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LOS ANGELES SUPERIOR COURT

MAR 26 2009

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9 aka Boudoir Queen

10
11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
12 **FOR THE COUNTY OF LOS ANGELES**

BC 410898

13 DAWN SIMORANGKIR, aka DAWN
14 YOUNGER-SMITH, aka BOUDOIR QUEEN,
15 an individual,

16 Plaintiff,

17 v.

18 COURTNEY MICHELLE LOVE, an
19 individual; and DOES 1 through 25, inclusive,

20 Defendants.

CASE NO.:

COMPLAINT FOR:

1. Libel;
2. Invasion of Privacy - False Light;
3. Intentional Interference With a Prospective Economic Advantage;
4. Intentional Infliction of Emotional Distress;
5. Breach of Contract; and
6. Breach of Contract

21 Plaintiff Dawn Simorangkir, aka Dawn Younger-Smith, aka Boudoir Queen ("Simorangkir"),
22 an individual, hereby alleges as follows:

23 **INTRODUCTION**

24 1. Simorangki made the grave mistake of doing business with
25 Michelle Love ("Love"). Simorangkir is an up and coming fashion designer, who through
26 work, sweat and tears, has been able to fulfill her dream of owning her own small business.
27 Love approached Simorangkir about having Simorangkir design clothing and apparel for
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CIT/DMSB: REAR...
RECEIPT #...
DATE PAID: 03/26/09 03:47 PM
PAYMENT: USD 50
RECEIVED:
COURT: ...
CLERK: ...
CASE: ...
CHARGE: ...
CASE: ...

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1 Little did Simorangkir know that by entering into Love's line of vision, Simorangkir would become
2 the latest victim of Love's volatile personality, hair trigger temper, and malicious and tortious
3 behavior. Whether caused by a drug induced psychosis, a warped understanding of reality, or the
4 belief that her money and fame allow her to disregard the law, Love has embarked in what is nothing
5 short of an obsessive and delusional crusade to terrorize and destroy Simorangkir, Simorangkir's
6 reputation and her livelihood. Simply put, Love's conduct is an egregious violation of the law. In
7 addition to spreading vile and vicious lies about Simorangkir through marathon rants in multiple
8 public forums, online marketplaces where Simorangkir conducts business, and to Simorangkir's
9 clients and others in the fashion industry, Love has gone as far to threaten Simorangkir's life. Love's
10 approach is not subtle. In particular, Love publicly made the menacing and disturbing statement that
11 Simorangkir will be "hunted til your dead."

12 2. In furtherance of Love's plot to destroy Simorangkir, Love has publicized malicious
13 and false statements that Simorangkir sold drugs, is a drug addict, has a history of dealing cocaine,
14 has a history of assault and burglary, has a record of prostitution, has committed grand theft, that
15 she stole cash and goods from Love, has engaged in felonious behavior, lied, embezzled money,
16 has committed blackmail, was deemed an unfit parent, lost custody of her child, is a racist and
17 homophobe, has outstanding warrants for her arrest, that the Austin police confiscated Love's
18 property from her home, and that she is a danger to society.

19 3. The sheer volume of animosity directed towards Simorangkir coupled with Love's
20 open, cavalier and outspoken motivations, demonstrate that Love is determined to deal out her brand
21 of retribution to Simorangkir, someone who is guilty of nothing more than doing business with Love.
22 By using her fame and influence to reach millions of people, Love has achieved her goal of
23 destroying Simorangkir's small business and causing irreparable damage to Simorangkir's name and
24 reputation. Love's celebrity, however, does not cloak Love with impunity to ruin others for sport.
25 Unfortunately, Love must learn this the hard way. Accordingly, Simorangkir seeks not only
26 compensatory damages, but also punitive damages in order to deter Love from repeating these
27 horrendous acts.

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COMPLAINT

PARTIES

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4. Simorangkir is, and at all times herein mentioned was, an individual residing in Austin, Texas.

5. Simorangkir is informed and believes, and thereon alleges, that Love is, and at all times herein mentioned was, an individual residing in Los Angeles County, California.

6. The true names and capacities, whether individual, corporate, associate or otherwise of the defendants named herein as DOES 1 through 25, inclusive, are unknown to Simorangkir who therefore sues said defendants by such fictitious names. Simorangkir alleges on information and belief that each of the defendants, including those designated as a DOE, are responsible for the events alleged herein and the damages caused thereby as a principal, agent, co-conspirator or aider and abettor. Simorangkir will seek leave of this Court to amend this Complaint to allege the true names and capacities of such defendants when the same have been ascertained.

7. Simorangkir alleges on information and belief that defendants, at all times relative to this action, were the agents, servants, partners, joint venturers and employees of each of the other defendants and, in doing the acts alleged herein, were acting with the knowledge and consent of each of the other defendants in this action.

8. Love and DOES 1 through 25 are hereinafter collectively referred to as "Defendants."

9. This Court is the proper court for trial of this matter because defendant Love resides in Los Angeles County, California, and the acts and occurrences alleged herein occurred in Los Angeles County, California. In particular, Simorangkir is informed and believes, and thereon alleges, that the defamatory statements alleged herein, were made by Defendants, and each of them, in Los Angeles, California and published on Internet websites, accessible and read by people in California and around the world, or re-published to residents of California.

GENERAL ALLEGATIONS

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10. Simorangkir is an up and coming clothing and accessories designer. Since 2002, Simorangkir has marketed and sold her collection under the "Boudoir Queen" trade name primarily over the internet. In particular, Simorangkir utilizes www.etsy.com ("Etsy"), an online marketplace that caters to independent designers.

11. In 2008, Love learned of Simorangkir, and through Etsy, contacted Simorangkir about her Boudoir Queen line. In turn, Love began to purchase Boudoir Queen clothing and apparel.

12. Subsequently, Love became infatuated with Simorangkir. In or around November 2008, Love insisted that Mrs. Younger-Smith and her husband fly to Los Angeles to meet with Love regarding the purchase of several custom pieces.

13. On or around January 28, 2009, Simorangkir returned to Los Angeles for a second meeting. Simorangkir and her husband met Love at the Chateau Marmount. Love ordered her driver and Simorangkir's husband to fill garment bags with various clothing remnants and trims for Simorangkir to use to make custom pieces for Love.

14. On or about February 2, 2009, the day after Simorangkir left Los Angeles, Simorangkir photographed all of the clothing trims that Love had given to Simorangkir for the purpose of creating an inventory. That same day, Simorangkir emailed these photographs to Love's manager, Marie Walsh.

15. After completing the first custom dress for Love in or around February, 2009, Simorangkir sent an invoice to Love for this work. Love became angered that she had to pay for Simorangkir's work. On or about March 10, 2009, Simorangkir invoiced Love for other garments that she had either completed and had yet to complete. Again, Love was angered that she would have to pay Simorangkir.

16. Since Love had not paid Simorangkir for the work completed under these invoices, Simorangkir temporarily suspended work for Love. Again, this angered Love.

17. On numerous occasions, Simorangkir has offered to return Love's clothing trims. Love failed to coherently respond.

1 24. On or about March 17, 2009, Love went on an extensive rant on Twitter whereby
 2 Love made a number of false and defamatory statements about Simorangkir which were published in
 3 writing on the Internet, true and correct copies which are attached hereto as Exhibit "1". Love
 4 claimed that Simorangkir is a felon, stole cash and goods from Love, has a history of dealing
 5 cocaine, lost custody of her children, has a history of assault and burglary, and has a record of
 6 prostitution. Among others, Love posted the following false statements on Twitter about or
 7 concerning Simorangkir (the "Twitter Postings"):

- 8 a. "wwd. someone who will NEVER grace your pages the felonious
 9 Dawn/Boudoir Queen witnessed stealing 2 MASSIVE army bags out of the chat at 4am"
 10 (Published by Love on twitter.com/courtneylover79 on March 17, 2009 at 7:22 PM) (emphasis
 11 added).
- 12 b. "austin police are morethan ecstatic to pick her up she has a history of
 13 dealing cocaine, lost all custody of her child, assualt and burglary" (Published by Love on
 14 twitter.com/courtneylover79 on March 17, 2009 at 7:27 PM) (emphasis added).
- 15 c. "stay away well well away, and etsy cant wait tos e the backof her, so goodbye
 16 asswipe nasty lying hosebag thief, now for pleasant things" (Published by Love on
 17 twitter.com/courtneylover79 on March 17, 2009 at 7:28 PM) (emphasis added).
- 18 d. "gets to haul her 52 year old desperate cokes out ass to jail where they dont
 19 have three bottles of vodka a night, to all shes bullied onetsy" (Published by Love on
 20 twitter.com/courtneylover79 on March 17, 2009 at 7:29 PM) (emphasis added).
- 21 e. "you have my empathy, a perfect community withone extremely rotten apple
 22 trust me to pick it, she owes me over 40k and a million in damages" (Published by Love on
 23 twitter.com/courtneylover79 on March 17, 2009 at 7:30 PM) (emphasis added).
- 24 f. "scorched earth ignore and blacklist, few people ever deserve our toal ignoring
 25 butthis thief and burglar does, austin police loathher!orange" (Published by Love on
 26 twitter.com/courtneylover79 on March 17, 2009 at 7:35 PM) (emphasis added).

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1 g. "is my clothes my WARDROBE! oi vey dont fuck with my wradrobe or
2 you willend up in a circle of corched eaeth hunted til your dead,new job>" (Published by Love
3 on twitter.com/courtneylover79 on March 17, 2009 at 7:38 PM) (emphasis added).

4 h. "as one of her many bullied victims smashes her face soon as shes an assault
5 addict herself (theres apprently prostitution in her record too" (Published by Love on
6 twitter.com/courtneylover79 on March 17, 2009 at 7:39 PM) (emphasis added).

7 i. "iler, I told imogen heap if she dosnt mind being whored out by a felon well
8 thats fine, but my girls in citizens band DO mind, so she best" (Published by Love on
9 twitter.com/courtneylover79 on March 17, 2009 at 7:42 PM) (emphasis added).

10 j. "little bassists. goodbye 'boudoir queen' to be replacedby 100s of great indie
11 designers on etsy that are trained that do know whattheyredo in" (Published by Love on
12 twitter.com/courtneylover79 on March 17, 2009 at 7:43 PM) (emphasis added).

13 25. Apparently, Love was not finished. On or about March 18 and 20, 2009, Love posted
14 more false and defamatory statements about Simorangkir on Simorangkir's Etsy feedback page, true
15 and correct copies of which are attached hereto as Exhibit "2". Again, Love claimed that
16 Simorangkir is a thief, stole cash and goods from Love, and is a drug addict and a drug dealer. More
17 specifically, Love posted the following false statements, among others, on Etsy about or concerning
18 Simorangkir (the "Etsy Postings"):

19 a. "the nastiest lying worst person I have ever known, a thief a liar and needs
20 to be remved from this site immediatly and my lawyers are working on this, today, evil incarnate.
21 vile horrible lying bitch"(Published by Love on www.etsy.com on March 18, 2009) (emphasis
22 added).

23 b. "total scumbag, a lying ripoff who if she isnt taken off of etsy I willmake sure
24 none I knows comesON etsy she took 40,TJOUSAND dollars from me and blogged she gave me
25 "50" dresses out of the 200 I allowed her to use she gave me 6 and stole one back evil . drug
26 addict anddealer. get her OFF cherryforever666" (Published by Love on www.etsy.com on March
27 18, 2009) (emphasis added).

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1 c. "eyond words is how disgusted and furious I am its all on this person wether
2 they will I've up ti thier pbligations or destory thier"career" because right now they have leprosyin
3 the "fashion" industry,. the ONE area one cannotget away with stealing fromnw is in the clothing
4 area, what a cow, when she makes nice and does her JOB and stops trying to use me for an atm I may
5 say "im so sorry I was wrong" all I know now is that etsy is goign to throw her ass to the pavement if
6 she doesnt do what she obligated to do, and whee the FUCK is my hakf a MILLION dollars in
7 textiles? stealingand then what stealing some more? let it go your dead, you need to got o the
8 learning annex and learn how to teach taxes at h and r block., vile and evil crettin" (Published
9 by Love on www.etsy.com on March 20, 2009) (emphasis added).

10 26. As if her vile and defamatory Twitter Postings and Etsy Posting were not enough,
11 Love went on yet another rant on her Myspace blog. On or about March 17, 2009, Love posted more
12 false and defamatory statements about Simorangkir on www.myspace.com/courtneylove, true and
13 correct copies of which are attached hereto as Exhibit "3". Again, Love claimed that Simorangkir is
14 a thief, stole cash and goods from Love, has assaulted people, sold drugs, committed grand theft, has
15 engaged in felonious behavior, lied, embezzled money, has committed blackmail, was deemed an
16 unfit parent, is a racist and homophobe, has outstanding warrants for her arrest, that the Austin police
17 confiscated Love's property from her home, that she was removed from Etsy, that she has
18 manipulated local girls and that she is a danger to society. Among others, Love posted the following
19 false statements on www.myspace.com/courtneylove about Simorangkir (the "MySpace Postings"):

20 a. "imnot going to deal with this issue until after my lawyer and the Austin
21 Police deal with it, but my etsy adventures are about to end period, if it turns out as i suspect i have
22 been stolen from on a level(finacially yes but noone callingthemselves a "designer" has ever
23 (emphasis added). like this" (Published by Love on www.myspace.com/courtneylove on March 17,
24 2009 at 12:55 AM) (emphasis added).

25 b. "she has received a VAST amount of money from me over 40,000 dollars
26 and i do not make people famous and get raped TOO! besides Etsy is great but they need to get
27 thier admin together,i hve been asured they will they will remove her store completely so she cant
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1 icitmise anyone else" (Published by Love on www.myspace.com/courtneylove on March 17, 2009 at
2 12:55 AM) (emphasis added).

3 c. "shes a geniunly nasty person so i dont kow what makinh her "fakous "
4 willactually DO FOR HER AT SOME POINT SHELL HAVE TO SHOW SHER FACT AND
5 THAT BLACK CLPUD OF VAMPITIC ENERGY THAT IS AROUND PEOPLE WHO SOLD
6 DRUGS OR WERE MOLESTED OR its that grey and biyts of black in the aura" (Published by
7 Love on www.myspace.com/courtneylove on March 17, 2009 at 12:55 AM) (emphasis added).

8 d. "ive been assured from etsy she'll be removed and banished but its not
9 enough , we had a dal i gave her a VAST amount of money clothes id been collecting for 8 years
10 and 40,000\$, is that not a vast amont of momey? the clothes are insured for 340,00 but are mo
11 wortgh 500,000 some were as i said a formr ziegfeld girls and some were a silent film stars"
12 (Published by Love on www.myspace.com/courtneylove on March 17, 2009 at 12:55 AM) (emphasis
13 added).

14 e. "this insancely nasty Etsy person has committed a straight up felony, Grand
15 Theft, not to mention Blackmail, i dont live in Austin but the Police there, my lawyer said were
16 more than happy to confiscate everything there and take her in for Grand Theft, hopefully tho
17 this is a big misunderstanding and she stops after recieving the cash and the notions" (Published by
18 Love on www.myspace.com/courtneylove on March 17, 2009 at 12:55 AM) (emphasis added).

19 f. My lawyer is dealing withthis is 20 minutes and id rather spend his hourly all
20 day long because perhaps her blackmail demands" (Published by Love on
21 www.myspace.com/courtneylove on March 17, 2009 at 12:55 AM) (emphasis added).

22 g. "and oh convicted for Grand Theft too" (Published by Love on
23 www.myspace.com/courtneylove on March 17, 2009 12:55 AM).

24 h. "i think shes a dime a dozen at the same time i flew her up the first time she
25 came to la , and it was alot of havoc that day but i did giveher over 300,000 of my insured and
26 photographed pieces we sogned a cotract istingthe pieces and the date they were to be upcycled and
27 returned to me for a certain sum, and then she wanted 5000 more so i gave it to her like an idiot

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1 and another 5000 and now shes holding my shit hostage and im not even including the overpaying
2 netsy" (Published by Love on www.myspace.com/courtneylove on March 17, 2009 at 12:55 AM).
3 (emphasis added).

4 i. "also the fashion industry doesnt tolerate blackmailers and bullies"
5 (Published by Love on www.myspace.com/courtneylove on March 17, 2009 12:55 AM) (emphasis
6 added).

7 j. "she must not be original to be bullying .screaming thre tending shes goignto
8 sue, thats insane cming from someone with three warrants for her arrest" (Published by Love on
9 www.myspace.com/courtneylove on March 17, 2009 at 12:55 AM) (emphasis added).

10 k. she remains a nasty piece of work until she stops this madness and realises
11 that being in possession of half a MILLION dollars worth of investments that took 7/8 years to
12 collect is precious and to have a major magazine doing a piece on nothing but her stuff, and 40
13 fucking GRAND is far too much, she should be on her knees praying to hat ver god she has(shes a
14 nihilistic black clud of negativty whoever her higher power is i dont want it!)" (Published by Love on
15 www.myspace.com/courtneylove on March 17, 2009 at 12:55 AM) (emphasis added).

16 l. "I CANT afford this shit 2 LIFES TOO SHORT FOR MEAN
17 GIRLS/HOMOPHOBES/RACISTS/UNTRAINED WOMEN WHO ATTACH A PIECE OF
18 CHEFFON TO AN D DRESS AND CALL IT WORTH thousand of dollars! (Published by Love on
19 www.myspace.com/courtneylove on March 17, 2009 at 12:55 AM).

20 m. "i promis eyou, within a few weeks, Madeoff will secem warm and
21 FUZZY"(Published by Love on www.myspace.com/courtneylove on March 17, 2009 12:55 AM).

22 n. "i can really help her and shes promised to stop bullying other people, and has
23 addresses her warrants and her 16 year odl son who she was deemed toally unfit and my
24 nderstanding is shes spoken to him three times in his life" (Published by Love on
25 www.myspace.com/courtneylove on March 17, 2009 at 12:55 AM) (emphasis added).

26 o. "This is pretty dramatic as the self destruction with this girl its like she is so
27 scared of success that she has to blow it with me with all my friends and with etsy all in one fell
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1 swoop so lets all hope she wakes the fuck up NOW cos theres about 5 hours left for her to do so,
2 or she will be sleeping in a jail cell tonight" (Published by Love on
3 www.myspace.com/courtneylove on March 17, 2009 at 12:55 AM) (emphasis added).

4 p. "thetrick is just do the right thing always your repitaion is the coin of the
5 realm for a vendor a seller of goods, and bullying, lyong, embzzlement and theft are not things we
6 associate with a "designer" so she needs to jst suck it up and realise i do know what is best for her
7 and allow me to help her help herself, i venever called a designer thats failed, so girl get your shit
8 together" (Published by Love on www.myspace.com/courtneylove on March 17, 2009 at 12:55 AM)
9 (emphasis added).

10 q. "so i certainly hope the logical only chpice to make gets made, in fact im sure
11 she is perhaps self preserving enough that she wont destroy it all by greed. blackmail . embezzlemnt
12 and the rest, that leaves her to get up off her ass and start making the "FIFTY DRESSES" starting
13 NOW 2.5 dresses a DAY. go girl go! and ell ook at this as a little glitch, to choose the fight youll lose
14 beyond fast, just make the decision to do the right thing and do it. i say this from experiance with
15 beong self destructive and stubborn myself, but no you dont get as i stared all that cash and all those
16 clothes and then changethe rules of pur deal, its not done, **NOONE WILL EVER TOUCH YOUR**
17 **ITEMS FOR THE REST PF YOUR CAREER** i do mean even Imogen and Patti. **NOONE**
18 (Published by Love on www.myspace.com/courtneylove on March 17, 2009 at 12:55 AM) (emphasis
19 added).

20 r. "im boycotting etsy altogether, due to this vendor there but apparently they
21 will remove her store as im her first BIG victim but shes been ripping people off for a long
22 time" (Published by Love on www.myspace.com/courtneylove on March 17, 2009 at 11:01 AM)
23 (emphasis added).

24 s. "if you got any of that last post a "designer" on etsy whose been paid a
25 massive amount of money and is in ossesion of preless noyions dresses and fabrics changed the
26 "rules" she now wants 1750 per item! she bogged she made me fifty dresses, uh they must be
27 INVISIBLE dresses but if the "fifty dresses" she has enought o make about 100 and every scrap of
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1 mine isnt sent to me within 9 days or she can express her thoughts to my lawye today, the Police will
2 **confiscate everything in that studio and i will sortthru and get out what is mine (almost all of**
3 **it) return the trest to her while she serves her year plus for Grand Theft, as she was filmed**
4 **stealing things from my room on top if everything else (god loves a girl who puts cameras up !)”**
5 **(Published by Love on www.myspace.com/courtneylove on March 17, 2009 at 11:01 AM) (emphasis**
6 **added).**

7 t. “i hope she makes the right decision, really its an asspain jail and stuff, sheed
8 be a leper and noone will touch her or her **“designs:”** eventhese pretty austin local girls she
9 **maniupulates to “model” for her, implying she dresses cerain “celebrities” who havent even heard of**
10 **her,. etc etc” (Published by Love on www.myspace.com/courtneylove on March 17, 2009 at 11:01**
11 **AM) (emphasis added).**

12 u. “idont wnatt o scorch the earth just gently and firmly let her know the
13 **consequences of her actions and that greed is not good, greed in this case is illegal and all**
14 **transactions have ebenn witnessed, by credible peope with impeccable reputations, who were**
15 **underwhelmed byher to sya the least and warned me she woudl pulthis, i kep tthe faith that her**
16 **clothes modelled by alot of london it girls me and some ny it girls in a mega mag would saveher**
17 **from her negativity, but she apparently allowed her greed to get the best of her” (Published by Love**
18 **on www.myspace.com/courtneylove on March 17, 2009 at 11:01 AM) (emphasis added).**

19 v. however she has a few hours to get back on track and to get her ass to work on
20 my **“fifty dresses”** otherwie my advise re etsy is to be very very careful, in fact forget about etsy for a
21 **but here, 99% of thier vendors are great and sincere butt hsi one bad apple if she sticks with this**
22 **felonious behaviour needs to be jailed and removed off etsy as she represented that she**
23 **represented etsy (Published by Love on www.myspace.com/courtneylove on March 17, 2009 at**
24 **11:01 AM) (emphasis added).**

25 w. “she needs to learn not to steal, not to be greedy and not to bully”
26 **(Published by Love on www.myspace.com/courtneylove on March 17, 2009 at 11:01 AM) (emphasis**
27 **added).**

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1 x. "my lawyer i s speakingd irectly with the owners and thier lawyer,and the
 2 **Austin police, hehas been speaking to them theyrve caled him several times, but im hoping**
 3 **despite all of this there will be a happy ending i thought she was my friend and friends do not fuck**
 4 **over friends,"** (Published by Love on www.myspace.com/courtneylove on March 17, 2009 11:01
 5 AM) (emphasis added).

6 y. "so shellrethink this absurd insane greedy illegal 'concept: and throw it
 7 out, im sure of it, and well have a lovely making up and shell be able to be ready for some success
 8 and not this desperate fringe dwelling liar, **she can be tellingthetruth for once** (Published by Love
 9 on www.myspace.com/courtneylove on March 17, 2009 11:01 AM) (emphasis added).

10 z. "i refer Geminola who is more skilled than he **austin seller** who i have yet to
 11 NAME because in naming her the police will then have been called , she can choose to complete her
 12 professional obligations to me or **she can choose to be charged with Grand Theft,** wichis what
 13 happens whenyou sneak out of the chateau in full view of my mackup artist with two massive army
 14 bags full of things that do not belong to you and take them to another state and present them to
 15 someone "hotter" for your "career plans" (Published by Love on www.myspace.com/courtneylove on
 16 March 17, 2009 at 4:32 PM) (emphasis added).

17 aa. "than me so you can pass off my clithes as yours, **its called GRAND THEFT**
 18 **and worse,** and i will spend more money onb my lawyers thna i ever spent on any clpthes just
 19 getting this danger to society in jail, where she needs to be, unless she completes her contracted
 20 /witnessd obligations, you dont charge someone 40,000\$ and then give hem a deadline DEc 10th and
 21 here we are in march and deliver them a few items, and shopw the rest as though they didnt belong to
 22 you made of your textiles, i knew she was a hustler, but a fe;on? yeah that kind of energy knows
 23 no boundaries, well its called A BLACKLISTING. and given the proof of what shes done i sincerely
 24 dont think a few shitty frocks are going to bust apart years and years of positive and honest people
 25 andvendors and designers to come, or karmic and friendship and professipnal conncections, so its
 26 inmy lawyers hands and the Austin laywers and police s hands and oh my god! the calls and emails
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1 ive had " (Published by Love on www.myspace.com/courtneylove on March 17, 2009 at 4:32 PM)
2 (emphasis added).

3 bb. Thank God that crazy bitch did this**assault, stole, sold drugs, beat up,**
4 **ripped off, underpaid, drank three bottles of vodka (hey i saw that too!)** bullied....me thank you
5 so much, **she is seriously a danger to society and orange will look good on her"** (Published by
6 Love on www.myspace.com/courtneylove on March 17, 2009 at 4:32 PM) (emphasis added).

7 27. Simorangkir is informed and believes, and thereon alleges, that Love, and/or Love's
8 agents have contacted Etsy in writing and requested that Etsy remove Simorangkir's online store
9 from that website. In doing so, Simorangkir is informed and believes, and thereon alleges, that Love
10 and or/Love's agents made similar false and defamatory written statements about Simorangkir.

11 28. Simorangkir is informed and believes, and thereon alleges, that Love, and/or Love's
12 agents have contacted Simorangkir's clients, various stylists, competitors, distributors, fashion
13 publications and websites, and/or other influential people in the fashion industry. In doing so,
14 Simorangkir is informed and believes, and thereon alleges, that Love and or/Love's agents made
15 similar false and defamatory written statements about Simorangkir.

16 29. All of the statements alleged in paragraphs 24 through 28 above are false, in their
17 entirety, as they pertain to Simorangkir.

18 30. All of the false statements alleged in paragraphs 24 through 28 are defamatory and
19 libelous on their face as they adversely affect Simorangkir's reputation, expose Simorangkir to
20 hatred, contempt, ridicule, and obloquy, and have a tendency to injure her in her occupation.

21 31. The above-alleged statements were seen and read by potentially millions of people
22 who reside in California, and elsewhere, by logging on to the various websites listed above.

23 32. Defendants, and each of them, published the statements either with knowledge that
24 they were false or with reckless disregard as to their truth and falsity.

25 33. As a proximate result of the above-described publication, Simorangkir has suffered
26 loss of her reputation, shame and mortification, all to her general damage in an amount to be
27 determined at the time of trial, but well in excess of this Court's general jurisdiction.

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THIRD CAUSE OF ACTION

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2 **(For Intentional Interference With A Prospective Economic Advantage, against all defendants)**

3 42. Simorangkir re-alleges herein by this reference each and every allegation contained in
4 paragraphs 1 through 41, inclusive, of this Complaint as if set forth fully herein.

5 43. Simorangkir had economic relationships with various clients. Simorangkir's clients
6 had previously purchased goods and services from Simorangkir, in particular Boudoir Queen
7 clothing and apparel.

8 44. There was a strong probability that Simorangkir's clients would continue to purchase
9 Boudoir Queen clothing and apparel from Simorangkir.

10 45. Love was aware of some of Simorangkir's clients, as well as their relationship with
11 Simorangkir.

12 46. Love's above-referenced intentional acts, in particular Love's defamatory conduct,
13 were designed to disrupt Simorangkir's relationship with her clients. Love intended to intimidate
14 Simorangkir's clients and discourage them from doing business with Simorangkir.

15 47. Love's intentional acts have caused actual disruption of the relationship between
16 Simorangkir and her clients. Love has intimidated Simorangkir's clients and discouraged them from
17 doing business with Simorangkir.

18 48. As a proximate result of the above-described intentional acts, Simorangkir has
19 suffered economic harm and damages in an amount to be determined at the time of trial, but well in
20 excess of this Court's general jurisdiction.

21 49. In addition, Love's conduct was intentional and done for the purpose of causing
22 injury, and was despicable conduct that subjected Simorangkir to a cruel and unjust hardship in
23 conscious disregard of her rights, so as to justify an award of exemplary and punitive damages.

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FOURTH CAUSE OF ACTION

(For Intentional Infliction of Emotional Distress, against all defendants)

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50. Simorangkir re-alleges herein by this reference each and every allegation contained in paragraphs 1 through 49, inclusive, of this Complaint as if set forth fully herein.

51. Love has engaged in a pattern of extreme and outrageous conduct that is intolerable in a civilized society, including but not limited to, the following:

- a. Love's continued attempts to contact Simorangkir with multiple menacing emails and voicemails containing not only delusional accusations and lies, but threats of harm.
- b. Threats insinuating that Simorangkir would be killed.
- c. Threats that Love would have Simorangkir arrested and incarcerated.
- d. Threats that Love would ruin Simorangkir's business.
- e. A continuous barrage of malicious, false, and defamatory statements in various public forums and directly to Etsy, Simorangkir's clients, and others in the fashion industry, including but not limited to, statements that Simorangkir is a thief, stole cash and goods from Love, has assaulted people, sold drugs, is a drug addict, has a history of dealing cocaine, has a history of assault and burglary, has a record of prostitution, committed grand theft, has engaged in felonious behavior, lied, embezzled money, has committed blackmail, was deemed an unfit parent, lost custody of her children, is a racist and homophobe, has outstanding warrants for her arrest, that the Austin police confiscated Love's property from her home, that she was removed from Etsy, that she has manipulated local girls and that she is a danger to society.

52. Love's conduct was intentional and malicious and done for the purpose of causing Simorangkir to suffer severe emotional distress, humiliation, mental anguish, and emotional and physical distress.

53. Love's conduct was also done with knowledge that Simorangkir's emotional and physical distress would increase over time as the conduct continued and intensified.

SIXTH CAUSE OF ACTION

(For Breach of Contract, against all defendants)

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62. Simorangkir re-alleges herein by this reference each and every allegation contained in paragraphs 1 through 61, inclusive, of this Complaint as if set forth fully herein.

63. Simorangkir and Love entered into an enforceable contract for goods and services whereby Simorangkir agreed to make various custom garments and apparel for Love out of vintage textiles, and in turn, Love agreed to pay Simorangkir for doing so.

64. Simorangkir has duly performed all of the conditions, promises and covenants which Simorangkir was required to perform, except those obligations Simorangkir was prevented or excused from performing. More specifically, Simorangkir has made and delivered to Love, and Love has accepted, garments and accessories valued at over \$4,000. Additionally, Simorangkir has incurred significant expenses delivering these custom garments as well as unused vintage textiles.

65. Love has breached this contract by failing and refusing to pay the amount due owing under same.

66. As a proximate result of Love's breach of this contract, Simorangkir has been damaged in the amount presently unknown but will be proven at trial.

WHEREFORE, Simorangkir prays for judgment in her favor against Defendants, and each of them, as follows:

ON THE FIRST CAUSE OF ACTION

- 1. For general damages according to proof at the time of trial, but in an amount in excess of the jurisdictional limits of this Court;
- 2. For special damages according to proof at the time of trial, but in an amount in excess of the jurisdictional limits of this Court;
- 3. For interest on any monetary award to Simorangkir at the legal rate;
- 4. For punitive damages;

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- 5. For costs of suit incurred herein;
- 6. For attorneys' fees to the extent permitted by contract or statute; and
- 7. For such other and further relief as the Court may deem just and proper.

ON THE SECOND CAUSE OF ACTION

- 1. For general damages according to proof at the time of trial, but in an amount in excess of the jurisdictional limits of this Court;
- 2. For special damages according to proof at the time of trial, but in an amount in excess of the jurisdictional limits of this Court;
- 3. For interest on any monetary award to Simorangkir at the legal rate;
- 4. For punitive damages;
- 5. For costs of suit incurred herein;
- 6. For attorneys' fees to the extent permitted by contract or statute; and
- 7. For such other and further relief as the Court may deem just and proper.

ON THE THIRD CAUSE OF ACTION

- 1. For general damages according to proof at the time of trial, but in an amount in excess of the jurisdictional limits of this Court;
- 2. For special damages according to proof at the time of trial, but in an amount in excess of the jurisdictional limits of this Court;
- 3. For interest on any monetary award to Simorangkir at the legal rate;
- 4. For punitive damages;
- 5. For costs of suit incurred herein;
- 6. For attorneys' fees to the extent permitted by contract or statute; and
- 7. For such other and further relief as the Court may deem just and proper.

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ON THE FOURTH CAUSE OF ACTION

1. For general damages according to proof at the time of trial, but in an amount in excess of the jurisdictional limits of this Court;
2. For special damages according to proof at the time of trial, but in an amount in excess of the jurisdictional limits of this Court;
3. For interest on any monetary award to Simorangkir at the legal rate;
4. For punitive damages;
5. For costs of suit incurred herein;
6. For attorneys' fees to the extent permitted by contract or statute; and
7. For such other and further relief as the Court may deem just and proper.

ON THE FIFTH CAUSE OF ACTION

1. For general damages according to proof at the time of trial, but in an amount in excess of the jurisdictional limits of this Court;
2. For interest on any monetary award to Simorangkir at the legal rate;
3. For costs of suit incurred herein;
4. For attorneys' fees to the extent permitted by contract or statute; and
5. For such other and further relief as the Court may deem just and proper.

ON THE SIXTH CAUSE OF ACTION

1. For general damages according to proof at the time of trial, but in an amount in excess of the jurisdictional limits of this Court;
2. For interest on any monetary award to Simorangkir at the legal rate;
3. For costs of suit incurred herein;
4. For attorneys' fees to the extent permitted by contract or statute; and
5. For such other and further relief as the Court may deem just and proper.

///

1 Dated: March 26, 2009

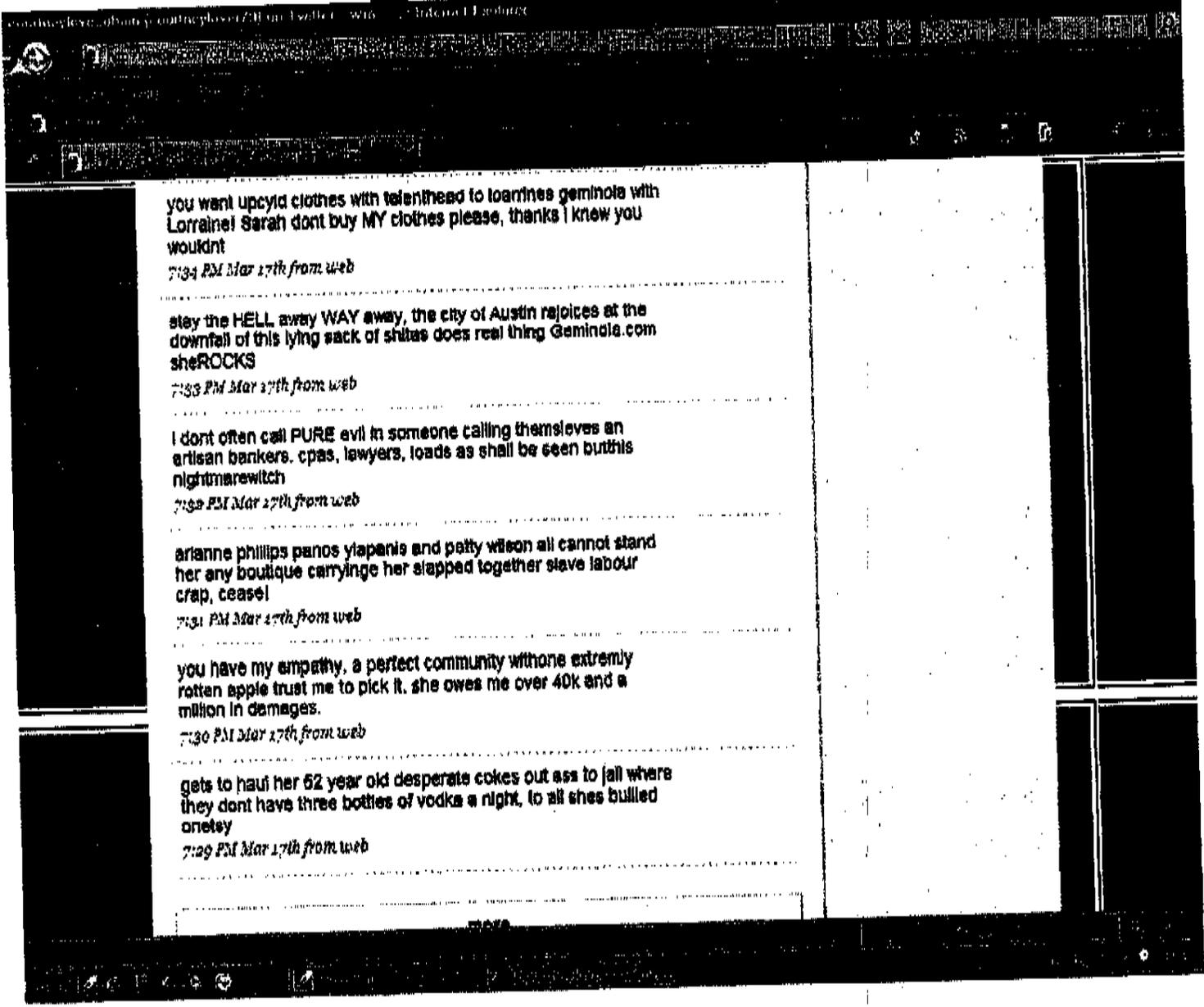
FREEDMAN & TAITELMAN, LLP

2
3 By:



Bryan Freedman, Esq.
Attorneys for Plaintiff Mario Simorangkir, aka
Dawn Younger-Smith aka Boudoir Queen

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you want upcyid clothes with talenthead to loanines geminola with Lorraine! Sarah dont buy MY clothes please, thanks I knew you wouldnt
7:34 PM Mar 17th from web

stay the HELL away WAY away, the city of Austin rejoices at the downfall of this lying sack of shitas does real thing Gemindia.com sheROCKS
7:33 PM Mar 17th from web

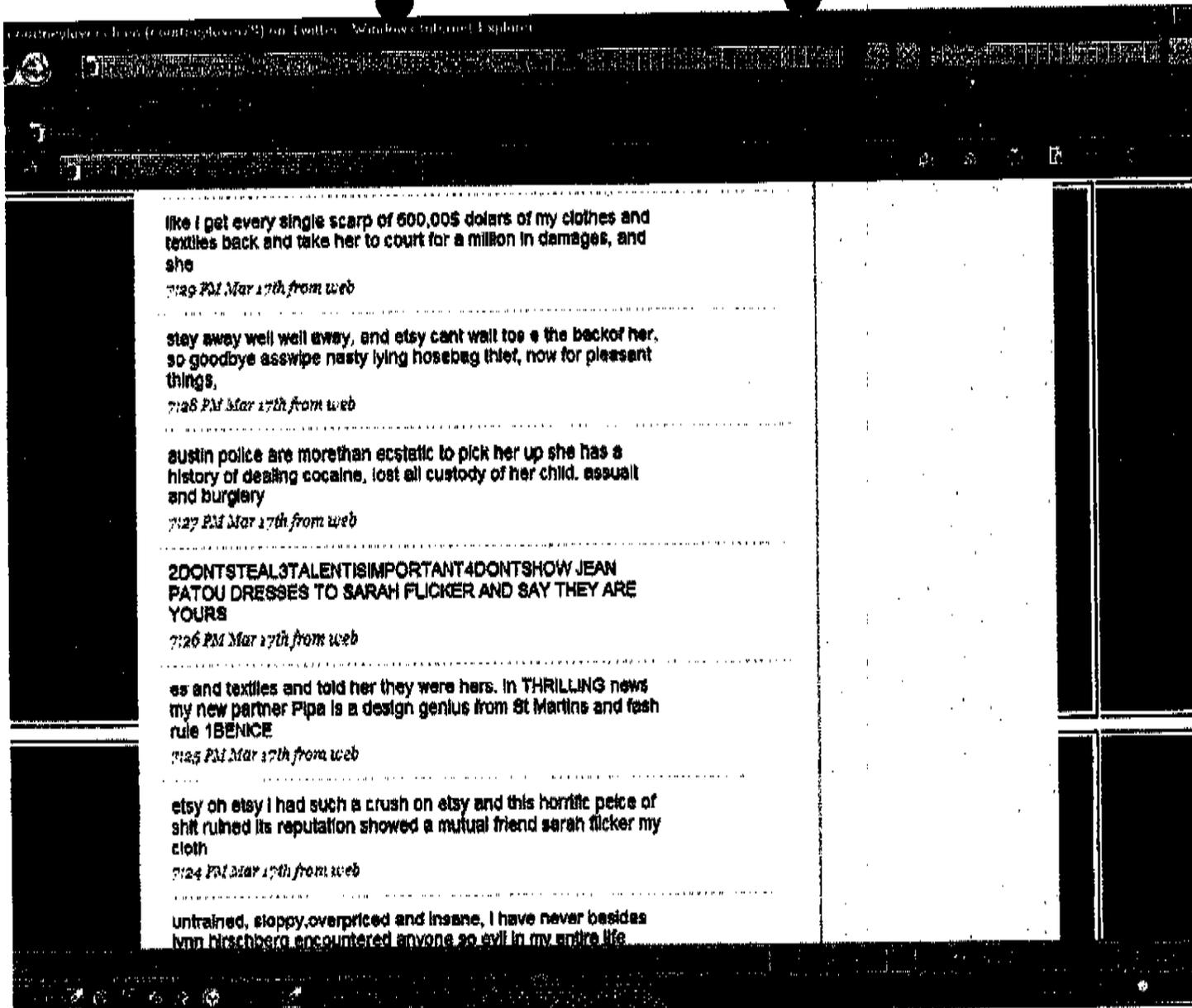
I dont often call PURE evil in someone calling themselves an artisan bankers. cpas, lawyers, loads as shall be seen butthis nightmarewitch
7:32 PM Mar 17th from web

arianne phillips panos yiapanis and patty wilson all cannot stand her any boutique carryinge her slapped together slave labour crap, cease!
7:31 PM Mar 17th from web

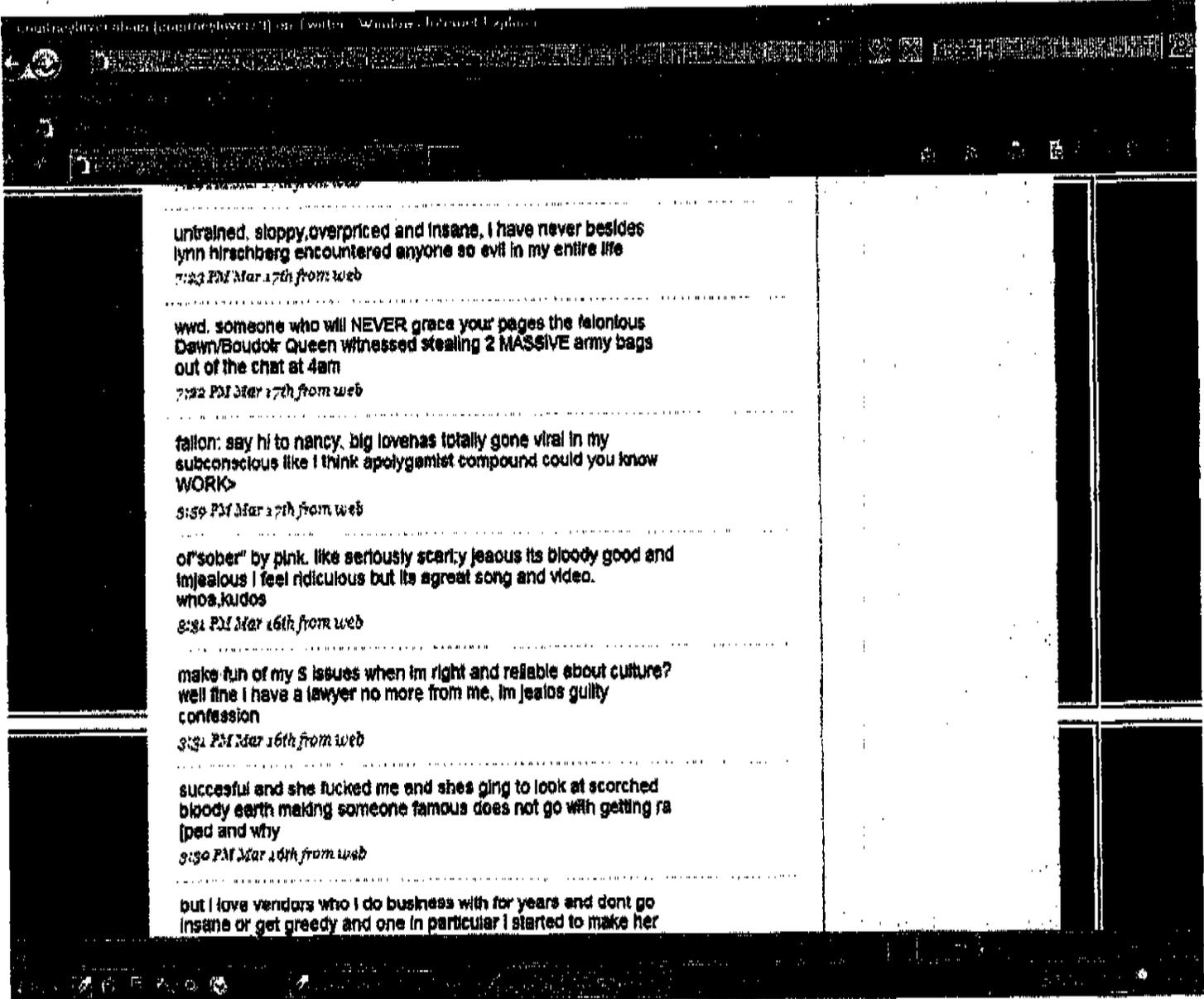
you have my empathy. a perfect community withone extremly rotten apple trust me to pick it. she owes me over 40k and a million in damages.
7:30 PM Mar 17th from web

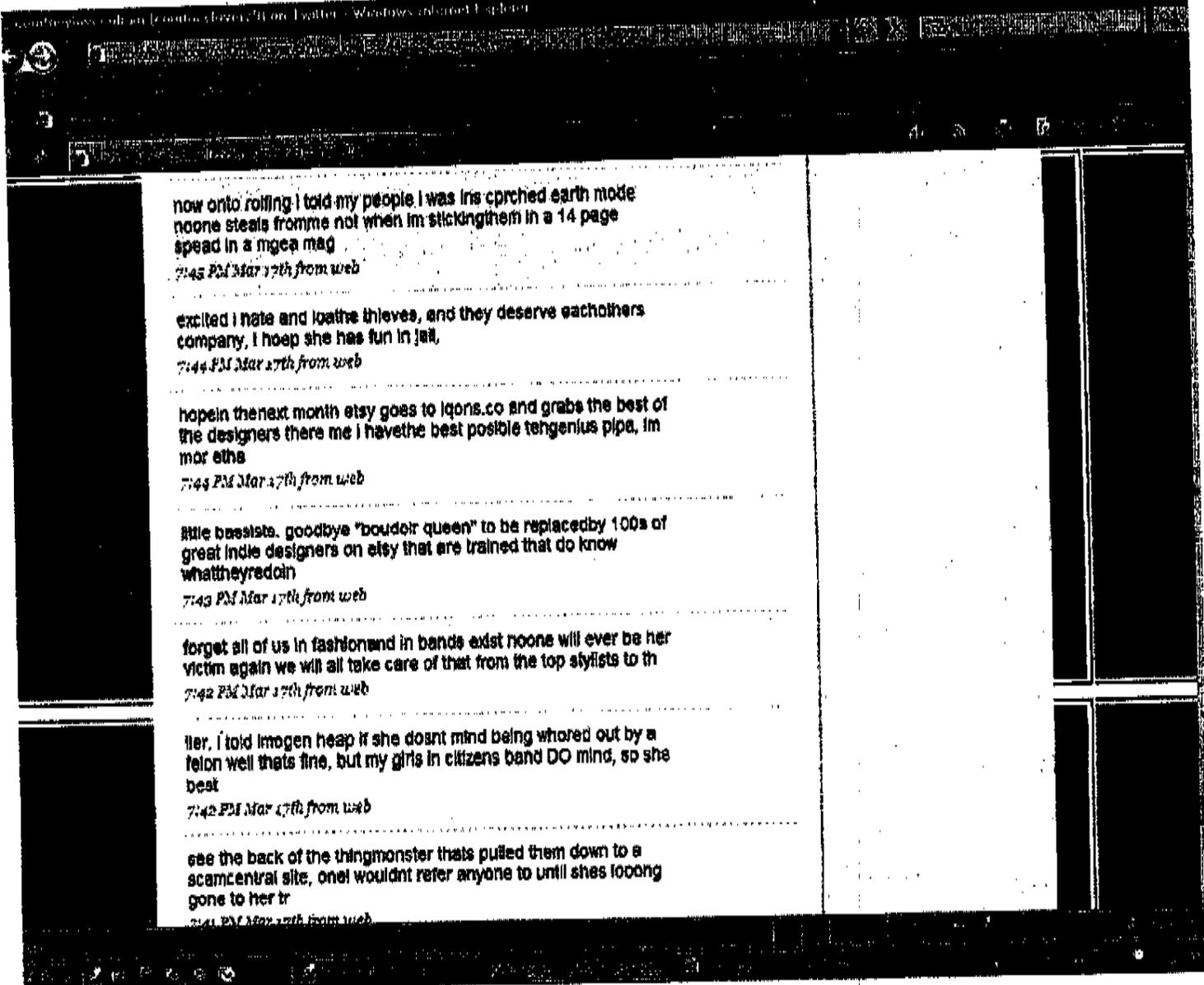
gets to haui her 52 year old desperate cokes out ass to jail where they dont have three bottles of vodka a night, to all shes bullied onetsy
7:29 PM Mar 17th from web

EXH 1



Vertical text on the left side of the page, possibly a page number or reference code.





03/26/09 7:26 PM

as one of her many bullied victims smashes her face soon as
shes an assault addict herself (theres apprently prostitution in
her record too

7:39 PM Mar 17th from web

well after rehab maybe she can work cleaningbats out of
underneath that bridge in boston and what an ugly mug tookok im
done slls well as lon

7:38 PM Mar 17th from web

is my clothes my WARDROBE! oi vey dont fuck with my wradrobe
or you will end up in a circle of corched earth hunted til your
dead.new job

7:36 PM Mar 17th from web

lus ooooh I cannot recall beingthis actually angry for YEARS ryan
yeah that shit pisses me off but i have a criminal litigator for that
this

7:37 PM Mar 17th from web

jump suite a sexy look, citizensband.net, topsyturvydesigns.com
and links paris apartment.com and look up ziegfeld on etsy for
Johnstons gen

7:36 PM Mar 17th from web

scorched earth ignore and blacklist, few people ever deserve our
total ignoring butthis thief and burglar does. austin police loathher!
orange

7:35 PM Mar 17th from web

you want upcyld clothes with talenthead to loarrines geminola with
Lorraine! Sarah dont buy MY clothes please. thanks i knew you
wouldnt

Etsy :: BoudoirQueen's Feedback

<http://www.jdsupra.com/post/documentViewer.aspx?fid=6a8ea6f3-d01b-4829-8618-094994a3451d>

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Handmade items: tags, titles

[Home](#) > [BoudoirQueen.etsy.com](#) > [Feedback](#)

BoudoirQueen's Feedback

Positive: 292 Neutral: 1 Negative: 2

View: [From everyone](#) / [From buyers](#) / [From sellers](#) / [Left for others](#)

Comment	From	Date	Image	Item
beyond words is how disgusted and furious I am its all on this person wether they will live up ti thier pblications or destory thier "career" because right now they have leprosy in the "fashion" industry.. the ONE area one cannot get away with stealing frommw is in the clothing area, what a oow, when she makee nice and does her JOB and stops trying to use me for an atm I may say "im so sorry i was wrong " all I know now is that etsy is goign to throw her asa to the pavement if she doesnt do what she obligated to do, and whee teh FUCK is my hakf a MILLION dollars in textiles? etealingend then what stealing some more? let it go your dead, you need to got o the learning annex and learn how to teach taxes at h and r block., vile and evil cretin.	cherryforever666	3/20/2009		ERTE-ESQUE HALF DOLL NECKLACE OLD STOCK CHANEL CRYSTAL CHAIN
perfect buyer. thank you! xoxoxo	BabooohkaBoutique	3/18/2009		BABOOSHKA Faux Leather Textured Harem Jodphur Leggings Black XS S M L
total scumbag, a lying ripoff who if she isnt taken off of etsy i	cherryforever666	3/18/2009		SILVER HAREM TURBAN BY BOUDOIR QUEEN

[Shop home \(all items\)](#)



BoudoirQueen

[Profile](#)

[Shop Policies](#)

[Favorites](#)

[Feedback](#) 294, 99% pos.

[Request Custom Item](#)

user info

rating: 294, 99% pos.

joined: Jul 20, 2007

location: Los Angeles-Austin

contact [BoudoirQueen](#)

EXH 2

Etsy :: BoudoirQueen's Feedback

will make sure none I know comes ON etsy she took 40, THOUSAND dollars from me and blogged she gave me "50" dresses out of the 200 I allowed her to use she gave me 6 and stole one back evil , drug addict and dealer. get her OFF

<p>the nastiest lying worst person I have ever known, a thief a liar and needs to be removed from this site immediately and my lawyers are working on this, today, evil incarnate, vile horrible lying bitch</p>	<p>cherryforever888</p>	<p>3/18/2009</p>	<p>BOUDOIR FLOWER CAPE</p>
<p>another beauty!</p>	<p>vmaxanne</p>	<p>3/02/2009</p>	<p>ON HOLD ANKLE CUFF CAKES THE ORIGINALS BY BQ</p>
<p>Dawn's clothing are as lovely as she is :)</p>	<p>vmaxanne</p>	<p>3/02/2009</p>	<p>ELEGANTLY WASTED Victorian CORSET TOP WITH ZIPPER</p>
<p>GREAT SELLER <345!! Makes beautiful, quality items! Extremely easy to work with! Very empathetic and feeling towards customers! I can't WAIT to buy from you again, my friend A..vii</p>	<p>brownlec019</p>	<p>2/25/2009</p>	<p>Silent Lovers Silhouette Compact HOYDENS CRYSTAL COMPACT NECKLACE</p>
<p>neati</p>	<p>curvygreeneysa</p>	<p>2/14/2009</p>	<p>THE ROYAL BAD GIRL CHANDELIER and Rhinestone Butterfly NECKLACE BY BOUDOIR QUEEN</p>
<p>Excellent as always! The headband didn't work out for me, but Dawn exchanged very quickly and pleasantly. I loooooove the capel My beautiful fringy outfit is to die for!</p>	<p>carnivore</p>	<p>2/13/2009</p>	<p>DRESDEN Silver Frosted Lace Head Ache Band A Decadent Head Adornment By Boudoir Queen</p>
<p>OOOOHHhh! Stunning. This is beautiful. So glad I bought it. :)</p>	<p>vmaxanne</p>	<p>2/06/2009</p>	<p>MOULIN ROUGE QUEEN FLORA AND FEATHER EXTRAVAGANZA BY BOUDOIR QUEEN</p>
<p>I haven't tried this on yet...but it's absolutely gorgeous! You've</p>	<p>vmaxanne</p>	<p>2/06/2009</p>	<p>LITTING LOLITA LUXURY WEAR DRESS BY</p>

Etsy :: BoudoirQueen's Feedback

<http://www.jdsupra.com/post/documentViewer.aspx?fid=6a8ea6f3-d01b-4829-8618-094994a3451d>

been so busy lately. I miss you :)

BOUDOIR QUEEN
 CROWN
 COLLECTION

+ Delicate, delicate, this lynxmouth 2/08/2009
 spider-web of woven beads. It'll look just right with a sweetheart collar. I do believe. Merci beaucoup, beauty Dawn for more beauty. I'll have another order in a few days, I'm sure!

 Hold for Jewel ROCK AND ROYALTY BLACK HEART JET STEAMPUNK NECKLACE

+ As scrumptious as a lynxmouth 2/05/2009
 little cupcake, and twice as pretty.

 RESERVE for Jewel HIGH SOCIETY CUFF FLAPPER ARM-BAND NEW AT BOUDOIR QUEEN

+ All of your pieces feel lynxmouth 2/08/2009
 so ancient and yet modern. This one did not disappoint.

 RESERVE FOR JEWEL BLACK FROUF a decadent lace Cuff a re-list of old styles by Boudoir Queen

+ Deliciously perfect. I lynxmouth 2/05/2009
 just watched Gia with Angelina Jolie, and this cuff reminds me of the too-brief Studio 54 scenes. The blue buttons are like ice afire.

 RESERVE FOR JEWEL TINA CHOW STUDIO 54 CUFF BOUDOIR QUEEN COLLECTION

+ In a word: splendidlygurty 2/05/2009
 FABULOUS! Stupendous, as always! Love this shop!

 Startet Adore Jet Head Band By Boudoir Queen

+ Love this cloche splendidlygurty 2/05/2009
 oodles! Yay! BoudoirQueen totally kicks fashionable tushie!

 Toile De Juey English Country Spring Cloche Hat BY BOUDOIR QUEEN

+ the most beautiful moonprincess38 2/04/2009
 skirt ever!!! Thanks!

 Most Disheveled BQ Libertine in Disaray Skirt

+ STUNNING Spielberg1 2/02/2009

 reserved for Spielberg1 DRESDEN Silver Frosted Lace Head Ache Band A Decadent Head Adornment By Boudoir Queen

+ I love it!!! The blue vmaxanne 2/01/2009
 velvet is gorgeous...and the zipper makes it so easy to wear. I miss you...hope you're having fun in L.A. and not working too hard. Take lots of photos :)

 CRUSHED IN VELVET CROWN COLLECTION DRESS BY BOUDOIR QUEEN

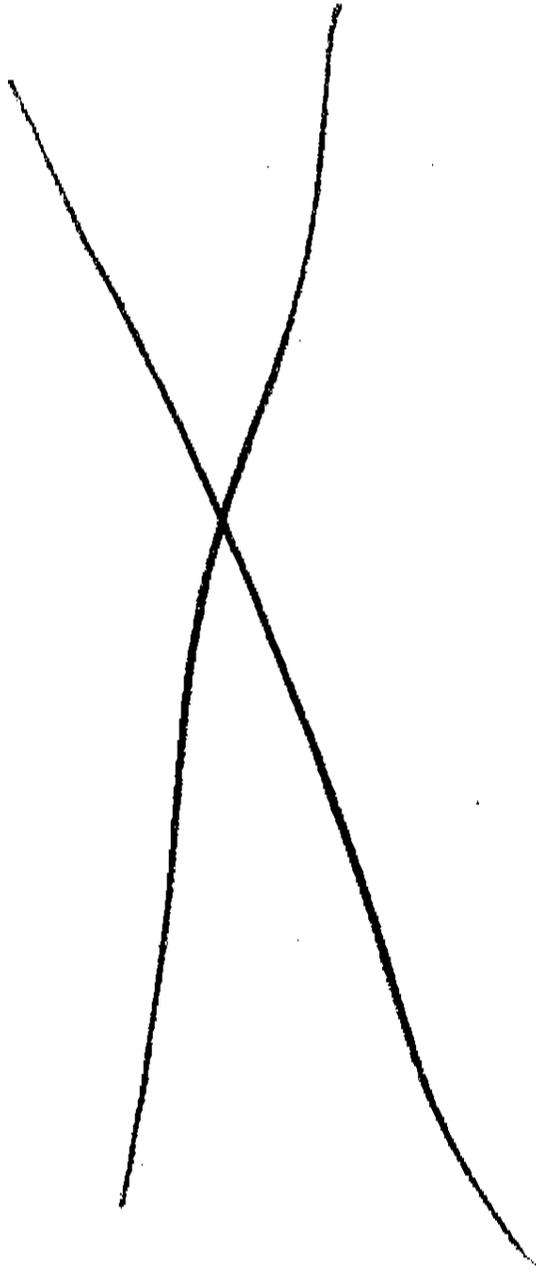
Etsy :: BoudoirQueen's Feedback

Pages: 1 2 3 4 5 ... 15 Jump to:



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Handmade items: tags, titles Search

Home > cherryforever666.etsy.com > Profile

cherryforever666's Profile

Bio

courtney love cobain here, ive tried this now 5 times i guess i write too much have a new album coming to my website jan 1 it will cost 2 dollars to come onto the site wich is being made absolutely magcal by jordene and then i pick 8 songs a day you can have for free but you really ought to pay me as i have spent most of my money on this record whatever you think i deserve, then there will be 10 - 14 other songs with content and video and lachapelle video at that that you can buy for 99 cents just like i tunes i am doing loads of pr so i love gothic lolita pieces (if you live in japan and want to do some shopping for me for a small fee let me know) with antique pieces with the stuff i am makin, very slouchy boyfriend t shirt with an 1890s waistcoat with a bustle and a pair of black on black pinstriped bloomer pant, oh yeah , bloomer pants, i swear they look cool as heck, and a flannel wrapped around a teens titanic dress, anne boleyn, marie antoinette (that's whose crest that is) and witohea cinderella and chinese foot binding and bridal stuff all obsess me cake toppers and brides left at the altar, etc. this record postively oozes the widowhood i never have acknowledged in a record and its very hard and so these symbols and art help me a lot. if you have old antique dry rotted shawls or dresses hanging around with useful appliques im your girl and if you have a cool pattern but not the greatest fabric i will send you the fabric.

SIDE NOTE Please do not ship to me using packaging peanuts or popcorn. It is terrible for the environment and not to mention really messy. Thank You!

Favorite Materials

victoriana, jet, altered paper ephemera, clothes with a goth but cool design, appliques, altered shattered antique victoriana, secred hearts, rubies, steampunk, altered books, origami, mucha, busties

cherryforever666's other stuff

shop . favorites . feedback . contact

☆ Shop home (all items)



cherryforever666

☆ Profile

☆ Shop Policies

☆ Favorites

☆ Feedback : 1663, 100% pos.

☆ Request Custom Item

user info

rating: 1663, 100% pos.
 joined: Aug 28, 2008
 location: Los Angeles
 contact cherryforever666



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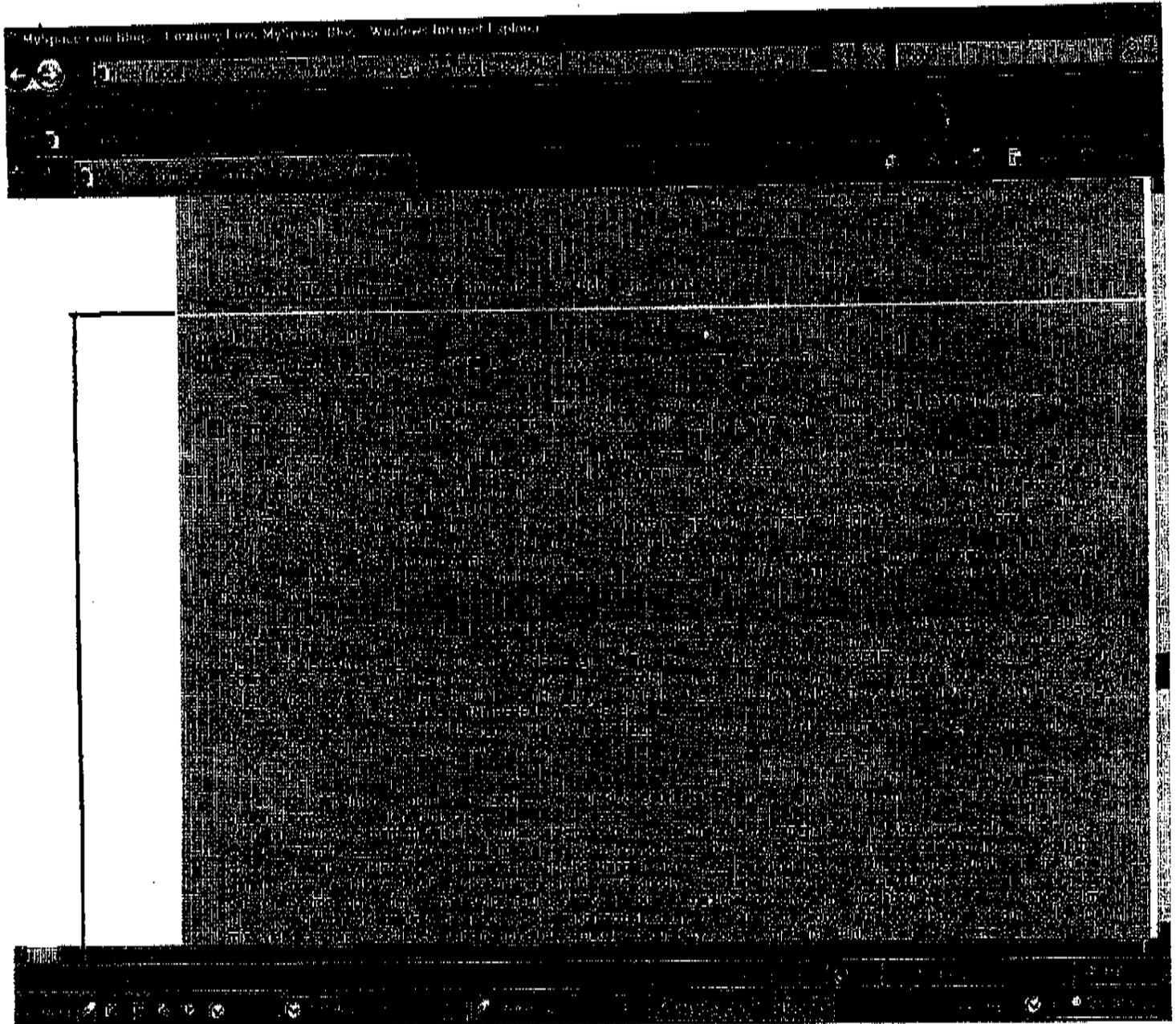
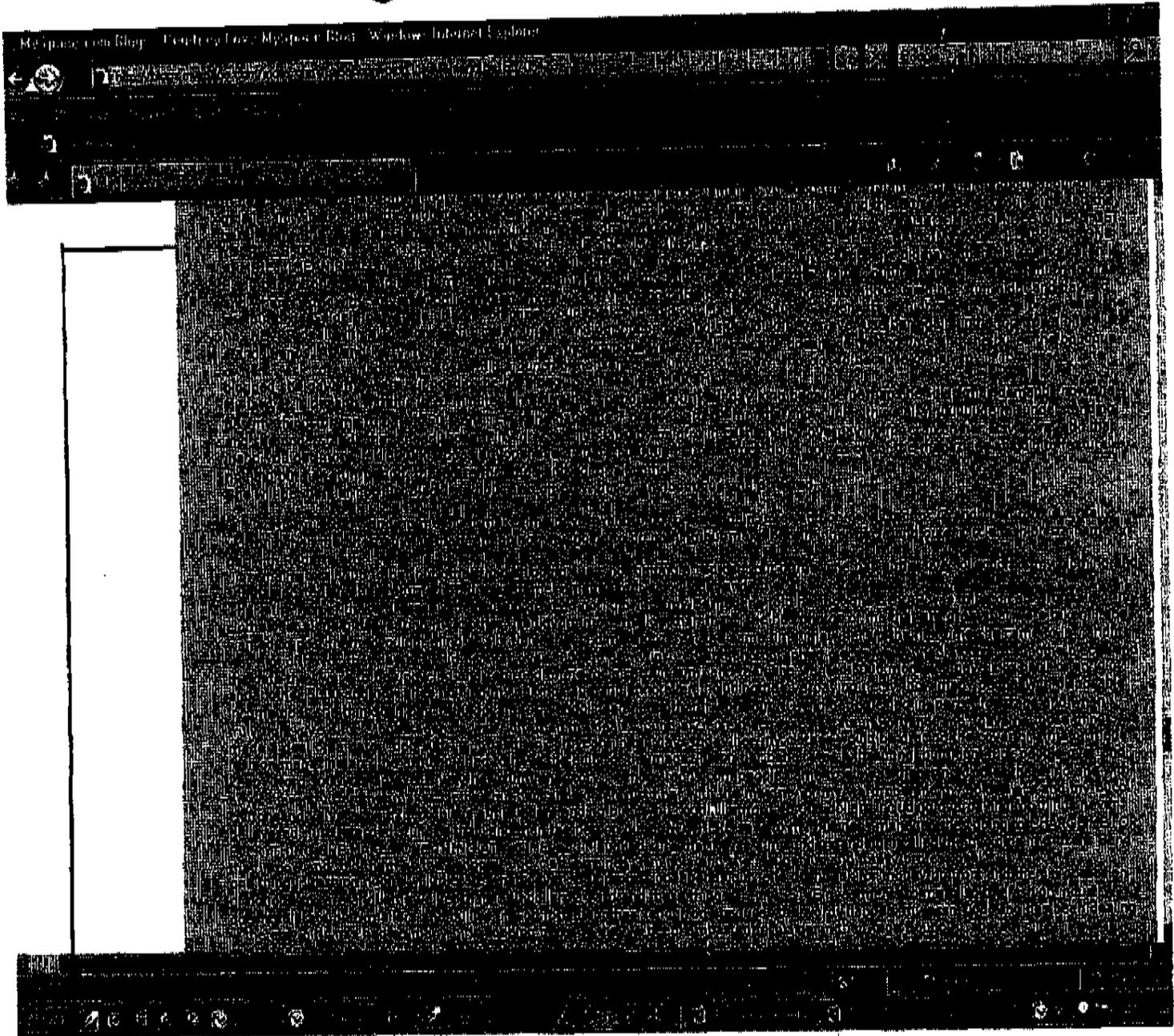
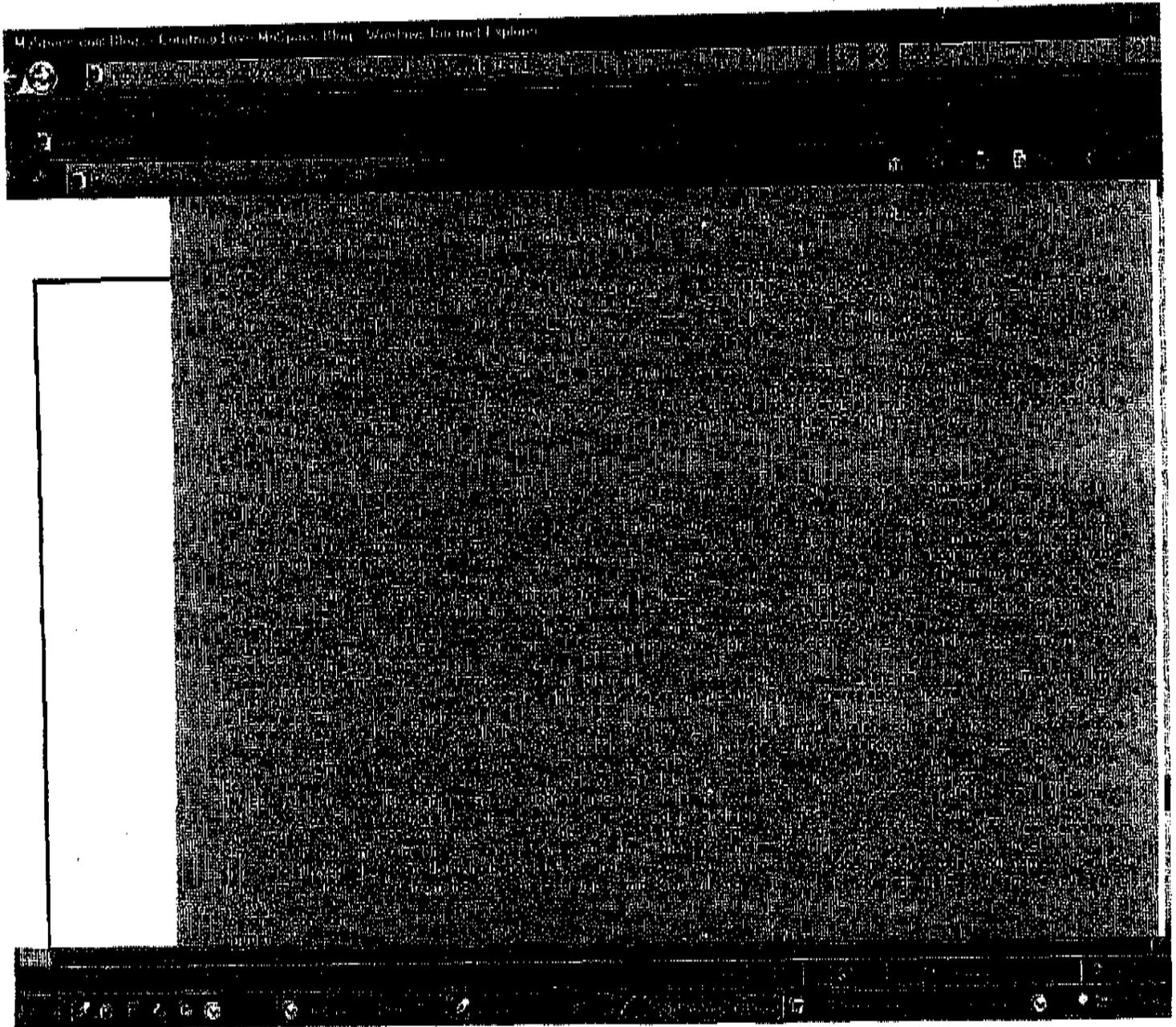


EXHIBIT 3

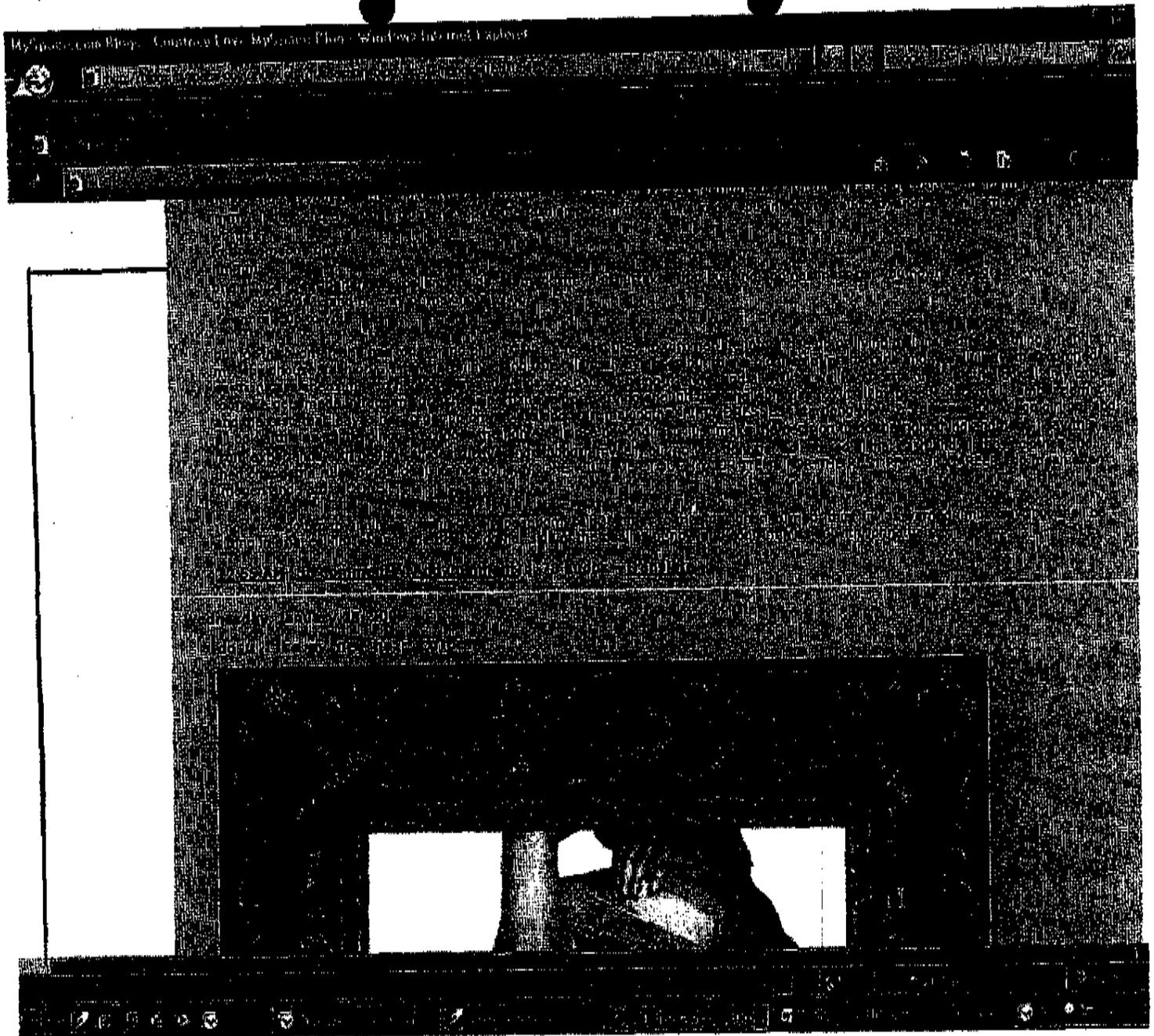
EXH3



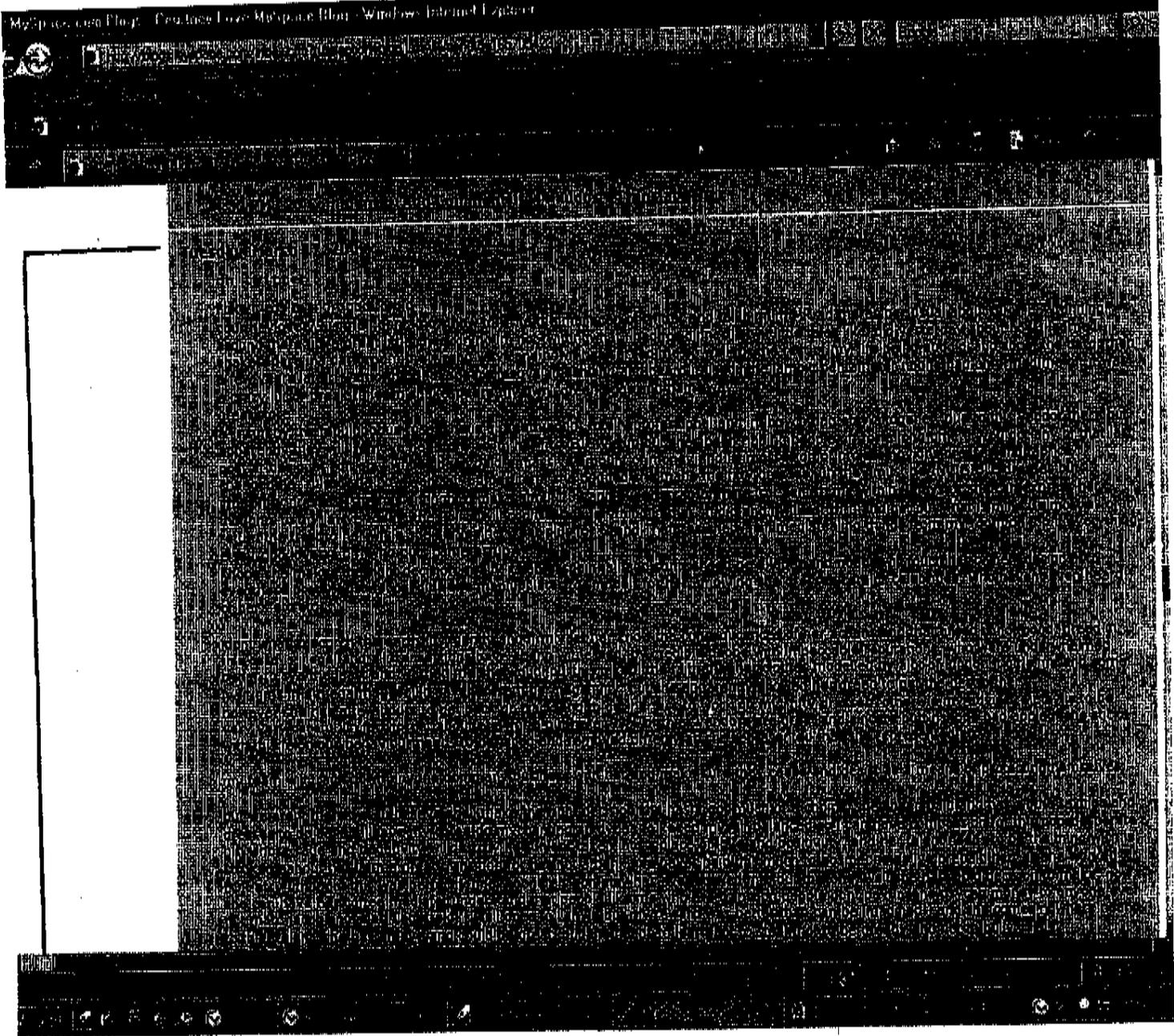
10/11/09 10:11 AM



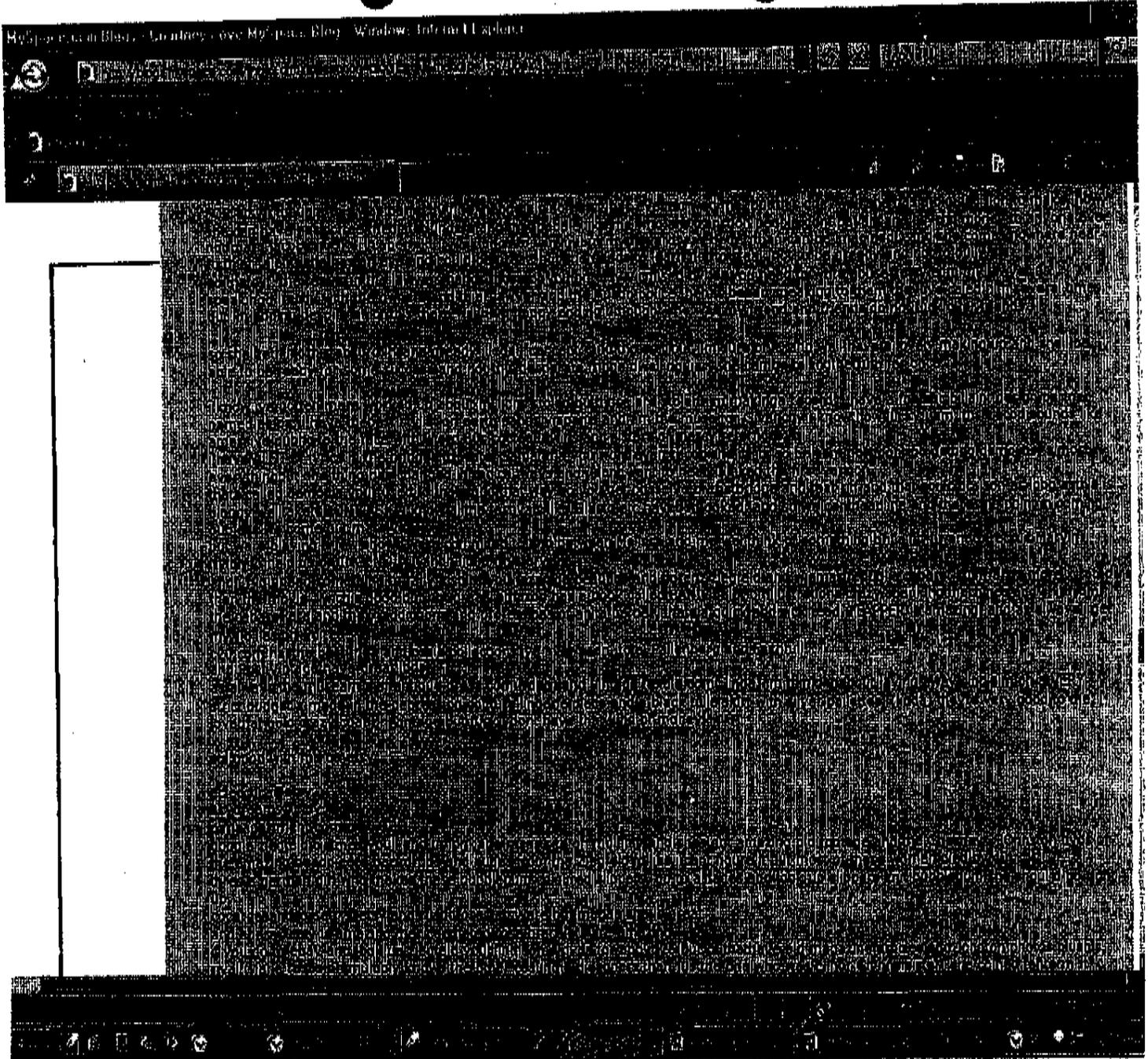
01/26/09 10:21:21 AM

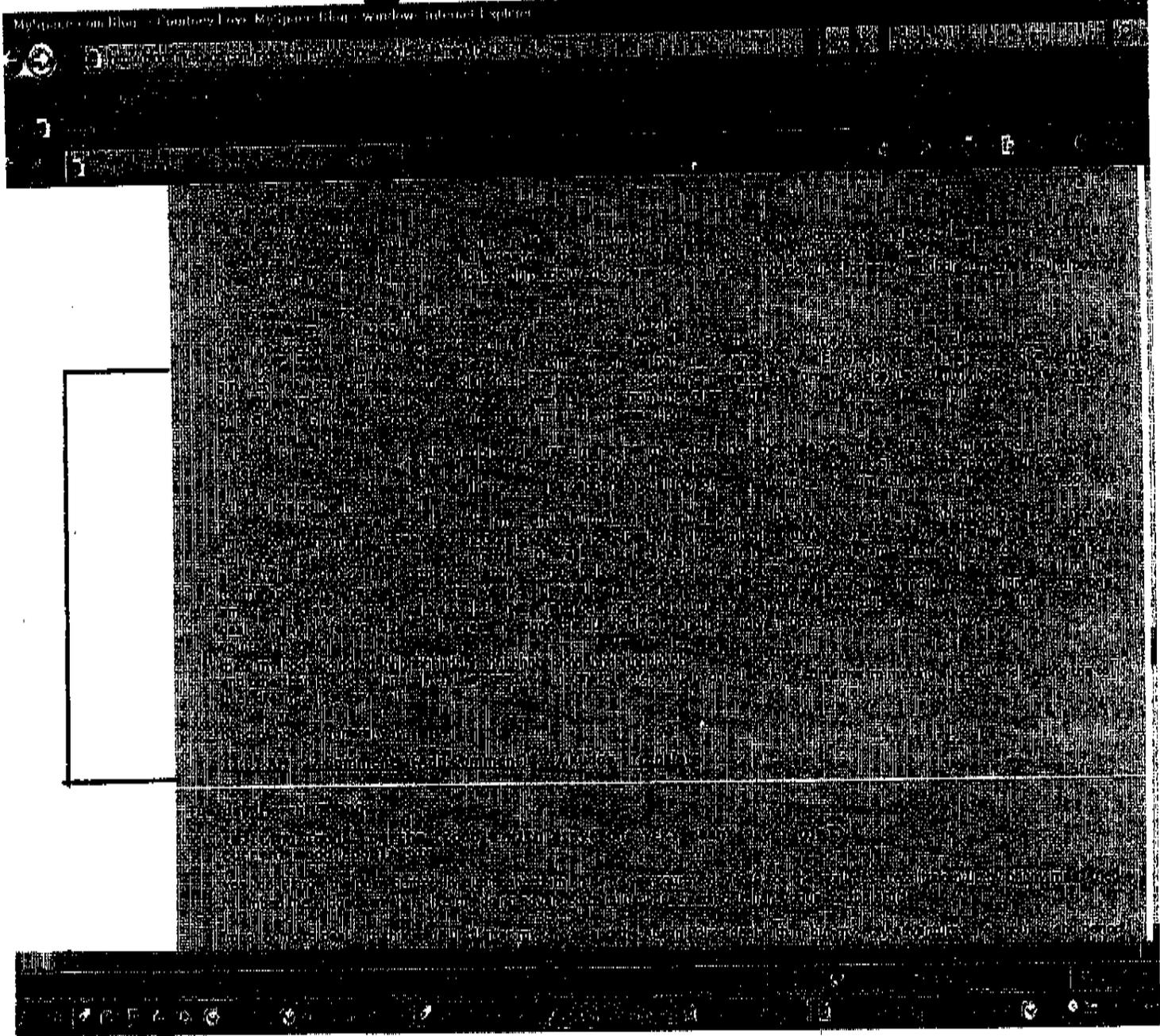


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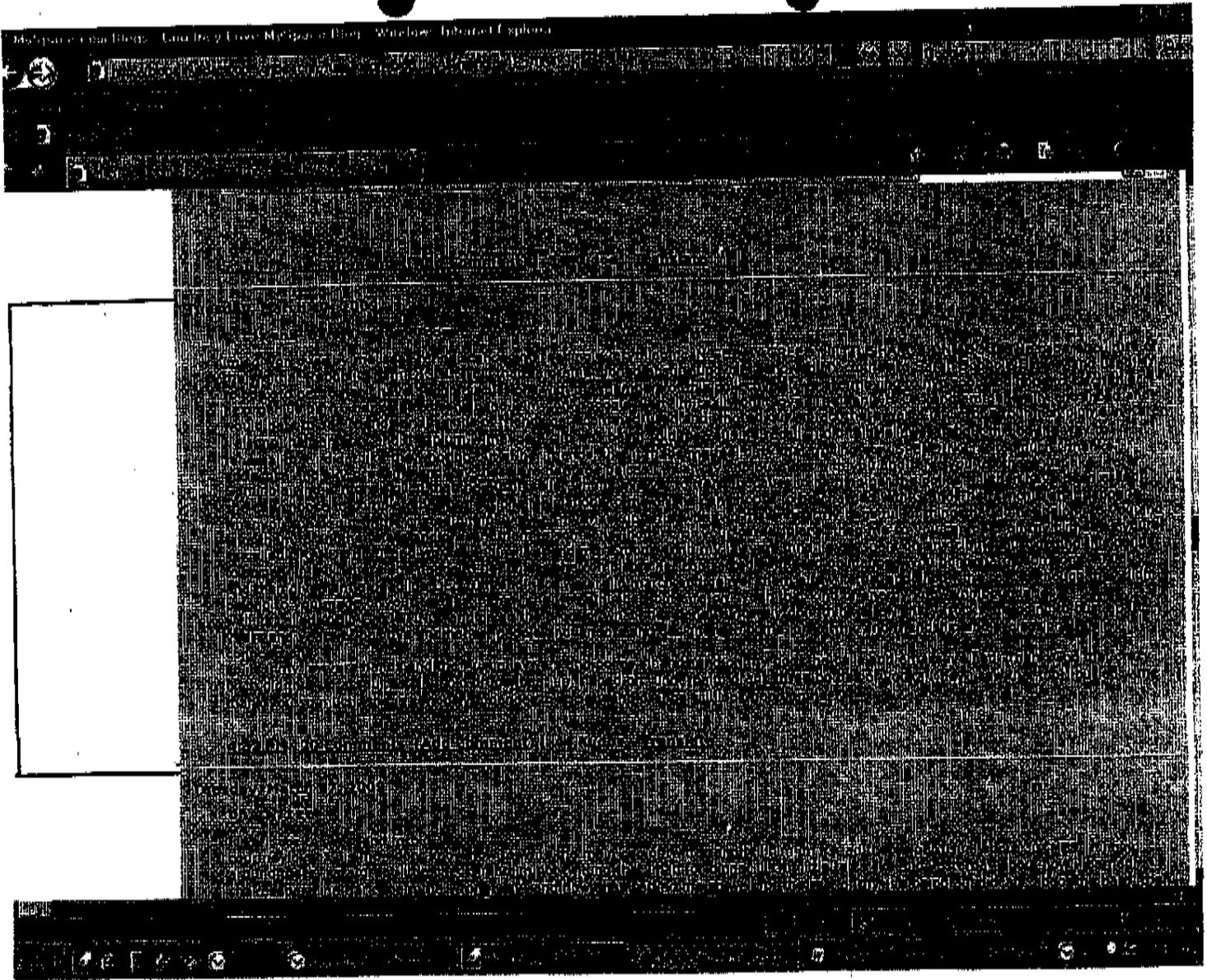


323-908-6096





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SHORT TITLE: SIMORANGKIR V. LOVE	CASE NUMBER BC 410598
---	---------------------------------

**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 5-7 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)

- | | |
|---|--|
| <ol style="list-style-type: none"> 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. | <ol style="list-style-type: none"> 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.
Other 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 type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death	1., 2., 4.
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., 2., 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.

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

SHORT TITLE: SIMORANGKIR V. LOVE		CASE NUMBER
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.
	<input type="checkbox"/> A6025 Other Non-Personal Injury/Property Damage tort	2., 3.
Other (35)		
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.
Other Employment (15)		
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., 8.
	<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 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.

SHORT TITLE: SIMORANGKIR V. LOVE	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 (Cont'd.)	Writ of Mandate (02)	<input type="checkbox"/> A8151 Writ - Administrative Mandamus	2., 8.
		<input type="checkbox"/> A8152 Writ - Mandamus on Limited Court Case Matter	2.
		<input type="checkbox"/> A8153 Writ - Other Limited Court Case Review	2.
	Other Judicial Review (39)	<input type="checkbox"/> A8150 Other Writ / Judicial Review	2., 8.
Provisionally Complex Litigation	Antitrust/Trade Regulation (03)	<input type="checkbox"/> A8003 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"/> A8141 Sister State Judgment
<input type="checkbox"/> A8160 Abstract of Judgment			2., 8.
<input type="checkbox"/> A8107 Confession of Judgment (non-domestic relations)			2., 9.
<input type="checkbox"/> A8140 Administrative Agency Award (not unpaid taxes)			2., 8.
<input type="checkbox"/> A8114 Petition/Certificate for Entry of Judgment on Unpaid Tax			2., 8.
<input type="checkbox"/> A8112 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"/> A8113 Partnership and Corporate Governance Case	2., 8.
	Other Petitions (Not Specified Above) (43)	<input type="checkbox"/> A8121 Civil Harassment	2., 3., 9.
		<input type="checkbox"/> A8123 Workplace Harassment	2., 3., 9.
		<input type="checkbox"/> A8124 Elder/Dependent Adult Abuse Case	2., 3., 9.
		<input type="checkbox"/> A8190 Election Contest	2.
		<input type="checkbox"/> A8110 Petition for Change of Name	2., 7.
		<input type="checkbox"/> A8170 Petition for Relief from Late Claim Law	2., 3., 4., 8.
	<input type="checkbox"/> A8100 Other Civil Petition	2., 9.	

SHORT TITLE: SIMORANGKIR V. LOVE	CASE NUMBER
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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 NUMBER UNDER COLUMN C WHICH APPLIES IN THIS CASE		ADDRESS:	
<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.		9145 St. Ives Drive	
CITY:	STATE:	ZIP CODE:	
Los Angeles	CA	90069	

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 LASC - Downtown Courthouse courthouse in the Central District of the Los Angeles Superior Court (Code Civ. Proc., § 392 et seq., and LASC Local Rule 2.0, subds. (b), (c) and (d)).

Dated: March 26, 2009



(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 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.

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):
 Bryan J. Freedman, Esq. (SBN 151990)
 Jesse A. Kaplan, Esq. (SBN 255059)
 FREEDMAN & TAITELMAN, LLP
 1901 Avenue of the Stars, Suite 500
 Los Angeles, CA 90067
 TELEPHONE NO.: (310) 201-0005 FAX NO.: (310) 201-0045
 ATTORNEY FOR (Name): Plaintiff DAWN SIMORANGKIR, aka DAWN Y
 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

FILED
 LOS ANGELES SUPERIOR COURT
 MAR 26 2009
 JOHN A. CLARKE, CLERK
 BY MARY GARCIA, DEPUTY

CASE NAME: SIMORANGKIR V. LOVE

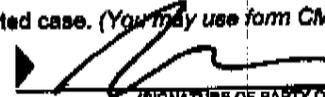
CIVIL CASE COVER SHEET
 Unlimited (Amount demanded exceeds \$25,000) Limited (Amount demanded is \$25,000 or less)
 Complex Case Designation
 Counter Joinder
 Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)

CASE NUMBER: **BC 410593**
 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
<input type="checkbox"/> Auto (22)
<input type="checkbox"/> Uninsured motorist (46)
Other P/DP/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 P/DP/WD (23)
Non-P/DP/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-P/DP/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) |
|---|--|--|

2. This case is is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:
- | | |
|--|--|
| a. <input type="checkbox"/> Large number of separately represented parties | d. <input type="checkbox"/> Large number of witnesses |
| b. <input type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve | e. <input type="checkbox"/> Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court |
| c. <input type="checkbox"/> Substantial amount of documentary evidence | f. <input type="checkbox"/> Substantial postjudgment judicial supervision |
3. Remedies sought (check all that apply): a. monetary b. nonmonetary; declaratory or injunctive relief c. punitive

4. Number of causes of action (specify): Six (6)
 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: March 26, 2009
 Bryan J. Freedman, 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 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 P/IPD/AWD (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 P/IPD/AWD (23)
 - Premises Liability (e.g., slip and fall)
 - Intentional Bodily Injury/PD/AWD (e.g., assault, vandalism)
 - Intentional Infliction of Emotional Distress
 - Negligent Infliction of Emotional Distress
 - Other P/IPD/AWD

Non-P/IPD/AWD (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)
- Reputation (16)
- Intellectual Property (19)
- Professional Negligence (25)
 - Legal Malpractice
 - Other Professional Malpractice (not medical or legal)
- Other Non-P/IPD/AWD 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