regarding the preparation of the case for trial. Failure to attend the hearing on any such OSC may result in additional sanctions, including dismissal of the case. Responsive papers to such an OSC must be filed at least five calendar days before the hearing. See, CRC Rule 3.110(i).

Addresses for Mailing: