

1 BOB M. COHEN, ESQ. (SBN: 47602)  
2 BASEL G. JAMRA, ESQ. (SBN: 214123)  
3 MICHAEL M. MARZBAN, ESQ. (SBN: 238624)

(Space Below for Filing Stamp Only)

4 Law Offices of  
5 BOB M. COHEN AND ASSOCIATES  
6 Law Corporation  
7 16000 Ventura Boulevard, Suite 701  
8 Encino, California 91436-4494  
9 Telephone: (818) 986-3332  
10 Facsimile: (818) 986-5879

Case assigned to  
Judge

**FILED**  
LOS ANGELES SUPERIOR COURT

MAR 02 2007

JOHN A. CLARK, CLERK

BY RUGENA LOPEZ, DEPUTY

11 Attorneys for Plaintiff Gerard Rechnitzer

12 SUPERIOR COURT FOR THE STATE OF CALIFORNIA  
13 FOR THE COUNTY OF LOS ANGELES, CENTRAL DISTRICT

14 GERARD RECHNITZER,

15 Plaintiff,

16 vs.

17 SEAN JOHN COMBS (also known as  
18 DIDDY, also known as P. DIDDY, also  
19 known as PUFF DADDY, also known as  
20 PUFFY), and DOES 1 to 100, Inclusive,

21 Defendants.

COMPLAINT FOR DAMAGES

1. Assault and Battery  
2. General Negligence

8C367239

22 COMES NOW Plaintiff Gerard Rechnitzer and alleges as follows:

23 1. That at all times herein mentioned, Plaintiff Gerard Rechnitzer ("Plaintiff") was  
24 a resident of the County of Los Angeles, State of California.

25 2. That at all times herein mentioned, Defendant Sean John Combs was  
26 resident of the City of New York, State of New York. Defendant Sean John Combs conducted  
27 business in the City of Los Angeles, frequently visits the City of Los Angeles for business and  
28 for pleasure, and therefore has minimum contacts within the jurisdiction of this Court.

3. That the above entitled Court is the proper Court for this action because the  
injury to Plaintiff Gerard Rechnitzer occurred within the jurisdiction of said Court.

//

CIT/CASE: BX67239-1-1A DEF: 1  
RECEIVED: 03/02/07  
DATE FILED: 03/02/07  
FBI/DOJ: 03/02/07  
RECEIVED: 03/02/07  
0310

1           4.       That Plaintiff is ignorant of the true names and capacities of Defendants sued  
2 herein as Does 1 through 100, inclusive, and each of them, and therefore sues these Defendants  
3 by such fictitious names. Plaintiff will amend his complaint to allege the true names and  
4 capacities of said fictitiously named Defendants when their true names, identities and  
5 capacities have been ascertained. Plaintiff is informed and believes and herein alleges that  
6 each of the fictitiously named Defendants acted maliciously, willfully, negligently, and/or  
7 carelessly, and thereby caused injury to Plaintiff and which acts and/or omissions occurred  
8 within the jurisdiction of the above-entitled Court as hereinafter alleged, and that Plaintiff's  
9 losses as herein alleged were proximately caused by such acts and/or omissions of said  
10 fictitiously named Defendants.

11           5.       That Defendants, inclusive, and each of them, whether named or designated as  
12 Doe, or otherwise, were at all times herein mentioned, the agents, employees, or servants, and  
13 partners of each of the other Defendants, and/or contracting parties with their co-defendants,  
14 and in doing the things hereinafter alleged, were acting within the course and scope of such  
15 agency, employment, service, contract and/or partnership and the conduct of each Defendant  
16 was authorized and ratified by the other.

17           6.       That on February 25, 2007, Plaintiff went to a nightclub by the name of Teddy's  
18 at the Roosevelt Hotel at 7000 Hollywood Boulevard, Los Angeles, California 90028. The  
19 incident occurred as Plaintiff proceeded to leave the Roosevelt Hotel between 2:00 a.m. and  
20 2:30 a.m.

21           7.       As Plaintiff proceeded to leave the Roosevelt Hotel with his girlfriend and a  
22 group of other friends, Plaintiff stopped to use the restroom. Before doing so, Plaintiff and his  
23 girlfriend decided that his girlfriend would accompany their group of other friends to the  
24 parking lot in order to retrieve Plaintiff's vehicle from the valet parking attendant, and further  
25 agreed that Plaintiff would meet his girlfriend and the remainder of the group in the parking lot  
26 when Plaintiff was done.

27           8.       Shortly thereafter, Plaintiff left the restroom and proceeded to the parking lot  
28 wherein he observed one of his friends in a vehicle. Plaintiff approached the vehicle and

1 inquired from his friend as to the whereabouts of his girlfriend. At which point, Plaintiff's  
2 friend indicated that Plaintiff's girlfriend was speaking with "Puff Daddy." Plaintiff observed  
3 his girlfriend speaking with Defendant Sean John Combs (also known as "Diddy" also known  
4 as "P. Diddy," also known as "Puff Daddy," also known as "Puffy," hereinafter "Defendant  
5 Combs). At which point, Plaintiff decided that this would be a good opportunity to meet  
6 defendant Combs, join his girlfriend, get his car, and eventually leave.

7 9. Defendant Combs was surrounded by an unknown number of his private security  
8 guards. One of these private security guards prevented Plaintiff from approaching the location  
9 and entering the proximate area where Defendant Combs and Plaintiff's girlfriend were  
10 speaking. At that time, Plaintiff said "Hi Babe," to his girlfriend and she then stated, "That's  
11 my boyfriend." Prior to Plaintiff's arrival, Plaintiff's girlfriend had already informed Defendant  
12 Combs that she had a boyfriend who was with her on the night of the subject incident.  
13 Defendant Combs signaled his security officer by nodding his head, and Plaintiff was allowed  
14 to approach the location where Defendant Combs and Plaintiff's girlfriend were speaking,  
15 which was an area that was surrounded by Defendant's security guards.

16 10. Plaintiff stood next to his girlfriend. Defendant Combs and Plaintiff's girlfriend  
17 continued their conversation. Shortly thereafter, and without any provocation on the part of  
18 Plaintiff, Defendant Combs turned to Plaintiff and in a threatening and ominous manner yelled,  
19 "What the fuck you looking at dude?" Right away, Plaintiff, who felt threatened by Defendant  
20 and in fear for his safety and the safety of his girlfriend given Defendant's conduct and the fact  
21 that they were surrounded by Defendant's private security, immediately looked at his girlfriend  
22 and advised her that they should leave. Instantly, Defendant Combs, again in a threatening and  
23 ominous manner, yelled at Plaintiff that, "I'll smack flames out your ass!" Plaintiff was  
24 horrified, shocked, embarrassed, humiliated, afraid that both he and his girlfriend would be  
25 harmed, and was seriously concerned that Defendant Combs would attack him, his girlfriend or  
26 both of them. However, before Plaintiff was able to do anything, Defendant Combs

27 intentionally, willfully, knowingly and unlawfully attacked, assaulted and battered Plaintiff,  
28 without Plaintiff's consent, thereby causing Plaintiff to fly backwards several feet and Plaintiff

1 alleges, on information and belief, that thereafter Plaintiff struck a vehicle that was behind  
2 Plaintiff. At no time was Plaintiff, who is five feet, seven inches, (5'7"), tall with a slim build,  
3 ever a threat to Defendants, nor was he able to protect or defend himself from the larger  
4 Defendant Combs.

5 11. Plaintiff alleges, on information and belief, that after attacking Plaintiff,  
6 Defendant Combs intentionally, willfully and knowingly pushed Plaintiff's girlfriend and  
7 attempted to spit on another female member of Plaintiff's group.

8 12. At that point, Defendants fled away from the location of this incident. As the  
9 vehicle in which Defendant Combs was an occupant left the parking area of the Roosevelt  
10 Hotel, Defendant Combs stuck out the upper half of his body through an open passenger  
11 window of his vehicle, and stared Plaintiff down in a threatening and menacing manner thereby  
12 causing Plaintiff to fear for his safety and the safety of his girlfriend.

13 13. Shortly thereafter, Plaintiff called the police. After speaking with the police, and  
14 making a report of the incident, Plaintiff and his girlfriend left the scene of the incident.

15  
16 **FIRST CAUSE OF ACTION**

17 **FOR ASSAULT AND BATTERY**

18 14. Plaintiff incorporates herein by this reference as if fully set forth herein the  
19 allegations contained in Paragraphs 1 through 13, inclusive, as alleged herein above.

20 15. That on or about February 25, 2007, Defendant Combs, and Does 1 through 50,  
21 inclusive, and each of them, intentionally, willfully, knowingly, unlawfully and maliciously  
22 attacked, struck, assaulted and battered Plaintiff, without Plaintiff's consent, and with the intent  
23 to cause Plaintiff injury and harm, such that Defendant caused Plaintiff to fly backwards  
24 several feet and strike a vehicle that was behind him. The conduct of Defendant Combs, and  
25 ~~Does 1 through 50, inclusive, and each of them, was despicable and was carried out with a~~  
26 ~~willful and conscious disregard for the rights and safety of Plaintiff, thereby actually and~~  
27 proximately causing Plaintiff to suffer injuries, damage, harm and pain. The acts complained  
28 of, and pled herein and thereon, were carried out by Defendant Combs, and Does 1 through 50,

1 inclusive, and each of them, with full knowledge, understanding and awareness of the  
2 dangerous consequences and certain injuries, damages, embarrassment, and harm that Plaintiff  
3 would suffer, and with a conscious disregard for Plaintiff's health and safety.

4 16. Additionally, and as a direct result and consequence of the damages suffered by  
5 Plaintiff as alleged herein, Plaintiff will in the future suffer special economic damages  
6 consisting of, but not limited to, hospital and medical expenses, and general damages for pain  
7 and suffering.

8 17. Furthermore, as a direct result of the acts of Defendant Combs, and Does 1  
9 through 50, inclusive, and each of them, Plaintiff is entitled to recover punitive and/or  
10 exemplary damages against said Defendants, inclusive, and each of them, in an amount  
11 according to proof.

12  
13 SECOND CAUSE OF ACTION  
14 FOR GENERAL NEGLIGENCE

15 18. Plaintiff incorporates herein by this reference as if fully set forth herein the  
16 allegations contained in Paragraphs 1 through 13, and Paragraphs 14 through 17, inclusive, as  
17 alleged herein above.

18 19. Defendant Combs, and Does 51 through 100, inclusive, and each of them,  
19 negligently and carelessly caused Plaintiff to be unlawfully, touched, assaulted, battered, and  
20 attacked.

21 20. Defendant Combs, and Does 51 through 75, inclusive, and each of them,  
22 breached their duty of care to Plaintiff by not acting in a reasonable manner and taking any  
23 reasonable steps to prevent the violent altercation and attack on Plaintiff, which caused  
24 Plaintiff injuries and damages.

25 21. Moreover, Does 51 through 75 were negligently hired, trained, supervised,  
26 contracted, and/or retained by Defendant Combs, and Does 76 through 100, inclusive, and each  
27 of them, to secure and protect Defendant Combs and any location, area or surrounding in which  
28 Defendant Combs may be present, but failed to do so in a reasonable manner, thereby being an

1 actual and proximate cause of the subject incident and the injuries and damages suffered by  
2 Plaintiff.

3 **WHEREFORE**, Plaintiff Gerard Rechnitzer prays for Judgment against Defendants,  
4 inclusive, and each of them, as follows:

5 1. For economic and special damages consisting of, but not limited to, past, present  
6 and future hospital and medical expenses, and loss of earnings, and other losses, of Plaintiff  
7 Gerard Rechnitzer herein;

8 2. For non-economic and general damages consisting of, but not limited to,  
9 damages to compensate Plaintiff Gerard Rechnitzer herein for his past, present and future pain  
10 and suffering;

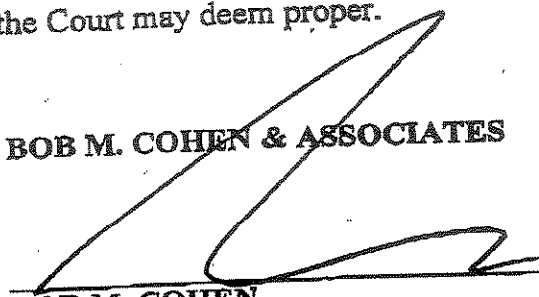
11 3. For punitive and/or exemplary damages against Defendant Combs, and Does 1  
12 through 50, inclusive, and each of them;

13 4. For costs of suit incurred herein; and,

14 5. For such other and further relief as the Court may deem proper.

15  
16 **DATED: March 7, 2007**

**BOB M. COHEN & ASSOCIATES**

  
**BOB M. COHEN,  
BASEL G. JAMRA,  
MICHAEL M. MARZBAN,  
Attorneys for Plaintiff**

FOR COURT USE ONLY

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

BOB M. COHEN (SBN: 47062)  
 BOB M. COHEN & ASSOCIATES  
 16000 VENTURA BLVD., SUITE 701  
 P.O. BOX 18200, ENCINO, CA 91416  
 ENCINO, CA 91436

TELEPHONE NO.: 818-986-3332

FAX NO.:

ATTORNEY FOR (Name): PLAINTIFF GERARD RECHNITZER

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

STREET ADDRESS: 111 NORTH HILL STREET

MAILING ADDRESS: \*\*\*\*\*

CITY AND ZIP CODE: LOS ANGELES, CA 90012

BRANCH NAME: CENTRAL DISTRICT

CASE NAME: RECHNITZER v. COMBS, et al.

## CIVIL CASE COVER SHEET

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

## Complex Case Designation

☐ Counter ☐ Joinder  
 Filed with first appearance by defendant  
 (Cal. Rules of Court, rule 1811)

CASE NUMBER:

JUDGE:

DEPT:

**FILED**  
 LOS ANGELES SUPERIOR COURT  
 MAR 02 2007  
 JOHN A. CLARKE, CLERK  
 BY RUGENA LOPEZ, DEPUTY

80367239

Items 1-5 below must be completed (see instructions on page 2).

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

## Auto Tort

☐ Auto (22)  
☐ Uninsured motorist (46)

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

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

Non-PI/PD/WD (Other) Tort

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

## Employment

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

## Contract

☐ Breach of contract/warranty (06)  
☐ Collections (09)  
☐ Insurance coverage (18)  
☐ Other contract (37)

## Real Property

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

## Unlawful Detainer

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

## Judicial Review

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

Provisionally Complex Civil Litigation  
(Cal. Rules of Court, rules 1800-1812)

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

## Enforcement of Judgment

☐ Enforcement of judgment (20)

## Miscellaneous Civil Complaint

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

## Miscellaneous Civil Petition

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

2. This case ☐ is ☒ is not complex under rule 1800 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. Type of remedies sought (check all that apply):
- a. ☒ monetary b. ☐ nonmonetary; declaratory or injunctive relief c. ☒ punitive
4. Number of causes of action (specify): TWO: (1) ASSAULT AND BATTERY and (2) GENERAL NEGLIGENCE
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 1, 2007

BOB M. COHEN (SBN: 47062)

(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 201.8.) 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 1800 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 complex case, this cover sheet will be used for statistical purposes only.

Page 1 of 2

CIVIL CASE COVER SHEET

Legal  
Solutions  
& PlusCal. Rules of Court, rules 201.8, 1800-1812;  
Standards of Judicial Administration, § 19



# 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 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)

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

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

Auto Tort

Damage/Wrongful Death Tort

Injury/Property

A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Auto (22)	<input type="checkbox"/> A7100 Motor Vehicle - Personal Injury/Property Damage/Wrongful Death	1., 2., 4.
Uninsured Motorist (46)	<input type="checkbox"/> A7110 Personal Injury/Property Damage/Wrongful Death - Uninsured Motorist	1., 2., 4.
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 <input type="checkbox"/> A7240 Other Professional Health Care Malpractice	1., 2., 4. 1., 2., 4.
Other Personal Injury Property Damage Wrongful Death (23)	<input type="checkbox"/> A7250 Premises Liability (e.g., slip and fall) <input checked="" type="checkbox"/> A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.) <input type="checkbox"/> A7270 Intentional Infliction of Emotional Distress <input type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death	1., 2., 4. 1., 2., 4. 1., 2., 3. 1., 2., 4.
Business Tort (07)	<input type="checkbox"/> A6029 Other Commercial/Business Tort (not fraud/breach of contract)	1., 2., 3.
Civil Rights (08)	<input type="checkbox"/> A6005 Civil Rights/Discrimination	1., 2., 3.
Defamation (13)	<input type="checkbox"/> A6010 Defamation (slander/libel)	1., 2., 3.
Fraud (16)	<input type="checkbox"/> A6013 Fraud (no contract)	1., 2., 3.
Intellectual Property (19)	<input type="checkbox"/> A6016 Intellectual Property	2., 3.



SHORT TITLE: RECHNITZER v. COMBS, et al.

CASE NUMBER

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

CIVIL CASE COVER SHEET ADDENDUM  
AND STATEMENT OF LOCATION

# SUMMONS (CITACION JUDICIAL)

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

**FILED**  
LOS ANGELES SUPERIOR COURT

MAR 02 2007

JOHN A. CLARKE, CLERK

BY RUGENA LOPEZ, DEPUTY

## NOTICE TO DEFENDANT: (AVISO AL DEMANDADO):

SEAN JOHN COMBS (also known as DIDDY, also known as PUFF DADDY, also known as PUFFY), AND DOES 1 TO 100, INCLUSIVE

## YOU ARE BEING SUED BY PLAINTIFF: (LO ESTÁ DEMANDANDO EL DEMANDANTE):

GERARD RECHNITZER

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](http://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](http://www.lawhelpcalifornia.org)), the California Courts Online Self-Help Center ([www.courtinfo.ca.gov/selfhelp](http://www.courtinfo.ca.gov/selfhelp)), or by contacting your local court or county bar association.

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.courtinfo.ca.gov/selfhelp/espanol/](http://www.courtinfo.ca.gov/selfhelp/espanol/)), 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](http://www.lawhelpcalifornia.org)), en el Centro de Ayuda de las Cortes de California, ([www.courtinfo.ca.gov/selfhelp/espanol/](http://www.courtinfo.ca.gov/selfhelp/espanol/)) o poniéndose en contacto con la corte o el colegio de abogados locales.

CASE NUMBER:  
(Número del Caso):

BC367259

The name and address of the court is:

(El nombre y dirección de la corte es):  
STANLEY MOSK COURTHOUSE  
111 NORTH HILL STREET  
\*\*\*\*\*

LOS ANGELES, CA 90012  
CENTRAL DISTRICT

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):  
818-986-3332

BOB M. COHEN  
BOB M. COHEN & ASSOCIATES  
16000 VENTURA BLVD., SUITE 701  
ENCINO, CA 91436

DATE:

MAR 02 2007

Clerk, by  
(Secretario)

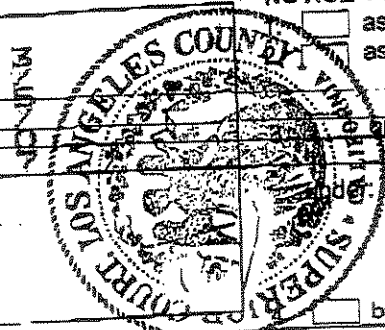
RUGENA LOPEZ

Deputy  
(Adjunto)

(Fecha)  
(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)).

NOTICE TO THE PERSON SERVED: You are served

(SEAL)



as an individual defendant.  
as the person sued under the fictitious name of (specify):

on behalf of (specify):

- ☐ CCP 416.10 (corporation)  
☐ CCP 416.20 (defunct corporation)  
☐ CCP 416.40 (association or partnership)  
☐ other (specify):

by personal delivery on (date):

- ☐ CCP 416.60 (minor)  
☐ CCP 416.70 (conservatee)  
☐ CCP 416.90 (authorized person)