

OCT 08 2020

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9 OSCAR LEDESMA and SHERIEN AWAD

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **FOR THE COUNTY OF VENTURA**

12 OSCAR LEDESMA, an individual; and SHERIEN
13 AWAD, an individual,

14 Plaintiffs,

15 vs.

16 SANTA CLARA HOUSE LLC, a California
17 Limited Liability Company dba THE TAVERN;
18 ALEX STEWART, an individual; and DOES 1
19 through 50 Inclusive,

20 Defendants.

CASE NO.:

**PLAINTIFF'S COMPLAINT FOR
DAMAGES FOR:**

1. ASSAULT AND BATTERY;
2. VIOLATION OF THE BANE CIVIL RIGHTS ACT [CIVIL CODE § 52.1];
3. INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS; AND
4. NEGLIGENCE

****DEMAND FOR JURY TRIAL****

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23 **COME NOW** plaintiffs, OSCAR LEDESMA, an individual, and SHERIEN AWAD, an
24 individual (hereinafter "Plaintiffs"), who allege and assert the following against all defendants, and
25 each of them:

26 **PARTIES**

- 27 1. Plaintiff, OSCAR LEDESMA, is, and at all times relevant herein was, a resident of the

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KX

- 1 County of Ventura, State of California.
- 2 2. Plaintiff, SHERIEN AWAD, is, and at all times relevant herein was, a resident of the
3 County of Ventura, State of California.
- 4 3. Defendant, SANTA CLARA HOUSE LLC ("Defendant SCH"), is, and at all times relevant
5 herein was, a limited liability company organized under the laws of, and doing business in,
6 the State of California as the business established commonly known as, and doing business
7 as, The Tavern located at 211 East Santa Clara Street, Ventura, California ("THE
8 TAVERN").
- 9 4. Defendant, ALEX STEWART ("Defendant STEWART"), is, and at all times relevant
10 herein was, a resident of the County of Ventura, State of California.
- 11 5. Defendant STEWART is, and at all times relevant herein was, acting as the employee,
12 agent, principal, and representative of Defendant SCH and every other defendant.
- 13 6. Defendants SCH, STEWART and DOES 1 to 50, and each of them, will collectively herein
14 be referred to as "Defendant" or "Defendants."
- 15 7. Plaintiffs are informed and believe, and thereon allege, that at all times relevant herein,
16 defendants SCH and DOES 1 to 50, and each of them, owned, operated, provided
17 security/crowd control at, controlled and/or otherwise managed THE TAVERN.
- 18 8. Plaintiffs are informed and believe, and thereon allege, that at all times mentioned herein,
19 defendants STEWART and DOES 1 through 50 were the employees and/or agents of each
20 and every other defendant, and whose responsibilities included but were not limited to
21 providing security services at THE TAVERN.
- 22 9. The true names and capacities of the defendants sued herein as DOES 1 through 50, are
23 unknown to the Plaintiffs, who therefore sue such defendants by such fictitious names
24 pursuant to *Code of Civil Procedure* § 474. Plaintiffs are informed and believe, and thereon
25 allege, that each of the fictitiously named defendants is responsible in some manner for the
26 occurrences alleged and that Plaintiffs' damages alleged were proximately caused by those
27 defendants. Plaintiffs will seek permission of this court to amend this complaint to set forth
the true names of the fictitiously named defendants and their capacities when ascertained.

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Reference herein to any defendant shall include reference to all Defendants, including all named and all fictitiously named Defendants.

10. Plaintiffs are informed and believe, and thereon allege, that at all times relevant hereto, each Defendant was the officer, director, owner, managing agent, employee, or employer of each of the co-Defendants and in doing the acts hereinafter mentioned, each Defendant was acting within the scope of its authority and as such officer, director, owner, managing agent, employee or employer with the permission and consent of the co-Defendants, and that said acts of each Defendant were ratified by said Defendant's co-Defendants.

11. Defendants knew or should have known that Defendants DOES 1 through 50 and other employees involved possessed violent tendencies and would engage in inappropriate and dangerous conduct in the presence of Plaintiffs, including but not limited to assaulting and battering Plaintiffs and violating Plaintiffs' rights pursuant to, without limitation, Civil Code §§ 43 and 52.1 and Penal Code §§ 240, 241, 242, 243 and 245(a)(1), all while acting as an agent/employee of Defendants.

FIRST CAUSE OF ACTION
ASSAULT AND BATTERY

(By Plaintiffs and Against All Defendants, and Each of Them.)

12. Plaintiffs re-allege each and every allegation contained in the above paragraphs 1 through 11 and by this reference incorporate said paragraphs as though fully set forth herein.

13. On or about December 28, 2019, Plaintiffs were at the SUBJECT BAR as patrons with several of their friends and family members.

14. At all times herein mentioned, Plaintiffs were lawfully at the premises of THE TAVERN.

15. Plaintiffs were at THE TAVERN when a verbal confrontation ensued between a member of Plaintiffs' group; and Defendant STEWART and Defendants' other employees and/or agents (hereinafter collective referred to as "SECURITY GUARDS").

16. Plaintiff LEDESMA attempted to speak to the SECURITY GUARDS to attempt to help and diffuse the situation while Plaintiff AWAD stood by a few feet away observing.

- 1 17. Without warning, provocation or justification, the SECURITY GUARDS physically began
2 to attack, restrain and harm Plaintiffs.
- 3 18. Said attack included, without limitation, the SECURITY GUARDS placing Plaintiff
4 LEDESMA in a chokehold and repeatedly striking him in the head with a flashlight which
5 thereby caused him to lose consciousness and sustain permanent and life altering injuries to
6 his body and his brain.
- 7 19. The SECURITY GUARDS also viciously struck and battered Plaintiff AWAD, causing her
8 to sustain serious injuries.
- 9 20. Plaintiffs attempted to leave THE TAVERN, but the SECURITY GUARDS continued to
10 come after them, placed them in holds and further assaulted and battered them. The
11 SECURITY GUARDS repeatedly pushed Plaintiffs onto the ground, then onto the sidewalk
12 and into the street, further assaulting and battering Plaintiffs, including battering them even
13 after they were off the premises of THE TAVERN.
- 14 21. The SECURITY GUARDS acted in a physically threatening manner, with the intent of
15 creating fear and apprehension in Plaintiffs of harmful and offensive contact, and Plaintiffs
16 felt so threatened.
- 17 22. Despite Plaintiffs' efforts and intent to cooperate, the SECURITY GUARDS nonetheless
18 physically touched and harmed Plaintiffs, causing injuries to Plaintiffs.
- 19 23. This aforementioned abusive and reprehensible conduct engaged in by the SECURITY
20 GUARDS, all of which was done in the course and scope of their employment and/or
21 agency with all Defendants, was done without justification and without provocation by
22 Plaintiffs.
- 23 24. The aforementioned abusive conduct by the SECURITY GUARDS was intended to, and
24 did, result in serious physical injuries to Plaintiffs, including severe emotional distress and
25 anxiety.
- 26 25. At the time of the assault and battery, the SECURITY GUARDS were acting as agents
27 and/or employees of Defendants, and each of them, with the permission and consent of said
Defendants, and that said acts were subsequently ratified by Defendants and each of them.

- 1 26. The actions and conduct of the SECURITY GUARDS were ratified by defendants, and each
- 2 of them, in that Defendants did not terminate, discipline or in any manner take any adverse
- 3 employment action against the involved SECURITY GUARDS, thereby ratifying their
- 4 conduct.
- 5 27. At no time did Plaintiffs consent to any of the acts of the Defendants or the SECURITY
- 6 GUARDS alleged herein-above.
- 7 28. Defendant STEWART was arrested and charged with assault with a deadly weapon as a
- 8 result of his brutal actions as stated herein-above.
- 9 29. Plaintiffs are informed and believe, and thereon allege, that prior to December 28, 2019,
- 10 Defendants, including their officers, directors, and/or managing agents of THE TAVERN,
- 11 with substantial discretionary authority over decisions that ultimately determine the
- 12 company's policy, were aware of the fact that the other Defendants, SECURITY GUARDS
- 13 and employees/agents had engaged in reckless physical handling of patrons, unwarranted
- 14 violent, intimidating, aggressive, and confrontational conduct at THE TAVERN with regard
- 15 to patrons and that said individuals were unfit to be employed, specifically including, being
- 16 unfit to be employed as security personnel.
- 17 30. Despite being aware of said individuals' reckless and confrontational conduct, Defendants,
- 18 including officers, directors, and/or managing agents of Defendants, nonetheless continued
- 19 to employ said SECURITY GUARDS, and/or otherwise failed to take all reasonable steps
- 20 to prevent the conduct that forms the subject matter of this action from occurring.
- 21 31. Plaintiffs are informed and believe, and thereon allege, that subsequent to learning of the
- 22 above described actions, Defendants, including officers, directors, and/or managing agents,
- 23 among other employees of Defendants, ratified said conduct by, among other things, not
- 24 undertaking an investigation of the incident, not disciplining the SECURITY GUARDS as a
- 25 result of the incident, and continuing to employ said individuals.
- 26 32. Plaintiffs are informed and believe and thereon allege, that prior to and on December 28,
- 27 2019, the other Defendants and employees/agents were authorized by and had the
- permission and consent of Defendants, and officers, directors, and other employees of

1 Defendants, to use physical force while in the course and scope of their employment,
2 specifically including, the course and scope of their employment as employees, agents,
3 bouncers and/or security personnel at THE TAVERN.

4 33. As a factual and legal result of Defendants' actions, Plaintiffs have suffered serious injuries
5 which will result in some permanent disabilities to Plaintiffs, all to the Plaintiffs' general
6 damages in a sum to be proven at the time of trial.

7 34. As a further factual and legal result of the aforesaid acts of Defendants, Plaintiffs have
8 required and/or for an unpredictable period in the future will require the services of doctors,
9 physicians, surgeons, nurses, hospitals and like related professional services, including
10 drugs, medication and x-rays, and Plaintiffs have and continue to incur medical and
11 incidental expenses which will be shown according to proof.

12 35. As a further factual and legal result of the acts of defendants, Plaintiffs were prevented from
13 attending to their usual occupations and have suffered loss of present and future earnings in
14 an amount according to proof at trial. Plaintiffs additionally have suffered impairment and
15 loss of present and future earning capacity, also in an amount according to proof at trial.

16 36. Defendants committed the acts alleged herein intentionally, with the intent to cause injuries
17 to Plaintiffs and with a conscious disregard of the rights and safety of Plaintiffs and others.
18 Further, the foregoing intentional acts subjected Plaintiffs to cruel and unjust hardship in
19 conscious disregard of Plaintiffs' rights. As a result of the foregoing, Plaintiffs are entitled
20 to punitive damages against defendants in an amount according to proof.

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22 **SECOND CAUSE OF ACTION**

23 **VIOLATION OF THE BANE CIVIL RIGHTS ACT**

24 **(By Plaintiffs and Against All Defendants, and Each of Them.)**

25 37. Plaintiffs re-allege each and every allegation contained in the above paragraphs 1 through
26 36 and by this reference incorporate said paragraphs as though fully set forth herein.

27 38. Defendants attempted and indeed did interfere – through threats, intimidation, and coercion
– with Plaintiffs' exercise and enjoyment of their rights secured by the Constitution and

1 laws of the United States and the Constitution and laws of the state of California.

2 39. Namely, defendants attempted and did interfere, through threats, intimidation, and coercion,
3 with Plaintiffs' exercise and enjoyment of their rights pursuant to, and without limitation,
4 California Civil Code § 43; their personal rights mentioned and recognized in the California
5 Government Code, the California Constitution and the common law interpreting the
6 California Constitution and the statutes enacted by the state of California.

7 40. Specifically, and without limitation, Defendants verbally and physical threatened and
8 intimidated Plaintiffs with deprivation of their rights to bodily integrity, to be free from
9 attack and from restraint and to be free from assault and battery.

10 41. Said acts constitute violations of the Bane Civil Rights Act, Civil Code § 52.1, as well as the
11 California Constitution and various other state legislative enactments.

12 42. At the time of said acts, Defendants were acting as the agents and/or employees of each and
13 every other Defendant, and in doing the aforementioned acts, each Defendant was acting
14 within the scope of their agency and/or employment with each and every other Defendant,
15 with the permission and consent of said Defendants, and that said acts of each Defendant
16 were ratified by said co-Defendants.

17 43. Plaintiffs are informed and believe, and thereon allege, that on and prior to December 28,
18 2019, Defendants, including its officers, directors, and/or managing agents, among other
19 employees, were aware of the fact that the involved SECURITY GUARDS had engaged in
20 reckless handling of patrons, unwarranted violent, intimidating, aggressive and
21 confrontational conduct at THE TAVERN with regard to patrons and that said SECURITY
22 GUARDS were unfit to be employed, specifically including, being unfit to be employed as
23 bouncers and/or security personnel, especially Defendant STEWART.

24 44. Despite being aware of said individuals' reckless and confrontational conduct, Defendants,
25 including its officers, directors, and/or managing agents, among other employees,
26 nonetheless continued to employ defendants and otherwise failed to take all reasonable steps
27 to prevent the conduct that forms the subject matter of this action from occurring.

45. Plaintiffs are informed and believe, and thereon allege, that subsequent to learning of the

1 above described actions by the SECURITY GUARDS against Plaintiffs, Defendants –
2 including their officers, directors, and/or managing agents, among other employees –
3 ratified said conduct by, among other things, not undertaking an investigation of the
4 incident, not disciplining the SECURITY GUARDS as a result of the incident and
5 continuing to employ them.

6 46. Plaintiffs are further informed and believe, and thereon allege, that prior to and on
7 December 28, 2019, Defendants and the involved employees/agents were authorized by and
8 had the permission and consent of each other Defendant – including its officers, directors,
9 and/or managing agents, among other employees – to use physical force while in the course
10 and scope of their employment, specifically including, their employment as security
11 personnel at THE TAVERN.

12 47. As a factual and legal result of Defendants' actions, Plaintiffs have suffered injuries which
13 will result in some permanent disabilities to the Plaintiffs, all to the Plaintiffs' general
14 damages in a sum to be proven at the time of trial.

15 48. As a further factual and legal result of the aforesaid acts of Defendants, Plaintiffs have
16 required and/or for an unpredictable period in the future will require the services of doctors,
17 physicians, surgeons, nurses, hospitals and like related professional services, including
18 drugs, medication and x-rays, and Plaintiffs have and continue to incur medical and
19 incidental expenses which will be shown according to proof.

20 49. As a further factual and legal result of the acts of Defendants, Plaintiffs were prevented
21 from attending to their usual occupations and have suffered loss of present and future
22 earnings in an amount according to proof at trial. Plaintiffs additionally have suffered
23 impairment and loss of present and future earning capacity, also in an amount according to
24 proof at trial.

25 50. Defendants committed the acts alleged herein intentionally, with the intent to cause injury to
26 Plaintiffs and with a conscious disregard of the rights and safety of Plaintiffs and others.
27 Further, the foregoing intentional acts subjected Plaintiffs to cruel and unjust hardship in
conscious disregard of Plaintiffs' rights. As a result of the foregoing, Plaintiffs are entitled

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to punitive damages against defendants in an amount according to proof.

51. As a further factual and legal result of Defendants', their agents' and their employees' illegal acts as alleged herein, Plaintiffs are entitled to reasonable attorneys' fees and costs of said suit and a civil penalty of \$25,000 as provided in Civil Code §§ 52 and 52.1.

52. Furthermore, as a result of Defendants', their agents' and their employees' threat of violence as alleged herein, Plaintiffs are also entitled to three times their actual damages, in an amount according to proof.

53. Plaintiffs shall further be entitled to appropriate equitable remedies to be proven at trial.

THIRD CAUSE OF ACTION

INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

(By Plaintiffs and Against All Defendants, and Each of Them.)

54. Plaintiffs re-allege each and every allegation contained in the above paragraphs 1 through 53 and by this reference incorporate said paragraphs as though fully set forth herein.

55. Plaintiffs are informed and believe, and thereon allege, that the aforementioned acts of defendants were outrageous and were engaged in by Defendants intentionally and maliciously, for the purpose of causing Plaintiffs to suffer humiliation, mental anguish and emotional and physical distress.

56. Defendants' conduct in confirming and ratifying that conduct was done with the knowledge that Plaintiffs' emotional and physical distress would thereby increase, and was done with wanton and reckless disregard of the consequences to Plaintiffs.

57. As a factual and legal result of Defendants' actions, Plaintiffs have suffered injuries which will result in some permanent disabilities to the Plaintiffs, all to the Plaintiffs' general damages in a sum to be proven at the time of trial.

58. As a further factual and legal result of the aforesaid acts of Defendants, Plaintiffs have required and/or for an unpredictable period in the future will require the services of doctors, physicians, surgeons, nurses, hospitals and like related professional services, including drugs, medication and x-rays, and Plaintiffs have and continue to incur medical and

- 1 incidental expenses which will be shown according to proof.
- 2 59. As a further factual and legal result of the acts of Defendants, Plaintiffs were prevented
- 3 from attending to their usual occupations and have suffered loss of present and future
- 4 earnings in an amount according to proof at trial. Plaintiffs additionally have suffered
- 5 impairment and loss of present and future earning capacity, also in an amount according to
- 6 proof at trial.
- 7 60. Defendants committed the acts alleged herein intentionally, with the intent to cause injury to
- 8 Plaintiffs and with a conscious disregard of the rights and safety of Plaintiffs and others.
- 9 Further, the foregoing intentional acts subjected Plaintiffs to cruel and unjust hardship in
- 10 conscious disregard of Plaintiffs' rights. As a result of the foregoing, Plaintiffs are entitled
- 11 to punitive damages against defendants in an amount according to proof.
- 12 61. As alleged herein above, said conduct was committed in the course and scope of their
- 13 employment with defendants, and authorized and ratified by defendants' corporate decision
- 14 makers.

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16 **FOURTH CAUSE OF ACTION**

17 **NEGLIGENCE AND NEGLIGENT HIRING,**

18 **TRAINING, SUPERVISION AND/OR RETENTION**

19 **(By Plaintiffs and Against All Defendants, and Each of Them.)**

- 20 62. Plaintiffs re-allege each and every allegation contained in the above paragraphs 1 through
- 21 61 and by this reference incorporate said paragraphs as though fully set forth herein.
- 22 63. Defendants owed to Plaintiffs a duty of reasonable care regarding, *inter alia*, Defendants'
- 23 duty to safely maintain the premises and Defendants' duty with respect to the management
- 24 of their employees/agents and their treatment of patrons. This duty included, without
- 25 limitation, Defendants' duty of reasonable care in hiring, training, supervising and/or
- 26 retaining their employees/agents and SECURITY GUARDS.
- 27 64. Defendants also owed to Plaintiffs a duty to use reasonable care in providing security at
- THE TAVERN, and use reasonable care necessary to physically restrain any patron or to

- 1 remove any patron from the premises of THE TAVERN.
- 2 65. On December 28, 2019, Defendants so negligently managed, administered and provided
- 3 security services at THE TAVERN and so negligently treated patrons including Plaintiffs,
- 4 such that Plaintiffs suffered injuries and damages as hereinafter described.
- 5 66. Defendants, and each of them, as owners and operators of THE TAVERN and security
- 6 therein, an establishment open to the general public and providing security services and
- 7 protection for their patrons, failed to exercise due care in ownership, operation, security of
- 8 THE TAVERN to protect Plaintiffs, patrons, from harm and ensure that bar patrons were
- 9 not subject to unreasonable risks of harm, injury and violence while on the bar's premises.
- 10 67. Defendants, and each of them, so negligently provided security and protection that Plaintiffs
- 11 were injured by Defendants and Defendants' agents/employees. Defendants, and each of
- 12 them, including the SECURITY GUARDS, conducted themselves negligently and directly
- 13 caused injuries to Plaintiffs.
- 14 68. Defendants knew, or in the reasonable exercise of diligence should have known, that
- 15 Defendants' employees and/or agents, including but not limited to the involved SECURITY
- 16 GUARDS and employees/agents and defendants, were unfit and incompetent to perform the
- 17 duties for which they were hired, and that an undue risk to persons such as Plaintiffs would
- 18 exist because of the hiring and/or because of Defendants dereliction with respect to its duty
- 19 to properly train and supervise its employees and Defendants' improper retention of unfit
- 20 employees.
- 21 69. Plaintiffs are informed and believe, and thereon allege, that, in doing the acts as alleged,
- 22 Defendants – including, without limitation, Defendants' officers, directors, and/or managing
- 23 agents, among other employees – knew, or in the reasonable exercise of diligence should
- 24 have known, that said Defendants' employees and SECURITY GUARDS were unfit and
- 25 incompetent to perform the duties for which they were hired and that an undue risk to
- 26 persons such as Plaintiffs would exist because of the hiring.
- 27 70. Plaintiffs are informed and believe, and thereon allege, that Defendants' negligence and
- recklessness was the actual and legal cause of Plaintiffs' injuries and that Defendants'

1 negligence and recklessness is the actual and legal cause of and impetus for Defendants and
2 other employees/agents involved injuring Plaintiffs.

3 71. As a direct and legal result of Defendants' negligence in hiring, training, supervising and/or
4 retaining of their employees, Plaintiffs have suffered injuries which will result in some
5 permanent disabilities to the Plaintiffs, all to the Plaintiffs' general damages in a sum to be
6 proven at the time of trial.

7 72. As a further factual and legal result of the aforesaid acts of Defendants, Plaintiffs have
8 required and/or for an unpredictable period in the future will require the services of doctors,
9 physicians, surgeons, nurses, hospitals and like related professional services, including
10 drugs, medication and x-rays, and Plaintiffs have and continue to incur medical and
11 incidental expenses which will be shown according to proof.

12 73. As a further factual and legal result of the acts of Defendants, Plaintiffs were prevented
13 from attending to their usual occupations and have suffered loss of present and future
14 earnings in an amount according to proof at trial. Plaintiffs additionally have suffered
15 impairment and loss of present and future earning capacity, also in an amount according to
16 proof at trial.

17 **WHEREFORE, Plaintiffs pray for judgment against defendants, and each of them, as**
18 **follows:**

19 1. AS TO THE FIRST CAUSE OF ACTION

- 20 a. For general damages in an amount to be proven at trial;
21 b. For special damages in an amount to be proven at trial; and
22 c. For exemplary and punitive damages according to proof at the time of trial.

23 2. AS TO THE SECOND CAUSE OF ACTION

- 24 a. For general damages in an amount to be proven at trial;
25 b. For special damages in an amount to be proven at trial;
26 c. For treble actual damages in an amount to be proven at trial;
27 d. For a civil penalty of \$25,000;
e. For exemplary and punitive damages according to proof at the time of trial; and

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f. For attorney's fees according to proof at the time of trial.

3. AS TO THE THIRD CAUSE OF ACTION

- a. For general damages in an amount to be proven at trial;
- b. For special damages in an amount to be proven at trial; and
- c. For exemplary and punitive damages according to proof at the time of trial.

4. AS TO THE FOURTH CAUSE OF ACTION

- a. For general damages in an amount to be proven at trial; and
- b. For special damages in an amount to be proven at trial.

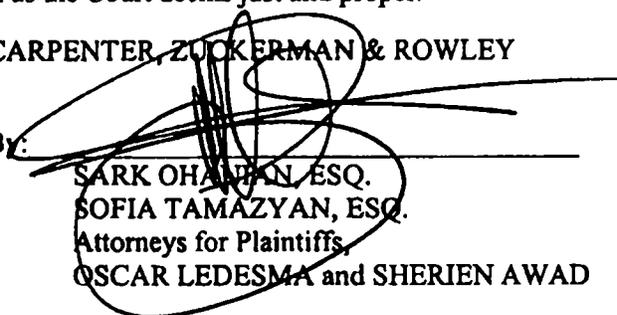
5. AS TO ALL CAUSES OF ACTION

- a. For costs of suit incurred herein;
- b. For prejudgment interest; and
- c. For such other further relief as the Court deems just and proper.

DATED: October 1, 2020

CARPENTER, ZUCKERMAN & ROWLEY

By:


SARK OHANIAN, ESQ.
SOFIA TAMAZYAN, ESQ.
Attorneys for Plaintiffs,
OSCAR LEDESMA and SHERIEN AWAD

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DEMAND FOR JURY TRIAL

Plaintiffs hereby demand a trial by jury in all the aforementioned matters.

DATED: October 1, 2020

CARPENTER, ZUCKERMAN & ROWLEY

By: _____


SARK OHANIAN, ESQ.
SOFIA TAMAZYAN, ESQ.,
Attorneys for Plaintiffs,
OSCAR LEDESMA and SHERIEN AWAD